



Sustainability Appraisal of the North West Regional Spatial Strategy Partial Review
Interim SA Report



June 2008

Revision Schedule

Sustainability Appraisal Report – Issues and Options June 2008

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Acronyms

AA	Appropriate Assessment (also known as HRA)
AFS	Action For Sustainability
AGMA	Association of Greater Manchester Authorities
AMR	Annual Monitoring Report
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Areas
BERR	Department for Business, Enterprise and Regulation Reform
BME	Black and Minority Ethnic persons or groups
BMI	Body Mass Index
BREEAM	Building Research Establishment Environmental Assessment Method
CACI	Consolidated Analysis Center Incorporated
CEEQUAL	Civil Engineering Environmental Quality Assessment and Award Scheme
CHD	Coronary Heart Disease
CI	Confidence Interval
CLG	Department of Communities and Local Government
DDA	Disability Discrimination Act
DEFRA	Department of Environment, Food and Rural Affairs
DFT	Department for Transport
DH	Department of Health
DTI	Department of Trade and Industry
EA	Environment Agency
EEC	European Economic Community
EfW	Energy from Waste
EiP	Examination in Public
EqIA	Equalities Impact Assessment
EU	European Union
FAHAP	Food and Health Action Plan
FMC	Former Metropolitan County
FRS	Family Resources Survey
GONW	Government Office for the North West
GP	General Practitioner

GTAA	Gypsy and Traveller Accommodation Assessments
GVA	Gross Value Added
GWP	Global Warming Potential
HES	Hospital Episode Statistics
HIA	Health Impact Assessment
HLE	Healthy Life Expectancy
HRA	Habitats Regulations Assessment
HSSA	Housing Strategy Statistical Appendix
ICT	Information and Communication Technology
IMD	Index of Multiple Deprivation
LA	Local Authority
LGBT	Lesbian, Gay, Bisexual, and Transgender
LLSI	Limiting Long-Standing Illness
LPA	Local Planning Authority
LPI	Local Performance Indicator
LSOA	Lower-layer Super Output Area
MPA	Mineral Planning Authority
MPS	Minerals Policy Statement
NCOD	National Childhood Obesity Database
NHPAU	National Housing and Planning Advice Unit
NHS	National Health Service
NVQ	National Vocational Qualification
NWDA	North West Development Agency
NWEDLG	North West Equality and Diversity Leadership Group
NWPHO	North West Public Health Observatory
NWRA	North West Regional Assembly
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PFI	Private Finance Initiative
PPPSI	Policies / Plans / Programmes / Strategies / Initiatives
PPS	Planning Policy Statement
PSA	Public Service Agreement
RES	Regional Economic Strategy
RFF	Regional Forestry Framework
RFRA	Regional Flood Risk Appraisal

ROC	Renewable Obligation Certificate
RPB	Regional Planning Body
RPG	Regional Planning Guidance
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCP	Sustainable Consumption and Production
SEA	Strategic Environmental Assessment
SER	Sub-National Economic Review
SES	Single Equality Scheme
SFRA	Strategic Flood Risk Assessment
SIC	Standard Industrial Classification
SoS	Secretary of State
SR	Scoping Report
SSSI	Sites of Special Scientific Interest
UE	Unauthorised Encampments
UKCIP	United Kingdom Climate Change Impacts Programme
VAT	Value Added Tax
WwTWs	Waste Water Treatment Works

Non-Technical Summary

Introduction

Scott Wilson was commissioned by the North West Regional Assembly (NWRA) to carry out the Sustainability Appraisal (SA) of the Partial Review of the North West Regional Spatial Strategy (the RSS). The SA is part of a suite of assessments to be carried out as part of the review including:

- **Habitats Regulations Assessment**
- **Health Impact Assessment**
- **Equalities Impact Assessment**
- **Rural Proofing**

The North West Plan

The NWRA prepared a Draft RSS – ‘the North West Plan’ - during 2004 – 06, setting out the scale, priorities and broad locations for future development across the region and providing a framework for where and how much development should take place. It covers a broad range of issues including housing, retail and the environment and includes a Regional Transport Strategy. Once published by the Secretary of State (SoS) in summer 2008, it will form part of the statutory development plan and will have to be taken into account by Local Planning Authorities (LPAs) in deciding planning applications in the region.

During the preparation of the Submitted Draft Plan and in line with legislation a SA was undertaken – by Entec on behalf of NWRA - to appraise the Plan’s sustainability performance. The SA Report produced was submitted alongside the Plan prior to the Examination in Public (EiP).

The Partial Review

A full review of the RSS commenced in July 2004 and included widespread consultation with interested parties (see the Assembly’s website for more details¹). The Draft RSS was submitted to the Secretary of State in January 2006. An Examination in Public (EIP) on the Draft RSS was held between November 2006 and January 2007. Subsequently, the Secretary of State’s Proposed Changes to Draft RSS were published for consultation in March 2008. The final version of the RSS will be issued in July 2008.

¹ Available at: http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=223.

At the time of the submission of the Draft RSS, the Assembly identified a number of policy topics which would need to be addressed in a future review of the RSS. The Panel Report² has endorsed this approach. Subsequently the Sub-National Economic Review (SER) has been published envisaging new governance arrangements for the regions, and the replacement of RSS and the Regional Economic Strategy (RES) with a Single Regional Strategy (SRS). In this context, the Assembly agreed on 16th November 2007, to undertake a Partial Review of RSS, covering a number of issues. This Partial Review will focus on 3 key policy issues relating to **housing, renewable energy and waste**. The Partial Review will need to take place within the current legislative process for RSS, but will also need to be adaptable to fit within the emerging procedures for the preparation of a SRS.

Partial Review Tasks

The Partial Review of the RSS will lead to the further development of policies to support the underlying strategy³. In late 2007, the Assembly and its Executive Board both agreed that the Partial review should focus on key policy issues relating to:

- Sub-regional Housing Market Areas;
- Revision of District Housing Figures;
- Growth Points;
- Renewable Energy; and
- Waste.

The NWRA and its Executive Board are also taking the opportunity to ‘tidy up’ a number of policy areas covering:

- Gypsies & Travellers;
- Travelling Showpeople; and
- Update of Regional Parking Standards.

Issues and Options

Background

The development of options for the Partial Review follows on from the consultation on the Project Plan which took place between mid February to the end of March 2008. The options follow the main themes to be covered in the Partial Review.

² North West Draft Regional Spatial Strategy: Examination in Public - Report of the Panel, March 2007. Available at: http://www.gos.gov.uk/497468/docs/457370/2007_Panel_Report_Chapters.pdf

³ The proposed scope of the Partial Review is subject to the outcome of the Secretary of State's (SoS) Proposed Changes to the Draft RSS and finalised RSS document.

Originally it was the intention that the Partial Review should cover another issue – key Service Centres. The Draft RSS (submitted to Government in January 2006) identified Key Service Centres as part of the settlement hierarchy in the North West. The EIP Report of the Panel recommended that further work should be urgently carried out on this issue to bring together the functional approach and the existing evidence base. However following publication of the Secretary of State’s Proposed Modifications to RSS, it is considered no longer prudent to continue to include this policy issue in the Partial Review. Furthermore, the lack of inclusion of any Eco-towns in the North West Region means that this issue has also been excluded at this stage.

Options Papers Development

The initial development of options papers has been the responsibility of officers within the Assembly. Drafts of options papers have undergone a round of internal comment by officers. In addition, the RSS Partial Review Steering Group met on 7 May to discuss the options papers and to provide a regional technical input into the development of the papers.

In order to provide an iterative element to the development of the options, the initial drafts of options papers were reviewed by Scott Wilson and partners to provide initial feedback on options development and possible sustainability implications. This report is the formal assessment of the options.

It is important to note that the options papers provide varying levels of detail in content reflecting the state of play for each policy issue in terms of evidence base, and the influence of national and other regional policy development. These are a important issues that need to be borne in mind when reading the options papers.

The options assessed and brief descriptions are provided below.

Issues and Options

Issue	Options
Car parking standards	Option A) Adopt the revised standards
	Option B) Keep existing parking standards as detailed in RPG13 and Draft RSS
Gypsies and Travellers	Option A) Use the results from the studies to distribute new provision
	Option B) Modify (a) to ensure a minimum level of pitch provision in every district
	Option C) Work to agree a more balanced share of meeting need across districts
Renewable Energy	Option A) Development of an approach that follows the ‘theoretical maximum’ assessment
	Option B) Development of an approach that follows the ‘pragmatic’ assessment
Housing Provision	Option A1.1) at least 23,111 dwellings per annum and continue existing spatial distribution

	Option A1.2) at least 23,111 dwellings per annum and revise spatial distribution
	Option A2.1) at least 28,000 dwellings per annum and continue existing spatial distribution
	Option A2.2) at least 28,000 dwellings per annum and revise spatial distribution
	Option A3.1) at least 32,000 dwellings per annum and continue existing spatial distribution
	Option A3.2) at least 32,000 dwellings per annum and revise spatial distribution
Rural Housing Provision	Option A) Give no indication of the level of housing provision in rural areas
	Option B) Give a figure for the level of provision to be made in settlements of less than 10,000 population as part of the overall housing provision figure
	Option C) Give a figure for the level of provision to be made in settlements of less than 3,000 population and between 3,000 – 10,000 population as part of the overall housing provision figure.
Travelling Showpeople	Option A) Use the results from the studies to distribute new provision
	Option B) Modify (a) to ensure a minimum level of pitch provision in every district
	Option C) Work to agree a more balanced share of meeting need across districts
Broad locations for Waste Management Facilities	Option A) Regional Approach
	Option B) Sub-Regional Approach
	Option C) Varied Time Scale

Sustainability Appraisal

A Sustainability Appraisal (SA) – incorporating Strategic Environmental Assessment (SEA) – was carried out by Entec during the preparation of the Draft North West Plan and a SA Report was published alongside the Submitted Draft Plan in January 2006. In light of the Panel Report, the GONW undertook to revise the Plan. Scott Wilson carried out a SA of the Draft Proposed Changes in December 2007 – January 2008.

This SA process is continuing through the Partial Review and this report documents the preliminary findings of **Stage B** of the process. It should be borne in mind that this is one of three SA's that have been carried out consecutively on the RSS and provides supplemental information to that carried out by Entec in 2006 and Scott Wilson in 2007 - 2008.

Scott Wilson is following the Guidance for the assessment of RSSs as published by the department for Communities and Local Government (CLG)⁴. The SA process is set out below.



Stages required in SA

Key Sustainability Issues faced by the North West

Flood Risk - The additional requirements of PPS25, in combination with the increased risk of flooding and the quantum of development outlined as part of the current RSS will place a much greater risk of flooding on the region than previously assessed.

Deprivation - As highlighted in the baseline summary, the North West is an area with particular pockets of deprivation. The areas of particular deprivation include Liverpool, Manchester, Knowsley, Blackpool and Manchester.

Climate Change - The combination of increased requirements from the Government and EU on reducing energy demand, increasing energy efficiency and providing a greater proportion of energy from renewable sources should contribute towards a reduction the North West's potential climate change impacts. However, more effort will be needed to counter the predicted growth in emissions from vehicles, in order to not negate good work done elsewhere.

⁴ See: <http://www.communities.gov.uk/publications/planningandbuilding/sustainabilityappraisal>

Water resources - The demand for water will increase as new developments are built and completed. The growing population will also create a burden on existing water supplies. Added to this will be the pressure on current waste treatment and sewage facilities.

Vulnerable groups - Climate change, water scarcity and other environmental factors often impact upon the more vulnerable sections of society more seriously than the more affluent. As such, in the context of the sustainability effects identified, the need to reduce inequalities and ensuring that the population of the North West as a whole are considered is highlighted.

Cumulative effects - The effects of increased population and shifting housing sizes will affect the North West's influence on the natural environment and infrastructure through cumulative impacts through increased consumption on a number of fronts.

Equality - The key issues identified in relation to equalities in the region pertaining specifically to the issues subject to the partial review are:

- Meeting the housing needs, including the need for increased affordable housing, of diverse groups in the region, including disabled people, BME people, and other vulnerable groups, including families with children, single parent families, homeless households and older people, recognising the existing poor housing conditions experienced by BME groups, limited housing choices of disabled people and the problems of affordability for disadvantaged and low income groups.
- Meeting the accommodation needs and equal access to other services of gypsies and travellers in the region, in particular for Roma gypsies and Irish travellers, to address severe shortages of accommodation needs.
- Promoting diversity as an asset in the region, including via equal economic participation for diverse groups in the region, including disabled people, BME people, young people and older people, recognising the changing profile of the regional population and differences in employment and unemployment rates for these groups compared with regional averages.
- Promoting diversity as an asset in the region, including via narrowing the pay gap between women and men, tackling the pay gap for full time and part time women, particularly in the context of lower average earnings for both men and women compared with UK averages.
- Promoting diversity as an asset in the region, including the social and economic inclusion of different groups, including faith groups and LGBT people, addressing existing prejudice and discrimination and building on existing concentrations of specific groups in certain areas
- Promoting social inclusion for equality groups in NW, including BME people, to address existing spatial and social concentrations of poverty and deprivation experienced by BME groups in the region

- Promoting improved access to public transport services and other local services, which particularly disadvantage low income groups and women.

Renewable provision - The opportunity of providing renewable energy in the North West faces challenges in multiple sectors:

- **Human health** – stroboscopic effects, noise, ice shear are some of the considerations that will need to be integrated into the options for the RSS
- **Biodiversity** – wildlife flight paths, disturbance to species and habitats and noise effects will need to be considered.

Assessment Findings

The options that are being considered for each of the issues have undergone a systematic assessment in which their performance has been evaluated against a range of sustainability objectives. Following this systematic assessment, the key effects were summarised and the relative merits of the options considered. These summaries are set out below, with the detailed assessment findings included in the appendix to this report.

Car Parking Standards

Summary

The proposed parking standards are very different from the existing ones in their holistic approach. As well as discouraging the use of the car at sites where there is good accessibility by alternative modes of transport, the proposed standards also encourage the use of other modes of transportation by emphasising the importance of providing bicycle and motorcycle parking; by underlining the need of employers to design travel plans; and by discouraging certain types of development in inaccessible areas (as opposed to promoting that they will require a great deal of car parking).

The focus on public transportation and on curbing dependency on the car has two obvious benefits, one is environmental, and the other relates to more equitable accessibility. The proposed standards again take a more holistic approach in promoting equitable access not only by promoting public transportation (which is important for those without access to a private car) but also stipulating bicycle, motorcycle and disabled parking standards.

Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of curb parking is associated with increased risk of injury for children⁵. In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased

⁵ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). *Journal of Public Health Medicine* 1998;20(4):463-6.

risk and occurrence of accidents⁶. This will also apply to streets where people use the pavement for accommodating their vehicles. Well managed parking can provide friction and slow the flow of traffic thus giving greater priority to pedestrians⁷. The management of parking is of crucial importance.

The Sustainability Appraisal has shown clearly that, in terms of a number of SA Objectives, the proposed parking standards perform better than the existing standards. The appraisal has not highlighted any sustainability trade-offs that must be considered, should the decision be taken to take the new standards forward as the preferred option.

Recommendations

- 1) The language used in the table related to discouraging certain types of development could possibly be toned down so that it is not so exclusionary. In particular, employment should not be discouraged in locations not accessible by public transportation if it can be demonstrated that parking spaces won't be needed since most employees reside nearby.
- 2) The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW. In particular, the standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments.
- 3) Whilst increasing the provision of public transport should encourage people to use alternatives to the car it is important that the cost of these services supports this approach. We recommend that where possible economic analysis is undertaken to ensure that alternatives to the car are financially competitive.

Gypsies and Travellers

Summary

It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently, Gypsies and Travellers are not evenly spread throughout the region (although they are spread more evenly throughout the region than is the case for Travelling Showpeople). Option A will reinforce this unequal distribution, whilst Option C will distribute new pitches for Gypsies and Travellers throughout the region in a more 'balanced' fashion.

It is likely that Gypsies and Travellers have chosen to concentrate around certain areas for reasons such as proximity to friends and family. It is also likely that, in some instances, Gypsies and Travellers will have chosen to live in a particular area for economic reasons, although in practice Gypsies and Travellers are less likely to have strong economic ties to a particular area

⁶ Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

⁷ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

than is the case for members of the settled or Travelling Showpeople communities. Conversely, many Gypsy and Traveller families will have chosen to live in a certain area for little other reason than the fact that opportunities elsewhere for a pitch on an authorised site are hard to come by.

It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Gypsy and Traveller pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). A high concentration of Gypsy and Traveller pitches could generate some negative sustainability effects that would impact upon the receiving environment, community or economy. A particularly significant effect is worsening social relations between the Gypsy and Traveller community and the settled community in the area, signified for example, in concerns about crime levels.

It is important to consider that many effects felt by the receiving environment and settled community in the vicinity of Gypsy and Traveller pitches may be insignificant or non-existent if pitches are authorised as it can be assumed that authorised pitches are sensitively located. Furthermore, any negative effects associated with new authorised sites have the potential to decrease over time, as it is more likely that there will be the potential for harmonious relationships and cultural understanding to develop between the settled and Gypsy and Traveller communities.

For these reasons, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. However, it is difficult to predict with any certainty whether this will occur as evidence does suggest a strong preference for permanent pitches, with a preference for authorised sites, a resort to privately owned unauthorised sites where an authorised pitch cannot be obtained and a final resort to unauthorised encampments. Gypsies and Travellers are currently more dispersed around the region than is the case for Travelling Showpeople, and so it might be suggested that promoting a more balanced dispersal would be something that Gypsies and Travellers find acceptable. The potential for unauthorised pitches remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Gypsy and Traveller pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result

in increased access to services and opportunities. This is because the number of Gypsies and Travellers within a given area will always be relatively small in comparison to the settled community, even if the number of Gypsies and Travellers in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Gypsy and Traveller and settled communities. If Option A is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Gypsies and Travellers, namely access to services and opportunities.

Option C promotes working with the Gypsy and Traveller community to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Gypsy and Traveller families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Gypsies and Travellers to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Gypsies and Travellers could become isolated from the rest of the community. Option B could result in particular potential for effects to be felt by individual families.

In conclusion, Option C, developed and implemented well, could achieve a more sustainable outcome for all, but developed and implemented badly, could have damaging effects on the Gypsy and Traveller community.

Recommendations

- 1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.
- 2) Requiring some Gypsies and Travellers to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Gypsy and Traveller community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Renewable Energy

Summary

A theoretical maximum approach performs well against the following SA Objectives:

- To exploit the growth potential of business sectors
- To develop and market the region's image
- To deliver urban renaissance
- To deliver rural renaissance
- To secure economic inclusion
- To mitigate and adapt to climate change
- To ensure the prudent use of natural resources and the sustainable management of existing resources
- To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources
- To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery

A theoretical maximum approach performs poorly, in comparison to a more pragmatic approach, when assessed against the following SA Objectives:

- Improve access to good quality affordable and resource efficient housing
- To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.
- To protect and enhance the biodiversity, local character and accessibility of the landscape across the region
- To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity

It is important to realise that, although a theoretical maximum approach has been shown to result in greater benefits when assessed against a number of SA Objectives, in practice a theoretical maximum approach may be more difficult to implement and may necessitate taking greater risk. In particular, maximising renewable energy generation could result in less emphasis being placed on ensuring a diverse energy mix, which might result in energy supplies being less secure. Much will depend upon the exact definition of maximum and pragmatic, and as a result there is a great deal of uncertainty in the prediction of effects at this stage. Drawing on the above assessment and summary, it is advisable that a pragmatic approach (Option B) is pursued.

However, it will be important that a pragmatic approach can demonstrate that it is still ambitious, with targets, locations and feasible renewable energy technologies clearly outlined. A pragmatic approach need not aim for minimum renewable energy targets, but for the best energy mix for the whole region. This might include low carbon energy sources such as clean coal and CHP should research show this to be a more appropriate option than renewables.

A pragmatic approach must also consider what is pragmatic given a scenario of increasing energy needs and increasing need to mitigate for climate change. This reinforces the fact that a pragmatic approach must be ambitious, and far-sighted.

Recommendations

- 1) Any approach must be complemented by a stringent suite of policies tackling energy demand alongside sustainable energy generation.
- 2) The SA will need to be backed up with research commissioned in December 2007 assessing future energy demand, progress against renewable energy targets and broad locations for (but not limited to) the renewable energy technologies under consideration.

Overall Housing Provision

Summary

The assessment against the following SA Objectives found that increasing housing will lead to benefits, and that benefits will be maximised by an approach that concentrates housing in urban areas:

- To exploit the growth potential of business sectors
- To deliver urban renaissance
- To secure economic inclusion
- To develop and maintain a healthy labour market
- To reduce social exclusion
- To improve health and mental health and reduce health inequalities
- Improve access to good quality affordable and resource efficient housing
- To develop strong and positive relationships between people from different backgrounds and communities?
- To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources

A number of these potential benefits stem from the fact that there are areas of economic and social deprivation in the region, much of which can be found in the more urban areas, and new housing will be a key component of the regeneration of such areas. New housing will also be

important to support a growing economy, and it is likely that focusing housing around the major conurbations is likely to be effective in supporting the growth of key business sectors.

Rural communities in the region suffer a range of sustainability issues that can be at least partially addressed by an approach of directing new housing to these areas. However, the assessment has found that the benefits in terms of a number of SA Objectives might be greater should social and economic issues be met as a priority in urban rather than rural areas. This finding works from the assumption that increasing housing in rural areas would lessen the degree to which sustainability issues can be tackled through housing led regeneration in urban areas, although in reality this might not be the case.

The assessment against the following SA Objective found that increasing housing will lead to benefits, and that benefits will be maximised by an approach that promotes housing in rural areas:

- To improve access to basic goods, services and amenities for all groups

The assessment against the following SA Objectives found that increasing housing will lead to negative effects, but that effects will be minimised by an approach that promotes housing in urban areas:

- To reduce the need to travel improve choice of use and use of sustainable transport modes
- To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.
- To protect and enhance the biodiversity, local character and accessibility of the landscape across the region
- To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.
- To protect and improve the quality of inland and coastal waters
- To restore and protect land and soil

The assessment against the following SA Objective found that increasing housing will lead to negative effects, but that effects will be minimised by an approach that promotes housing in rural areas:

- To protect and improve air quality

The assessment against the following SA Objective found that increasing housing will lead to negative effects, and that whether housing is focused in urban or rural areas will not have a major influence,

- To mitigate and adapt to climate change
- To ensure the prudent use of natural resources and the sustainable management of existing resources
- To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery

Recommendations

- 1) It will be important that there is adequate capacity for housing to be delivered outside of the highest risk flood zones.
- 2) It will be important that the offsite effects of flooding are considered as part of new development, not only in urban areas, but also in more rural areas where effects of development might act cumulatively to result in increased flood risk downstream.
- 3) Policies on provision of housing will need to link in with regeneration policies and ensure that the private car is discouraged, that high quality employment is available, that the need to travel is minimised and that the new developments have high quality public transport and good connectivity.

Rural Housing Provision

Summary

This assessment has worked from the assumption that Option B and Option C would lead to a greater proportion of houses going to rural areas and that under Option A the majority of housing would go to existing larger towns and cities. In reality, the options do not actually promote a spatial distribution of housing, but rather consider whether or not there should be an indication of spatial distribution.

The assessment against a number of SA Objectives has found that promoting housing in rural areas generally will have a positive effect:

- To reduce the disparities of sub-regional economic assemblies
- To deliver rural renaissance
- To improve access to basic goods, services and amenities for all groups

The assessment against all three of these SA Objectives also highlights that there will be particular benefits associated with Option C as a result of it ensuring that smaller rural towns will also receive a greater proportion of housing

The assessment against a number of SA Objectives has found that promoting housing in rural areas generally will have a negative effect:

- To exploit the growth potential of business sectors
- To develop and market the region's image
- To deliver urban renaissance
- To develop and maintain a healthy labour market
- To reduce the need to travel improve choice of use and use of sustainable transport modes
- To improve health and mental health and reduce health inequalities
- Improve access to good quality affordable and resource efficient housing
- To develop strong and positive relationships between people from different backgrounds and communities
- To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.
- To protect and enhance the biodiversity, local character and accessibility of the landscape across the region
- To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.
- To restore and protect land and soil

A number of these predicted negative effects are based the assumption that promoting housing in more rural areas will have the knock-on effect of less housing being delivered in urban areas and, as a result, housing need might not be met in urban areas. However, these effects are uncertain as, in reality, ensuring that an adequate proportion of housing goes to rural areas, will not necessarily preclude housing need being met in urban areas.

The assessment against the following three SA Objectives found that it was not possible to predict with any certainty whether there would be greater benefits associated with an approach that promotes housing in urban or rural areas:

- To secure economic inclusion
- To reduce social exclusion
- To mitigate and adapt to climate change

In terms of economic inclusion and social exclusion, there are particular issues that exist in both urban and rural areas that can be effectively addressed by increased provision of accessible housing as part of integrated approaches to regeneration.

Recommendations

1) Recognising that delivery of extra housing in rural areas presents certain sustainability challenges, it will be important to ensure that policy promotes targeted delivery to areas where housing will meet an identified need and will tackle issues of rural deprivation and decline of rural communities and economies.

Travelling Showpeople

Summary

It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently Travelling Showpeople are not evenly spread throughout the region, but are concentrated around the Manchester area. Option A will therefore reinforce this unequal distribution. Option C will distribute new pitches for Travelling Showpeople throughout the region in a more 'balanced' fashion.

There is certainly potential for the Option C approach to impact upon the lives and, in particular the livelihoods, of Travelling Showpeople. It is highly likely that Travelling Showpeople have chosen to concentrate around the Manchester conurbation for logistical reasons, such as the need to have good access to the major road network and the pattern of fun fairs across the region throughout the year, as well as perhaps for reasons of being close to friends and family. If this is indeed the case then Option C will have the potential to jeopardise the viability of the business that is key to their economic well-being, as well as perhaps affect the strength of the Travelling Showpeople community.

It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Travelling Showpeople pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). However, it is not entirely clear what problems might be experienced within areas with a concentration of Travelling Showpeople. There could be localised environmental, community or economic impacts, including possibly a fear of crime, but there is no clear evidence to support this.

Furthermore, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. There is no evidence available currently on the prevalence or impacts associated with unauthorised Travelling Showpeople pitches. However, it is possible that Travelling Showpeople could reject the offer of authorised pitches spread around the region and choose unauthorised sites instead. This potential effect remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities.

A benefit to Travelling Showpeople resulting from an Option C approach is the possible increased potential for identification of suitably large sites to accommodate Travelling Showpeople's vehicles and equipment and to address localised issues of access to sites for large numbers of heavy vehicles.

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Travelling Showpeople pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Travelling Showpeople within a given area will always be relatively small in comparison to the settled community, even if the number of Travelling Showpeople in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Travelling Showpeople and settled communities. If Option A is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Travelling Showpeople, namely access to services and opportunities.

Option C promotes working with the Showman's Guild to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Travelling Showpeople families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Travelling Showpeople to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Travelling Showpeople could become isolated from the rest of the community (many of whom would remain concentrated around Manchester. Option B could result in particular potential for effects to be felt by individual families, whilst Option C would be more likely to result in more insidious impacts on the regions Travelling show people community or communities.

Recommendations

- 1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.
- 2) Requiring some Travelling Showpeople to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Travelling Showpeople community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Waste Management Facilities

Summary

It may be important that major, regional scale facilities are identified and planned for at the regional scale. Equally, it will be important that as much waste as possible is dealt with close to source, and so it will be important to consider waste arisings and how these can best be managed at a sub-regional scale. A sub-regional scale consideration of waste arisings and the need for waste facilities may allow for consideration of local opportunities for recycling, re-use and recovery, including through identifying opportunities for industrial symbiosis.

In the above appraisal, varied time-scale is addressed separately as it is not a mutually exclusive option. The accuracy of shorter-term data necessitates its use whereas long-term data provides a less accurate but useful insight in to meeting future needs and ensuring that waste management remains economically viable and also sustainable (particularly in terms of minimising road transport).

Recommendations

- 1) Ensure that policy is conducive to promoting opportunities for waste to be managed close to source.
- 2) When considering the broad location of major waste management facilities at the regional scale, consider how waste can be transported to and from facilities in the most sustainable fashion. In particular, consider the feasibility of transport of waste by rail and water.

Habitats Regulations Assessment

Habitats Regulations Assessment (HRA) aims to ensure that the integrity of sites of international nature conservation importance⁸ is not negatively affected by plans such as the North West RSS Partial Review. A HRA for the Draft North West Plan was prepared in December 2007. This

⁸ Special Protection Areas, Special Areas for Conservation, Ramsar sites and European marine sites

identified a range of conditions needed to maintain site integrity: the same conditions apply to the Partial Review.

Most of the Partial Review's impacts on site integrity can only be determined once the likely broad locations of future development are known. However it is possible to proactively suggest locations, and approaches to development, that can help to avoid significant impacts. As such, we are in the process of:

- Exploring in more detail potential key impacts that the different forms of development (waste, renewable energy, housing etc.) could have on European sites;
- Making recommendations about how these impacts could be avoided in the selection of broad areas for development; and
- Once broad areas for development have been identified, identifying (through maps) the European sites that might be affected by the development 'in combination' with other plans and projects.

If the broad locations could lead to significant 'in combination' impacts on the integrity of European sites, recommend measures to ensure that development does not lead to such impacts. This will be done through a combination of overlay mapping, workshops related to particular sub-regions, and possibly workshops related to specific types of impacts.

At this stage, the following recommendations for the Partial Review can be made.

Homes for the Future

New housing must be accompanied by adequate infrastructure (which may also mean infrastructure to make up for existing deficits), else medium to long - term constraints and/or impacts are likely to arise. These can occur where

- infrastructure has a long lead-in period (e.g. reservoirs) but has not been planned far enough in advance;
- infrastructure cannot be easily upgraded, so more expensive solutions are required (e.g. wastewater treatment plants at the limit of Best Available Technology Not Entailing Excessive Cost (BATNEEC), so that either 'excessive cost' is required or wastewater must be pumped (also at great cost) to other wastewater treatment plants); and
- there is no agreed standard for infrastructure provision (e.g. green infrastructure) so that there is a progressive reduction in per capita provision even if there is an increase in provision overall.

We commend the NWDA's research into issues and constraints regarding infrastructure. Provision of adequate infrastructure can be assured through a policy that makes housing delivery conditional on the provision, in advance, of adequate infrastructure. Less effectively, it can be

promoted by putting firm maximum numbers on housing allocations for districts, so that infrastructure providers can have certainty about the level of provision needed.

Infrastructure provision is particularly important for HRA, as it helps to ensure adequate water quality, water levels, and provision of green infrastructure to act as a buffer and 'draw' for European sites.

Broad Locations for Waste Management Facilities

There is an implication that Option 1, with its focus on 'regional scale facilities' could result in a different type and number of waste management facilities than Option 2, with its sub-regional focus. This could have implications for the HRA that cannot be fully explored at this stage (and SA).

Renewable Energy – Broad Locations/Criteria

Without seeing the results of the research providing the evidence base that will underpin the options, it is difficult to provide meaningful commentary on the options.

However, it is our understanding that with respect to onshore facilities, it is likely that 'theoretical maximum' targets can be met without impacts on European sites so long as appropriate locations are chosen. The evidence study is believed to have considered impacts on European sites and so its spatial recommendations should be acceptable.

With respect to offshore facilities, we have outstanding concerns about the capacity of the waters around the NW to meet theoretical maximum targets due to the concentration of European sites. All of the estuaries within the NW Region are European sites, for example, and so any estuarine barrages would cause an adverse effect on European sites and would therefore need to follow the path of 'no alternatives – imperative reasons of over-riding public interest', with costly and programme-constraining compensation required.

Conclusions

It is important to comment not only on the SA and HRA findings of the options but also on the nature of the options themselves.

SA of the Options

The SA has highlighted a continuing tension between supplying urban and rural housing, in particular the trade-off between supplying a greater proportion of housing to rural areas at the expense of housing in urban areas. Given the Government's agenda for developing on brownfield land, near transport nodes etc. it seems like the rural housing deprivation is likely to continue unless robust policy is forthcoming to ensure that the gap in equality between the rural and urban areas does not widen.

Clearly there are also tradeoffs in regard to the provision of renewable energy. These major sites are often considered for rural and upland area where they will have a more significant impact due to the sensitivity of the receiving environment. There is therefore a balance to be made between the pressing climate change agenda and the landscape and historic cultural values that define the North West region. However, the trade-offs that must be made in order to deliver renewable energy can be minimised by such things as careful location, good design and close working with stakeholders to ensure that all values are understood and work towards consensus.

In terms of further studies and ongoing strategy development, and in regard to developing policy, the consideration of infrastructure, natural resources and environmental constraints in a pan-regional way is important. Other RSSs' approach to these issues may well affect the North West and vice-versa. This issue was flagged up by the East of England EiP inspector:

"Many... have struggled with the difficulty of forming a view on the right level of development for one region in isolation. There is a common perception that in the Midlands and the North growth is wanted more and would be more easily absorbed. Whilst... this cannot absolve the East of England from dealing with its own growth requirements it remains the case that there are major inter-regional issues that cannot satisfactorily be addressed separately by each region in turn, as is happening with the current round of RSS. These are not just about balancing housing growth, jobs and environmental interest, but also raise serious issues about infrastructure and resources."

Given that Government is not supporting any eco-towns in the North West, we feel that the options should include consideration of free-standing new settlements (essentially eco-towns but without that name). The larger the total volume of housing being proposed, the more challenging it becomes to accommodate it according to the RSS's preferred spatial strategy in ways that will achieve the benefits, and avoid the disbenefits, which justified its choice. At the same time, the greater the growth, the greater the potential sustainability benefits become of one or more new large towns or cities: the easier it would become to achieve critical mass to provide diverse life chances within a small envelope, to support excellent infrastructure to enable sustainable living, and to relieve development pressures on other places without jeopardising regeneration where it is needed.

The idea of a large new settlement raises huge challenges. There is nowhere in the region where one could be developed without major environmental impacts. It would require major infrastructure investments, and guarantees of viability to attract employment and services. Even on the most optimistic assumptions it could not make a significant contribution to housing numbers until late in the RSS period. It is not at all clear that the benefits would justify the disbenefits, and we do not imply that such an option would necessarily be the most sustainable one.

Provision of significant numbers of affordable homes and balancing of jobs and housing should be key aims of the Partial Review. Provision of affordable homes is good socially and economically; balancing of jobs and housing helps to reduce the need to travel, with consequent social, environmental and efficiency benefits.

The NWRA should investigate the links between energy and waste – given they are two topics within this Partial Review - which could increase sub-regional self-sufficiency. The RSS in developing its policies should consider: exploring options to:

- reduce waste export from the region;
- exploit government support to reduce waste; and
- address employment opportunities associated with waste sorting and/or recycling in areas of high unemployment.

In terms of the more specific issues that are being considered by this Partial Review, particularly Gypsies and Travellers, Travelling Showpeople and Car Parking Standards, there is less need to add further to the comments that are set out in the relevant assessment summaries. In terms of Gypsies and Travellers the issues are complex and there is the need to make tough decisions that will require substantial trade-offs between sustainability objectives. In terms of Car Parking Standards, it is very clear that a more sophisticated approach is supportive of wider efforts to reduce dependency on the car as well as bringing about a range of other social benefits.

The nature of the options

The options themselves, in terms of their detail and refinement should also be held to scrutiny. The options are at an early stage of development and therefore do not contain the level of details ideally suited to the appraisal. As such certain assumptions have been made in the assessment process (these are noted where applicable).

The Panel Report indicated that there needed to be a greater emphasis on spatial locations for the Partial Review for waste and renewable energy options. However, it can be seen that the current options are limited in the degree to which they include spatial considerations. It is likely that as the plan progresses, and further baseline evidence becomes available, that there will be further opportunity for developing more spatially explicit options.

Returning to the options available at the current time, some can be considered to be more process oriented rather than spatial, which limits the sustainability issues that can be discussed in order to help differentiate between the options. In the case of affordable housing, the options were considered to be purely procedural in nature, and no benefit to undertaking an SA of the options could be foreseen and so none was undertaken.

It is understood that the timetable dictates that some information is readily available and other data is not. In order to overcome this 'data lag' the consultants will monitor the development of the Partial Review options and supporting strategies to ensure that as and when spatial data becomes available, it is fed into the SA and in particular used to re-address the options assessment if relevant.

Cumulative Effects

The SEA Directive and Regulations require the consideration of cumulative effects⁹ as part of the impact assessment. At this stage it is difficult to comment on the exact nature of the effects as the spatial component of the options is not available. At the point when this information is available, an analysis will be carried out to determine the in-combination effects of the spatial distribution of the Partial Review Topics. Nonetheless it is possible to comment on the effects in a general manner at this stage.

The areas where cumulative effects may occur include:

- **Combination of maximum scenarios** – if the maximum scenarios for renewables and housing are selected, this will place an increased burden on the land and resources of the North West, including overall development footprint in addition to draws on resources such as water. Furthermore, increased housing may increase overall energy demand, thereby possibly negating any increase in renewable energy in terms of proportion of the total energy supply.
- **Maximum renewables scenario and high levels of rural development** – on the assumption that major renewables projects will occur in rural areas, an increased pressure on delivering rural housing may significantly affect the historic character of these areas and the visual attributes for which they are valued.
- **Renewables provision and waste facilities provision** – positive effects may be facilitated through the use of energy from waste facilities. This will have the benefit of reducing the amount of waste exported from the North West and going to landfill, whilst also providing additional sources of energy. Clearly joined up policy in this case will improve both these sectors' performances.

⁹ Annex I (f) - These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);

Next Steps

The options and this report will be consulted on for four weeks with the Statutory Consultees and other stakeholders. This is the first part of Stage 2: Develop options and policies, taking account of assessed effects, and develop the draft revision. Once this aspect is complete, the consultation findings will need to be considered and the policies for the review developed. Once this is complete a assessment will be carried out on the policies and documented in a SA Report. Stage 3 (Publish and formally consult on the draft RSS revision) will provide stakeholders another opportunity to comment on the policies as they are proposed to appear in the RSS.

PPS11 indicates that as issues and options papers are produced, further technical work and analysis can - and should - be included in the development of the SA. It is the intention to keep the Scoping Report and other documents live, updated periodically as and when further studies come 'on-line'. The statutory consultees, as part of the steering group will be informed of any significant changes as and when they occur.

Consultation

The requirement for consultation arises from the guidance and the regulations:

“To meet the requirements of the SEA Directive, the RPB must seek the views of the three statutory environmental consultation bodies designated in the SEA Regulations (English Heritage, Natural England and the Environment Agency) on the scope and level of detail of the environmental information to be included in the SA Report. It is also desirable for other relevant bodies to be consulted as the RPB considers appropriate, with a balance between those concerned with social, environmental and economic issues.”

Sections 2.2.20 SA of Regional Spatial Strategies and Local Development Documents, DCLG 2005

“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies” (Statutory Consultees)”

Article 12 (5) The Environmental Assessment of Plans and Programmes Regulations 2004

Where a consultation body wishes to respond to a consultation under para (5), it shall do so within the period of 5 weeks...)

Article 12 (6) The Environmental Assessment of Plans and Programmes Regulations 2004

This Interim Sustainability Appraisal Report will be submitted to the statutory consultees and those stakeholders outlined in **Appendix 2** for a consultation period of four weeks (from the 4th June 2008 to the 30th June 2008).

Commenting on this report

Key questions for stakeholders

The NWRA and Scott Wilson would welcome comments on this report. With this in mind a series of four questions are addressed to stakeholders. The questions are as follows:

- **Assessment findings** – do you agree or disagree with the assessment findings, please provide comments where relevant.
- **Option conclusions** – do you agree or disagree with the assessment where it has suggested which option might be broadly more sustainable?
- **Options** – do you propose any alterations or further options for consideration?
- **Further data** – is there any further data that is available that should be considered in the assessment in future?

Where to send comments

Please send comments on this report to:

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1 Introduction

1.1.1 Scott Wilson was commissioned by the North West Regional Assembly (NWRA) to carry out the Sustainability Appraisal (SA) of the Partial Review of the North West Regional Spatial Strategy (the RSS). The SA is part of a suite of assessments to be carried out as part of the review including:

- **Habitats Regulations Assessment**
- **Health Impact Assessment**
- **Equalities Impact Assessment**
- **Rural Proofing**

1.2 This Report

1.2.1 This report is provided as a tool to deliver information to the NWRA and stakeholders. It is not a statutory requirement to provide a discrete report at this stage, however, in the interests of transparency the NWRA and Scott Wilson took the view that in order to provide early and effective involvement in the optioneering process, a report should be made available. Therefore, this report sets out the findings of the SA Partial Review of the North West Plan, and is known as an Interim SA Report. The report is structured as follows:

- **Chapter 1** sets out the context and background to the assessment;
- **Chapter 2** sets out the process and method for the SA;
- **Chapter 3** sets out the findings of the options assessment for the Partial Review Issues; and
- **Chapter 4** sets out the next steps in the SA process.

1.3 The North West Plan

1.3.1 The NWRA prepared a Draft RSS – ‘the North West Plan’ - during 2004 – 06, setting out the scale, priorities and broad locations for future development across the region and providing a framework for where and how much development should take place. It covers a broad range of issues including housing, retail and the environment and includes a Regional Transport Strategy. Once published by the Secretary of State (SoS) in summer 2008, it will form part of the statutory development plan and will have to be taken into account by Local Planning Authorities (LPAs) in deciding planning applications in the region.

- 1.3.2 During the preparation of the Submitted Draft Plan and in line with legislation a SA was undertaken – by Entec on behalf of NWRA - to appraise the Plan’s sustainability performance. The SA Report produced was submitted alongside the Plan prior to the Examination in Public (EiP).

The Secretary of State’s Proposed Changes

- 1.3.3 The Draft North West Plan was submitted to Government on 30th January 2006. The Submitted Draft Plan was also tested at the EiP during November 2006 - February 2007. A Stage 1 (Screening) HRA – carried out by Entec on behalf of the NWRA - was also undertaken but could not be given adequate consideration by the Panel. The Panel Report – detailing recommendations for changes to the Plan - was published in early May 2007, and GONW subsequently prepared Final Proposed Changes published for consultation in March 2008.
- 1.3.4 Following the Panel Report an HRA was undertaken on the Submitted Draft Plan – by Scott Wilson, Levett-Therivel and Treweek Environmental Consultants for GONW. This HRA provided input and recommendations to the GONW in the formulation of the Draft Proposed Changes.
- 1.3.5 Four assessments were carried out on the **Draft** Proposed Changes to determine their effects on sustainability, European wildlife sites, equality and health.

The Partial Review

Box 1 - Partial Review Objectives

The Partial Review will update specific policy areas in response to recommendations of the RSS Examination in Public Panel report and recent developments in Government policy. In doing so, it will take account of the context provided by existing RSS, Government policy and other regional strategies.

- 1.3.6 A full review of the RSS commenced in July 2004 and included widespread consultation with interested parties (see the Assembly’s website for more details¹⁰). The Draft RSS was submitted to the Secretary of State in January 2006. An Examination in Public on the Draft RSS was held between November 2006 and January 2007. Subsequently, the Secretary of State’s Proposed Changes to Draft RSS were published for consultation in March 2008. The final version of the RSS will be issued in July 2008.
- 1.3.7 At the time of the submission of the Draft RSS, the Assembly identified a number of policy topics which would need to be addressed in a future review of the RSS. The Panel Report¹¹ has endorsed this approach. Subsequently the Sub-National Economic

¹⁰ Available at: http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=223.

¹¹ North West Draft Regional Spatial Strategy: Examination in Public - Report of the Panel, March 2007. Available at: http://www.gos.gov.uk/497468/docs/457370/2007_Panel_Report_Chapters.pdf

Review (SER) has been published envisaging new governance arrangements for the regions, and the replacement of RSS and the Regional Economic Strategy (RES) with a Single Regional Strategy (SRS). In this context, the Assembly agreed on 16th November 2007, to undertake a Partial Review of RSS, covering a number of issues. This Partial Review will focus on 3 key policy issues relating to **housing**, **renewable energy** and **waste**. The Partial Review will need to take place within the current legislative process for RSS, but will also need to be adaptable to fit within the emerging procedures for the preparation of a SRS.

Partial Review Tasks

1.3.8 The Partial Review of the RSS will lead to the further development of policies to support the underlying strategy¹². In late 2007, the Assembly and its Executive Board both agreed that the Partial review should focus on key policy issues relating to:

- Sub-regional Housing Market Areas;
- Revision of District Housing Figures;
- Growth Points;
- Renewable Energy; and
- Waste.

1.3.9 The NWRA and its Executive Board are also taking the opportunity to ‘tidy up’ a number of policy areas covering:

- Gypsies & Travellers;
- Travelling Showpeople; and
- Update of Regional Parking Standards.

1.3.10 A review of regional transport investment priorities will not take place as part of the RSS Partial Review.

Sub-regional Housing Market Areas

1.3.11 Planning Policy Statement 3¹³ indicates that RSS should define sub-regional Housing Market Areas; identify which local planning authorities those areas include; and specify the proposed housing provision for each of them, and the districts within them. This was acknowledged in the Panel Report, and identified as an area where a review was needed to address this issue. The North West Regional Assembly commissioned

¹² The proposed scope of the Partial Review is subject to the outcome of the Secretary of State’s (SoS) Proposed Changes to the Draft RSS and finalised RSS document.

¹³ Planning Policy Statement 3: Housing, CLG, November 2006. Available at: <http://www.communities.gov.uk/publications/planningandbuilding/pps3housing>

research work in September 2007 to identify Housing Market Areas in the North West¹⁴. This work will inform the Partial Review and will enable the Assembly to develop policies based on a better understanding of the nature and extent of housing markets across the region.

Revision of District Housing Figures

- 1.3.12 Since the NWRA submitted Draft RSS to the Government in January 2006, and the Panel published their report in March 2007 the national housing policy agenda has changed. The Housing Green Paper¹⁵ published in July 2007 has set out a range of challenges to be met across the country. This includes a national target for the delivery of 240,000 net additional houses a year by 2016 in order to address increasing housing affordability problems. Subsequently the National Housing and Planning Advice Unit¹⁶ (NHPAU) has responded to the Housing Green Paper and advised the Government that potentially up to 270,000 to 280,000 new homes are needed nationally each year by 2016¹⁷, in order to keep affordability at the current level. This could potentially mean that the region would have to significantly increase new house building in the North West to accommodate between 28,000 and 32,000 new homes each year (compared to 23,111 each year that was recommended in the Panel Report). The Assembly will be preparing a revised set of housing figures as part of the Partial Review. These will need to take on board the agenda set out in the Housing Green Paper, the latest household projections produced by Government and the advice of the NHPAU. However this will need to be set within the context of a range of issues including the capacity of the environment to accommodate increased levels of house building, the supply of suitable available land¹⁸, the housing needs in each market area and the likely impact of increased supply on affordability. The Assembly will be asking all Local Authorities to provide existing information on the amount of available land for housing in their district. This work will also include the development of affordable housing targets for the region, as recommended in the Panel Report (paragraph 6.108). The development of the target will draw on the information gathered through Strategic Housing Market Assessments which are currently being undertaken across the region by local authorities and sub regional partners¹⁹. In addition, the NWRA will seek to ensure that affordability in rural

¹⁴ See http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=283#marker

¹⁵ Homes for the future: more affordable, more sustainable, CLG, July 2007
<http://www.communities.gov.uk/publications/housing/homesforfuture>

¹⁶ See <http://www.communities.gov.uk/housing/nhpau/>

¹⁷ See <http://www.communities.gov.uk/publications/housing/supplynewhomes>

¹⁸ PPS3 requires local authorities to produce Strategic Housing Land Availability Assessments which will assess the land available for housing over a 15 year period. Available at

<http://www.communities.gov.uk/archived/publications/planningandbuilding/landavailabilityassessment>

¹⁹ PPS3 requires local authorities to produce, either jointly, or using a consistent methodology, a Strategic Housing Market Assessment. Available at: <http://www.communities.gov.uk/publications/planningandbuilding/strategichousingmarket>

areas is given full consideration, in line with the Affordable Rural Housing Commission²⁰ \ Commission for Rural Communities recommendations²¹.

Growth Points and Eco-towns

- 1.3.13 The Housing Green Paper included provisions for the expansion of the Growth Points Initiative to include the northern regions and the creation of eco-towns across the country. In late 2007, Expressions of Interest were submitted to Government by the Association of **Greater Manchester Authorities** (AGMA), **Halton** and **St Helens, Warrington, Liverpool and Wirral, Blackpool and Central Lancashire**. In addition, a bid was submitted by **Carlisle**. Eco-town proposals were submitted from **East Cheshire, West Cumbria** and **Carrington** in Greater Manchester. The Government in deciding on the locations of eco-towns did not choose any of the proposals in the North West region. This does not mean that there won't be any in the future, just not in this round. The Partial Review will explore the implications of Growth Points - when announced - for the Spatial Strategy. These may impact on a range of key issues covered by the RSS, particularly the review of the housing figures.

Renewable Energy

- 1.3.14 The Government's draft Climate Change Bill and Energy White Paper set out a framework to reduce carbon dioxide emissions and secure clean and affordable energy supplies. PPS22 guidance states that bringing together resource assessments and criteria-based policies will help to establish targets for regions, and possibly sub-regions, leading to identification of broad areas suitable for renewable energy development. Draft RSS policies EM15 and EM16 already set out criteria-based policies and targets for the region for renewable energy development. However, RSS needs to include maps of broad areas where the development of particular types of renewable energy may be appropriate, in line with the Panel Report recommendations.

Waste

- 1.3.15 The Partial Review will predict the future waste arisings for the various waste streams and apportion by waste planning authority area or sub-region where appropriate, using the recently updated evidence base. PPS10 notes that these figures should provide a 15 to 20 year projection, meaning predictions and associated policy should consider the period up until 2030. The predicted waste arisings will be used, alongside national Government policy on reducing and managing waste, to identify the number and types of facilities required up until 2030 and the broad location for their accommodation will be shown. Further work on localities within the broad locations is to be undertaken where necessary at a district level.

²⁰ Available at: <http://www.defra.gov.uk/rural/pdfs/housing/commission/affordable-housing.pdf> for details of the Affordable Rural Housing Commission

²¹ "Assessing the Rural Content of Regional Spatial and Housing Strategies" Commission for Rural Communities, November 2007. Available at <http://www.ruralcommunities.gov.uk/publications/assessingtheruralcontentofregionalspatialandhousingstrategies>

Gypsies & Travellers and Travelling Showpeople

- 1.3.16 The Government has made clear that it views this issue as an integral part of the wider housing agenda to tackle affordability and homelessness issues. The Housing Act 2004 coupled with Planning Circulars 01/2006 and 04/2007, put in place a framework for identifying and providing sites to meet the accommodation needs of the Gypsy and Traveller community (which includes Travelling Showpeople). In light of this the Partial Review will set out separate figures for Gypsy & Travellers and Travelling Showpeople for each district, on the required provision (number of pitches).

Update of Regional Parking Standards

- 1.3.17 An undertaking was given during the development of RPG13 to review regional parking standards. Based on research a new set of standards will be set out - intended to be a direct replacement for those in the current draft of the RSS.

1.4 Issues and Options

Background

- 1.4.1 The development of options papers for the Partial Review follows on from the consultation on the Project Plan which took place between mid February to the end of March 2008. The options papers follow the main themes to be covered in the Partial Review.
- 1.4.2 Originally it was the intention that the Partial Review should cover another issue – Key Service Centres. The Draft RSS (submitted to Government in January 2006) identified Key Service Centres as part of the settlement hierarchy in the North West. The EIP Report of the Panel recommended that further work should be urgently carried out on this issue to bring together the functional approach and the existing evidence base. However following publication of the Secretary of State's Proposed Modifications to RSS, it is considered no longer prudent to continue to include this policy issue in the Partial Review. Furthermore, the lack of inclusion of any Eco-towns in the North West Region means that this issue has also been excluded at this stage.

Options Papers Development

- 1.4.3 The initial development of options papers has been the responsibility of officers within the Assembly. Drafts of options papers have undergone a round of internal comment by officers. In addition, the RSS Partial Review Steering Group met on 7 May to discuss the options papers and to provide a regional technical input into the development of the papers.
- 1.4.4 The initial drafts of options papers were reviewed by Scott Wilson and partners to provide initial feedback on options development and possible sustainability implications. This report is the formal response to the options.

- 1.4.5 It is important to note that the options papers provide varying levels of detail in content reflecting the state of play for each policy issue in terms of evidence base, and the influence of national and other regional policy development. There are a number of key issues that need to be borne in mind when reading the options papers.

Key Issues for the Options Papers

- 1.4.6 The options paper notes the challenging agenda set by the Housing Green Paper, published by Government in July 2007. There are key inputs into the development of the housing options paper and resulting policy for RSS that will need to be fed in when they become available – principally, in line with the Housing Green Paper the overall level of housing provision will need to be made within the context set by the advice to be provided to central Government by the National Housing and Planning Advice Unit (expected May 2008). This advice will focus on the level of housebuilding required to stabilise market affordability.
- 1.4.7 The waste options require careful consideration in the light of current discussions between Assembly officers and colleagues around the region regarding the evidence base developed for the broad locations for waste management facilities. Moreover, an important matter that is currently being discussed amongst regional and sub-regional organisations are figures for commercial and industrial waste arisings of the proposed changes to RSS. Assembly officers consider it is critical that agreement is reached on the evidence base for waste issues to ensure that the Partial Review concentrates on the key matter of determining broad locations for waste management facilities. As a result it is intended that the waste arisings figures that feature in the final published RSS, expected later this year, will be taken as a given for waste policy development in the Partial Review.
- 1.4.8 The development of the renewable energy options paper is running alongside an emerging evidence base. Consultants commissioned by the Assembly submitted a draft report in mid May. A short consultation with stakeholders involved in the study has commenced.
- 1.4.9 The options assessed and brief descriptions are provided in **Table 1** below.

Table 1: Issues and Options

Issue	Options
Car parking standards	Option A) Adopt the revised standards
	Option B) Keep existing parking standards as detailed in RPG13 and Draft RSS
Gypsies and Travellers	Option A) Use the results from the studies to distribute new provision
	Option B) Modify (a) to ensure a minimum level of pitch provision in every district
	Option C) Work to agree a more balanced share of meeting need across districts
Renewable Energy	Option A) Development of an approach that follows the ‘theoretical maximum’ assessment
	Option B) Development of an approach that follows the ‘pragmatic’ assessment
Housing Provision	Option A1.1) at least 23,111 dwellings per annum Continue existing spatial distribution
	Option A1.2) at least 23,111 dwellings per annum Revised spatial distribution
	Option A2.1) at least 28,000 dwellings per annum Continue existing spatial distribution
	Option A2.2) at least 28,000 dwellings per annum Revised spatial distribution
	Option A3.1) at least 32,000 dwellings per annum Continue existing spatial distribution
	Option A3.2) at least 32,000 dwellings per annum Revised spatial distribution
Rural Housing Provision	Option A) Give no indication of the level of housing provision in rural areas
	Option B) Give a figure for the level of provision to be made in settlements of less than 10,000 population as part of the overall housing provision figure
	Option C) Give a figure for the level of provision to be made in settlements of less than 3,000 population and between 3,000 – 10,000 population as part of the overall housing provision figure.
Travelling Showpeople	Option A) Use the results from the studies to distribute new provision
	Option B) Modify (a) to ensure a minimum level of pitch provision in every district
	Option C) Work to agree a more balanced share of meeting need across districts
Broad locations for Waste Management Facilities	Option A) Regional Approach
	Option B) Sub-Regional Approach
	Option C) Varied Time Scale

1.5 The Assessments

- 1.5.1 The multiple assessment strands represent both statutory and non-statutory types of appraisal. In developing the methodology the requirements of the statutory assessments (SA and HRA) take precedence in terms of dictating the process and therefore the programme. Furthermore, the SA process has more onerous requirements for consultation and outputs than the other assessments plus it is more established in terms of guidance and what constitutes ‘best practice’. Therefore the SA process forms the ‘spine’ of the process with the other assessments feeding in at the important points.
- 1.5.2 The important points - or decision making points - have been identified at three instances in the Partial Review process:
1. Issues consideration and options development;
 2. Options assessment; and
 3. Policy Assessment.
- 1.5.3 At these points key information needs to be made available to the NWRA in order to adequately inform the plan and decision makers and to meet regulatory obligations. **Figure 1** illustrates the process described above with red flashes marking the points where the assessments integrate with decision making.

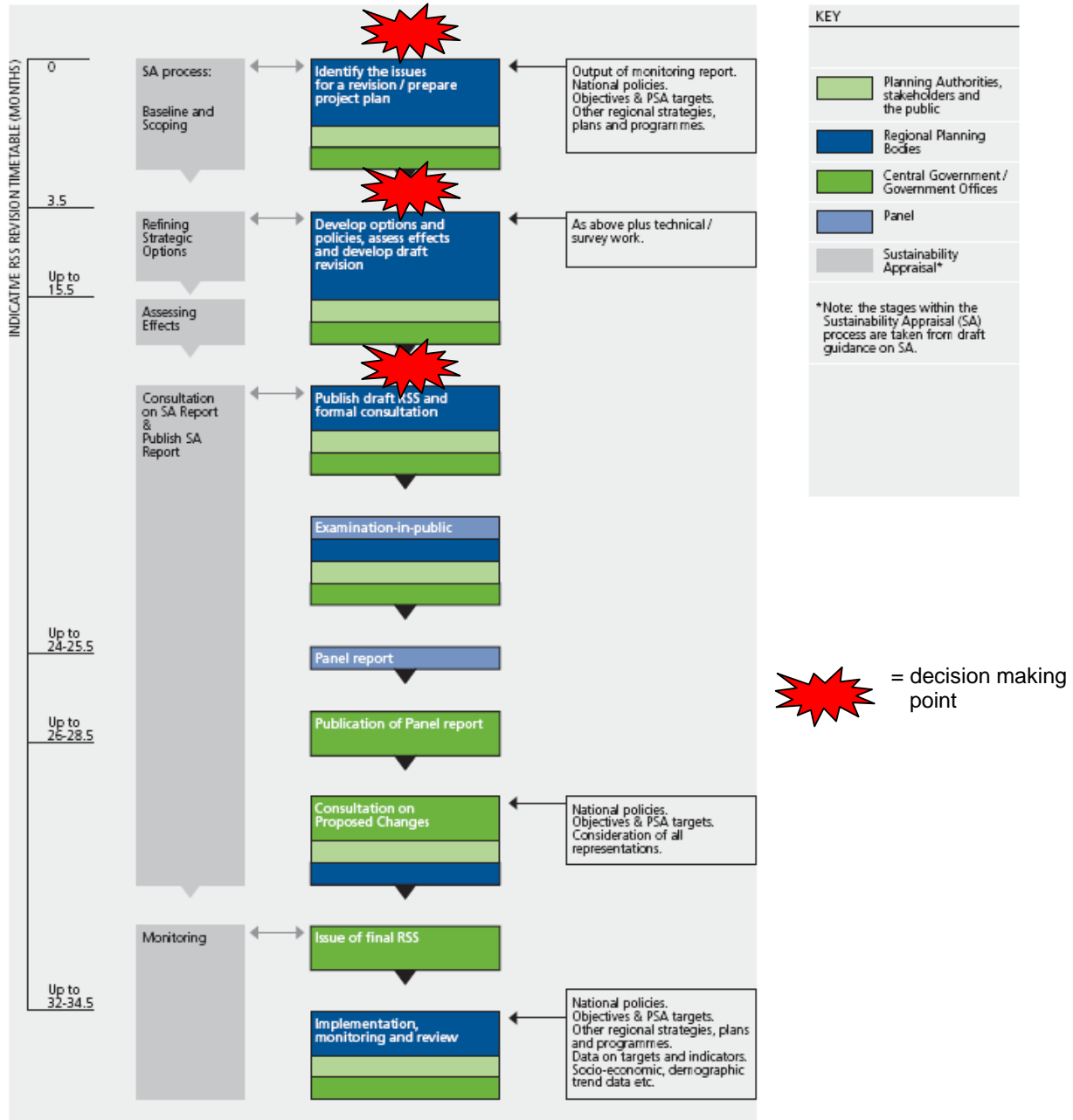


Figure 1: Decision making points in the partial review process²².

1.5.4 This report represents decision point two and has been written to inform not only the NRWA or the possible sustainability implications of the Partial Review but also to inform stakeholders and others at an early point in the decision making process.

²² ODPM (2005) PPS11 : Regional Spatial Strategies. See: <http://www.communities.gov.uk/publications/planningandbuilding/planningpolicystatement3>

2 Process and method

- 2.1.1 A Sustainability Appraisal (SA) – incorporating Strategic Environmental Assessment (SEA) – was carried out by Entec during the preparation of the Draft North West Plan and a SA Report was published alongside the Submitted Draft Plan in January 2006. In light of the Panel Report, the GONW undertook to revise the Plan. Scott Wilson carried out a SA of the Draft Proposed Changes in December 2007 – January 2008.
- 2.1.2 This SA process is continuing through the Partial Review and this report documents the preliminary findings of **Stage B** of the process. It should be borne in mind that this is one of three SA's that have been carried out consecutively on the RSS and provided supplemental information to that carried out by Entec in 2006 and Scott Wilson in 2007 - 2008.
- 2.1.3 Scott Wilson is following the Guidance for the assessment of RSSs as published by the department for Communities and Local Government (CLG)²³. The SA process is set out in **Figure 2** below.

Figure 2: Stages required in SA



²³ See: <http://www.communities.gov.uk/publications/planningandbuilding/sustainabilityappraisal>

- 2.1.4 **Stage A** in the SA process involves developing the **framework** for undertaking the appraisal – generally a set of sustainable development objectives – as well as an **evidence base** to inform the appraisal. The framework and evidence base are presented in a **Scoping Report** for consultation with stakeholders including the statutory consultees (English Heritage, the Environment Agency and Natural England). In this case, the Scoping Report was prepared by Entec in February 2005, this has been subsequently amended through a Scoping Report Addendum prepared by Scott Wilson and Ben Cave Associates in Spring 2008. The key issues highlighted in Stage A are provided in Box 2.
- 2.1.5 **Stage B** in the SA process involves undertaking the **appraisal** itself. This involves identifying and evaluating the impacts of the different options open to the plan-makers as well as the preferred options / draft plan policies. This is carried out in two phases, a relative comparison during the options development stage to assess which option performs the best in sustainability terms and then in a more detailed assessment against the SA Framework when the preferred options or policies have been developed. This report documents the first phase. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation.
- 2.1.6 **Stage C** in the SA process involves documenting the appraisal and preparing the **SA Report** (this incorporates the material required for inclusion in the Environmental Report under the SEA Directive). The SA Report, guided by the Regulations will be published in for consultation alongside the Partial Review options.
- 2.1.7 **Stage D** in the SA process involves **consulting** on the Draft RSS (in this case the Partial Review) and the SA Report. In the case of the Partial Review, this consultation will take place in May-July 2009. As a component of the consultation, the NWRA has assembled a 'Appraisal Group' made up of key stakeholders who will provide in-depth feedback on the appraisal findings in addition to the broader stakeholder feedback generated through public consultation.
- 2.1.8 **Stage E** in the SA process involves **monitoring** the adopted RSS including its sustainability impacts. In this case, NWRA will monitor the adopted North West Plan through its annual Regional Monitoring Reports.
- 2.1.9 The SA of the Partial Review will be undertaken in three stages:
- **Scoping Report Addendum** – providing and documenting the evidence base for the assessment;
 - **Interim Sustainability Appraisal Report** – documenting the assessment of the options for the Partial Review; and
 - **Sustainability Appraisal Report** – documenting the assessment of the preferred options or policies for submission to the Secretary of State.

Box 2 - Key issues highlighted in Stage A

Flood Risk - The additional requirements of PPS25, in combination with the increased risk of flooding and the quantum of development outlined as part of the current RSS will place a much greater risk of flooding on the region than previously assessed.

Deprivation - As highlighted in the baseline summary, the North West is an area with particular pockets of deprivation. The areas of particular deprivation include Liverpool, Manchester, Knowsley, Blackpool and Manchester.

Climate Change - The combination of increased requirements from the Government and EU on reducing energy demand, increasing energy efficiency and providing a greater proportion of energy from renewable sources should contribute towards a reduction the North West's potential climate change impacts. However, more effort will be needed to counter the predicted growth in emissions from vehicles, in order to not negate good work done elsewhere.

Water resources - The demand for water will increase as new developments are built and completed. The growing population will also create a burden on existing water supplies. Added to this will be the pressure on current waste treatment and sewage facilities.

Vulnerable groups - Climate change, water scarcity and other environmental factors often impact upon the more vulnerable sections of society more seriously than the more affluent. As such, in the context of the sustainability effects identified, the need to reduce inequalities and ensuring that the population of the North West as a whole are considered is highlighted.

Cumulative effects - The effects of increased population and shifting housing sizes will affect the North West's influence on the natural environment and infrastructure through cumulative impacts through increased consumption on a number of fronts.

Equality - The key issues identified in relation to equalities in the region pertaining specifically to the issues subject to the partial review are:

- Meeting the housing needs, including the need for increased affordable housing, of diverse groups in the region, including disabled people, BME people, and other vulnerable groups, including families with children, single parent families, homeless households and older people, recognising the existing poor housing conditions experienced by BME groups, limited housing choices of disabled people and the problems of affordability for disadvantaged and low income groups.
- Meeting the accommodation needs and equal access to other services of gypsies and travellers in the region, in particular for Roma gypsies and Irish travellers, to address severe shortages of accommodation needs.
- Promoting diversity as an asset in the region, including via equal economic participation for diverse groups in the region, including disabled people, BME people, young people and older people, recognising the changing profile of the regional population and differences in employment and unemployment rates for these groups compared with regional averages.
- Promoting diversity as an asset in the region, including via narrowing the pay gap between women and men, tackling the pay gap for full time and part time women, particularly in the context of lower average earnings for both men and women compared with UK averages.
- Promoting diversity as an asset in the region, including the social and economic inclusion of different groups, including faith groups and LGBT people, addressing existing prejudice and discrimination and building on existing concentrations of specific groups in certain areas
- Promoting social inclusion for equality groups in NW, Including BME people, to address existing spatial and social concentrations of poverty and deprivation experienced by BME groups in the region
- Promoting improved access to public transport services and other local services, which particularly disadvantage low income groups and women.

Renewable provision - The opportunity of providing renewable energy in the North West faces challenges in multiple sectors:

- Human health – stroboscopic effects, noise, ice sheer are some of the considerations that will need to be integrated into the options for the RSS
- Biodiversity – wildlife flight paths, disturbance to species and habitats and noise effects will need to be considered.

In order to provide a clear signpost to the requirements of the SEA Directive, a table has been provided below which illustrates where the requirements have been met in the SA process.

Table 2: SEA Directive requirements and where they have been met.

Environmental Report requirements ²⁴	Location
an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Scoping Report Scoping Addendum Section 1
the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report Scoping Addendum Section 1
the environmental characteristics of areas likely to be significantly affected;	Scoping Report Scoping Addendum Section 1
any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report Scoping Addendum Section 1
the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Scoping Report Scoping Addendum Section 1
the likely significant effects ²⁵ on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 3 and Appendix1 Forthcoming SA Report
the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 3 and Appendix1 Forthcoming SA Report
an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 3 Forthcoming Interim SA findings and SA Report
a description of the measures envisaged concerning monitoring in accordance with Article 10;	Forthcoming SA Report
a non-technical summary of the information provided under the above headings.	Non-technical summary

²⁴ As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment).

²⁵ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

2.2 Method

2.2.1 The appraisal of the options consisted of a matrix approach derived from that used by Entec for the Draft Submission Plan and used by Scott Wilson for the assessment of the proposed changes. Traditionally, the assessment matrices are carried out to compare the relative sustainability merits of the options proposed to address the issues identified in the area, in this case the North West Region. These are filled in using expert judgement and consensus from not only the consultants point of view but also incorporating local knowledge from the planning authority. This has been the case in this assessment, the scoring system used is provided below:

Table 3: Appraisal scoring key

++	Strongly positive effect	+	Positive effect	-	Negative effect	-	Strongly negative effect	?	Uncertain effect	0	Insignificant effect	*	Objectives are not relevant
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2.2.2 The SA Framework that has been used for previous SAs of the RSS was again used, however, the framework was rationalised to only score against the overarching Objectives and used the sub-questions as prompts only. This approach was agreed between the consultants and the NWRA in order to reflect the level of detail and development of the options thus far and to avoid dependence on false accuracy (in that as much of the detail of the policy is not present at this level of development, it would be disingenuous to appraise detailed points. The SA Framework is shown in Table 4.

Table 4: SA Objectives used for option assessment

SA Objective
1. To reduce the disparities of sub-regional economic assemblies
2. To exploit the growth potential of business sectors
3. To develop and market the region's image
4. To deliver urban renaissance
5. To deliver rural renaissance
6. To secure economic inclusion
7. To develop and maintain a healthy labour market
8. To reduce social exclusion
9. To reduce the need to travel improve choice of use and use of sustainable transport modes
10. To improve health and mental health and reduce health inequalities

11. Improve access to good quality affordable and resource efficient housing
12. To reduce crime, disorder and the fear of crime inequalities
13. To enable groups and communities to contribute to decision making
14. To develop strong and positive relationships between people from different backgrounds and communities?
15. To improve access to basic goods, services and amenities for all groups
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region
18. To protect and improve local environmental quality
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.
20. To protect and improve the quality of inland and coastal waters
21. To protect and improve air quality
22. To restore and protect land and soil
23. To mitigate and adapt to climate change
24. To ensure the prudent use of natural resources and the sustainable management of existing resources
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery

2.3 Appraisal Groups

- 2.3.1 This appraisal method will be supplemented through the use of 'Appraisal Groups'. The Appraisal Group will be made up of key stakeholders in the development of the RSS. They will undertake to verify and supplement the appraisals findings at key stages in order to reach a consensus. The Appraisal Group will meet as informal workshops with a open floor to enable discussion on a multitude of issues, the meetings will be documented and outcomes made available as part of the consultation process.

3 Appraisal of the Partial Review Options

3.1.1 The full appraisal matrices can be found in Appendix 1. The findings of the appraisal groups will be made available after the workshop has been undertaken.

3.2 Appraisal Summaries

Car Parking Standards

Summary

The proposed parking standards are very different from the existing ones in their holistic approach. As well as discouraging the use of the car at sites where there is good accessibility by alternative modes of transport, the proposed standards also encourage the use of other modes of transportation by emphasising the importance of providing bicycle and motorcycle parking; by underlining the need of employers to design travel plans; and by discouraging certain types of development in inaccessible areas (as opposed to promoting that they will require a great deal of car parking).

The focus on public transportation and on curbing dependency on the car has two obvious benefits, one is environmental, and the other relates to more equitable accessibility. The proposed standards again take a more holistic approach in promoting equitable access not only by promoting public transportation (which is important for those without access to a private car) but also stipulating bicycle, motorcycle and disabled parking standards.

Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of curb parking is associated with increased risk of injury for children²⁶. In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased risk and occurrence of accidents²⁷. This will also apply to streets where people use the pavement for accommodating their vehicles. Well managed parking can provide *friction* and slow the flow of traffic thus giving greater priority to pedestrians²⁸. The management of parking is of crucial importance.

The Sustainability Appraisal has shown clearly that, in terms of a number of SA Objectives, the proposed parking standards perform better than the existing standards. The appraisal has not highlighted any sustainability trade-offs that must be considered, should the decision be taken to take the new standards

²⁶ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). *Journal of Public Health Medicine* 1998;20(4):463-6.

²⁷ Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

²⁸ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

<p>Recommendations</p>	<p>forward as the preferred option.</p> <p>1) The language used in the table related to discouraging certain types of development could possibly be toned down so that it is not so exclusionary. In particular, employment should not be discouraged in locations not accessible by public transportation if it can be demonstrated that parking spaces won't be needed since most employees reside nearby.</p> <p>2) The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW. In particular, the standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments.</p> <p>3) Whilst increasing the provision of public transport should encourage people to use alternatives to the car it is important that the cost of these services supports this approach. We recommend that where possible economic analysis is undertaken to ensure that alternatives to the car are financially competitive.</p>
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Gypsies and Travellers

Summary

It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently, Gypsies and Travellers are not evenly spread throughout the region (although they are spread more evenly throughout the region than is the case for Travelling Showpeople). Option A will reinforce this unequal distribution, whilst Option C will distribute new pitches for Gypsies and Travellers throughout the region in a more 'balanced' fashion.

It is likely that Gypsies and Travellers have chosen to concentrate around certain areas for reasons such as proximity to friends and family. It is also likely that, in some instances, Gypsies and Travellers will have chosen to live in a particular area for economic reasons, although in practice Gypsies and Travellers are less likely to have strong economic ties to a particular area than is the case for members of the settled or Travelling Showpeople communities. Conversely, many Gypsy and Traveller families will have chosen to live in a certain area for little other reason than the fact that opportunities elsewhere for a pitch on an authorised site are hard to come.

It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Gypsy and Traveller pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). A high concentration of Gypsy and Traveller pitches could generate some negative sustainability effects that would impact upon the receiving environment, community or economy. A particularly significant effect is worsening social relations between the Gypsy and Traveller community and the settled community in the area, signified for example, in concerns about crime levels.

It is important to consider that many effects felt by the receiving environment and settled community in the vicinity of Gypsy and Traveller pitches may be insignificant or non-existent if pitches are authorised as it can be assumed that authorised pitches are sensitively located. Furthermore, any negative effects associated with new authorised sites have the potential to decrease over time, as it is more likely that there will be the potential for harmonious relationships and cultural understanding to develop between the settled and Gypsy and Traveller communities.

For these reasons, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. However, it is difficult to predict with any certainty whether this will occur as evidence does suggest a strong preference for permanent pitches, with a preference for authorised sites, a resort to privately owned unauthorised sites where an authorised pitch cannot be obtained and a final resort to unauthorised encampments. Gypsies and Travellers are currently more dispersed around the region than is the case for Travelling Showpeople, and so it might be

suggested that promoting a *more* balanced dispersal would be something that Gypsies and Travellers find acceptable. The potential for unauthorised pitches remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Gypsy and Traveller pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Gypsies and Travellers within a given area will always be relatively small in comparison to the settled community, even if the number of Gypsies and Travellers in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Gypsy and Traveller and settled communities. If Option A is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Gypsies and Travellers, namely access to services and opportunities.

Option C promotes working with the Gypsy and Traveller community to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a ‘balanced’ fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Gypsy and Traveller families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Gypsies and Travellers to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Gypsies and Travellers could become isolated from the rest of the community. Option B could result in particular potential for effects to be felt by individual families.

	<p>In conclusion, Option C, developed and implemented, could achieve a more sustainable outcome for all, but developed and implemented badly, could have damaging effects on the Gypsy and Traveller community.</p>
<p>Recommendations</p>	<p>1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.</p> <p>2) Requiring some Gypsies and Travellers to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Gypsy and Traveller community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.</p>

Renewable Energy

Summary	<p>A theoretical maximum approach performs well against the following SA Objectives:</p> <ul style="list-style-type: none"> 2) To exploit the growth potential of business sectors 3) To develop and market the region's image 4) To deliver urban renaissance 5) To deliver rural renaissance 6) To secure economic inclusion 23) To mitigate and adapt to climate change 24) To ensure the prudent use of natural resources and the sustainable management of existing resources 25) To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources 26) To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery <p>A theoretical maximum approach performs poorly, in comparison to a more pragmatic approach, when assessed against the following SA Objectives:</p> <ul style="list-style-type: none"> 11) Improve access to good quality affordable and resource efficient housing 16) To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value. 17) To protect and enhance the biodiversity, local character and accessibility of the landscape across the region 19) To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity <p>It is important to realise that, although a theoretical maximum approach has been shown to result in greater benefits when assessed against a number of SA Objectives, in practice a theoretical maximum approach may be more difficult to implement and may necessitate taking greater risk. In particular, maximising renewable energy generation could result in less emphasis being placed on ensuring a diverse energy mix, which might result in energy supplies being less secure. Much will depend upon the exact definition of maximum and pragmatic, and as a result there is a great deal of uncertainty in the prediction of effects at this stage. Drawing on the above assessment and summary, it is advisable that a pragmatic approach (Option B) is pursued. However, it will be important that a pragmatic approach can demonstrate that it is still ambitious, with targets, locations and feasible renewable energy technologies clearly outlined. A pragmatic approach need not aim for minimum renewable energy targets, but for the best energy mix for the whole region. This might include low carbon energy sources such as clean coal and CHP should research show this to be a more</p>
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	<p>appropriate option than renewables.</p> <p>A pragmatic approach must also consider what is pragmatic given a scenario of increasing energy needs and increasing need to mitigate for climate change. This reinforces the fact that a pragmatic approach must be ambitious, and far-sighted.</p>
<p>Recommendations</p>	<p>1) Any approach must be complemented by a stringent suite of policies tackling energy demand alongside sustainable energy generation.</p> <p>2) The SA will need to be backed up with research commissioned in December 2007 assessing future energy demand, progress against renewable energy targets and broad locations for (but not limited to) the renewable energy technologies under consideration.</p>

Overall Housing Provision

Summary	<p>The assessment against the following SA Objectives found that increasing housing will lead to benefits, and that benefits will be maximised by an approach that concentrates housing in urban areas:</p> <ul style="list-style-type: none">2) To exploit the growth potential of business sectors4) To deliver urban renaissance6) To secure economic inclusion7) To develop and maintain a healthy labour market8) To reduce social exclusion10) To improve health and mental health and reduce health inequalities11) Improve access to good quality affordable and resource efficient housing14) To develop strong and positive relationships between people from different backgrounds and communities?25) To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources <p>A number of these potential benefits stem from the fact that there are areas of economic and social deprivation in the region, much of which can be found in the more urban areas, and new housing will be a key component of the regeneration of such areas. New housing will also be important to support a growing economy, and it is likely that focusing housing around the major conurbations is likely to be effective in supporting the growth of key business sectors.</p> <p>Rural communities in the region suffer a range of sustainability issues that can be at least partially addressed by an approach of directing new housing to these areas. However, the assessment has found that the benefits in terms of a number of SA Objectives might be greater should social and economic issues be met as a priority in urban rather than rural areas. This finding works from the assumption that increasing housing in rural areas would lessen the degree to which sustainability issues can be tackled through housing led regeneration in urban areas, although in reality this might not be the case.</p> <p>The assessment against the following SA Objective found that increasing housing will lead to benefits, and that benefits will be maximised by an approach that promotes housing in rural areas:</p> <ul style="list-style-type: none">15) To improve access to basic goods, services and amenities for all groups <p>The assessment against the following SA Objectives found that increasing housing will lead to negative effects, but that effects will be minimised by an approach that promotes housing in urban areas:</p> <ul style="list-style-type: none">9) To reduce the need to travel improve choice of use and use of sustainable transport modes16) To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and
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	<p>buildings of historic, cultural and archaeological value.</p> <p>17) To protect and enhance the biodiversity, local character and accessibility of the landscape across the region</p> <p>19) To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.</p> <p>20) To protect and improve the quality of inland and coastal waters</p> <p>22) To restore and protect land and soil</p> <p>The assessment against the following SA Objective found that increasing housing will lead to negative effects, but that effects will be minimised by an approach that promotes housing in rural areas:</p> <p>21) To protect and improve air quality</p> <p>The assessment against the following SA Objective found that increasing housing will lead to negative effects, and that whether housing is focused in urban or rural areas will not have a major influence,</p> <p>23) To mitigate and adapt to climate change</p> <p>24) To ensure the prudent use of natural resources and the sustainable management of existing resources</p> <p>26) To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery</p>
<p>Recommendations</p>	<p>1) It will be important that there is adequate capacity for housing to be delivered outside of the highest risk flood zones.</p> <p>2) It will be important that the offsite effects of flooding are considered as part of new development, not only in urban areas, but also in more rural areas where effects of development might act cumulatively to result in increased flood risk downstream.</p> <p>3) Policies on provision of housing will need to link in with regeneration policies and ensure that the private car is discouraged, that high quality employment is available, that the need to travel is minimised and that the new developments have high quality public transport and good connectivity.</p>

Rural Housing Provision

Summary

This assessment has worked from the assumption that Option B and Option C would lead to a greater proportion of houses going to rural areas and that under Option A the majority of housing would go to existing larger towns and cities. In reality, the options do not actually promote a spatial distribution of housing, but rather consider whether or not there should be an indication of spatial distribution.

The assessment against a number of SA Objectives has found that promoting housing in rural areas generally will have a positive effect:

- 1) To reduce the disparities of sub-regional economic assemblies
- 5) To deliver rural renaissance
- 15) To improve access to basic goods, services and amenities for all groups

The assessment against all three of these SA Objectives also highlights that there will be particular benefits associated with Option C as a result of it ensuring that smaller rural towns will also receive a greater proportion of housing

The assessment against a number of SA Objectives has found that promoting housing in rural areas generally will have a negative effect:

- 2) To exploit the growth potential of business sectors
- 3) To develop and market the region's image
- 4) To deliver urban renaissance
- 7) To develop and maintain a healthy labour market
- 9) To reduce the need to travel improve choice of use and use of sustainable transport modes
- 10) To improve health and mental health and reduce health inequalities
- 11) Improve access to good quality affordable and resource efficient housing
- 14) To develop strong and positive relationships between people from different backgrounds and communities
- 16) To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.
- 17) To protect and enhance the biodiversity, local character and accessibility of the landscape across the region
- 19) To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.
- 12) To restore and protect land and soil

A number of these predicted negative effects are based the assumption that promoting housing in more rural areas will have the knock-on effect of less housing being delivered in urban areas and, as a result, housing need might not

	<p>be met in urban areas. However, these effects are uncertain as, in reality, ensuring that an adequate proportion of housing goes to rural areas, will not necessarily preclude housing need being met in urban areas.</p> <p>The assessment against the following three SA Objectives found that it was not possible to predict with any certainty whether there would be greater benefits associated with an approach that promotes housing in urban or rural areas:</p> <ul style="list-style-type: none"> 6) To secure economic inclusion 8) To reduce social exclusion 23) To mitigate and adapt to climate change <p>In terms of economic inclusion and social exclusion, there are particular issues that exist in both urban and rural areas that can be effectively addressed by increased provision of accessible housing as part of integrated approaches to regeneration.</p>
<p>Recommendations</p>	<ul style="list-style-type: none"> 1) Recognising that delivery of extra housing in rural areas presents certain sustainability challenges, it will be important to ensure that policy promotes targeted delivery to areas where housing will meet an identified need and will tackle issues of rural deprivation and decline of rural communities and economies.

Travelling Showpeople

Summary

It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently Travelling Showpeople are not evenly spread throughout the region, but are concentrated around the Manchester area. Option A will therefore reinforce this unequal distribution. Option C will distribute new pitches for Travelling Showpeople throughout the region in a more 'balanced' fashion.

There is certainly potential for the Option C approach to impact upon the lives and, in particular the livelihoods, of Travelling Showpeople. It is highly likely that Travelling Showpeople have chosen to concentrate around the Manchester conurbation for logistical reasons, such as the need to have good access to the major road network and the pattern of fun fairs across the region throughout the year, as well as perhaps for reasons of being close to friends and family. If this is indeed the case then Option C will have the potential to jeopardise the viability of the business that is key to their economic well-being, as well as perhaps affect the strength of the Travelling Showpeople community.

It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Travelling Showpeople pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). However, it is not entirely clear what problems might be experienced within areas with a concentration of Travelling Showpeople. There could be localised environmental, community or economic impacts, including possibly a fear of crime, but there is no clear evidence to support this.

Furthermore, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. There is no evidence available currently on the prevalence or impacts associated with unauthorised Travelling Showpeople pitches. However, it is possible that Travelling Showpeople could reject the offer of authorised pitches spread around the region and choose unauthorised sites instead. This potential effect remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities.

A benefit to Travelling Showpeople resulting from an Option C approach is the possible increased potential for identification of suitably large sites to accommodate Travelling Showpeople's vehicles and equipment and to address localised issues of access to sites for large numbers of heavy vehicles.

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal

access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Travelling Showpeople pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Travelling Showpeople within a given area will always be relatively small in comparison to the settled community, even if the number of Travelling Showpeople in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Travelling Showpeople and settled communities. If Option A is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Travelling Showpeople, namely access to services and opportunities.

Option C promotes working with the Showman’s Guild to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a ‘balanced’ fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Travelling Showpeople families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Travelling Showpeople to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Travelling Showpeople could become isolated from the rest of the community (many of whom would remain concentrated around Manchester. Option B could result in particular potential for effects to be felt by individual families, whilst Option C would be more likely to result in more insidious impacts on the regions Travelling show people community or communities.

Recommendations

1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.

2) Requiring some Travelling Showpeople to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Travelling Showpeople community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Waste Management Facilities

Summary

It may be important that major, regional scale facilities are identified and planned for at the regional scale. Equally, it will be important that as much waste as possible is dealt with close to source, and so it will be important to consider waste arisings and how these can best be managed at a sub-regional scale. A sub-regional scale consideration of waste arisings and the need for waste facilities may allow for consideration of local opportunities for recycling, re-use and recovery, including through identifying opportunities for industrial symbiosis.

In the above appraisal, varied time-scale is addressed separately as it is not a mutually exclusive option. The accuracy of shorter-term data necessitates its use whereas long-term data provides a less accurate but useful insight in to meeting future needs and ensuring that waste management remains economically viable and also sustainable (particularly in terms of minimising road transport).

Recommendations

1) Ensure that policy is conducive to promoting opportunities for waste to be managed close to source.

2) When considering the broad location of major waste management facilities at the regional scale, consider how waste can be transported to and from facilities in the most sustainable fashion. In particular, consider the feasibility of transport of waste by rail and water.

3.3 Habitats Regulations Assessment

3.3.1 Habitats Regulations Assessment (HRA) aims to ensure that the integrity of sites of international nature conservation importance²⁹ is not negatively affected by plans such as the North West RSS Partial Review. A HRA for the Draft North West Plan was prepared in December 2007. This identified a range of conditions needed to maintain site integrity: the same conditions apply to the Partial Review.

²⁹ Special Protection Areas, Special Areas for Conservation, Ramsar sites and European marine sites

3.3.2 Most of the Partial Review's impacts on site integrity can only be determined once the likely broad locations of future development are known. However it is possible to proactively suggest locations, and approaches to development, that can help to avoid significant impacts. As such, we are in the process of:

- Exploring in more detail potential key impacts that the different forms of development (waste, renewable energy, housing etc.) could have on European sites;
- Making recommendations about how these impacts could be avoided in the selection of broad areas for development; and
- Once broad areas for development have been identified, identifying (through maps) the European sites that might be affected by the development 'in combination' with other plans and projects.

3.3.3 If the broad locations could lead to significant 'in combination' impacts on the integrity of European sites, recommend measures to ensure that development does not lead to such impacts. This will be done through a combination of overlay mapping, workshops related to particular sub-regions, and possibly workshops related to specific types of impacts.

3.3.4 At this stage, the following recommendations for the Partial Review can be made.

Homes for the Future

3.3.5 New housing must be accompanied by adequate infrastructure (which may also mean infrastructure to make up for existing deficits), else medium- to long-term constraints and/or impacts are likely to arise. These can occur where

- infrastructure has a long lead-in period (e.g. reservoirs) but has not been planned far enough in advance;
- infrastructure cannot be easily upgraded, so more expensive solutions are required (e.g. wastewater treatment plants at the limit of Best Available Technology Not Entailing Excessive Cost (BATNEEC), so that either 'excessive cost' is required or wastewater must be pumped (also at great cost) to other wastewater treatment plants); and
- there is no agreed standard for infrastructure provision (e.g. green infrastructure) so that there is a progressive reduction in per capita provision even if there is an increase in provision overall.

3.3.6 We commend the NWDA's research into issues and constraints regarding infrastructure. Provision of adequate infrastructure can be assured through a policy that makes housing delivery conditional on the provision, in advance, of adequate infrastructure. Less effectively, it can be promoted by putting firm maximum numbers on housing

allocations for districts, so that infrastructure providers can have certainty about the level of provision needed.

- 3.3.7 Infrastructure provision is particularly important for HRA, as it helps to ensure adequate water quality, water levels, and provision of green infrastructure to act as a buffer and ‘draw’ for European sites.

Broad Locations for Waste Management Facilities

- 3.3.8 There is an implication that Option 1, with its focus on ‘regional scale facilities’ could result in a different type and number of waste management facilities than Option 2, with its sub-regional focus. This could have implications for the HRA that cannot be fully explored at this stage (and SA).

Renewable Energy – Broad Locations/Criteria

- 3.3.9 Without seeing the results of the research providing the evidence base that will underpin the options, it is difficult to provide meaningful commentary on the options.
- 3.3.10 However, it is our understanding that with respect to onshore facilities, it is likely that ‘theoretical maximum’ targets can be met without impacts on European sites so long as appropriate locations are chosen. The evidence study is believed to have considered impacts on European sites and so its spatial recommendations should be acceptable.
- 3.3.11 With respect to offshore facilities, we have outstanding concerns about the capacity of the waters around the NW to meet theoretical maximum targets due to the concentration of European sites. All of the estuaries within the NW Region are European sites, for example, and so any estuarine barrages would cause an adverse effect on European sites and would therefore need to follow the path of ‘no alternatives – imperative reasons of over-riding public interest’, with costly and programme-constraining compensation required.

3.4 Other topics

- 3.4.1 There were no HRA comments regarding the Gypsies and Travellers, Travelling Showpeople and Car Parking Standards.

Conclusions

- 3.4.2 It is important to comment not only on the SA and HRA findings of the options but also on the nature of the options themselves.

SA of the Options

- 3.4.3 The SA has highlighted a continuing tension between supplying urban and rural housing, in particular the trade-off between supplying a greater proportion of housing to rural areas at the expense of housing in urban areas. Given the Government's agenda for developing on brownfield land, near transport nodes etc. it seems like the rural housing deprivation is likely to continue unless robust policy is forthcoming to ensure that the gap in equality between the rural and urban areas does not widen.
- 3.4.4 Clearly there are also tradeoffs in regard to the provision of renewable energy. These major sites are often considered for rural and upland area where they will have a more significant impact due to the sensitivity of the receiving environment. There is therefore a balance to be made between the pressing climate change agenda and the landscape and historic cultural values that define the North West region. However, the trade-offs that must be made in order to deliver renewable energy can be minimised by such things as careful location, good design and close working with stakeholders to ensure that all values are understood and work towards consensus.
- 3.4.5 In terms of further studies and ongoing strategy development, and in regard to developing policy, the consideration of infrastructure, natural resources and environmental constraints in a pan-regional way is important. Other RSSs' approach to these issues may well affect the North West and vice-versa. This issue was flagged up by the East of England EiP inspector:
- 3.4.6 "Many... have struggled with the difficulty of forming a view on the right level of development for one region in isolation. There is a common perception that in the Midlands and the North growth is wanted more and would be more easily absorbed. Whilst... this cannot absolve the East of England from dealing with its own growth requirements it remains the case that there are major inter-regional issues that cannot satisfactorily be addressed separately by each region in turn, as is happening with the current round of RSS. These are not just about balancing housing growth, jobs and environmental interest, but also raise serious issues about infrastructure and resources."
- 3.4.7 Given that Government is not supporting any eco-towns in the North West, we feel that the options should include consideration of free-standing new settlements (essentially eco-towns but without that name). The larger the total volume of housing being proposed, the more challenging it becomes to accommodate it according to the RSS's preferred spatial strategy in ways that will achieve the benefits, and avoid the disbenefits, which justified its choice. At the same time, the greater the growth, the greater the potential sustainability benefits become of one or more new large towns or

cities: the easier it would become to achieve critical mass to provide diverse life chances within a small envelope, to support excellent infrastructure to enable sustainable living, and to relieve development pressures on other places without jeopardising regeneration where it is needed.

- 3.4.8 The idea of a large new settlement raises huge challenges. There is nowhere in the region where one could be developed without major environmental impacts. It would require major infrastructure investments, and guarantees of viability to attract employment and services. Even on the most optimistic assumptions it could not make a significant contribution to housing numbers until late in the RSS period. It is not at all clear that the benefits would justify the disbenefits, and we do not imply that such an option would necessarily be the most sustainable one.
- 3.4.9 Provision of significant numbers of affordable homes and balancing of jobs and housing should be key aims of the Partial Review. Provision of affordable homes is good socially and economically; balancing of jobs and housing helps to reduce the need to travel, with consequent social, environmental and efficiency benefits.
- 3.4.10 The NWRA should investigate the links between energy and waste – given they are two topics within this Partial Review - which could increase sub-regional self-sufficiency. The RSS in developing its policies should consider: exploring options to:
- reduce waste export from the region;
 - exploit government support to reduce waste; and
 - address employment opportunities associated with waste sorting and/or recycling in areas of high unemployment.
- 3.4.11 In terms of the more specific issues that are being considered by this Partial Review, particularly Gypsies and Travellers, Travelling Showpeople and Car Parking Standards, there is less need to add further to the comments that are set out in the relevant assessment summaries. In terms of Gypsies and Travellers the issues are complex and there is the need to make tough decisions that will require substantial trade-offs between sustainability objectives. In terms of Car Parking Standards, it is very clear that a more sophisticated approach is supportive of wider efforts to reduce dependency on the car as well as bringing about a range of other social benefits.

The nature of the options

- 3.4.12 The options themselves, in terms of their detail and refinement should also be held to scrutiny. The options are at an early stage of development and therefore do not contain the level of details ideally suited to the appraisal. As such certain assumptions have been made in the assessment process (these are noted where applicable).
- 3.4.13 The Panel Report indicated that there needed to be a greater emphasis on spatial locations for the Partial Review for waste and renewable energy options. However, it

can be seen that the current options are limited in the degree to which they include spatial considerations. It is likely that as the plan progresses, and further baseline evidence becomes available, that there will be further opportunity for developing more spatially explicit options.

- 3.4.14 Returning to the options available at the current time, some can be considered to be more process oriented rather than spatial, which limits the sustainability issues that can be discussed in order to help differentiate between the options. In the case of affordable housing, the options were considered to be purely procedural in nature, and no benefit to undertaking an SA of the options could be foreseen and so none was undertaken.
- 3.4.15 It is understood that the timetable dictates that some information is readily available and other data is not. In order to overcome this ‘data lag’ the consultants will monitor the development of the Partial Review options and supporting strategies to ensure that as and when spatial data becomes available, it is fed into the SA and in particular used to re-address the options assessment if relevant.

3.5 Cumulative Effects

- 3.5.1 The SEA Directive and Regulations require the consideration of cumulative effects³⁰ as part of the impact assessment. At this stage it is difficult to comment on the exact nature of the effects as the spatial component of the options is not available. At the point when this information is available, an analysis will be carried out to determine the in-combination effects of the spatial distribution of the Partial Review Topics. Nonetheless it is possible to comment on the effects in a general manner at this stage.
- 3.5.2 The areas where cumulative effects may occur include:
- **Combination of maximum scenarios** – if the maximum scenarios for renewables and housing are selected, this will place an increased burden on the land and resources of the North West, including overall development footprint in addition to draws on resources such as water. Furthermore, increased housing may increase overall energy demand, thereby possibly negating any increase in renewable energy in terms of proportion of the total energy supply.
 - **Maximum renewables scenario and high levels of rural development** – on the assumption that major renewables projects will occur in rural areas, an increased pressure on delivering rural housing may significantly affect the historic character of these areas and the visual attributes for which they are valued.

³⁰ Annex I (f) - These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);

- **Renewables provision and waste facilities provision** – positive effects may be facilitated through the use of energy from waste facilities. This will have the benefit of reducing the amount of waste exported from the North West and going to landfill, whilst also providing additional sources of energy. Clearly joined up policy in this case will improve both these sectors' performances.

4 Next Steps

- 4.1.1 The options and this report will be consulted on for four weeks with the Statutory Consultees and other stakeholders. This is the first part of Stage 2: Develop options and policies, taking account of assessed effects, and develop the draft revision. Once this aspect is complete, the consultation findings will need to be considered and the policies for the review developed. Once this is complete a assessment will be carried out on the policies and documented in a SA Report. Stage 3 (Publish and formally consult on the draft RSS revision) will provide stakeholders another opportunity to comment on the policies as they are proposed to appear in the RSS.
- 4.1.2 PPS11 indicates that as issues and options papers are produced, further technical work and analysis can - and should - be included in the development of the SA. It is the intention to keep the Scoping Report and other documents live, updated periodically as and when further studies come 'on-line'. The statutory consultees, as part of the steering group will be informed of any significant changes as and when they occur.

4.2 Consultation

- 4.2.1 The requirements for consultation arises from the guidance and the regulations:

“To meet the requirements of the SEA Directive, the RPB must seek the views of the three statutory environmental consultation bodies designated in the SEA Regulations (English Heritage, Natural England and the Environment Agency) on the scope and level of detail of the environmental information to be included in the SA Report. It is also desirable for other relevant bodies to be consulted as the RPB considers appropriate, with a balance between those concerned with social, environmental and economic issues.”

Sections 2.2.20 SA of Regional Spatial Strategies and Local Development Documents, DCLG 2005

“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies” (Statutory Consultees)”

Article 12 (5) The Environmental Assessment of Plans and Programmes Regulations 2004

Where a consultation body wishes to respond to a consultation under para (5), it shall do so within the period of 5 weeks...)

Article 12 (6) The Environmental Assessment of Plans and Programmes Regulations 2004

- 4.2.2 This Interim Sustainability Appraisal Report will be submitted to the statutory consultees and those stakeholders outlined in **Appendix 2** for a consultation period of four weeks (from the 4th June 2008 to the 30th June 2008).

Commenting on this report

Key questions for stakeholders

4.2.3 The NWRA and Scott Wilson would welcome comments on this report. With this in mind a series of four questions are addressed to stakeholders. The questions are as follows:

- **Assessment findings** – do you agree or disagree with the assessment findings, please provide comments where relevant.
- **Option conclusions** – do you agree or disagree with the assessment where it has suggested which option might be broadly more sustainable?
- **Options** – do you propose any alterations or further options for consideration?
- **Further data** – is there any further data that is available that should be considered in the assessment in future?

Where to send comments

4.2.4 Please send comments on this report to:

Alex White
Scott Wilson Ltd
6 Greencoat Place
London
SW1P 1PL
e - mail: northwestplanpartialreview@scottwilson.com

Appendix 1 – Appraisal Matrices

++	Strongly positive effect	+	Positive effect	-	Negative effect	--	Strongly negative effect	?	Uncertain effect	0	Insignificant effect	x	Objectives are not relevant
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Car parking standards

The Regional Parking Standards, set out in the Regional Spatial Strategy, provide the framework for the identification at a local level of appropriate parking provision for new developments. The current parking standards have remained unchanged since the publication of RPG13 in 2003 and an undertaking was given to review them within 5 years. Consequently the North West Regional Assembly, as part of the Partial Review of the Regional Spatial Strategy is proposing a revised set of standards. The proposed standards set out maximum parking standards and in addition set out an accessibility based tool through which parking requirements for individual sites will be assessed. The parking standards table has been significantly expanded from the existing table in RPG13 to take into account Use Classes Order, minimum parking standards for disabled drivers, bicycles, motorcycles, coaches as well as maximum standards for cars. The table also includes recommendations for residential developments.

SA Objective	Option A) Adopt the revised standards	Option B) Keep existing parking standards as detailed in RPG13 and Draft RSS (business as usual)	Comments
1. To reduce the disparities of sub-regional economic assemblies	+	0	The revised standards advise employers to provide travel plans which would have a disproportional positive impact on people who can not afford private transportation, thereby allowing them access to jobs how / why?. It also discourages industrial development in locations not accessible by a range of modes of transport which again will benefit people that do not own private transportation.
2. To exploit the growth potential of business sectors	x	x	
3. To develop and market the region's	x	x	

image			
4. To deliver urban renaissance	+?	0+	<p>Both existing and proposed parking standards differentiate between quantities of parking needed according to accessibility. Nevertheless the new parking standards include a much more thorough assessment of accessibility and so is more likely to ensure that there is not over provision of parking in places well served by public transportation. New parking standards also stipulate bicycle parking provision and recommend travel plan measures at a corporate level. All these measures help in reducing traffic, noise and emissions and allow pedestrians to enjoy public open spaces.</p> <p>The standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments.</p>
5. To deliver rural renaissance	? -	? +	<p>The proposed parking standards include comments on the need to resist locating offices, business parks, research and development, call centres and general industry in places not well served by public transportation, which will include many rural areas.</p> <p>Both existing and proposed parking standards intend to allow for more parking in rural areas (where accessibility is generally not as good) which will support rural diversification or the growth of rural businesses by, for example, making it easy for employees to drive to work where public transportation is not available.</p> <p>Therefore the proposed standards have the potential for negative effects in terms of this SA Objective.</p>
6. To secure economic inclusion	0+	0	<p>The proposed parking standards emphasise the need to locate employment in places well served by public transportation. They also stipulate the provision of bicycle parking which would benefit people who cannot afford private transportation. The proposed parking standards make allowance for the provision of disabled parking, encouraging equal participation in the jobs market by disabled people.</p>
7. To develop and maintain a healthy labour market	x	x	
8. To reduce social exclusion	0+	0	<p>The proposed parking standards emphasise the need to locate employment in places well served by public transportation. They also stipulate the provision of bicycle parking which would benefit people who cannot afford private transportation. The proposed parking standards make allowance for the provision of disabled parking, encouraging equal participation in society by disabled people.</p>
9. To reduce the need to travel improve	++	+	<p>It is expected that the existing parking standards will reduce car traffic, and encourage walking</p>

choice of use and use of sustainable transport modes			and cycling as alternatives. The proposed standards will do the same, but to a greater degree by: setting out a more thorough assessment of the level of accessibility; encouraging cycling; discouraging employment in places of low public transportation accessibility; and by encouraging the design of travel plans by employers.
10. To improve health and mental health and reduce health inequalities	?	?	Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of curb parking is associated with increased risk of injury for children ³¹ . In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased risk and occurrence of accidents ³² . This will also apply to streets where people use the pavement for accommodating their vehicles. Well managed parking can provide <i>friction</i> and slow the flow of traffic thus giving greater priority to pedestrians ³³ . The management of parking is of crucial importance. The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW.
11. Improve access to good quality affordable and resource efficient housing	x	x	
12. To reduce crime, disorder and the fear of crime inequalities	x	x	
13. To enable groups and communities to contribute to decision making	x	x	
14. To develop strong and positive relationships between people from different backgrounds and communities?	x	x	
15. To improve access to basic goods,	+	0+	Both existing and proposed parking standards allow for more parking in less accessible areas. Nevertheless the proposed parking standards include a much more thorough assessment of the

³¹ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). Journal of Public Health Medicine 1998;20(4):463-6.

³² Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

³³ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

services and amenities for all groups			level of accessibility of a development, and are likely to discourage the use of private transportation, making public transportation infrastructure more viable. More public transportation is likely to allow for more equitable access to leisure, sports facilities and services. Unlike the existing parking standards, the new parking standards also stipulate parking provision for bicycles, motorcycles and disabled people, allowing for a more equal access to facilities.
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.	+	0+	Neither existing nor proposed parking standards are likely to have a direct impact, but both discourage the use of cars, thereby protecting and enhancing the character and appearance of archaeological sites, historic buildings, landscapes and townscapes, parks and gardens, through the curbing of emissions, reducing congestion, allowing for green space, and improving the general aesthetic of the space by putting cars out of sight.
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	+	0+	Both existing and proposed parking standards are likely to discourage the use of cars, thereby protecting and enhancing the character and appearance of landscapes and biodiversity through the curbing of emissions, reducing congestion, lowering the amount of green space that would have to be dedicated to car parking, and improving the general aesthetic of the space by putting cars out of sight. The provision of bicycle and disabled parking and the encouragement of public transport use will improve accessibility to landscape and biodiversity resources across the region.
18. To protect and improve local environmental quality	+	0+	Both parking standards allow for more parking in less accessible areas. Nevertheless the proposed parking standards include a much more thorough assessment of the level of accessibility which will discourage the use of private transportation reducing noise pollution from private vehicles.
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	x	x	
20. To protect and improve the quality of inland and coastal waters	x	x	
21. To protect and improve air quality	++	+	Both parking standards discourage the use of cars in places likely to be accessible by public transportation but the proposed parking standards include a much more thorough assessment of the level of accessibility of a development and therefore allow for more fine-tuned solutions. The proposed parking standards also stipulate the provision of bicycle parking, encourage walking

			and advise employers to implement travel plans. These measures should reduce the level of emissions and improve air quality. One of the causal factors of poor air quality in AQMAs is road traffic, which is targeted by these measures.
22. To restore and protect land and soil	x	x	
23. To mitigate and adapt to climate change	++	+	See assessment against SA Objective 9
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	+	0+	See assessment against SA Objective 9.
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	+	0+	See assessment against SA Objective 9. A further consequence of less car usage on this SA Objective is likely to be a decrease in consumption of fossil fuels.
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	x	x	
Summary	<p>The proposed parking standards are very different from the existing ones in their holistic approach. As well as discouraging the use of the car at sites where there is good accessibility by alternative modes of transport, the proposed standards also encourage the use of other modes of transportation by emphasising the importance of providing bicycle and motorcycle parking; by underlining the need of employers to design travel plans; and by discouraging certain types of development in inaccessible areas (as opposed to promoting that they will require a great deal of car parking).</p> <p>The focus on public transportation and on curbing dependency on the car has two obvious benefits, one is environmental, and the other relates to more equitable accessibility. The proposed standards again take a more holistic approach in promoting equitable access not only by promoting public transportation (which is important for those without access to a private car) but also stipulating bicycle, motorcycle and disabled parking standards.</p> <p>Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can</p>		

	<p>obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of curb parking is associated with increased risk of injury for children³⁴. In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased risk and occurrence of accidents³⁵. This will also apply to streets where people use the pavement for accommodating their vehicles. Well managed parking can provide <i>friction</i> and slow the flow of traffic thus giving greater priority to pedestrians³⁶. The management of parking is of crucial importance.</p> <p>The Sustainability Appraisal has shown clearly that, in terms of a number of SA Objectives, the proposed parking standards perform better than the existing standards. The appraisal has not highlighted any sustainability trade-offs that must be considered, should the decision be taken to take the new standards forward as the preferred option.</p>
<p>Recommendations</p>	<ol style="list-style-type: none"> 1) The language used in the table related to discouraging certain types of development could possibly be toned down so that it is not so exclusionary. In particular, employment should not be discouraged in locations not accessible by public transportation if it can be demonstrated that parking spaces won't be needed since most employees reside nearby. 2) The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW. In particular, the standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments. 3) Whilst increasing the provision of public transport should encourage people to use alternatives to the car it is important that the cost of these services supports this approach. We recommend that where possible economic analysis is undertaken to ensure that alternatives to the car are financially competitive.

³⁴ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). Journal of Public Health Medicine 1998;20(4):463-6.

³⁵ Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

³⁶ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

Gypsies and Travellers

The Government has made clear that it views this issue as an integral part of the wider housing agenda to tackle affordability and homelessness issues. The Partial Review will set out separate figures for Gypsies & Traveller for each district, on the required provision (number of pitches). The Partial Review of RSS will be informed by the results of a series of Gypsy and Traveller Accommodation Assessments (GTAA's) undertaken in the region. The North West GTAA identifies total additional residential need for each sub-region. In addition the GTAA identifies need for the development of a number of transit pitches in order to cater for the seasonal increases in travelling needs of the Gypsies and Traveller population.

However these figures should not be interpreted directly into the policy provision of pitches across the region. The methodology used in the GTAA's was based on CLG guidance and best practice. This has been done on a 'need where it is seen to arise' basis. Thus findings reflect the historical inequalities in pitch provision. Therefore, there is a tendency when the need for additional accommodation is assessed, for the needs assessment to further compound existing inequalities in site provision. For example, authorities which already provide Gypsy and Traveller accommodation (publicly or privately) are assessed as having greater need for additional pitch provision than authorities with little or no pitch provision.

SA Objective	Option A) Use the results from the studies to distribute new provision	Option B) Modify (a) to ensure a minimum level of pitch provision in every district	Option C) Work to agree a more balanced share of meeting need across districts	Comments
1. To reduce the disparities of sub-regional economic assemblies	0-	0+	0+	Effects are unlikely to be significant. However, if authorised Gypsies and Traveller sites are concentrated in a part of the region that already suffers from economic deprivation then this could potentially act, to a small degree, to perpetuate economic problems and hinder efforts to achieve economic regeneration.
2. To exploit the growth potential of business sectors	x	x	x	Gypsies and Travellers will have no effect on the growth potential of key economic sectors at the regional scale.
3. To develop and market the region's image	0-	0?	0+	If authorised Gypsies and Traveller sites are concentrated in one authority (Option A) then the image of that authority could suffer. However, it is unlikely that this effect would be significant at the regional scale. A balanced spread of sites (Option C) would certainly ensure that the image of the region or authorities does not suffer. Option B is an intermediary between A and C in terms of the balance of Gypsies and Travellers in the region.

				Option B and Option C, could have the potential to increase the number of unauthorised pitches, and unauthorised pitches are more likely to impact upon local environmental quality. However, this effect is uncertain and would be localised.
4. To deliver urban renaissance	0?	0?	0?	These options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in an authority that has a trend of towns in need of urban renaissance could hinder such renaissance to a very minor degree. At the same time, however, Option B and Option C, could have the potential to increase the number of unauthorised pitches, and unauthorised pitches are more likely to impact upon local communities and economies.
5. To deliver rural renaissance	0-	0+	0+	These Options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in an authority that is characterised by rural villages and service centres in need of renaissance could have the effect of hindering renaissance to a very minor degree. In particular Gypsies and Travellers have the potential to put additional strain on services and facilities in small rural settlements.
6. To secure economic inclusion	+?	-?	-?	It must be assumed that in some instances Gypsies and Travellers will have chosen to live where they live for economic reasons. Options B and C promote distributing Gypsies and Travellers to parts of the region other than where they have chosen to live currently. This could, in theory, have negative effects on the economic fortunes of the Gypsy and Traveller community. In practice, however, Gypsies and Travellers may be less economically tied to a certain area than members of the settled population or indeed members of the Travelling Showpeople community. Redistributing Gypsies and Travellers across the region in a 'balanced' fashion, as promoted by Option C, could have a particularly significant effect. However, this could be mitigated by the fact that Option C promotes consultation with the Gypsy and Traveller community.
7. To develop and maintain a healthy labour market	0?	0?	0?	The distribution of Gypsy and Traveller pitches will have no significant effect on the labour market at the regional scale. In terms of the effects on participation and attainment in education amongst Gypsies and Travellers, this will depend, primarily, on the proportion of Gypsies and Travellers living in authorised sites. Authorised sites will tend to be located where there is adequate access to education. Furthermore, Gypsies and Travellers living on authorised sites will be more likely to settle in one place for a longer period of time. However, there are other complicating factors that determine whether Gypsy and Traveller

				<p>children are likely to attend and perform well at school such as the degree to which they are bullied and accepted more generally. These factors will be related to the perception of Gypsies and Travellers amongst the local settled community. It is likely that Option C, and to a lesser extent Option B would be most likely to promote good relations between the two communities.</p> <p>The overall result it that none of the options are guaranteed to have a significant effect, and any effects are very uncertain.</p>
8. To reduce social exclusion	?	?	?	<p>Option C suggests that it can successfully lead to increased social cohesion through determining the distribution of Gypsy and Traveller pitches through “working with sub-regional partnerships and the Gypsy & Traveller Community [to] agree a more balanced share of meeting need across districts.”</p> <p>It is expected that the benefits described would primarily come as a result of improved chances for successful integration between the settled and Gypsy and Traveller communities. This is in contrast to Option A, which could perpetuate or worsen poor relationships between the two communities in the parts of the region where Gypsies and Travellers are concentrated.</p> <p>However, it is also important to consider the importance of cohesion within the Gypsy and Traveller community, as this will be a major factor in determining whether they suffer from the effects of exclusion from the wider community. It is possible that enforcing a ‘more balanced’ distribution across the region could result in social networks between Gypsy and Traveller families being stretched to breaking point, as families make the tough decision to move further away from one another in order to access a pitch on an authorised site. This effect would occur under Option B and C.</p>
9. To reduce the need to travel improve choice of use and use of sustainable transport modes	0+	0-	0-	<p>A significant factor considered by Gypsies and Travellers when determining where they live is seasonal and more regular travel patterns. Promoting a distribution of Gypsies and Traveller pitches other than that which results from identified need could increase travel distances. However, it is important to remember that this effect will be felt by Gypsies and Travellers in terms of the distance they need to travel, but in terms of effects on total road travel (the concern of this SA Objective) effects will not be significant.</p>
10. To improve health and mental health and reduce health inequalities	0+	0-	0-	<p>The scale of health inequality between the Gypsy Traveller population and the UK general population is large, with reported health problems between two and five times more prevalent. Accommodation was the overriding factor, mentioned by every respondent, in the context of health effects. Issues include security of tenure, access to services and ability to register with a GP, support and security of being close to extended family, a non-hazardous environment and the notion of freedom for the children.</p>

				<p>In general, it is assumed that under any of the options Gypsies and Travellers will be accommodated in good living environments. If this is achieved and maintained it will contribute to health improvement: health practitioners cite a range of health issues experienced by Gypsies and Travellers “that are attributed partly to adverse environmental conditions: accidents, gastro-enteritis, upper respiratory infections and otitis media”³⁷. Poor access to health care services is a factor in poor health outcomes for Gypsies and Travellers. Travellers face discrimination in access to health care³⁸, this can arise as a result of NHS staff prejudice³⁹ and is also associated with enforced mobility⁴⁰.</p> <p>However, Option B and Option C could result in a higher number of unauthorised pitches. Gypsies and Travellers living in unauthorised pitches are less likely to have good access to health and social care, education and other services and more likely to experience tension with the settled communities. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a ‘need where it arises’ approach. This may be detrimental to good access to services, to the ability to live close to extended family and to relations with the settled community. It is possible that adverse effects could be mitigated by the approach of “working with the Gypsy and Traveller community” promoted by Option C. This approach should be integral to each option and it requires long-term commitment of proper resources.</p>
<p>11. Improve access to good quality affordable and resource efficient housing</p>	<p>+</p>	<p>?</p>	<p>?</p>	<p>All options promote the same number of Gypsy and Traveller pitches. However, it could be debated whether Options B and C promote pitches in locations where they will be suitably accessible to Gypsies and Travellers. Option C promotes a distribution that is significantly different to that which would be delivered through a ‘need where it arises’ approach, and so could have significant effects on Gypsy and Traveller communities. However, this effect will be mitigated, to a degree, through working with the Gypsy and Traveller community to determine sub-regional allocations.</p>
<p>12. To reduce crime, disorder and the fear of crime inequalities</p>	<p>-</p>	<p>+</p>	<p>++</p>	<p>Gypsies and Travellers sites can, in many instances, generate a fear of crime amongst the local settled community. The degree of fear is likely to be correlated to the number of Gypsy and Traveller pitches and sites in the vicinity. It is unlikely to be strongly correlated to whether sites are authorised or unauthorised, although over time there is the potential for fear of crime to decrease if integration between the two communities leads to mutual understanding, which</p>

³⁷ Parry, G., Van Cleemput, P., Peters, J., Walters, S., Thomas, K., Cooper, C. Health status of Gypsies and Travellers in England. *Journal of Epidemiology and Community Health* 2007; **61**: 198-204

³⁸ Lynch, E. Travellers' Tales. *Nursing Standard* June 21 vol 20 no 41 2006

³⁹ Bowers, J. Travellers' Tales. *Health Service Journal* 16 December 2004

⁴⁰ Webster, L. A report for the Children's Society on the impact of the Criminal Justice and Public Order Act on the lives of Travellers and their children. 1995

				<p>is more likely to occur with authorised sites. It is also important to consider that Gypsies and Travellers can be the victim of crime in areas where there is animosity towards them.</p> <p>Relative to Option A, Option C is certain to promote acceptance and understanding of Gypsies and Travellers by the settled community. This has the potential to reduce fear of crime amongst the settled and Gypsy and Traveller communities.</p> <p>There might be the potential for fear of crime (negative effects) associated with authorised sites to decrease over time.</p>
<p>13. To enable groups and communities to contribute to decision making</p>	<p>?</p>	<p>-</p>	<p>?-</p>	<p>Option C promotes consultation with the Gypsy and Traveller community, but at the same time it is not clear that this would be effective in terms of ensuring all Gypsies and Travellers have a voice and a say in where pitches are located. Furthermore, Option C starts from the premise that there will be a 'balanced' distribution throughout the region, and so it might be the case that any further decisions on sub-regional allocations are concerned with fine-tuning allocations only.</p> <p>Option A promotes a distribution determined by a 'need where it arises' approach, and so it is deemed that it takes accounts of the identified needs and wishes of the Gypsy and Traveller community in the decision as to how pitches should be distributed.</p> <p>Option B promotes a distribution of pitches other than that which would meet the needs of the Gypsy and Traveller community, and states nothing about involving them in decisions about the exact redistribution.</p>
<p>14. To develop strong and positive relationships between people from different backgrounds and communities?</p>	<p>-?</p>	<p>?</p>	<p>+?</p>	<p>It is likely that a more balanced distribution of Gypsies and Travellers would reduce the net animosity felt towards them by the settled community and so there would be greater potential for positive relationships to develop between the two communities.</p> <p>However, in terms of this SA Objective it is also important to consider that Options B and C have the potential to generate unauthorised pitches. A harmonious relationship between the two communities is much less likely where Gypsies and Travellers live in unauthorised pitches.</p> <p>Option C could be more likely to generate unauthorised pitches than Option B because it promotes a distribution of pitches that differs greatly from that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p>
<p>15. To improve access to basic goods, services and amenities for all groups</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>In general, it is assumed that under any of the options Gypsies and Travellers will be accommodated at sites in close proximity to services and facilities and some services and facilities will be provided on-site.</p> <p>However, Option B and Option C could result in more unauthorised pitches. Gypsies and</p>

				<p>Travellers living in unauthorised pitches are more likely to suffer from poor access to services and facilities. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. This effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p>
<p>16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The concentration of Gypsies and Travellers in a particular area (Option A) could have a cumulative effect on the landscape character of that area, although the effect would be far less likely if Gypsies and Travellers are accommodated in authorised sites as opposed to unauthorised sites.</p> <p>Option B and Option C could result in more unauthorised pitches. Unauthorised pitches are more likely to impact upon local landscapes. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p> <p>It is impossible to say that authorised sites, even acting cumulatively, can impact upon a particular landscape. Furthermore, it is impossible to say that the number of unauthorised pitches that could be generated by Options B and C would be enough to have a significant effect on any particular landscape. Therefore effects are judged as insignificant and uncertain.</p>
<p>17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The concentration of Gypsies and Travellers in a particular area (Option A) could have a cumulative effect on the landscape character and biodiversity of that area, although the effect would be far less likely if Gypsies and Travellers are accommodated in authorised sites as opposed to unauthorised sites. Authorised sites could have an impact on biodiversity if horses are kept by the Gypsies and Travellers, and grazed in inappropriate locations.</p> <p>Option B and Option C could result in more unauthorised pitches. Unauthorised pitches are more likely to impact upon local landscapes and biodiversity. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p> <p>It is impossible to say that authorised sites, even acting cumulatively, can impact upon a particular landscape or biodiversity value at the regional scale. Furthermore, it is impossible to say that the number of unauthorised pitches that could be generated by Options B and C would be enough to have a significant effect on any particular landscape or biodiversity at the</p>

				regional scale. Therefore effects are judged as insignificant and uncertain.
18. To protect and improve local environmental quality	0+	0-	0-	<p>Unauthorised sites can have significant negative effects on local environmental quality. Negative effects will be much less likely to result from authorised sites, and for the purposes of this assessment it is assumed that such effects would be negligible.</p> <p>Option B and Option C could result in more unauthorised pitches, which are more likely to impact upon local environmental quality. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p> <p>Effects will be localised and the magnitude of the effect means that effects will not be significant at the regional scale.</p>
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	0+	0-	0-	<p>Unauthorised sites have the potential to impact upon designated biodiversity. However, the effects of these options is unlikely to be significant as the majority of effects will be determined by decisions on the specific locations of sites.</p> <p>Option B and Option C could result in more unauthorised pitches, which are more likely to impact upon designated biodiversity. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C. . The effects of any one of these options is unlikely to be significant as the majority of effects will be determined by decisions on the specific locations of sites.</p>
20. To protect and improve the quality of inland and coastal waters	x	x	x	No effect
21. To protect and improve air quality	x	x	x	Gypsies and Travellers are heavily reliant on transport by private car, but none of these options will have any effect on air quality.
22. To restore and protect land and soil	x	x	x	Unauthorised pitches have the potential to impact upon land and soil, but this effect is considered as part of the assessment against SA Objective 24.
23. To mitigate and adapt to climate change	0+	0-	0-	Options B and C could result in Gypsies and Travellers living in areas where they would not choose to otherwise live, with the effect that net distances travelled by private car could

				increase. However, effects in terms of climate change are not likely to be significant.
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	0+	0-	0?	Option B and Option C could result in more unauthorised pitches, which are more likely to make inefficient use of land. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	x	x	x	No effect
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	x	x	x	Waste is less likely to be managed in a sustainable and efficient pattern at unauthorised sites, although these effects will have no significant effect in terms of this SA Objective.
Summary	<p>It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently, Gypsies and Travellers are not evenly spread throughout the region (although they are spread more evenly throughout the region than is the case for Travelling Showpeople). Option A will reinforce this unequal distribution, whilst Option C will distribute new pitches for Gypsies and Travellers throughout the region in a more 'balanced' fashion.</p> <p>It is likely that Gypsies and Travellers have chosen to concentrate around certain areas for reasons such as proximity to friends and family. It is also likely that, in some instances, Gypsies and Travellers will have chosen to live in a particular area for economic reasons, although in practice Gypsies and Travellers are less likely to have strong economic ties to a particular area than is the case for members of the settled or Travelling Showpeople communities. Conversely, many Gypsy and Traveller families will have chosen to live in a certain area for little other reason than the fact that opportunities elsewhere for a pitch on an authorised site are hard to come by, to say the least.</p> <p>It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those</p>			

parts of the region that currently have a high concentration of Gypsy and Traveller pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). A high concentration of Gypsy and Traveller pitches could generate some negative sustainability effects that would impact upon the receiving environment, community or economy. A particularly significant effect is worsening social relations between the Gypsy and Traveller community and the settled community in the area, signified for example, in concerns about crime levels.

It is important to consider that many effects felt by the receiving environment and settled community in the vicinity of Gypsy and Traveller pitches may be insignificant or non-existent if pitches are authorised as it can be assumed that authorised pitches are sensitively located. Furthermore, any negative effects associated with new authorised sites have the potential to decrease over time, as it is more likely that there will be the potential for harmonious relationships and cultural understanding to develop between the settled and Gypsy and Traveller communities.

For these reasons, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. However, it is difficult to predict with any certainty whether this will occur as evidence does suggest a strong preference for permanent pitches, with a preference for authorised sites, a resort to privately owned unauthorised sites where an authorised pitch cannot be obtained and a final resort to unauthorised encampments. Gypsies and Travellers are currently more dispersed around the region than is the case for Travelling Showpeople, and so it might be suggested that promoting a *more* balanced dispersal would be something that Gypsies and Travellers find acceptable. The potential for unauthorised pitches remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Gypsy and Traveller pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Gypsies and Travellers within a given area will always be relatively small in comparison to the settled community, even if the number of Gypsies and Travellers in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas

where there are acceptable relations between the Gypsy and Traveller and settled communities. If Option A is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Gypsies and Travellers, namely access to services and opportunities.

Option C promotes working with the Gypsy and Traveller community to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Gypsy and Traveller families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Gypsies and Travellers to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Gypsies and Travellers could become isolated from the rest of the community. Option B could result in particular potential for effects to be felt by individual families.

In conclusion, Option C, developed and implemented well, could achieve a more sustainable outcome for all, but developed and implemented badly, could have damaging effects on the Gypsy and Traveller community.

Recommendations

- 1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.
- 2) Requiring some Gypsies and Travellers to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Gypsy and Traveller community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Renewable Energy

The Government’s draft Climate Change Bill and Energy White Paper set out a framework to reduce carbon dioxide emissions and secure clean and affordable energy supplies. PPS22 guidance states that bringing together resource assessments and criteria-based policies will help to establish targets for regions, and possibly sub-regions, leading to identification of broad areas suitable for renewable energy development.

Draft RSS policies EM15 and EM16 already set out criteria-based policies and targets for the region for renewable energy development. However, RSS needs to include maps of broad areas where the development of particular types of renewable energy may be appropriate, in line with the EIP Panel recommendations.

The specific renewable energy technologies under consideration are:

- Wind (offshore and onshore)
- Solar (photovoltaic, passive solar design and water heating)
- Water (wave, tidal and hydro)
- Biomass (co-firing, waste, crops and wood)
- Geothermal (hot rock and heat pumps)

Link with the submission draft RSS and Proposed Changes:

The bulk of the policy framework for renewable energy contained in the proposed changes will remain unchanged in the Partial Review. The intention is to supplement policy which may be through the introduction of a diagram(s) that will set out broad locations for various renewable energy technologies. It may be necessary to amend policy EM17 in the Proposed Changes to RSS dependent on the recommendations for criteria that emerge from the current regional study on broad locations

SA Objective	Option A) Development of an approach that follows the 'theoretical maximum' assessment	Option B) Development of an approach that follows the 'pragmatic' assessment	Comments
1. To reduce the disparities of sub-regional economic assemblies	0+	0	NWRA has commissioned research to identify broad locations for renewables. If locations for major renewable energy generation schemes such as wind farms fall within areas of relative deprivation within the region then a slight positive impact may be observed on local economies through as a result of the construction and operation of the facilities. It is likely that some renewable energy technologies could benefit rural areas in particular, and so in this sense may act to reduce sub-regional economic disparities. Such effects would be

			more likely under a 'theoretical maximum' scenario.
2. To exploit the growth potential of business sectors	++	+	The green economy has the potential to be a major growth sector in the region. Taking the theoretical maximum approach implies maximum exploitation of the renewables industry, thus generating high levels of investment. The same effect could be associated with a pragmatic approach but it would not be likely to be as significant. The impact of this would also depend greatly upon the renewable energy technologies that would be implemented, and thus depends greatly upon the region's assessment work and consequent options and decisions.
3. To develop and market the region's image	++	+	The use of renewables is likely to benefit the image of the region. A pragmatic approach would need to aim at national and regional targets and may not necessarily go beyond the minimum required, and thus not necessarily boost the region's image above that of others(although image can also be enhanced by clear promotion of sound sustainable energy use policy). A maximum approach would demonstrate a clear regional commitment to environmental protection and forward-thinking. Increasing the use of renewables could also improve the perception of the region by business.
4. To deliver urban renaissance	+	0+	Assuming small-scale, onsite and domestic renewable generation is taken forward based upon research commissioned by the NWRA, a degree of urban renaissance could be delivered in terms of housing quality, local pride and environmental quality. A maximum approach is more likely to include urban renewables (such as microrenewables) than a pragmatic approach, which might put more emphasis on exploiting offsite, large-scale and/or rural renewables.
5. To deliver rural renaissance	+	0+	There is the potential for some large scale renewables schemes to be located in rural areas. However, it is important to consider that this represents external investment that would not necessarily support internal regional diversification and strengthening of rural economies. There is also the potential for these options to result in a local demand for biomass production, should policy promote electricity generation from biomass. This could have knock-on effects in terms of the rural agricultural economy, although the significance of such effects is highly uncertain. Dependent upon ongoing research, a maximum approach may be more likely to include rural renewables than a pragmatic approach.
6. To secure economic inclusion	+	0+	Renewables can create new business opportunities and might, in particular, create opportunities for business start-ups and small businesses. Maximum exploitation of renewable energy potential should see new jobs created ranging from high skilled to low

			skilled.
7. To develop and maintain a healthy labour market	0+	0	Promoting renewables will have no direct effects on skills or education in the region, although if the renewables industry attracts high tech business and skilled workers, then there could be indirect positive effects as a result of raising the image of the region in terms of this type of business.
8. To reduce social exclusion	*	*	
9. To reduce the need to travel, improve choice of use and use of sustainable transport modes	0?	0?	It is not thought that RSS policy can have a significant effect on the uptake of biofuels for private cars, although there might be some potential for a maximum approach to increase the likelihood of the public transport fleet being run on biofuels. Another consideration is the transport of raw fuels for heat and electricity generation. If energy from biomass is heavily promoted by a maximum approach then transport of the raw material will be an important consideration.
10. To improve health and mental health and reduce health inequalities	0?	0?	Supporting renewable energy will provide a clear message of intent to address and adapt to climate change. This is assuming greater importance as a public health issue. Also, the NHS has a large estate, is a large consumer of energy and could be a valuable partner in this policy. As described above developing expertise in renewable energy will create employment. This will be beneficial for people in this sector. We note that it is likely to be entrepreneurial and experimental so may not provide supportive working environments. Regional support for these enterprises and healthy working environments will be important.
11. Improve access to good quality affordable and resource efficient housing	-?	0?	It is conceivable that stringent requirements on the incorporation of microrenewables may discourage developers from coming forward with proposals for new development in the region. The effect might be to discourage the building of affordable residences. However, effects are uncertain as requirements for the sustainable design and construction of new housing will be heavily dependent on other policy
12. To reduce crime, disorder and the fear of crime inequalities	*	*	
13. To enable groups and communities to contribute to decision making	*	*	

<p>14. To develop strong and positive relationships between people from different backgrounds and communities</p>	*	*	
<p>15. To improve access to basic goods, services and amenities for all groups</p>	*	*	
<p>16. To protect, enhance and manage the Region’s rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.</p>	-?	0-	<p>The location of renewables could impact on environmental and cultural/heritage assets, particularly in rural locations. The impact will vary considerably depending on the technology being employed. Wind farms, for example, have specific location and scale requirements, and by many are seen as a visual intrusion. If the maximum amount of renewable potential is pursued, a significant negative impact on this SA Objective could occur.</p> <p>Assuming the pragmatic approach is taken to meeting minimum renewables requirements and the diversity of technology is available, then a negative impact could potentially be avoided. It may be the case, however, that in order to meet minimum renewables requirements, if the diversity of technology and spatial options are limited in 2020, then a negative impact could still occur under the pragmatic option.</p> <p>Effects against this SA Objective will largely depend upon the assessment of broad locations and spatial detail.</p>
<p>17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region</p>	-	0-	<p>There is potential for wind farms to impact on the visual integrity of landscapes within AONBs and other important landscapes. The location of renewables should not impact directly on biodiversity sites protected by law, but there is potential for more indirect effects on the region’s biodiversity resource as a result of changes to species behavioural and dispersal patterns as well as the direct loss of non-protected habitat that plays an important role in ensuring the health of biodiversity and ecosystems at the landscape scale.</p> <p>Public opinion is divided as to the aesthetics of renewable options, such as wind turbines and changing fields to unfamiliar biomass crops. Pursuing the theoretical maximum as an option is more likely to have a strong impact on the region, particularly in rural areas. A pragmatic approach should give due consideration to these factors, but availability of technologies and locations may inevitably result in at least some negative impact.</p> <p>It is possible that landscape impacts could act in combination with other drivers of land-use change to reduce the distinctiveness of the region’s landscapes and therefore reduce understanding and ‘access’ to landscapes.</p>

18. To protect and improve local environmental quality	0	0	There are unlikely to be any significant effects other than as a result of changes to the aesthetic of local townscapes, which will be highly subjective and is also considered under the assessment against another SA Objective.
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	-	0	As stated in SA Objective 17 some large scale renewables options, particularly wind turbines, can have an effect on protected species and the viability of protected habitats.
20. To protect and improve the quality of inland and coastal waters	0+	0	Renewables should not impact upon the quality of inland or coastal waters (offshore wind farms are not taken in to account by these options), and should have less impact on water quality than conventional means of energy generation (e.g. nuclear or coal-fired plants). For example, renewables with negligible heat generation or CHP recapturing heat from power plants, as an alternative to conventional power plants pumping excess heat in to water sources.
21. To protect and improve air quality	0	0	<p>Promotion of renewables will lead to more efficient use of fossil fuels and so less air pollution entering the atmosphere. However, it is important to remember that effects will only be significant if it can be shown that changes to air quality will lead to effects on human health or ecosystems.</p> <p>Promotion of micro-renewables in urban areas is unlikely to have a significant effect on air quality in such areas. There can be localised air quality effects associated with CHP that burns biomass, but such effects can invariably be adequately mitigated for at the project level.</p>
22. To restore and protect land and soil	0	0	If energy from biomass is heavily promoted by a ‘theoretical maximum’ approach, this could have the effect of creating a demand to switch productive agricultural land to growing biofuels. In general any effects on land or soil are uncertain and are not likely to be significant.
23. To mitigate and adapt to climate change	++?	+	Renewable energy technologies by 2020, if properly developed, should contribute to mitigation and adaptation to climate change, by emitting less (or even zero) greenhouse gases. Utilising the maximum theoretical potential for renewables should have a greater effect than a pragmatic approach, but a pragmatic approach will have the benefit of taking in to account the actual likelihood of technologies being available, therefore mitigating the potential misuse of undeveloped technologies with unknown costs and benefits.

<p>24. To ensure the prudent use of natural resources and the sustainable management of existing resources</p>	<p>+++?</p>	<p>+</p>	<p>See assessment against SA Objective 23</p>
<p>25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources</p>	<p>++</p>	<p>+++?</p>	<p>Both options seek to increase renewable energy use, one to maximum potential, and the other option a more ‘pragmatic approach’, which could equally suggest optimum use of renewable energy and sound policy to minimise the requirement for energy use and promote efficiency. It would be important to ensure the theoretical maximum approach also promotes efficient use.</p>
<p>26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery</p>	<p>+++?</p>	<p>+</p>	<p>Dependent upon the findings of the NWRA assessment of viable renewable energy technologies for 2020 and broad locations, a positive impact of these options may be the promotion of energy from waste.</p>
<p>Summary</p>	<p>A theoretical maximum approach performs well against the following SA Objectives:</p> <ul style="list-style-type: none"> 2) To exploit the growth potential of business sectors 3) To develop and market the region’s image 4) To deliver urban renaissance 5) To deliver rural renaissance 6) To secure economic inclusion 23) To mitigate and adapt to climate change 24) To ensure the prudent use of natural resources and the sustainable management of existing resources 25) To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources 26) To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery 		

	<p>A theoretical maximum approach performs poorly, in comparison to a more pragmatic approach, when assessed against the following SA Objectives:</p> <ul style="list-style-type: none"> 11) Improve access to good quality affordable and resource efficient housing 16) To protect, enhance and manage the Region’s rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value. 17) To protect and enhance the biodiversity, local character and accessibility of the landscape across the region 19) To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity <p>It is important to realise that, although a theoretical maximum approach has been shown to result in greater benefits when assessed against a number of SA Objectives, in practice a theoretical maximum approach may be more difficult to implement and may necessitate taking greater risk. In particular, maximising renewable energy generation could result in less emphasis being placed on ensuring a diverse energy mix, which might result in energy supplies being less secure. Much will depend upon the exact definition of maximum and pragmatic, and as a result there is a great deal of uncertainty in the prediction of effects at this stage. Drawing on the above assessment and summary, it is advisable that a pragmatic approach (Option B) is pursued. However, it will be important that a pragmatic approach can demonstrate that it is still ambitious, with targets, locations and feasible renewable energy technologies clearly outlined. A pragmatic approach need not aim for minimum renewable energy targets, but for the best energy mix for the whole region. This might include low carbon energy sources such as clean coal and CHP should research show this to be a more appropriate option than renewables.</p> <p>A pragmatic approach must also consider what is pragmatic given a scenario of increasing energy needs and increasing need to mitigate for climate change. This reinforces the fact that a pragmatic approach must be ambitious, and far-sighted.</p>
<p>Recommendations</p>	<ul style="list-style-type: none"> 1) Any approach must be complemented by a stringent suite of policies tackling energy demand alongside sustainable energy generation. 2) The SA will need to be backed up with research commissioned in December 2007 assessing future energy demand, progress against renewable energy targets and broad locations for (but not limited to) the renewable energy technologies under consideration.

Overall Housing Provision

The Housing Green Paper sets out explicit targets for a significant increase in housebuilding across the Country – delivering 240,000 new houses per annum by 2016, and a total of 3 million new homes to be delivered by 2020. The overall level of housing provision set out in the RSS needs to be re-examined in light of this agenda.

Recent ministerial decisions in other regions, most notably the West Midlands where further work has been commissioned to look at the potential to increase the proposed housing provision figures above the level included in the draft RSS submitted to Government, is a clear signal of the commitment of central Government to achieving those targets.

The Government has also made clear that figures presented in RSS documents should no longer be seen as maximum targets or ceilings. We have seen this reflected most recently in the North West in the proposed changes to RSS published by the Secretary of State in March 2008.

Finally in line with the Housing Green Paper the overall level of housing provision will need to be made within the context set by the advice to be provided to central Government by the National Housing and Planning Advice Unit (expected May 2008). This advice will focus on the level of housebuilding required to stabilise market affordability.

As well as considering overall housing provision, the options set out below also consider rural housing provision. Affordable Rural Housing Commission and the Council for Rural Communities have raised concerns that Regional Spatial Strategies have failed to give proper consideration to the need for the provision of sufficient rural housing (affordable and market) to address the needs of rural communities. The Government is also currently establishing rural affordable housing targets for each region. To address these issues an alternative spatial distribution is proposed in this Partial Review. This has been prepared with reference to the urban / rural nature of each sub-region using DEFRA's urban – rural classification at middle super output area (MSOA) level, and an indicator of affordability (ratio of lower quartile earnings to lower quartile house prices).

SA Objective	Option A1.1) at least 23,111 dwellings per annum Continue existing spatial distribution	Option A1.2) at least 23,111 dwellings per annum Revised spatial distribution	Option A2.1) at least 28,000 dwellings per annum Continue existing spatial distribution	Option A2.2) at least 28,000 dwellings per annum Revised spatial distribution	Option A3.1) at least 32,000 dwellings per annum Continue existing spatial distribution	Option A3.2) at least 32,000 dwellings per annum Revised spatial distribution	Comments
1. To reduce the disparities of sub-regional economic assemblies	+	++	++	++	+++	+++	The North West performs at below the UK average in terms of its GVA. However, within the region there are contrasting areas of economic performance with the Cheshire sub-region performing at approximately 26% above the regional average. The other sub-region performing above the regional average is Greater Manchester

							<p>(which has seen the most significant increases in GVA since 1995). Merseyside and Cumbria are the most disadvantaged, in terms of economic performance, at around 82% of the regional average. Lancashire and Cumbria's relative share of the region's GVA has declined since 1995.</p> <p>It is important to reduce existing disparities, but it is also important to build on existing strengths, and ensure that economic benefits from one part of the region that is performing well spread to other less well performing parts of the region.</p> <p>New housing will be important to support a growing economy, assuming that there is potential for economic growth at this scale (i.e. economic growth can keep in check with housing growth). Increasing housing in rural areas could have the effect of reducing sub-regional economic disparities. However, it will be important that increased housing in more rural sub-regions is still directed to cities and towns so that they can act as centres as growth.</p>
<p>2. To exploit the growth potential of business sectors</p>	<p>+</p>	<p>?</p>	<p>++</p>	<p>+</p>	<p>+++</p>	<p>++</p>	<p>Since the 2002 figures, the North West has experienced a consistent rise in GVA per capita (approximately 14%). The NE has experienced a 18% increase, with Y&H (13%), EM (15%) and WM (13%).</p> <p>The RSS should support the economic development of growth sectors including supporting the transition to an increasingly knowledge based economy. New housing will be important in terms of retaining and attracting skilled workers.</p> <p>In terms of the spatial distribution of housing, it is likely that focusing housing around the major conurbations is likely to be effective in supporting the growth of key business sectors.</p>

<p>3. To develop and market the region's image</p>	?	?	?	?	?	?	<p>High quality and affordable housing will be an important element of what makes the image of the region attractive to business. However, the natural environment and landscapes of the region will also be an important element of what makes the image of the region attractive. If we assume that higher levels of housing would have greater potential to impact on landscapes and the natural and cultural environment, then it follows that the effects of all options must be scored as uncertain.</p>
<p>4. To deliver urban renaissance</p>	+	?	++	+	+++	++	<p>Unemployment is still a major issue in some parts of the region. The RSS should seek urban renaissance and economic regeneration. Key to such an approach will be a twin approach of delivering housing and employment development in close spatial proximity.</p>
<p>5. To deliver rural renaissance</p>	?	?	?	?	?	?	<p>Providing more housing, and particularly more housing in rural areas is likely to be a key element of an integrated approach to rural renaissance. However, protection of the environment and the distinctiveness and diversity of rural landscapes and communities is a key aspect of enabling a sustainable approach to rural diversification. If it is assumed that high levels of housing in rural areas have the potential to alter the receiving environment and communities, then effects must be predicted as uncertain.</p>
<p>6. To secure economic inclusion</p>	+	?	++	+	+++	++	<p>At a local authority level, Liverpool and Manchester have the lowest percentage of the working age population in employment. The percentage of benefits claimants in the NW has increased overall (2.2 – 2.6), with only Manchester and Cumbria experiencing a decrease. Economic inclusion is clearly a major issue within the most deprived urban areas of the region. Any</p>

							approach that supports the regeneration of such areas is likely, therefore, to have benefits in terms of economic inclusion.
7. To develop and maintain a healthy labour market	+	?	++	+	+++	++	<p>The percentage of people achieving NVQ Level 4 or above varies considerably through the region. Within the region, local authorities with the lowest performance are Knowsley (12.4%), Halton whilst South Lakeland and Ribble Valley perform strongly at 39.8 and 35.2% respectively.</p> <p>In areas that have relatively low performance in term of levels of qualifications it might be that new housing can play an important role in economic regeneration by attracting the higher skilled workers that are currently lacking.</p>
8. To reduce social exclusion	+	?	++	+	+++	++	<p>The North West Region experiences a high level of deprivation. According to the Indices of Deprivation compiled by the Department for Communities and Local Government (CLG) the Region comes second to the North East in terms of multiple deprivation with 31.8% of Lower-layer Super Output Area (LSOA) in the bottom 20% for all of England. In particular, 9 of the top 10 worst performing LSOAs are found in the region. The Manchester and Liverpool areas experience particular levels of deprivation.</p> <p>A significant proportion of BME groups in the North West live in areas of deprivation. Given the high levels of deprivation in the region, this is a significant implication for the North West region, in terms of tackling inequality for BME groups.</p> <p>New housing will be a key element in an integrated approach to the regeneration of deprived areas.</p>
9. To reduce the need to travel improve choice of use and use of	0-	-?	-?	-	-	--	In terms of the % of people who use the private car as their usual means of travelling to work it is

sustainable transport modes							<p>notable that the majority of regions have experienced a reduction whereas the North West has remained the same.</p> <p>The average kilometre distance travelled to work in the north west is 12.46 km and this compares favourably with the UK average of 13.31 km. Within the region distances are greater in the more rural sub-regions, the highest being Cumbria (15.33) and Cheshire (15.13)</p> <p>The RSS should encourage the use of more sustainable forms of transport through land-use planning policies, and consequently seek to achieve a reduction in car journeys. New development should be located in locations that are accessible to all modes of transport. It is not clear that the total level of housing will affect the need to travel or affect the use of sustainable transport modes. However, it will increase the total amount of traffic on the roads in the region. What is clearer is that directing housing to more rural areas could have negative effects in terms of this SA Objective.</p>
10. To improve health and mental health and reduce health inequalities	+	?	++	+	+++	++	<p>In 2001 67% of the region's population considered themselves to be in good health and it is slightly below the England and Wales average of 69%. Life expectancy is generally lowest in the region's metropolitan and industrial authorities. By contrast life expectancy is generally higher in the region's more rural districts of Cumbria, Lancashire and Cheshire.</p> <p>Access to adequate housing is a significant determinant of good health. Increased availability of housing, targeted at the more urban areas in the region, has the potential to reduce inequalities in health.</p>

							<p>Policies on provision of housing will need to link in with regeneration policies and ensure that the private car is discouraged, that high quality employment is available, that the need to travel is minimised and that the new developments have high quality public transport and good connectivity. Social cohesion should be encouraged and regeneration policies should not depend upon a night-time economy.</p>
<p>11. Improve access to good quality affordable and resource efficient housing</p>	<p>+</p>	<p>?</p>	<p>++</p>	<p>+</p>	<p>+++</p>	<p>++</p>	<p>The RSS should seek to meet all housing needs, including the need for increased affordable housing, of diverse groups in the region, including disabled people, BME people, and other vulnerable groups, including families with children, single parent families, homeless households and older people, recognising the existing poor housing conditions experienced by BME groups, limited housing choices of disabled people and the problems of affordability for disadvantaged and low income groups.</p> <p>The percentage of homes in the region that are unfit for use is decreasing and is beginning to compare more favourably with the national figure of 2.5%. Percentages within the region vary substantially with Chester having a rate of 2.7% to Blackburn with Darwen of 35% (2003).</p> <p>80% of households within the region have incomes below the 'affordability' threshold (house prices more than three times average income). This percentage increases to 86% in Merseyside and 87% in Cheshire and declines to 76% and 77% in Lancashire and Greater Manchester.</p> <p>There is likely to be some relationship between increasing housebuilding and improving the affordability of market housing in the region, although the relationship is not as strong and linear as one might expect as market affordability</p>

							<p>is affected by a range of complex factors. Perhaps the greatest effect that new housebuilding can be certain to have in terms of this SA Objective is the effect of alleviating the most extreme housing need through increasing the number of affordable homes that will be built (assuming that delivery of affordable homes will be a requirement on developers of market housing).</p> <p>There are priority housing needs associated with both the urban and rural areas of the region. However, in terms of the deprivation and other inequalities that are fostered by the inability to access adequate housing, it might be that the greatest need can be shown to exist in more urban areas. None-the-less, this SA Objective is concerned with housing need only, whilst other SA Objectives deal with issues of social inclusion and equality. Therefore, it is uncertain whether an approach that gives greater emphasis to rural or urban areas will have a greater benefit in terms of this SA Objective.</p>
12. To reduce crime, disorder and the fear of crime inequalities	0	0	0	0	0	0	<p>It is not thought that these options can be predicted to have a direct effect in terms of this SA Objective, although there will be indirect effects on crime, should increased housing have an effect on local communities or the health of the economy / local economies.</p>
13. To enable groups and communities to contribute to decision making	*	*	*	*	*	*	<p>No effect</p>
14. To develop strong and positive relationships between people from different backgrounds and communities?	+	?	++	+	+++	++	<p>It is known that the majority of the BME population is concentrated in the urban areas of the region and suffer disproportionately from problems of poor access to adequate housing and deprivation</p>

							<p>more generally. It is likely that housing directed to these areas could lead to the creation of mixed communities where there is greater potential for the development of positive relationships between people from different backgrounds.</p>
<p>15. To improve access to basic goods, services and amenities for all groups</p>	<p>?</p>	<p>+</p>	<p>+</p>	<p>++</p>	<p>++</p>	<p>+++</p>	<p>If it is assumed that housing will only come forward where there is adequate access to basic goods and services then it can be assumed that housing will not worsen existing conditions in terms of this SA Objective.</p> <p>In rural areas there may be settlements that are unable to support basic services and facilities, and as a result people may have to rely on travelling considerable distances by private car to access to basic goods, services and amenities. It is likely that well targeted housing in rural areas has the potential to support the development and regeneration of rural services centres and vital villages that are able to support basic services and facilities.</p>
<p>16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.</p>	<p>+?</p>	<p>?</p>	<p>+?</p>	<p>-?</p>	<p>?</p>	<p>-</p>	<p>261 square miles are designated national park, against an England figure of 994 equating to 18% of the total land area, compared to an England figure of 7%. 11% of land is designated as Areas of Outstanding Natural Beauty and a further 18% protected from inappropriate development through Green belt designation (compared with figures for England of 16% and 13% respectively)..</p> <p>It is likely that it will be more difficult for a higher level of housing to be delivered without the region's rich diversity of cultural and built environmental and archaeological assets being impacted.</p> <p>In terms of 'rural/urban' question, it generally accepted that rural towns and villages are more susceptible to development causing significant</p>

							<p>adverse change to built and cultural heritage. Conversely, urban concentration of housing is often promoted due to its ability to keep historic urban centres well-used and vital. However, it is important to realise that all historic urban centres will have limits to the amount of new development and additional pressure from users that can be sustainably absorbed.</p>
<p>17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region</p>	<p>++</p>	<p>?</p>	<p>+</p>	<p>-?</p>	<p>?</p>	<p>-</p>	<p>The percentage of SSSIs in the region in favourable condition is increasing, but there is still need for further increase if the government target of 95% of SSSIs in favourable condition by 2010 is to be met.</p> <p>It is likely that it will be more difficult for a higher level of housing to be delivered without the region's valued biodiversity and landscape assets coming under increased pressure.</p> <p>In terms of the 'rural/urban' question, there is clearly greater potential for direct negative impacts on biodiversity and landscape to occur should a greater proportion of housing be directed to rural areas. However, there might also be indirect benefits to landscape and biodiversity associated with maintaining and increasing access to and understanding of semi-natural habitats and landscapes.</p>
<p>18. To protect and improve local environmental quality</p>	<p>+</p>	<p>?</p>	<p>+</p>	<p>?</p>	<p>+</p>	<p>?</p>	<p>Issues of poor environmental quality are likely to be more prevalent in urban area, and so it is likely that higher amounts of housing directed to urban areas could result in the creation of high quality urban neighbourhoods in the place of more run-down areas.</p> <p>Local environmental quality in rural areas is likely, in general, to be higher, but none-the-less is still sensitive to change. There is unlikely to be any benefit to local environments associated with an</p>

							<p>approach that focuses housing in rural areas, although negative effects cannot be predicted with any certainty.</p>
<p>19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.</p>	<p style="text-align: center;">+</p>	<p style="text-align: center;">?</p>	<p style="text-align: center;">?</p>	<p style="text-align: center;">-?</p>	<p style="text-align: center;">-?</p>	<p style="text-align: center;">-</p>	<p>Development in rural areas is likely to increase the indirect pressures on important habitat as a result of such things as the fragmentation of ecological networks and also increased recreational pressures. Furthermore, development in general, and in the countryside in particular, can increase competition for water resources with the natural environment.</p> <p>It is assumed that development in urban areas has the potential to increase the ecological value of these areas through designing in ecological networks and also by increasing access to and understanding of biodiversity.</p> <p>However, in general, it must be assumed that greater housing pressure will mean that there is the potential for planning to give less weight to biodiversity considerations.</p>
<p>20. To protect and improve the quality of inland and coastal waters</p>	<p style="text-align: center;">?</p>	<p style="text-align: center;">-?</p>	<p style="text-align: center;">?</p>	<p style="text-align: center;">-?</p>	<p style="text-align: center;">-?</p>	<p style="text-align: center;">-?</p>	<p>The biological and chemical water quality of rivers in the region has been increasing consistently since 2000, although the performance of both indicators is still worse than the average for England.</p> <p>It is assumed that new housing will have minimal impact on water quality, as water quality is affected more by other land management decisions.</p> <p>Flood risk, however, must be considered a key constraint when determining what level of housing and what spatial distribution should be promoted in the region. Increasing the level of housing will make it more difficult to locate housing outside of flood risk areas (taking account of increased flood risk in the future under a climate change</p>

							<p>scenario). The Environment Agency has made an increasing number of objections to development in the region on the basis of flood risk in recent years (235 objections in 2007). However, it must be assumed that housing can avoid flood risk areas. What is more certain is that housing and associated development has the potential to alter catchments in such a way that off-site flood risk will increase. The effect of new development on the flow of water through catchments might be greater in rural areas. The reason for this is that in more urban areas measures will be taken to ensure good and sustainable drainage, because the result otherwise will be flash-flooding. However, in more rural areas the flooding effects are more likely to be felt off-site and so there may be less incentive to design in sustainable drainage systems.</p>
<p>21. To protect and improve air quality</p>	<p>-?</p>	<p>?</p>	<p>-</p>	<p>-?</p>	<p>--</p>	<p>-</p>	<p>The level of air pollution in the North West – in terms of numbers of days exceeding air quality levels <i>and</i> number of Air Quality Management Areas (AQMA) designated – have both increased since 2005. The AQMAs are focused in the Greater Manchester and Merseyside sub-regions but including north Lancashire and south Cumbria. The vast majority of the Air Quality Management Areas are seeking to control the emissions of nitrogen dioxide and particulate matter from traffic and are designated around the major road networks. The Environment Agency provide figures showing that traffic in the region increased by 15% from 1995-2005 causing air quality problems in major cities. Housing growth concentrated in urban areas will increase car traffic and congestion, and as a result will be likely to exacerbate existing air quality problems. Although air quality in rural areas might</p>

							<p>decrease as a result of increased development and associated traffic and congestion, it is less likely that air quality will decrease to a level where there will be implications for human health (although ecological health in rural areas is another important consideration).</p>
<p>22. To restore and protect land and soil</p>	<p>++</p>	<p>-</p>	<p>+</p>	<p>--</p>	<p>+?</p>	<p>--</p>	<p>Of the total land area within the region, 3.5% is classified as derelict land or buildings compared to an English average of 1.7% (2005). Previously developed vacant land in the region declined from 1.8% in 1998 to 0.7% in 2002. The region has the second highest amount of land that is unused or may be available for development at 7.4% after the north east at 7.9%. The English average is 5.5%.</p> <p>In response to the amount of derelict land available, the proportion of housing built on previously developed land has increased from 55% in 1991 to 71% in 2002/3. This is the second highest of all the English regions behind London.</p> <p>As might be expected, new dwelling densities are highest in the urban authorities. The 2003/04 figures reveal that over half of all new dwellings constructed in both Greater Merseyside and Greater Manchester were built at densities of greater than 50 dwellings per hectare. In both instances this represents a marked increase on the previous year. These increases most likely reflect the widespread construction of flats and apartments suitable for city/town centre living in the two core cities.</p> <p>In the North West there is clearly significant potential to make use of previously developed land and to build at high densities. It will be important that development is concentrated on the existing major urban areas if this potential is to be realised. It is unclear whether the higher growth</p>

							<p>scenarios proposed would have the potential to exceed the capacity of available previously developed land in the region, and would therefore require a greater amount of greenfield development.</p>
<p>23. To mitigate and adapt to climate change</p>	?	?	-?	-?	-?	-?	<p>The performance of the North West Region is variable, with some gains in mitigation to climate change through the reduction of energy used, set against a background of increased emissions from the transport sector.</p> <p>New housing will be built to high sustainability standards and so, assuming that new build will over time replace the older and more unfit housing stock, it is possible that overall energy savings can be predicted. However, it is also important to consider that new housing may be built to cater for smaller household sizes, which will result in greater energy use per capita.</p> <p>The effect of new housing in terms of mitigating for climate change is debatable and not strong. What is clearer is that the quantum of new development proposed will create challenges in terms of ensuring that the region is able to adapt to climate change. It will be important that decisions taken now do not limit the options available in the future.</p> <p>Flood risk will increase in the future as a result of climate change, as considered under the assessment of SA Objective 20. A further important consideration is the effect that climate change will have on water resources as temperatures rise and rainfall patterns alter.</p> <p>The demand for water will increase as new developments are built and completed. The growing population will also create a burden on existing water supplies. Added to this will be the pressure on current waste treatment and sewage</p>

							<p>facilities. Furthermore, the Habitats Regulations Assessment of the Submission Draft RSS identified that current abstraction levels are already adversely affecting at least eight European sites in the region.</p> <p>A further important point is that natural habitats and ecosystems more generally will need space available and the appropriate conditions to shift and adapt with the changes to the environments on which they depend. Should housing and development constrain the ability of habitats and species to adapt to a changing environment, then this could rapidly lead to an unsustainable situation and the collapse of ecosystems, with ramifications in terms of both the natural world itself and the functions that it provides for the humans.</p>
<p>24. To ensure the prudent use of natural resources and the sustainable management of existing resources</p>	<p>?</p>	<p>?</p>	<p>-?</p>	<p>-?</p>	<p>-</p>	<p>-</p>	<p>New housing will be built to high sustainability standards and so, assuming that new build will over time replace the older and more unfit housing stock, it is possible that overall energy savings can be predicted. However, it is also important to consider that new housing may be built to cater for smaller household sizes. The effects of increased population and shifting housing sizes will affect the North West's use the natural resources on a number of fronts. It has been calculated that dwellings of lower occupancies consume more natural resources per capita than those with higher occupancy levels. The projected growth in housing in the North West and the nature of its occupancy may create a non-linear growth in the demand for natural resources and waste production. The availability of water will have further repercussions in terms of impacts on biodiversity and human health. Further, it may act as a constraint on development with economic</p>

							implications through water shortages and sanitation.
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	+	+?	++	++?	+++	+++?	New housebuilding is likely to facilitate the promotion of local renewable generation as this is easiest designed in from the outset of development, rather than retrofitted. It is also likely that some renewable or low carbon energy generation technologies, such as community heating or Combined Heat and Power (CHP) schemes are likely to be more feasible in urban areas where development will be of a higher density, but the effect in terms of the 'rural/urban' distinction of these options is not clear.
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	?	?	-?	-?	-	-	Although there is little data available to suggest what capacity exists in the region to sustainability manage further waste generation, it is likely that higher growth scenarios will exacerbate existing issues in terms of the sustainable management of waste.
Summary	<p>The assessment against the following SA Objectives found that increasing housing will lead to benefits, and that benefits will be maximised by an approach that concentrates housing in urban areas:</p> <ul style="list-style-type: none"> 2) To exploit the growth potential of business sectors 4) To deliver urban renaissance 6) To secure economic inclusion 7) To develop and maintain a healthy labour market 8) To reduce social exclusion 10) To improve health and mental health and reduce health inequalities 11) Improve access to good quality affordable and resource efficient housing 14) To develop strong and positive relationships between people from different backgrounds and communities? 						

25) To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources

A number of these potential benefits stem from the fact that there are areas of economic and social deprivation in the region, much of which can be found in the more urban areas, and new housing will be a key component of the regeneration of such areas. New housing will also be important to support a growing economy, and it is likely that focusing housing around the major conurbations is likely to be effective in supporting the growth of key business sectors.

Rural communities in the region suffer a range of sustainability issues that can be at least partially addressed by an approach of directing new housing to these areas. However, the assessment has found that the benefits in terms of a number of SA Objectives might be greater should social and economic issues be met as a priority in urban rather than rural areas. This finding works from the assumption that increasing housing in rural areas would lessen the degree to which sustainability issues can be tackled through housing led regeneration in urban areas, although in reality this might not be the case.

The assessment against the following SA Objective found that increasing housing will lead to benefits, and that benefits will be maximised by an approach that promotes housing in rural areas:

15) To improve access to basic goods, services and amenities for all groups

The assessment against the following SA Objectives found that increasing housing will lead to negative effects, but that effects will be minimised by an approach that promotes housing in urban areas:

9) To reduce the need to travel improve choice of use and use of sustainable transport modes

16) To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.

17) To protect and enhance the biodiversity, local character and accessibility of the landscape across the region

19) To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.

20) To protect and improve the quality of inland and coastal waters

22) To restore and protect land and soil

The assessment against the following SA Objective found that increasing housing will lead to negative effects, but that effects will be minimised by an approach that promotes housing in rural areas:

	<p>21) To protect and improve air quality</p> <p>The assessment against the following SA Objective found that increasing housing will lead to negative effects, and that whether housing is focused in urban or rural areas will not have a major influence,</p> <p>23) To mitigate and adapt to climate change</p> <p>24) To ensure the prudent use of natural resources and the sustainable management of existing resources</p> <p>26) To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery</p>
<p>Recommendations</p>	<p>1) It will be important that there is adequate capacity for housing to be delivered outside of the highest risk flood zones.</p> <p>2) It will be important that the offsite effects of flooding are considered as part of new development, not only in urban areas, but also in more rural areas where effects of development might act cumulatively to result in increased flood risk downstream.</p> <p>3) Policies on provision of housing will need to link in with regeneration policies and ensure that the private car is discouraged, that high quality employment is available, that the need to travel is minimised and that the new developments have high quality public transport and good connectivity.</p>

Rural Housing Provision

The Affordable Rural Housing Commission and the Council for Rural Communities have raised concerns that Regional Spatial Strategies have failed to give proper consideration to the need for the provision of sufficient rural housing (affordable and market) to address the needs of rural communities. The Government is also currently establishing rural affordable housing targets for each region. The options set out below seek to consider whether there should be certain requirements for affordable housing depending on the rural nature and size of the settlement.

SA Objective	Option A) Give no indication of the level of housing provision in rural areas	Option B) Give a figure for the level of provision to be made in settlements of less than 10,000 population as part of the overall housing provision figure	Option C) Give a figure for the level of provision to be made in settlements of less than 3,000 population and between 3,000 – 10,000 population as part of the overall housing provision figure.	Comments
1. To reduce the disparities of sub-regional economic assemblies	-	+	++	<p>Within the region there are contrasting areas of economic performance with the Cheshire sub-region performing at approximately 26% above the regional average. The other sub-region performing above the regional average is Greater Manchester (which has seen the most significant increases in GVA since 1995). Merseyside and Cumbria are the most disadvantaged, in terms of economic performance, at around 82% of the regional average. Lancashire and Cumbria's relative share of the region's GVA has declined since 1995.</p> <p>It is important to reduce existing disparities, but it is also important to build on existing strengths, and ensure that economic benefits from one part of the region</p>

				<p>that is performing well spread to other less well performing parts of the region. Increasing housing in rural areas could have the effect of reducing sub-regional economic disparities. However, it will be important that increased housing in more rural sub-regions is still directed to cities and towns so that they can act as centres as growth.</p> <p>Assuming that Option B and Option C would lead to a greater proportion of houses going to rural areas, these options could have the effect of reducing sub-regional economic disparities. Conversely it is assumed that under Option A the majority of housing would go to existing larger towns and cities.</p>
2. To exploit the growth potential of business sectors	+	-	-	<p>The RSS should support the economic development of growth sectors including supporting the transition to an increasingly knowledge based economy. New housing will be important in terms of retaining and attracting skilled workers.</p> <p>In terms of the spatial distribution of housing, it is likely that focusing housing around the major conurbations is likely to be effective in supporting the growth of key business sectors.</p> <p>In terms of this SA Objective it is important that housing is directed to existing urban areas where they will be in close proximity to key employment sites. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.</p>
3. To develop and market the region's image	-	+	+	<p>The natural environment and landscapes of the region will be an important element of what makes the image of the region attractive. We assume that higher levels of housing in rural areas would have greater potential to impact on landscapes and the natural and cultural environment.</p> <p>It is likely that housing directed to existing major towns and cities will be most likely to be integrated with existing development in such a way that image is maintained or improved. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.</p>
4. To deliver urban renaissance	+	-	-	<p>Unemployment is still a major issue in some parts of the region. The RSS should seek urban renaissance and economic regeneration. Key to such an approach will be a twin approach of delivering housing and employment development in close spatial proximity.</p> <p>Housing directed to urban areas will be an important element of urban renaissance.</p>

				It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.
5. To deliver rural renaissance	-	+	++	<p>Providing more housing, and particularly more housing in rural areas, is likely to be a key element of an integrated approach to rural renaissance. However, protection of the environment and the distinctiveness and diversity of rural landscapes and communities is a key aspect of enabling a sustainable approach to rural diversification. If it is assumed that high levels of housing in rural areas have the potential to alter the receiving environment and communities, then effects must be predicted as uncertain.</p> <p>Housing directed to rural areas will be an important element of rural renaissance. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.</p>
6. To secure economic inclusion	?	?	?	<p>At a local authority level, Liverpool and Manchester have the lowest percentage of the working age population in employment. The percentage of benefits claimants in the NW has increased overall (2.2 – 2.6), with only Manchester and Cumbria experiencing a decrease.</p> <p>Economic inclusion is clearly a major issue within the most deprived urban areas of the region. Any approach that supports the regeneration of such areas is likely, therefore, to have benefits in terms of economic inclusion.</p> <p>Housing to both urban and rural areas will be an important element of tackling economic exclusion.</p>
7. To develop and maintain a healthy labour market	+?	-?	-?	<p>The percentage of people achieving NVQ Level 4 or above varies considerably through the region. Within the north west region local authorities with the lowest performance are Knowsley (12.4%), Halton whilst South Lakeland and Ribble Valley perform strongly at 39.8 and 35.2% respectively.</p> <p>In areas that have relatively low performance in term of levels of qualifications it might be that new housing can play an important role in economic regeneration by attracting the higher skilled workers that are currently lacking.</p> <p>It is possible that skilled labour will be most in need in the major urban areas, and so housing will be important to attract and retain such people in these areas. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing</p>

				<p>would go to existing larger towns and cities.</p>
<p>8. To reduce social exclusion</p>	<p>+?</p>	<p>-?</p>	<p>-?</p>	<p>9 of the top 10 worst performing LSOA nationally in terms of Multiple Deprivation are found in the region. The Manchester and Liverpool areas experience particular levels of deprivation.</p> <p>A significant proportion of BME groups in the North West live in areas of deprivation. Given the high levels of deprivation in the region, this is a significant implication for the North West region, in terms of tackling inequality for BME groups.</p> <p>New housing will be a key element in an integrated approach to the regeneration of deprived areas. Housing in both urban and rural areas will be an important element of reducing social exclusion. It is likely that social exclusion might be most severe in urban area.</p>
<p>9. To reduce the need to travel improve choice of use and use of sustainable transport modes</p>	<p>+</p>	<p>-?</p>	<p>-?</p>	<p>In terms of the % of people who use the private car as their usual means of travelling to work it is notable that the majority of regions have experienced a reduction whereas the North West has remained the same.</p> <p>The average kilometers distance travelled to work in the North West is 12.46 km and this compares favourably with the UK average of 13.31 km. Within the region distances are greater in the more rural sub-regions, the highest being Cumbria (15.33) and Cheshire (15.13)</p> <p>The RSS should encourage the use of more sustainable forms of transport through land-use planning policies, and consequently seek to achieve a reduction in car journeys. New development should be located in locations that are accessible to all modes of transport.</p> <p>Directing housing to more rural areas could have negative effects in terms of this SA Objective It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.</p>
<p>10. To improve health and mental health and reduce health inequalities</p>	<p>+</p>	<p>-?</p>	<p>-?</p>	<p>Life expectancy is generally lowest in the region's metropolitan and industrial authorities. By contrast life expectancy is generally higher in the region's more rural districts of Cumbria, Lancashire and Cheshire. However, care should be taken when looking at population data at this high level of aggregation; within rural areas there will be pockets of wealth and there will also be pockets of deprivation, poor access to services and isolation.</p>

				<p>This would suggest that prioritising greater specificity in housing provision is a wise approach.</p> <p>Meeting a need for rural housing will ensure that families and communities are not broken up due to lack of access to housing. It will be important to ensure that housing is provided in line with employment opportunities and transport.</p> <p>However, increased housing, targeted at the region's more urban areas, also has the potential to reduce health inequalities. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.</p>
<p>11. Improve access to good quality affordable and resource efficient housing</p>	<p>+</p>	<p>-?</p>	<p>-?</p>	<p>The RSS should seek to meet all housing needs, including the need for increased affordable housing, of diverse groups in the region, including disabled people, BME people, and other vulnerable groups, including families with children, single parent families, homeless households and older people, recognising the existing poor housing conditions experienced by BME groups, limited housing choices of disabled people and the problems of affordability for disadvantaged and low income groups.</p> <p>80% of households within the region have incomes below the 'affordability' threshold (house prices more than three times average income). This percentage increases to 86% in Merseyside and 87% in Cheshire and declines to 76 and 77% in Lancashire and Greater Manchester.</p> <p>There is likely to be some relationship between increasing housebuilding in more rural areas and improving the affordability of market housing in the locality, although the relationship is not as strong and linear as one might expect as market affordability is affected by a range of complex factors.</p> <p>Perhaps the greatest effect that new housebuilding in more rural areas can be certain to have in terms of this SA Objective is the effect of alleviating the most extreme housing need through increasing the number of affordable homes that will be built (assuming that delivery of affordable homes will be a requirement on developers of market housing).</p> <p>There are priority housing needs associated with both the urban and rural areas of the region. However, it might be that the most extreme forms of need can be shown to exist in more urban areas. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely</p>

				that under Option A the majority of housing would go to existing larger towns and cities.
12. To reduce crime, disorder and the fear of crime inequalities	x	x	x	It is not thought that these options can be predicted to have a direct effect in terms of this SA Objective, although there will be indirect effects on crime, should increased housing have an effect on local communities or the health of the economy / local economies.
13. To enable groups and communities to contribute to decision making	x	x	x	No effect
14. To develop strong and positive relationships between people from different backgrounds and communities	+	-?	-?	It is known that the majority of the BME population is concentrated in the urban areas of the region and suffer disproportionately from problems of poor access to adequate housing and deprivation more generally. It is likely that housing directed to these areas could lead to the creation of mixed communities where there is greater potential for the development of positive relationships between people from different backgrounds. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.
15. To improve access to basic goods, services and amenities for all groups	-?	+?	++?	In rural areas there may be settlements that are unable to support basic services and facilities, and as a result people may have to rely on travelling considerable distances by private car to access to basic goods, services and amenities. It is likely that well targeted housing in rural areas has the potential to support the development and regeneration of rural services centres and vital villages that are able to support basic services and facilities. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.	+?	-?	-?	261 square miles are designated national park, against an England figure of 994 equating to 18% of the total land area, compared to an England figure of 7%. 11% of land is designated as Areas of Outstanding Natural Beauty and a further 18% protected from inappropriate development through Green belt designation (England - 16% and 13% respectively). It generally accepted that rural towns and villages are more susceptible to development causing significant adverse change to built and cultural heritage. It is

				<p>assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas.</p> <p>Conversely, urban concentration of housing is often promoted due to its ability to keep historic urban centres well-used and vital. However, it is important to realise that all historic urban centres will have limits to the amount of new development and additional pressure from users that can be sustainably absorbed. It is assumed that under Option A the majority of housing would go to existing larger towns and cities.</p>
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	+	-	-	<p>The percentage of SSSIs in the region in favourable condition is increasing, but there is still need for further increase if the government target of 95% of SSSIs in favourable condition by 2010 is to be met.</p> <p>There is clearly greater potential for direct negative impacts on biodiversity and landscape to occur should a greater proportion of housing be directed to rural areas. However, there might also be indirect benefits to landscape and biodiversity associated with maintaining and increasing access to and understanding of semi-natural habitats and landscapes. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas.</p>
18. To protect and improve local environmental quality	0	0	0	<p>Issues of poor environmental quality are likely to be more prevalent in urban areas, and so it is likely that higher amounts of housing directed to urban areas could result in the creation of high quality urban neighbourhoods in the place of more run-down areas.</p> <p>Local environmental quality in rural areas is likely, in general, to be higher, but none-the-less is still sensitive to change. There is unlikely to be any benefit to local environments associated with an approach that focuses housing in rural areas, although negative effects cannot be predicted with any certainty.</p>
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	+	-	-	<p>Development in rural areas is likely to increase the indirect pressures on important habitat as a result of such things as the fragmentation of ecological networks and also increased recreational pressures. Furthermore, development in general, and in the countryside in particular, can increase competition for water resources with the natural environment. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas</p> <p>It is assumed that development in urban areas has the potential to increase the ecological value of these areas through designing in ecological networks and also by increasing access to and understanding of biodiversity. It is assumed that under</p>

				Option A the majority of housing would go to existing larger towns and cities.
20. To protect and improve the quality of inland and coastal waters	0	0	0	<p>The biological and chemical water quality of rivers in the region has been increasing consistently since 2000, although the performance of both indicators is still worse than the average for England.</p> <p>Flood risk, however, must be considered a key constraint when determining the spatial distribution of housing that should be promoted in the region.</p> <p>The Environment Agency has made an increasing number of objections to development in the region on the basis of flood risk in recent years (235 objections in 2007). However, it must be assumed that housing can avoid flood risk areas.</p> <p>Housing and associated development has the potential to alter catchments in such a way that off-site flood risk will increase. The effect of new development on the flow of water through catchments might be greater in rural areas. The reason for this is that in more urban areas measures will be taken to ensure good and sustainable drainage, because the result otherwise will be flash-flooding. However, in more rural areas the flooding effects are more likely to be felt off-site and so there may be less incentive to design in sustainable drainage systems.</p> <p>However, effects remain uncertain and it is likely that with appropriate mitigation will not be significant.</p>
21. To protect and improve air quality	-?	+?	+?	<p>The level of air pollution in the North West – in terms of numbers of days exceeding air quality levels <i>and</i> number of Air Quality Management Areas (AQMA) designated – have both increased since 2005. The AQMAs are focused in the Greater Manchester and Merseyside sub-regions but including north Lancashire and south Cumbria. The vast majority of Air Quality Management Areas are seeking to control the emissions of nitrogen dioxide and particulate matter from traffic and are designated around the major road networks. The Environment Agency provides figures showing that traffic in the region increased by 15% from 1995-2005 causing air quality problems in major cities.</p> <p>Housing growth concentrated in urban areas will increase car traffic and congestion, and as a result will be likely to exacerbate existing air quality problems. Although air quality in rural areas might decrease as a result of increased development and associated traffic and congestion, it is less likely that air quality will decrease to a level where there will be implications for human health (although ecological health in rural areas is another important consideration). It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to</p>

				existing larger towns and cities.
22. To restore and protect land and soil	+?	-?	-?	<p>Of the total land area within the region, 3.5% is classified as derelict land or buildings compared to an English average of 1.7% (2005). Previously developed vacant land in the region declined from 1.8% in 1998 to 0.7% in 2002. The region has the second highest amount of land that is unused or may be available for development at 7.4% after the north east at 7.9%. The English average is 5.5%. In response to the amount of derelict land available, the proportion of housing built on previously developed land has increased from 55% in 1991 to 71% in 2002/3. This is the second highest of all the English regions behind London.</p> <p>As might be expected, new dwelling densities are highest in the urban authorities. The 2003/04 figures reveal that over half of all new dwellings constructed in both Greater Merseyside and Greater Manchester were built at densities of greater than 50 dwellings per hectare. In both instances this represents a marked increase on the previous year. These increases most likely reflect the widespread construction of flats and apartments suitable for city/town centre living in the two core cities.</p> <p>In the North West there is clearly significant potential to make use of previously developed land and to build at high densities. It will be important that development is concentrated on the existing major urban areas if this potential is to be realised. It is assumed that Option B and Option C would lead to a greater proportion of houses going to rural areas, and conversely that under Option A the majority of housing would go to existing larger towns and cities.</p>
23. To mitigate and adapt to climate change	0	0	0	<p>The performance of the North West Region is variable, with some gains in mitigation to climate change through the reduction of energy used, set against a background of increased emissions from the transport sector.</p> <p>Flood risk will increase in the future as a result of climate change, as considered under the assessment of SA Objective 20. A further important consideration is the effect that climate change will have on water resources as temperatures rise and rainfall patterns alter.</p> <p>The demand for water will increase as new developments are built and completed. The growing population will also create a burden on existing water supplies. Added to this will be the pressure on current waste treatment and sewage facilities. Furthermore, the Habitats Regulations Assessment of the Submission Draft RSS identified that current abstraction levels are already adversely affecting at least eight European sites in the region.</p> <p>A further important point is that natural habitats and ecosystems more generally will</p>

				<p>need space available and the appropriate conditions to shift and adapt with the changes to the environments on which they depend. Should housing and development constrain the ability of habitats and species to adapt to a changing environment, then this could rapidly lead to an unsustainable situation and the collapse of ecosystems, with ramifications in terms of both the natural world itself and the functions that it provides for the humans.</p> <p>Overall, it is not possible to predict effects in terms of this SA Objective as a result of directing more housing to urban or rural areas.</p>
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	0	0	0	<p>The availability of water will have further repercussions in terms of impacts on biodiversity and human health. Further, it may act as a constraint on development with economic implications through water shortages and sanitation.</p> <p>It is possible that directing more housing to rural areas could be more likely to compete with natural systems for scarce water resources, although this effect is uncertain.</p>
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	0	0	0	<p>It is likely that some renewable or low carbon energy generation technologies, such as community heating or Combined Heat and Power (CHP) schemes are likely to be more feasible in urban areas where development will be of a higher density, but this effect is not clear.</p>
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	x	x	x	<p>Although there is little data available to suggest what capacity exists in the region to sustainably manage further waste generation, it is likely that higher growth scenarios will exacerbate existing issues in terms of the sustainable management of waste.</p>
Summary	<p>This assessment has worked from the assumption that Option B and Option C would lead to a greater proportion of houses going to rural areas and that under Option A the majority of housing would go to existing larger towns and cities. In reality, the options do not actually promote a spatial distribution of housing, but rather consider whether or not there should be an indication of spatial distribution.</p> <p>The assessment against a number of SA Objectives has found that promoting housing in rural areas generally will have a positive effect:</p> <p>1) To reduce the disparities of sub-regional economic assemblies</p>			

- 5) To deliver rural renaissance
- 15) To improve access to basic goods, services and amenities for all groups

The assessment against all three of these SA Objectives also highlights that there will be particular benefits associated with Option C as a result of it ensuring that smaller rural towns will also receive a greater proportion of housing. The assessment against a number of SA Objectives has found that promoting housing in rural areas generally will have a negative effect:

- 2) To exploit the growth potential of business sectors
- 3) To develop and market the region's image
- 4) To deliver urban renaissance
- 7) To develop and maintain a healthy labour market
- 9) To reduce the need to travel improve choice of use and use of sustainable transport modes
- 10) To improve health and mental health and reduce health inequalities
- 11) Improve access to good quality affordable and resource efficient housing
- 14) To develop strong and positive relationships between people from different backgrounds and communities
- 16) To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.
- 17) To protect and enhance the biodiversity, local character and accessibility of the landscape across the region
- 19) To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.
- 12) To restore and protect land and soil

A number of these predicted negative effects are based the assumption that promoting housing in more rural areas will have the knock-on effect of less housing being delivered in urban areas and, as a result, housing need might not be met in urban areas. However, these effects are uncertain as, in reality, ensuring that an adequate proportion of housing goes to rural areas, will not necessarily preclude housing need being met in urban areas.

	<p>The assessment against the following three SA Objectives found that it was not possible to predict with any certainty whether there would be greater benefits associated with an approach that promotes housing in urban or rural areas:</p> <ul style="list-style-type: none">6) To secure economic inclusion8) To reduce social exclusion23) To mitigate and adapt to climate change <p>In terms of economic inclusion and social exclusion, there are particular issues that exist in both urban and rural areas that can be effectively addressed by increased provision of accessible housing as part of integrated approaches to regeneration.</p>
Recommendations	<ul style="list-style-type: none">1) Recognising that delivery of extra housing in rural areas presents certain sustainability challenges, it will be important to ensure that policy promotes targeted delivery to areas where housing will meet an identified need and will tackle issues of rural deprivation and decline of rural communities and economies.

Travelling Showpeople

The Government has made clear that it views this issue as an integral part of the wider housing agenda to tackle affordability and homelessness issues. The Partial Review will set out separate figures for Travelling Showpeople for each district, on the required provision (number of pitches). The Partial Review of RSS will be informed by the results of a series of Travelling Showpeople Accommodation Assessments (GTAA's) undertaken in the region (which include assessments Travelling Showpeople accommodation needs). Results from the North West GTAA, identified the total additional residential need for Travelling Showpeople in each Sub-region of the North West.

However these figures should not be interpreted directly into the policy provision of pitches across the region. The methodology used in the GTAA's was based on CLG Guidance and best practice. This has been done on a 'need where it is seen to arise' basis. Findings reflect the historical inequalities in pitch provision and, therefore, there is a tendency for the needs assessment to further compound inequalities in site provision.

When developing new site provision for Travelling Showpeople it is important that RSS takes a strategic view of allocation of sites which accommodates logistical issues (i.e. travelling with large equipment) and the pattern of fun fairs across the area. To assist in this process the Assembly has been working with the Showman's Guild to collate information on the working \ travelling patterns of Showman's Guild members in the region over a calendar year⁴¹.

SA Objective	Option A) Use the results from the studies to distribute new provision	Option B) Modify (a) to ensure a minimum level of pitch provision in every district	Option C) Work to agree a more balanced share of meeting need across districts	Comments
1. To reduce the disparities of sub-regional economic assemblies	0-	0+	0+	Effects are unlikely to be significant. However, if authorised Travelling Showpeople sites are concentrated in a part of the region that already suffers from economic deprivation then this could potentially act, to a small degree, to perpetuate economic problems and hinder efforts to achieve economic regeneration.
2. To exploit the growth potential of business sectors	*	*	*	Travelling Showpeople will have no effect on the growth potential of key economic sectors at the regional scale.
3. To develop and market the	0-	0?	0+	If authorised Travelling Showpeople sites are concentrated in one part of the region (Option

⁴¹ Such patterns will be heavily influenced by the location of Fairs within the region.

region's image				<p>A) then the image of that area could suffer. However, it is unlikely that this effect would be significant at the regional scale. A balanced spread of sites (Option C) would certainly ensure that the image of the region does not suffer. Option B is an intermediary between A and C in terms of the balance of Travelling Showpeople sites in the region.</p> <p>Option B and Option C, could have the potential to increase the number of unauthorised sites, and unauthorised sites are more likely to impact upon local environmental quality. However, is uncertain and would be localised.</p>
4. To deliver urban renaissance	0?	0?	0?	<p>These options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in one part of the region that has a trend of towns in need of urban renaissance could hinder such renaissance to a very minor degree. At the same time, however, Option B and Option C could have the potential to increase the number of unauthorised pitches, and unauthorised pitches are more likely to impact upon local communities and economies.</p>
5. To deliver rural renaissance	0-	0+	0+	<p>These Options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in a part of the region that is characterised by rural villages and service centres in need of renaissance could perhaps have the effect of hindering renaissance. In particular Travelling Showpeople and their families have the potential to put additional strain on services and facilities in small rural communities.</p>
6. To secure economic inclusion	+	-	-	<p>It must be assumed that in many instances Travelling Showpeople will have chosen to live where they live for economic reasons. Options B and C promote distributing Travelling Showpeople to areas of the region other than where they would choose to live given the choice. There is clear potential for this to have a negative effect on the economic fortunes of Travelling Showpeople. In terms of economic inclusion Travelling Showpeople are clearly reliant on a narrow range of economic activity, and so it is vital that their ability to continue with current economic activity is not overly hindered.</p> <p>Redistributing Travelling Showpeople across the region in a 'balanced' fashion, as promoted by Option C, could have a particularly significant effect. However, this could be mitigated by the fact that Option C promotes consultation with the Showman's Guild.</p>
7. To develop and maintain a healthy labour market	0?	0?	0?	<p>The distribution of Travelling Showpeople pitches will have no significant effect on the labour market at the regional scale.</p> <p>In terms of effects on participation and attainment in education amongst Travelling Showpeople, this will depend, primarily, on the proportion of Travelling Showpeople living in</p>

				<p>authorised sites. Authorised sites will tend to be located in an area with adequate access to education. Furthermore, Travelling Showpeople living on authorised sites will be more likely to settle in one place for a longer period of time.</p> <p>However, there are other complicating factors that determine whether Travelling Showpeople children are likely to attend and perform well at school such as the degree to which they are bullied and accepted more generally. These factors will be related to the perception of Travelling Showpeople amongst the local settled community. It is likely that Option C, and to a lesser extent Option B would be most likely to promote good relations between the two communities.</p> <p>The overall result it that none of the options are guaranteed to have a significant effect, and any effects are very uncertain.</p>
<p>8. To reduce social exclusion</p>	<p>?</p>	<p>?</p>	<p>?</p>	<p>Option C suggests that it can successfully lead to increased social cohesion through determining the distribution of Travelling Showpeople pitches through <i>“working with the Showman’s Guild [to] agree a more balanced share of meeting need across districts.”</i></p> <p>It is expected that the benefits described would primarily come as a result of improved chances for successful integration between the settled and Travelling Showpeople communities. This is in contrast to Option A, which could perpetuate or worsen any poor relationships between the two communities in the parts of the region where Travelling Showpeople are concentrated.</p> <p>However, it is also important to consider the importance of cohesion within the Travelling Showpeople community, as this will be a major factor in determining whether they suffer from the effects of exclusion from the wider community. It is possible that enforcing a ‘more balanced’ distribution across the region could result in social networks between Travelling Showpeople families being stretched to breaking point, as families make the tough decision to move further away from one another in order to access a pitch on an authorised site. This effect would occur under Option B and C.</p>
<p>9. To reduce the need to travel improve choice of use and use of sustainable transport modes</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>A significant factor considered by Travelling Showpeople when determining where they live is the pattern of fairs and shows across the region and access to the strategic road network. Promoting a distribution of Travelling Showpeople pitches other than that which results from a ‘need where it arises’ approach could increase distances travelled. However, it is important to remember that, although this effect will be felt by Travelling Showpeople in terms of the distance they need to travel, the effect in terms of total road travel (the concern of this SA Objective) will not be significant.</p>
<p>10. To improve health and mental</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>No information has been found on health and wellbeing issues for Travelling Showpeople. We have assumed that the pathways by which the health of Travelling Showpeople are affected</p>

health and reduce health inequalities				<p>are similar to those for the Gypsy Traveller population. As a result the conclusions for these policy options are the same as for the policy options for Gypsies and Travellers.</p>
11. Improve access to good quality affordable and resource efficient housing	+	?	?	<p>All options promote the same number of Travelling Showpeople pitches. However, it could be debated whether Options B and C promote pitches in locations where they will be suitably accessible to Travelling Showpeople. Option C promotes a distribution that is significantly different to that which would be delivered through a 'need where it arises' approach, and so could have significant effects on Travelling Showpeople communities and their ability to maintain a viable business. However, this effect will be mitigated, to a degree, through working with the Showman's Guild to determine sub-regional allocations.</p>
12. To reduce crime, disorder and the fear of crime inequalities	-?	+?	+?	<p>It is unclear whether Travelling Showpeople generate fear of crime amongst the local settled community. For the purposes of this assessment it will be assumed that there can be some degree of fear of crime felt by the settled community in the vicinity of Travelling Showpeople sites.</p> <p>The degree of fear is likely to be correlated to the number of Travelling Showpeople pitches and sites in the vicinity. It is unlikely to be strongly correlated to whether sites are authorised or unauthorised, although over time there is the potential for fear of crime to decrease if integration between the two communities leads to mutual understanding, which is more likely to occur with authorised sites. It is also important to consider that Travelling Showpeople can be the victim of crime in areas where there is animosity towards them, or when sites do not include adequate space and facilities for them to store their equipment.</p> <p>Relative to Option A, Option C is certain to promote acceptance and understanding of Gypsies and Travellers by the settled community. This has the potential to reduce fear of crime amongst the settled and Travelling Showpeople communities. Option B might also have a lesser positive effect.</p> <p>There might be the potential for fear of crime (negative effects) associated with authorised sites to decrease over time.</p>
13. To enable groups and communities to contribute to decision making	?	-	?-	<p>Option C promotes consultation with the Showman's Guild, but at the same time it is not clear that this would be effective in terms of ensuring all Travelling Showpeople have a voice and a say in where pitches are located. Furthermore, Option C starts from the premise that there will be a 'balanced' distribution throughout the region, and so it might be the case that any further decisions on sub-regional allocations are concerned with fine-tuning allocations only.</p> <p>Option A promotes a distribution determined by a 'need where it arises' approach, and so it is deemed that it takes accounts of the identified needs and wishes of the Travelling</p>

				<p>Showpeople community in the decision as to how pitches should be distributed.</p> <p>Option B promotes a distribution of pitches other than that which would meet the needs of the Travelling Showpeople community, and states nothing about involving them in decisions about the exact redistribution.</p>
<p>14. To develop strong and positive relationships between people from different backgrounds and communities?</p>	<p>?</p>	<p>-?</p>	<p>-?</p>	<p>Where as for Gypsies and Travellers it is well known that there are often tensions between themselves and the settled community, the nature of the relationships that exist between Travelling Showpeople and local settled communities in the vicinity of their 'yards' is less well established. It may well be that unauthorised sites are less common with Travelling Showpeople, and as a result, problems with themselves and the settled community are less widespread and well-known than is the case for Gypsies and Travellers.</p> <p>It is likely that a more balanced distribution of Travelling Showpeople would reduce the net animosity felt towards them by the settled community and so there would be greater potential for positive relationships to develop between the two communities.</p> <p>However, it is possible that a balanced distribution (Options B and C) could generate the possibility of a step-change in unauthorised travelling Showpeople sites. A harmonious relationship between the two communities is much less likely where Travelling Showpeople live in unauthorised pitches.</p> <p>Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly from that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C.</p>
<p>15. To improve access to basic goods, services and amenities for all groups</p>	<p>?</p>	<p>?</p>	<p>?</p>	<p>In general, it is assumed that under any of the options Travelling Showpeople will be accommodated at sites in close proximity to services and facilities and some services and facilities will be provided on-site. It is not entirely clear why Option C states that it could increase access to services and facilities amongst Travelling Showpeople, although it is accepted that widening the search will make it easier to find sites large enough to accommodate vehicles and machinery.</p> <p>However, Option B and Option C could result in more unauthorised pitches. Travelling Showpeople living in unauthorised pitches are more likely to suffer from poor access to services and facilities. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. This effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C.</p>
<p>16. To protect, enhance and</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The concentration of Travelling Showpeople, along with their machinery and vehicles, in a</p>

<p>manage the Region’s rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.</p>				<p>particular area (Option A) could have a cumulative effect on the landscape character of that area, although the effect would be far less likely if Travelling Showpeople are accommodated in authorised sites as opposed to unauthorised sites.</p> <p>Option B and Option C could result in more unauthorised pitches. Unauthorised pitches are more likely to impact upon local landscapes. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a ‘need where it arises’ approach. However, this effect could be mitigated by the approach of “working with the Travelling Showpeople community” promoted by Option C.</p> <p>It is impossible to say that authorised pitches, even acting cumulatively, can impact upon a particular landscape. Furthermore, it is impossible to say that the number of unauthorised pitches that could be generated by Options B and C would be enough to have a significant effect on any particular landscape. Therefore effects are judged as insignificant and uncertain.</p>
<p>17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The concentration of Travelling Showpeople in a particular area (Option A) could have a cumulative effect on the landscape character and biodiversity of that area, although the effect would be far less likely if Travelling Showpeople are accommodated in authorised sites as opposed to unauthorised sites. Authorised sites could have an impact on biodiversity or landscape if there is insufficient space and facilities on-site for equipment and vehicles.</p> <p>Option B and Option C could result in more unauthorised pitches. Unauthorised pitches are more likely to impact upon local landscapes and biodiversity. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a ‘need where it arises’ approach. However, this effect could be mitigated by the approach of “working with the Showman’s Guild” promoted by Option C.</p> <p>It is impossible to say that authorised sites, even acting cumulatively, can impact upon a particular landscape or biodiversity at anything other than the local scale. Furthermore, it is impossible to say that the number of unauthorised pitches that could be generated by Options B and C would be enough to have a significant effect on any particular landscape or biodiversity at anything other than the local scale. Therefore effects are judged as insignificant and uncertain.</p>
<p>18. To protect and improve local environmental quality</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>Unauthorised sites can have significant negative effects on local environmental quality. Negative effects will be much less likely to result from authorised sites of an adequate size and with adequate on-site storage facilities. For the purposes of this assessment it is assumed that such effects would be negligible.</p>

				Option B and Option C could result in more unauthorised pitches, which are more likely to impact upon local environmental quality. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C. Effects will be localised and the frequency at which effects could potentially occur means that effects will not be significant at the regional scale.
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	0+	0-	0-	It is assumed that all three options would result in authorised sites of an adequate size and with adequate on-site storage facilities so that there would not be any direct effects on biodiversity bordering sites. Unauthorised sites have the potential to impact upon designated biodiversity. Option B and Option C could result in more unauthorised pitches, which are more likely to impact upon designated biodiversity. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C. The effects of any one of these options is unlikely to be significant as the majority of effects will be determined by decisions on the specific locations of sites.
20. To protect and improve the quality of inland and coastal waters	*	*	*	No effect
21. To protect and improve air quality	*	*	*	Travelling Showpeople are heavily reliant on transport by private car, but none of these options will have any effect on air quality.
22. To restore and protect land and soil	*	*	*	It is assumed that all three options would result in authorised sites of an adequate size and with adequate on-site storage facilities so that there would not be any direct effects on land and soil bordering sites. Unauthorised pitches have the potential to impact upon land and soil, but this effect is considered as part of the assessment against SA Objective 24.
23. To mitigate and adapt to climate change	0+	0-	0-	Options B and C could result in Travelling Showpeople living in areas where they would not choose to otherwise live, with the effect that net distances travelled by private transport, including by HGVs, could increase. However, effects in terms of climate change are not likely to be significant.

	0+	0-	0?	
24. To ensure the prudent use of natural resources and the sustainable management of existing resources				Option B and Option C could result in more unauthorised pitches, which are more likely to make inefficient use of land. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a ‘need where it arises’ approach. However, this effect could be mitigated by the approach of “working with the Showman’s Guild” promoted by Option C.
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	x	x	x	No effect
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	x	x	x	Waste is less likely to be managed in a sustainable and efficient pattern at unauthorised sites, although these effects will have no significant effect in terms of this SA Objective.
Summary	<p>It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a ‘need where it arises’ basis. Currently Travelling Showpeople are not evenly spread throughout the region, but are concentrated around the Manchester area. Option A will therefore reinforce this unequal distribution. Option C will distribute new pitches for Travelling Showpeople throughout the region in a more ‘balanced’ fashion.</p> <p>There is certainly potential for the Option C approach to impact upon the lives and, in particular the livelihoods, of Travelling Showpeople. It is highly likely that Travelling Showpeople have chosen to concentrate around the Manchester conurbation for logistical reasons, such as the need to have good access to the major road network and the pattern of fun fairs across the region throughout the year, as well as perhaps for reasons of being close to friends and family. If this is indeed the case then Option C will have the potential to jeopardise the viability of the business that is key to their economic well-being, as well as perhaps affect the strength of the Travelling Showpeople community.</p> <p>It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Travelling Showpeople pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). However, it is not entirely clear what problems might be experienced within areas with a concentration of Travelling Showpeople. There could be localised environmental, community</p>			

or economic impacts, including possibly a fear of crime, but there is no clear evidence to support this.

Furthermore, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. There is no evidence available currently on the prevalence or impacts associated with unauthorised Travelling Showpeople pitches. However, it is possible that Travelling Showpeople could reject the offer of authorised pitches spread around the region and choose unauthorised sites instead. This potential effect remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities.

A benefit to Travelling Showpeople resulting from an Option C approach is the possible increased potential for identification of suitably large sites to accommodate Travelling Showpeople's vehicles and equipment and to address localised issues of access to sites for large numbers of heavy vehicles.

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

"would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities."

However, it is not clear that promoting an even distribution of Travelling Showpeople pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Travelling Showpeople within a given area will always be relatively small in comparison to the settled community, even if the number of Travelling Showpeople in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Travelling Showpeople and settled communities. If Option A is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Travelling Showpeople, namely access to services and opportunities.

Option C promotes working with the Showman's Guild to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Travelling Showpeople families, including

	<p>hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.</p> <p>Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Travelling Showpeople to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Travelling Showpeople could become isolated from the rest of the community (many of whom would remain concentrated around Manchester. Option B could result in particular potential for effects to be felt by individual families, whilst Option C would be more likely to result in more insidious impacts on the regions Travelling show people community or communities.</p>
<p>Recommendations</p>	<p>1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.</p> <p>2) Requiring some Travelling Showpeople to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Travelling Showpeople community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.</p>

Broad Locations for Waste Management Facilities

The Partial Review will predict future waste arisings for the various waste streams and apportion by waste planning authority area or sub-region where appropriate, using the recently updated evidence database. The predicted waste arisings will be used, alongside national government policy on reducing and managing waste, to identify the number and types of facilities required up until at least 2025 and the broad location for their accommodation will be shown. Further work on localities within the broad locations is to be undertaken where necessary at District level. Currently we have developed policy based options that do not include detail on the potential requirement for waste management facilities. There is considerable debate underway about the findings from the broad locations for waste management facilities study produced for the Assembly last year which is intended to provide the evidence base for the Partial Review. Moreover, an important matter that is currently being discussed amongst regional and sub-regional organisations are figures for commercial and industrial waste arisings featured in Table 9.3 of the proposed changes to RSS. It is intended that the waste arisings figures that feature in the final published RSS, expected later this year, will be taken as a given for waste policy development in the Partial Review.

SA Objective	Option A) Regional Approach	Option B) Sub- Regional Approach	Option C) Varied Time Scale	Comments
1. To reduce the disparities of sub-regional economic assemblies	0?	+?	*	The NW region produces large amounts of waste that with careful planning can be exploited for economic benefit through recycling and recovery. A sub-regional approach is more likely to be able to take account of the potential for economic opportunities for a locality to come about as a result of the promotion of waste management facilities. Longer timescale data is unlikely to result in benefits in terms of this SA Objective.
2. To exploit the growth potential of business sectors	+	++	+	Sustainable waste management has the potential to be a major growth sector and there are currently many unexploited opportunities. Industrial symbiosis has the potential to open up many new opportunities to realise economic gains from waste management. A sub-regional approach is more likely to be able to take account of the potential for economic opportunities for a locality to come about as a result of the promotion of waste management facilities. Option C should allow business opportunities to be assessed based on longer-term data projections and so should provide a better analysis of where opportunities lie and activity should be focused.
3. To develop and market the region's image	+	++	+	A region with a sound waste management plan that shows commitment to environmental, social and energy issues, is likely to have a good image. Option B may allow the image of particular sub-regions to be considered. Planning over longer time-scale suggests a forward-planning region which, again, is good for image, particularly in the eyes of

				business and investors.
4. To deliver urban renaissance	*	*	*	Waste management facilities could, if poorly located, impact upon urban renaissance, but it is unlikely that these strategic options will have any effect in terms of this SA Objective.
5. To deliver rural renaissance	*	*	*	Waste management facilities could, if poorly located, impact upon rural renaissance, but it is unlikely that these strategic options will have any effect in terms of this SA Objective.
6. To secure economic inclusion	0-	0+	0+	Waste can create new business opportunities and opportunities for business start-ups, on both small and large scales, and in both rural and urban areas. Working on a sub-regional level (Option B) would better identify where these specific opportunities exist, and longer-term data should also inform future potential or mis-venture. Maximum exploitation of economic opportunities from different waste facility types should also result in an increase in job availability and employment overall, including both high and low skilled jobs.
7. To develop and maintain a healthy labour market	*	*	*	
8. To reduce social exclusion	*	*	*	
9. To reduce the need to travel, improve choice of use and use of sustainable transport modes	-?	+	+	The broad location of waste facilities can have a significant effect on road transport as result of large amount of materials being transported to and from facilities. A sub-regional approach to waste management issues could better identify where such issues could be overcome in terms of locating facilities near to where they are needed, as opposed to a general region-wide approach. Using data projections on a longer timescale should help to ensure that the most appropriate locations are chosen, taking into account changing sub-regional trends in waste production.
10. To improve health and mental health and reduce health inequalities	0	0	0	Waste management is a very large scale activity which inevitably has consequences for human health and the environment. At the very least it involves transporting waste materials. We note that road traffic injuries are a concern for the NW with children in the North West being significantly more likely to be injured or killed in a traffic accident in comparison to all

				<p>other regions. The various waste management processes such as landfill and incineration are very different in character and give rise to different kinds of human health hazards⁴².</p> <p>It is noted above that waste management facilities could, if poorly located, impact upon both urban and rural renaissance. Waste management facilities are not popular and are likely to face opposition. This will have local effects on people's mental health and wellbeing,</p> <p>In the longer term waste management facilities should not adversely affect human health for any of the options. Excellent better planning of facility locations will contribute towards minimising any potential for health issues. Poor planning for projected waste quantities will also impact upon human health if the waste management capacity is not in place, and therefore longer-term data projections should be referred to in addition to shorter-term (more accurate) projections.</p>
11. Improve access to good quality affordable and resource efficient housing	*	*	*	
12. To reduce crime, disorder and the fear of crime inequalities	*	*	*	
13. To enable groups and communities to contribute to decision making	0	0+	*	A sub-regional approach is more likely to take in to account local opinions on the location of waste management facilities, although community participation is not specified in the text of the options.
14. To develop strong and positive relationships between people from different backgrounds and communities	*	*	*	
15. To improve access to basic goods, services and amenities for all groups	*	*	*	These options are concerned with the location of major waste management facilities, rather than the location of local waste facilities.

⁴² Enviro Consulting Ltd, University of Birmingham, Risk and Policy Analysts Ltd, Open University, and Thurgood, M. Review of environmental and health effects of waste management: municipal solid waste and similar wastes. 2004 Department for Environment, Food and Rural Affairs. Available at www.defra.gov.uk

16. To protect, enhance and manage the Region’s rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.	0	0+	*	Waste management facilities are unlikely to impact upon this SA Objective, provided that the types of facilities and their broad locations do not interfere visually (cities and rural) or through pollution with the surrounding landscape and buildings and thus reduce their value. Sub-regional planning is better placed to consider any constraints, but longer-term data projections should make no difference.
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	0-	0+	*	A specific type of waste management facility, depending on its characteristics– for example, how the waste is processed, any by-products/end-products etc – may have an impact on local biodiversity. Facilities may also affect townscape and countryside character visually. Sub-regional planning is better placed to consider any constraints, but longer-term data projections should make no difference.
18. To protect and improve local environmental quality	0	0	0	Local environmental quality effects of waste management facilities will be a site specific issue, and so these strategic options can not be seen to have an effect
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	0-	0+	*	See assessment against SA Objective 17
20. To protect and improve the quality of inland and coastal waters	0+	+	0+	Some types of waste management facilities might have an impact on local water resources, and this consideration should be made when selecting broad locations. This will be addressed on a regional scale, but on a sub-regional scale this may be taken in to account in greater detail. Using data projection of 20 years, rather than 15 years, is unlikely to have a great effect.
21. To protect and improve air quality	0	0	0	Air quality effects of waste management facilities will be a site specific issue, and so these strategic options can not be seen to have an effect
22. To restore and protect land and soil	+?	+	+?	It is assumed that these options will result in the consideration of the broad location for landfill. A sub-regional approach might be more likely to ensure that landfill is directed to areas where land and soil resources will not be affected. Longer-term data is particularly important when considering landfill capacity, although shorter-term data is seen as more accurate.

23. To mitigate and adapt to climate change	?	+	+	See assessments against SA Objectives 9 and 25
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	+	++	+	See assessment against SA Objective 26
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	+?	+	+	A sub-regional approach might be more likely to make the most of opportunities for energy from waste or community heating / CHP schemes. Longer term data projections can also help to encourage investment in such operations.
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	+	+	+	<p>It may be important that major, regional scale facilities are identified and planned for at the regional scale. Equally, it will be important that as much waste as possible is dealt with close to source, and so it will be important to consider waste arisings and how these can best be managed at a sub-regional scale.</p> <p>The accuracy of shorter-term data necessitates its use whereas long-term data provides a less accurate but useful insight in to meeting future needs and ensuring that waste management remains economically viable and also sustainable (particularly in terms of minimising road transport).</p>
Summary	<p>It may be important that major, regional scale facilities are identified and planned for at the regional scale. Equally, it will be important that as much waste as possible is dealt with close to source, and so it will be important to consider waste arisings and how these can best be managed at a sub-regional scale. A sub-regional scale consideration of waste arisings and the need for waste facilities may allow for consideration of local opportunities for recycling, re-use and recovery, including through identifying opportunities for industrial symbiosis.</p> <p>In the above appraisal, varied time-scale is addressed separately as it is not a mutually exclusive option. The accuracy of shorter-term data necessitates its use whereas long-term data provides a less accurate but useful insight in to meeting future needs and ensuring that waste management remains economically viable and also sustainable (particularly in terms of minimising road transport).</p>			
Recommendations	<ol style="list-style-type: none"> 1) Ensure that policy is conducive to promoting opportunities for waste to be managed close to source. 2) When considering the broad location of major waste management facilities at the regional scale, consider how waste can be transported to and from facilities in the most sustainable fashion. In particular, consider the feasibility of transport of waste by rail and water. 			

