

## Revision Schedule

### Draft Sustainability Appraisal Report. March 2009

Rev	Date	Details	Prepared by	Reviewed by	Approved by
01	February 2009	Draft	Alex White Senior Consultant  Peter Richards Planning Consultant	Steve Smith Associate	Alan Houghton Head of Planning & Regeneration North West
02	March 2009	Draft	Alex White Senior Consultant  Peter Richards Planning Consultant	Steve Smith Associate	Alan Houghton Head of Planning & Regeneration North West

This document has been prepared in accordance with the scope of Scott Wilson's appointment with its client and is subject to the terms of that appointment. It is addressed to and for the sole and confidential use and reliance of Scott Wilson's client. Scott Wilson accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided. No person other than the client may copy (in whole or in part) use or rely on the contents of this document, without the prior written permission of the Company Secretary of Scott Wilson Ltd. Any advice, opinions, or recommendations within this document should be read and relied upon only in the context of the document as a whole. The contents of this document do not provide legal or tax advice or opinion.

© Scott Wilson Ltd 2008

**Scott Wilson**  
St James's Buildings  
Oxford Street  
Manchester  
M1 6EF

Tel. 0161 236 8655  
Fax. 0161 228 2581

[www.scottwilson.com](http://www.scottwilson.com)



## Table of Contents

Acronyms .....	i
<b>1 Introduction .....</b>	<b>1</b>
1.1 Introduction .....	1
1.2 This Report .....	3
<b>2 SA and Evidence Base .....</b>	<b>5</b>
2.2 Sustainability Appraisal .....	5
2.3 Evidence Base .....	8
2.4 Context Review (A1) .....	8
2.5 Baseline (A2) .....	12
2.6 Key Issues (A3) .....	18
2.7 Sustainability Framework (A4) .....	24
<b>3 Appraisal Methodology .....</b>	<b>31</b>
3.1 The Assessments .....	31
3.2 Method.....	31
<b>4 Appraisal Findings .....</b>	<b>35</b>
4.1 Issues and Options .....	35
4.2 Habitats Regulations Assessment (HRA).....	42
4.3 Health Impact Assessment (HIA) .....	43
4.4 Equality Impact Assessment (EqIA) .....	43
4.5 Assessment of the Draft Policies.....	43
4.6 Mitigation and Recommendations .....	45
4.7 Monitoring.....	48
4.8 Conclusions .....	50
<b>5 Next Steps .....</b>	<b>51</b>
5.2 Consultation.....	51
Commenting on this report .....	52
<b>Appendix 1: Appraisal Matrices .....</b>	<b>53</b>
<b>Appendix 2: Appraisal Group Report .....</b>	<b>55</b>

## List of Tables

Issues and Options .....	<b>Error! Bookmark not defined.</b>
Table 1: SEA Directive requirements and where they have been met. ....	7
Table 2: Key messages from context review update .....	9
Table 3: Baseline issues summary .....	13
Table 4: Top 10 worst performing LSOAs in England. ....	<b>Error! Bookmark not defined.</b>
Table 5: per capita consumption of resources .....	21
Table 6: SA Framework .....	25
Table 7: Blank Matrix .....	33
Table 8: Assessment key .....	34
Table 9: Issues and Options .....	35

## List of Figures

Figure 1: Stages required in SA .....	6
Figure 2: Change in average minimum temperature. ....	<b>Error! Bookmark not defined.</b>
Figure 3: Change in average maximum temperature. ....	<b>Error! Bookmark not defined.</b>
Figure 4: Forecast of the distribution of annual average flood damage for the 2080s ..	<b>Error! Bookmark not defined.</b>
Figure 5: Index of Multiple Deprivation – North West .....	19

## Acronyms

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

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

---

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





# 1 Introduction

## 1.1 Introduction

1.1.1 Scott Wilson was commissioned by 4NW (previously the North West Regional Assembly) to carry out the Sustainability Appraisal (SA) of the Partial Review of the North West Regional Spatial Strategy (the RSS). The process should also integrate a range of assessments including:

- Habitats Regulations Assessment;
- Health Impact Assessment;
- Equalities Impact Assessment; and
- Rural Proofing.

### The North West Plan

1.1.2 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. The plan was published by the Secretary of State (SoS) in September 2008, it forms 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.

1.1.3 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).

1.1.4 There has been a change in the scope of the Partial Review primarily due to the Sub-national Review (and the Government’s response) and the subsequent draft legislation; Local Democracy, Economic Development and Construction Bill<sup>12</sup>. Essentially these documents outline a new direction for regional planning which includes the production on a Regional Strategy (RS) which will replace the Regional Economic Strategy (RES) and the Regional Spatial Strategy (RSS). Additionally there have been changes in the mechanics of plan delivery with the change in emphasis of Regional Assemblies and the increased emphasis on sub-regional planning.

<sup>1</sup> <http://services.parliament.uk/bills/2008-09/localdemocracyeconomicdevelopmentandconstruction.html> (see Part 5)

<sup>2</sup> Another key related factor was the decision by the Regional Planning Body (RPB), 4NW to change the scope of the Partial Review of Regional Spatial Strategy (RSS) endorsed by the Regional Leaders Forum at their meeting on 15 September 2008.

- 1.1.5 In the North West of England, a pro-active approach has been taken by the North West Development Agency (NWD) and 4NW to progressing towards the RS<sup>3</sup>. The RS will be a new and clear strategic investment framework for the region. The strategy builds on the learning gained in the process of developing the **Regional Economic Strategy 2006**<sup>4</sup> the **Regional Spatial Strategy** and **RSS Partial Review** and the **Regional Housing Strategy**. The Northwest Regional Development Agency and 4NW have agreed that they should quickly move to produce a Northwest Regional Strategy (RS2010) over the next 18-24 months. The process involved in developing the RS2010 will need to ensure it encompasses the relevant steps outlined in the emerging legislation and guidance.

### 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.

- 1.1.6 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 Report<sup>5</sup> has endorsed this approach.
- 1.1.7 The Report of the Panel following the Examination in Public (EiP) of the RSS recommended that 4NW undertake an immediate Partial Review of the RSS to provide more detail on certain topics and creating policy on others. On inception, the Partial Review originally addressed six topics following recommendations made in the Report of the Panel:
1. Strategic Renewable locations;
  2. Location of Waste facilities;
  3. Housing allocation (including rural);
  4. Gypsies and Travellers;
  5. Travelling Showpeople; and
  6. Car parking standards.
- 1.1.8 As a result of the change in planning direction, the RPB has taken the view that topics 1-3 should be taken out of the Partial Review process and instead included in the RS2010

<sup>3</sup> Further Information is available at the following website address: <http://www.nwregionalstrategy.com/>

<sup>4</sup> Further Information is available at the following website address: <http://www.nwregionalstrategy.com/files/RES06v2.pdf>

<sup>5</sup> 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](http://www.gos.gov.uk/497468/docs/457370/2007_Panel_Report_Chapters.pdf)

process<sup>6</sup>. The remaining topics (4-6) will follow the Partial Review process set out in the Project Plan.

### **Gypsies & Travellers and Travelling Showpeople**

- 1.1.9 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**

- 1.1.10 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.

## 1.2 This Report

- 1.2.1 This Draft SA Report has been prepared to inform consultation and provide appraisal information on the three remaining draft policies in the Review. It is intended that after consultation, 4NW will make any final changes prior to submission to the Secretary of State. A further iteration of this SA Report will be issued that takes into account any *significant* changes made by 4NW during this process.

---

<sup>6</sup> See Item 4 of the Regional Leaders Forum on 15<sup>th</sup> Sept 2008



## 2 SA and Evidence Base

2.1.1 This chapter sets out the background and process to SA and provides a summary of the Evidence Base as it relates to the policy topics.

### 2.2 Sustainability Appraisal

2.2.1 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 and prepared the Consolidated SA Report to accompany the published RSS.

2.2.2 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.

2.2.3 Scott Wilson is following the Guidance for the assessment of RSSs as published by the department for Communities and Local Government (CLG)<sup>7</sup>. The SA process is set out in **Figure 2** below.

2.2.4 **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.

2.2.5 **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 both of these phases. Mitigation measures for alleviating adverse

<sup>7</sup> See: <http://www.communities.gov.uk/publications/planningandbuilding/sustainabilityappraisal>

impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation.

*Figure 1: Stages required in SA*



2.2.6 **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.

2.2.7 **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.

2.2.8 **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.

2.2.9 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.

2.2.10 In order to provide a clear signpost to the requirements of the SEA Directive, **Table 1** illustrates where the requirements have been met in the SA process.

*Table 1: SEA Directive requirements and where they have been met.*

Environmental Report requirements <sup>8</sup>	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 <sup>9</sup> 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	Section 3 Forthcoming Interim SA

<sup>8</sup> 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).

<sup>9</sup> These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

(such as technical deficiencies or lack of know-how) encountered in compiling the required information;	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

## 2.3 Evidence Base

2.3.1 Stage A provides the evidence base for the SA of the RSS Partial Review. The Addendum sets out additional information that has been published since the Scoping Report was finalised (7<sup>th</sup> February 2005) and includes:

1. Information supplied for the Examination in Public (EiP);
2. Studies undertaken by the statutory consultees; and
3. Updates to the Baseline and Context review as a result of more up-to-date data.

2.3.2 The following sections set out summaries of the information found in the Scoping Report Addendum. For the information in full, please see the Scoping Report and Scoping Report Addendum available from 4NW.

## 2.4 Context Review (A1)

2.4.1 The requirement to undertake a context review arises from the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations:

**The SEA Directive requires:**

“the relevant aspects of the current state of the environment and the likely evolution there of without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” to be included into the Environmental Report.

Annex 1(b) and (c) of the SEA Directive and Schedule 2 (2) & (3) of the Environmental Assessment of Plans and Programmes Regulations 2004

**Also, the government guidance states that:**

Baseline information “provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them.”

Para 2.2.7, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents



2.4.2 The PPSIs reviewed for the first SA Scoping Report are listed in Appendix 1 of the Scoping Report Addendum. The relevant key messages for the Partial Review are listed in **Table 2**:

*Table 2: Key messages from context review update*

Document	Key message
<b>National</b>	
<b>Homes for the future: more affordable, more sustainable - Housing Green Paper (July 2007)</b>	Significant increases in housing deliver required. Sub-regional housing allocations will provide additional spatial information to better predict sustainability effects
<b>Planning White Paper</b>	Given the Partial Review covers both Renewable delivery and housing it will be essential that trade-offs are clearly identified. Improved building performance will reduce the overall energy demand from the region.
<b>Securing the Future, delivering the UK Sustainable Development Strategy (2005)</b>	Sustainable communities, amongst other things to be: Active inclusive and safe- fair, tolerant and cohesive with a strong local culture and other shared community activities Fair for everyone – including those in other communities, now and in the future
<b>OPDM - PPS1: Delivering Sustainable Development (2005)</b>	High quality inclusive design in the layout of new developments Requires development plans to contain clear, comprehensive and inclusive access policies. Community involvement is an essential element of delivering sustainable development and creating sustainable and safe communities
<b>PPS 3 Housing – Equality Impact Assessment</b>	PPS3 key goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live  - to promote opportunities for home ownership & ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need,  - to improve affordability across the housing market, including by increasing the supply of housing and to create sustainable, inclusive, mixed communities in all areas, both urban & rural.  - PPS3 emphasises meeting the needs of disabled people, families with children, single parent families, homeless households, older people and students.
<b>PPS9: Biodiversity and Geological Conservation (August 2005)</b>	The spatial implications on sustainability will need to be considered in more depth than the previous SA due to increased information. In particular the effects of sites on European Sites should be addressed. Note that this will be addressed in detail through the ongoing Habitats Regulations Assessment.

<p><b>Planning Policy Statement 25: Development and Flood Risk (December 2006)</b></p>	<p>The RPB should take flood risk into account in determining strategic planning considerations in the RSS for its region, including the criteria to be used for selecting and determining broad strategic locations for housing provision and transport infrastructure.</p> <p>Inclusion of an SA objective on flooding based on SFRA findings.</p> <p>The SA should incorporate or reflect the RPB's RFRA and the planning authority's SFRA.</p>
	<p>To encourage consultation with stakeholders on their waste strategies when identifying locations for waste management facilities.</p> <p>Consider location for waste management in terms of coordinating business with local authorities and third sector organisations</p> <p>Need to consider Energy from Waste when locating waste management facilities, and in conjunction with renewable energy generation facilities.</p>
<p><b>Future Water – The Government's water strategy for England</b></p>	<p>Climate change and water availability will be key challenges for the UK in the future. This may have effects on both human health and biodiversity. Housing provision in the sub-regions will need to take into consideration not only water availability but also, implications for water pollution and the increased risk of flooding</p>
<p><b>Planning for Gypsy and Traveller Caravan Sites. ODPM Circular 01/2006</b></p>	<p>Issues of sustainability for sites are important and so should be considered in the SA, including tranquillity, access to services and schools, provision of a settled base, locating sites away from floodplains.</p>
<p><b>Your health, your care, your say: a new direction for community service</b></p>	<p>Proposals to make NHS care in England more accessible by moving services from hospitals into the community. Reconfiguring healthcare services presents opportunities to increase sustainability and so should be considered in the SA.</p>
<p><b>Delivering Choosing Health: Making Healthier Choices Easier, Department of Health, (March 2005)</b></p>	<p>This delivery plan highlights how the DH and the NHS, within the framework of government policies, will help more people make more healthy choices and reduce health inequalities. Individual choice is a key Government driver: the SA will need to identify how the revisions can create a framework that enable people to live healthy lives and any trade-offs that may reduce these choices.</p>
<p><b>Delivering Housing For An Ageing Population, Housing &amp; Older People Development Group, October 2005</b></p>	<p>Ensure the SA considers links with older people's strategies, transport, health and other strategies.</p>
<p><b>Regional</b></p>	
<p><b>NW Food and Health Action Plan, North West Food and Health Task Force, January 2007</b></p>	<p>Identify how the revisions can enable people to live healthy lives and any trade-offs that may reduce these choices.</p>
<p><b>NW Regional Housing Strategy (2005)</b></p>	<p>The regional housing strategy aims to contribute to economic growth and social inclusion, with a priority to provide affordable homes to maintain balanced communities.</p> <p>Tackling shortages of affordable housing in areas where demand is high, adversely affecting social inclusion and growth of local, sub-region</p>

	<p>and regional economies.</p> <p>Priority to meet the needs of the North West's diverse communities and individuals needing support, with an emphasis on specialist housing provision to meet community and individual needs at a local level</p>
<b>Northwest Equality and Diversity Strategy &amp; Implementation Plan 2006-9</b>	Identifies economic participation for all, promoting diversity as a regional asset and reducing hate crime and violence as the main equality and diversity objectives for the region. The NWRA is the lead agency for promoting diversity as a regional asset.
<b>North West Regional Assembly 'Single Equality Scheme' (2008)</b>	Its core objectives relate to increasing awareness of rights, increasing representation of under-represented groups in society, recognition of the benefits of diversity (closely relating to the NWRA's lead role on promoting diversity as a regional asset under the regional diversity and equality strategy) and promoting a more cohesive society.
<b>The North West Gypsy &amp; Traveller Accommodation Assessments, 2007</b>	The assessment is a tool towards fulfilling the responsibilities of the regional body to co-ordinate provision of accommodation to meet the needs of gypsies and travellers in the region. Romany gypsies and Irish travellers in particular are protected under Race Equality legislation. The assessment looks towards ensuring all authorities identify gypsy and traveller accommodation needs and develop attractive accommodation options for meeting need, in conjunction with other service provision for gypsies and travellers.
<b>Committed to Inclusion, Accepting the Challenge: The NW &amp; Disability</b>	This study informed a Disability Action Charter North West which encourages key players to address the issues affecting disabled people in the region. These include housing, education, employment and training, accessibility and public communications
<b>A Northwest Framework - to achieve healthy weight for children and families (Feb 2008)</b>	Consideration will need to be given to how the Plan supports Physical Activity and Healthy Eating for all ages and reduces the obesogenic environment.

## 2.5 Baseline (A2)

### 2.5.1 The requirement to consider the environmental and sustainability baseline arises from:

#### The SEA Directive requires:

“the relevant aspects of the current state of the environment and the likely evolution there of without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” to be included into the Environmental Report.

Annex 1(b) and (c) of the SEA Directive and Schedule 2 (2) & (3) of the Environmental Assessment of Plans and Programmes Regulations 2004

#### Also, the government guidance states that:

Baseline information “provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them.”

Para 2.2.7, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

2.5.2 The baseline provides not only a snapshot of current environmental / sustainability performance but should also describe the likely future of the baseline without implementation of the plan.

2.5.3 The update of the scoping report highlighted areas where the current performance in the North West is an issue. Note that by being an ‘issue’ it does not necessarily imply a negative performance, the issues may also be positive. **Table 3** summarises the relevant issues that have arisen and whether they were also considered in the original Scoping Report. A green fill indicates that the region is currently performing well; a red fill indicates that the region is currently performing poorly. A blue fill indicates that it is not possible to comment on performance at this stage. The arrows indicate what the likely performance of this indicator will be without the implementation of the Partial Review. An arrow pointing upwards means that the issue is likely to improve. A horizontal arrow indicates that there is likely to be no change and an arrow pointing downwards means that the performance of the issue is likely to deteriorate. If there is no arrow then it has not been possible to determine a trend (please see **Appendix 2** of the Scoping Report Addendum for full baseline table).

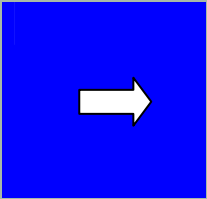
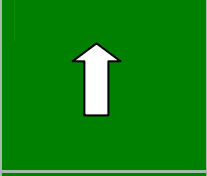

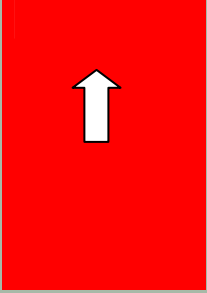


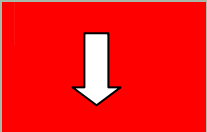
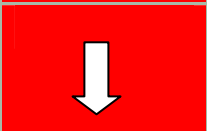

*Table 3: Baseline issues summary*

Indicator	Trend	Performance	Identified in original Scoping Report?
<b>Economic</b>			
GVA per capita in disadvantaged areas <sup>1</sup> . (£ per head - current basic prices <sup>10</sup> )	Since the 2002 figures, the North West has experienced a consistent rise in this indicator (approximately 14%). The NE has experienced a 18% increase, with Y&H (13%), EM (15%) and WM (13%).	↑	Yes
Claimants in most deprived areas - % resident working age population estimates.	Claimants in the NW have increased overall (2.2 – 2.6) with particular significance with only Manchester and Cumbria experiencing a decrease.	↓	Yes
Proportion of LSOAs in the bottom 20% deprived in England	Second worst performance of all Government Office Regions (only the North East fairs worse).	↓	No
No of VAT registrations in deprived areas (per 10,000 resident adults). (2006) <sup>11</sup>	Showing upward trend, 23, 23, 23, 26, 25, 25 from 2000 - 2005 <sup>12</sup> . Data only available Region – by – Region.	↑	Yes
% employed	Employment rate may have leveled off. 72.9% of all people in the North West employed, up from 2003.	→	Yes
<b>Environmental</b>			
% of people in employment's usual method of travel to work - car.	Notable that the majority of regions have experienced a reduction whereas the North West has remained the same.	→	Yes
Bus 'availability': % households within 13 minutes walk of a bus stop with a service at least once an hour.	Increase from 2002/2003 figures by 2% although still not as high as 1998 figure.	↑	Yes
<b>Petrol and diesel consumption of road vehicles (Thousand tones)</b>	<b>Personal – 2891 (of which 2170 is petrol cars) Freight – 1579. No trend identified, however, the NW is the second highest consumer in England after the SE.</b>	↓	No

<sup>10</sup> NUTS2.2

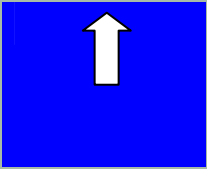
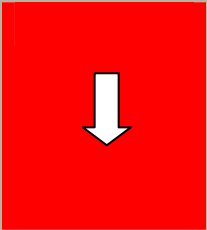
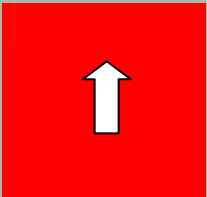

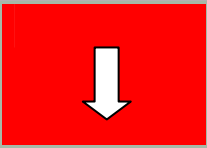
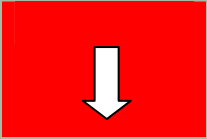
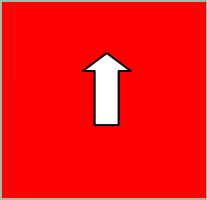
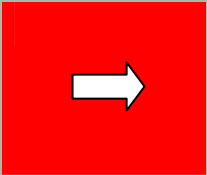

<sup>11</sup> See: <http://stats.berr.gov.uk/ed/vat/VATStatsPressReleaseNov2007.pdf>

<sup>12</sup> See: <http://stats.berr.gov.uk/ed/vat/20002005MostDeprivedAreas.xls>

% of total area designated because of landscape quality - Areas of Outstanding Natural Beauty and National Parks	Same areas designated.		Yes
% of listed (grade I and II) buildings at risk of decay.	Continued reduction from 6.7 (1999), 6.1 (2005) and 5.4 in 2007). New entries on the register outweighed by 7 buildings removed from the register (2007)		Yes
Woodland bird population versus 1994 levels.	Continuing increase in woodland bird species.		Yes
Designated SSSIs in 'favourable' habitat condition / Designated SSSIs <b>unfavourable</b> recovering habitat condition. (condition of SSSIs that make up Natura 2000 sites)	85.61% meeting PSA target so NW some way short.		Yes
Proportion of total river length of 'good/fair' biological quality.	Consistent increase since 2000 (84.3%) although not reaching England levels.		Yes
Proportion of total river length of 'good/fair' chemical quality.	Consistent increase since 2000 (91.5%) although not reaching England levels.		Yes
Percent of moderate/higher pollutant days (by NW monitoring stations).	Number of days with exceedences have increased from 2004 – 2006 for both Rural and Urban sites. <sup>13</sup>		Yes
CO <sub>2</sub> emissions from all sources	Emissions predicted to significantly increase (13 - 15%) primarily through increases in traffic movements and traffic growth <sup>14</sup> .		No
Average electricity consumption per domestic consumer (Kwh).	Electricity consumption has been decreasing since 2005 (2004 if experimental results are considered)		No

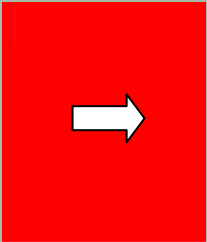
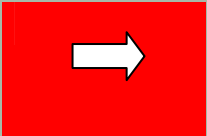
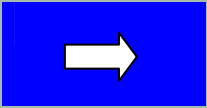
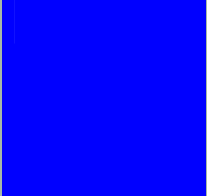


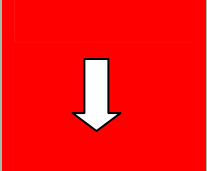
<sup>13</sup> See: <http://www.environment-agency.gov.uk/commondata/103196/606878?referrer=/regions/northwest/346910/588128/>

<sup>14</sup> See: [http://www.climatechangenorthwest.com/assets/files/documents/oct\\_07/cli\\_1191931499\\_nwra\\_1187602048\\_NWRA\\_Energy\\_an.pdf](http://www.climatechangenorthwest.com/assets/files/documents/oct_07/cli_1191931499_nwra_1187602048_NWRA_Energy_an.pdf)

Average electricity consumption per commercial and industrial consumer (Kwh).	Electricity consumption has been decreasing since 2005 (if experimental results are considered then there is a substantial increase)		No
Number of planning applications permitted contrary to the advice of the Environment Agency where the objection was made on flood defence grounds.	In 2007, 235 objections from the EA received, 7 of which were approved (3%) reinforcing the increased number of objections from the EA.		Yes
<b>Social</b>			
Male life Expectancy at Birth (years).	North West region still has the lowest life expectancy for males. However, life expectancy has increased from 2000-2002 (74.6) with Greater Manchester having the lowest of the sub-regions (74.8).		Yes
% homes unfit for use.	Still in decline and compares more favourably with the national figure of 2.5%		Yes
<b>Equalities Impact Assessment</b>			
<b>Access to Affordable Housing</b>			
% of households with incomes below the 'affordability' threshold	80% of households within the region have incomes below the 'affordability' threshold		Yes
Total additional affordable housing completions / acquisitions	Affordable Housing Completions declining. Affordable housing completions below average of 3067.1/ year and decreasing.		Yes
None available to show disabled people's access to affordable housing	Disabled people have considerably less choice about where they live than non-disabled people. Private housing stock in the region remains largely inaccessible to people with physical impairments.		No
None available to show BME people's access to affordable housing	Bangladeshi's and Black African people have the poorest housing conditions of any group. Large households and overcrowding is an issue, plus poor quality		No
Residential pitch needs for gypsy and travellers	Need for 315-326 residential pitches across NW 2006-2011		Yes

Transit pitch needs for gypsies and travellers	Need for 111-245 pitches on transit accommodation 2006-2011	↑	Yes
<b>Equal economic participation</b>			
% of disabled people of working age in employment	349,000 (41%) are in employment	→	No
% of disabled people on state benefits and not in work	416,000 (49%) are on state benefits and not in work.	→	No
% BME people of working age unemployed but want to work.	20% of BME people are unemployed but want to work BME women are less likely to be in work, and are concentrated in fewer occupations than men	↑	No
% of 18-24 year olds unemployed	11% of 18-24 year olds being unemployed	↑	No
% of 16 year olds not in education, employment or training	One in seven 16 year olds is not in education, training or employment Younger people are disproportionately working in lower skilled occupations and in industries lower in the value chain.	↑	No
Employment rate for 45-64 year olds and for 65-75 year olds	For 45-64 year olds the employment rate is 61% compared with 65.4% nationally and for 65-75 year olds it is 6.6%, compared with 8.4% nationally.	↑	No
Average median gross weekly earnings for women compared with men	£450.00 for males and £351.60 for females (2005) In employment, women still earn 18% less than men on average and this double for part time workers.	→	No
Economic inclusion of LGBT people	No data on economic inclusion but reported experience of homophobia	→	No
<b>Social Inclusion of Diverse Groups</b>			
% of BME groups in most deprived districts and local authority areas	30% of BME people are in the 'Top 5' most deprived Districts in NW and 70% of BME communities are concentrated in the 88 most deprived Local Authority areas in the country - 21 in NW	→	No



Equal access to services for gypsies and travellers.	- Households on UE have inappropriate living conditions - Move into housing generally stimulated by education, ill-health and older age More precise indicators on access to services for gypsies and travelers not available		No
Racially aggravated offences	Racially aggravated offences fell between 2002 and 2003 in Greater Manchester but increased in other areas of the NW.		No
% of households in receipt of or family tax credit.	North West 2002-2003: 6%.		No
% of people who feel that their local area is a place where people from different backgrounds and communities can live together harmoniously.	Currently a data gap		Yes
<b>Health</b>			
Infant Mortality	The North West Region has the second highest infant mortality rate in England.		No
Percentage of total deaths that are alcohol-specific (2005)	For both males and females the North West region has the highest percentage of alcohol specific deaths in England		No
Rate of children aged 0-15 years killed or seriously injured in road traffic accidents per 100,000 population (2004)	Child road traffic injuries have declined in recent years and in 2004 was 43% below the baseline (1994-98 average). However children in the North West are significantly more likely to be injured or killed in a traffic accident in comparison to all other regions.		No

## 2.6 Key Issues (A3)

### The 'Environmental Report' required under the SEA Directive should include:

"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 [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive']"

(Annex 1(d) SEA Directive and Schedule 2 (4) of the Environmental Assessment of Plans and Programmes Regulations 2004)

### Also, the government guidance states that:

"The identification of sustainability issues (including environmental problems as required by the SEA Directive) is an opportunity to define key issues for the RSS revision and to develop sustainable objectives and options."

Para 2.2.4, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

### Flood Risk

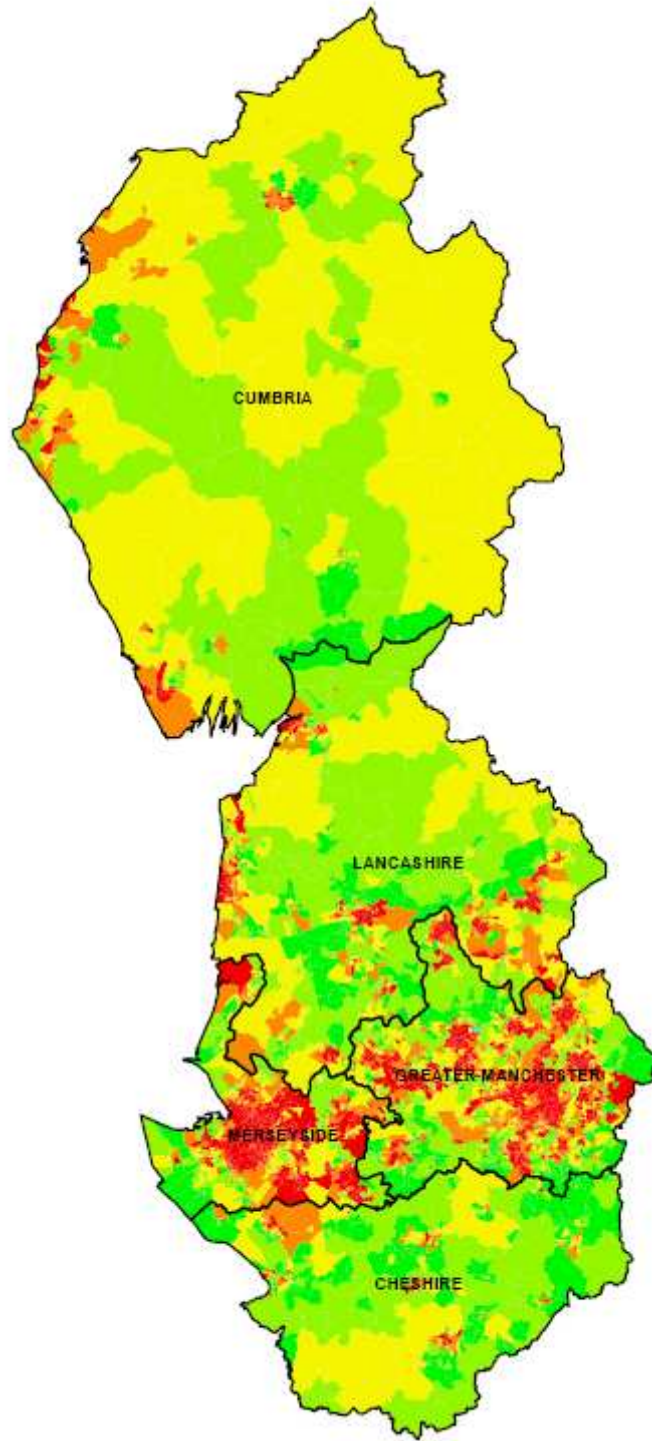
2.6.1 The additional requirements of PPS25, in combination with the increased risk of flooding and the quantum of development outlined as part of the current RSS will place a much greater risk of flooding on the region than previously assessed. To address this information will be needed on:

- Number of dwellings and associated infrastructure at risk of flooding
- Future flood risk based on climate change scenarios.

### Deprivation

2.6.2 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, Preston, Blackburn and Burnley. These areas have been identified in **Figure 10** taken from the Indices of Multiple Deprivation 2007<sup>15</sup> (please see **Appendix 3** for other deprivation maps).

<sup>15</sup> See: [http://www.communities.gov.uk/documents/communities/pdf/733520?bcsi\\_scan\\_F6892CABA15785B4=0](http://www.communities.gov.uk/documents/communities/pdf/733520?bcsi_scan_F6892CABA15785B4=0)



*Figure 5: Index of Multiple Deprivation – North West*

## Health Improvement

- 2.6.3 Considerable investments have been made to address deprivation in the North West. The North West Region has significantly worse levels of adult binge drinking than the England average (APHO Health Profiles 2008) along with significantly lower than England average levels of healthy eating and physically active adults. Housing allocation and subsequent regeneration and economic development policies should not depend upon a night-time economy which prioritises alcohol and fast-food and which has a damaging effect on the health of people living and working in the north west.
- 2.6.4 Many elements of the NW RSS partial review provide opportunities for encouraging the healthier choice to be the choice people make.

## Climate Change

- 2.6.5 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.
- 2.6.6 The new standards for sustainable buildings (the Code for Sustainable Homes) and for other developments (such as BREEAM and CEEQUAL) should contribute to overall energy savings.

## Water resources

- 2.6.7 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.

### Habitats Regulations Assessment (Submission Draft RSS)

The HRA of the Submission Draft RSS identified that:

- Current abstraction levels are already adversely affecting at least eight European sites in the region.
- The Plan provides for 411,160 new homes and for increases in economic activity and community facilities; the final Regional Spatial Strategy may provide for still more. This growth will add to existing pressure on water resources.

- 2.6.8 However, it has been identified in the Habitats Regulations Assessment (HRA) for the Proposed Changes to the RSS that *“the water companies are in the process of preparing their five-year plans, which will **inform and influence the RSS review** in terms of water resources and wastewater treatment.”*

## Vulnerable groups

2.6.9 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. The data on vulnerable people and any risk posed is scarce and it is recommended that the North West undertake a Vulnerability Mapping exercise to determine those most at risk.

## Cumulative effects

2.6.10 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. 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 an exponential growth in the demand for natural resources and waste production. **Table 5** provides an illustration of the levels of consumption resulting from shifting household sizes.

2.6.11 If data can be obtained on predicted household composition and accurate per capita consumption and waste then it may be possible to quantify to some extent the pressures on the North West Region from the use of resources.

*Table 5: per capita consumption of resources<sup>16</sup>*

No. of People in household	Average Water Use per person per day (litres)	Waste generation (kg per person per day)	Estimated final energy demand per capita per day (kWh)
1	223	2.7	61
2	182	1.7	40
3	136	1.3	34
4	129	1	28
5+	85	0.86	21

## Equality

2.6.12 Based on the context review and baseline, the key issues identifies equalities issues of relevance for the RSS revision and to develop sustainability objectives in relation to equality and equality criteria for use in the assessment.

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

<sup>16</sup> Source: Levett-Therivel and Treweek Environmental Consultants – *Household resource consumption*

- 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 and include the promotion of social enterprise schemes and their associated benefits to equalities issues, growth points and housing provision.
- 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.

## Air Pollution

2.6.14 The level of air pollution in the North West – in terms of numbers of days exceeding air quality levels *and* number of Air Quality Management Areas (AQMA) designated – have both increased since 2005. The Environment Agency provide figures showing that traffic in the region increased by 15% from 1995-2005 causing air quality problems in major cities. This will be amplified through the predicted growth in traffic (see climate change indicators above). The Agency also provides information on industrial pollutants

in the North West. The EA indicate that the levels of 6 of the 8 key air pollutants are below those in 1998 (the two exceedances are carbon monoxide and nitrogen oxide).<sup>17</sup>

- 2.6.15 The Habitats Regulations Assessment (HRA) of the Proposed Changes to the RSS identified that *“air pollution levels country-wide are expected to go down over the next ten years in response to improved vehicle technology and the closure of some power stations.”*

### Housing Affordability for Equality Groups

- 2.6.16 Access to affordable high quality housing is a key issue of concern in the region in general and in particular for BME groups, in particular Bangladeshis and Black Africans. Likewise, disabled people face less choice in their access to housing both in private housing and affordable housing. Requirements for Lifetime Homes standards in new housing and to meet DDA requirements are likely to contribute towards addressing this issue in new build housing.

### Social Inclusion and Deprivation

- 2.6.17 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.

### Gypsy and Traveller Accommodation and access to services

- 2.6.18 The current shortfall in suitable accommodation provision for gypsies and travellers is an equality concern. This particularly relates to the protection of Irish Travellers and Roma gypsies under Race Equality legislation, including for the promotion of good relations between different racial groups as part of sustainable communities. It also relates to the needs of children, older people, disabled people and women within the gypsy and traveller communities, including in relation to access to both accommodation and other services, such as health and education.

---

<sup>17</sup> See: [http://www.environment-agency.gov.uk/commondata/acrobat/nwenv\\_summary08\\_1473612.pdf](http://www.environment-agency.gov.uk/commondata/acrobat/nwenv_summary08_1473612.pdf)

## 2.7 Sustainability Framework (A4)

2.7.1 The requirements for the development of a SA Framework are outlined in the Government's SA Guidance:

"The SA framework provides a way in which sustainability effects can be described, analysed and compared. It is central to the SA process."

"Sustainability objectives are distinct from the objectives of the plan, through they may in some cases overlap with them. They provide a way of checking whether RSS Revision objectives are the best possible ones for sustainability and can be seen as a methodological yardstick against which the social, environmental and economic effects of the RSS Revision can be tested."

Sections 2.2.15 and 2.2.17, SA of Regional Spatial Strategies and Local Development Documents, DCLG 2005

2.7.2 The SA Framework should be informed by the previous stages of the SA process (A1, A2 and A3) and should form a robust benchmark against which the sustainability of the plan can be assessed.

2.7.3 The Scoping Report (2005) proposed a framework of 26 Objectives with sub-criteria. This framework was used for the assessment of the Proposed Changes and it is proposed to use the same framework for the Partial Review, with a few additional recommended changes developed through the consultation process.

2.7.4 It is not proposed to change any of the overarching Objectives but rather to include additional sub- objectives on the following themes:

- Climate change;
- Microgeneration;
- Flooding;
- Water consumption;
- European sites (Natura 2000);
- Air pollution; and
- Deprivation.

2.7.5 **Table 6** sets out the sustainability framework used for the appraisal of the draft policies



*Table 6: SA Framework*

SA Objective	Decision making question
<b>1. To reduce the disparities of sub-regional economic assemblies</b>	1a. Will it provide job opportunities in areas with residents most at need
	1b. Will it reduce economic disparities within the region and with other UK regions?
<b>2. To exploit the growth potential of business sectors</b>	2a. Will it increase employment opportunities within the region?
	2b. Will it help to diversify the regions economy?
	2c. Will it promote growth in key sectors of the regional economy?
	2d. Will it help to develop the regions knowledge base?
	2e. Will it increase the economic benefit derived from the regions natural environment?
<b>3. To develop and market the region's image</b>	3a. Will it support the preservation and/or enhancement
	3b. Will it promote the area as a destination for short and long term visitors, for residents and investors.
<b>4. To deliver urban renaissance</b>	4a. Will it improve economic, social and environmental conditions in the most deprived areas and most deprived groups?
	4b. Will it improve quality of the built and historic environment
	4c. Will it improve the quality of public open space?
<b>5. To deliver rural renaissance</b>	5a. Will it support rural diversification?
	5b. Will it support and encourage the growth of rural businesses?
	5c. Will it retain and promote the economic growth of market towns?
	5d. Will it retain and promote access to village services?
<b>6. To secure economic inclusion</b>	6a. Will it meet the employment needs of local people?
	6b. Will it improve physical accessibility to jobs with the location of sites and/ or public transport links being closer to areas of high unemployment?
	6c. Will it encourage business start-up especially from women and BME groups?

SA Objective	Decision making question
<b>7. To develop and maintain a healthy labour market</b>	7a. Will it address the skills gap and enable skills progression?
	7b. Will it increase the levels of participation and attainment in education?
	7c. Will it provide a broad range of jobs and employment opportunities?
<b>8. To reduce social exclusion</b>	8a. Will it reduce poverty and social exclusion in those areas and communities most affected? (particularly BME people, LGBT, Faith Groups and Rural Communities).
<b>9. To reduce the need to travel improve choice of use and use of sustainable transport modes</b>	9a. Will it reduce car and lorry traffic?
	9b. Will it encourage walking, cycling and equal access to and use of public transport?
	9c. Will it reduce freight movement?
	9d. Will it improve equal access to and encourage the use of ICT?
<b>10. To improve health and mental health and reduce health inequalities</b>	10a. Will it reduce deaths in key vulnerable groups?
	10b. Will it promote healthier lifestyles?
	10c. Will it reduce health inequalities among different groups in the community?
	10d. Will it reduce isolation for vulnerable people?
<b>11. Improve access to good quality affordable and resource efficient housing</b>	11a. Will it provide an appropriate mix of housing to meet all residents needs including affordable?
	11b. Will it reduce the number of unfit and empty homes?
	11c. Will it support the development and operation of resource efficient housing?
	11d. Will it meet the accommodation needs of gypsies and travellers, in line with Race Equalities requirements?
<b>12. To reduce crime, disorder and the fear of crime inequalities</b>	12a. Will it reduce actual levels of crime (including hate crime)?
	12b. Will it reduce the fear of crime?
	12c. Will it reduce prejudice (racial, homophobic, gender or age related)?
<b>13. To enable groups and communities to contribute to decision making</b>	13a. Will it identify and engage with hard to reach stakeholders?
	13b. Will it encourage wider community involvement in design, or the provision of services?

SA Objective	Decision making question
	13c. Will it enable the community to contribute to and have influence in decision-making and be involved in implementation?
14. To develop strong and positive relationships between people from different backgrounds and communities?	14a. Will it create a sense of belonging and well-being for all members of the community?
	14b. Will it support community development?
	14c. Will it improve relations between all groups and religions (including between gypsies and travellers and settled communities)?
	14d. (12c.) Will it reduce prejudice (racial or homophobic)? (moved)
15. To improve access to basic goods, services and amenities for all groups	15a. Will it improve equal access to cultural, sporting and leisure facilities including natural green spaces?
	15b. Will it improve equal access to essential services and facilities, including for gypsies and travellers?
	15c. Will it improve the range and quality of cultural, sporting and leisure facilities and equal access to them?
	15d. Will it improve equal access to basic goods, promoting the use of those that are locally sourced?
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.	16a. Will it protect and enhance the character and appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens and their settings?
	16b. Will it improve access to buildings of historic/cultural value?
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	17a. Will it protect and enhance the character and appearance of the regions townscape and countryside maintaining and strengthening local distinctiveness and sense of place?
	17b. Will it protect and enhance the biodiversity of the regions landscapes?
	17c. Will it protect and enhance the accessibility of the landscape across the region?
	17d. Will it protect and enhance the tranquillity of the region's landscapes?
18. To protect and improve local environmental quality	18a. Will it reduce light and noise pollution and graffiti?
	18b. Will it redress environmental inequalities within region's urban and/or rural areas?

SA Objective	Decision making question
<b>19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.</b>	19a. Will it protect and enhance existing designated European, national and regional wildlife and geological sites and species populations?
	19b. Will it protect and enhance habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?
<b>20. To protect and improve the quality of inland and coastal waters</b>	20a. Will it reduce or manage flooding?
	20b. Will it maintain and enhance ground and surface water quality?
	20c. Will it improve the quality of coastal waters?
<b>21. To protect and improve air quality</b>	21a. Will it maintain and improve air quality?
	21b. Will it address the causal factors of poor air quality in AQMAs?
<b>22. To restore and protect land and soil</b>	22a. Will it reduce the amount of derelict, contaminated, degraded and vacant/ underused land?
	22b. Will it encourage the development of brownfield land in preference to Greenfield?
	22c. Will it reduce the loss of good soils to development?
	22d. Will it maintain and enhance soil quality?
<b>23. To mitigate and adapt to climate change</b>	23a. Will it reduce or minimise greenhouse gas emissions?
	23b. Will it maintain water abstraction, run-off and recharge within carrying capacity?
	23c. Will it contribute to the ability to adapt to the impacts of climate change?
	23d. Will it expose the region to increased flood risk?
	23e. Will it reduce the economic impact of the future effects of climate change?
<b>24. To ensure the prudent use of natural resources and the sustainable management of existing resources</b>	24a. Will it alter the demand for raw materials and natural resources?
	24b. Will it support the repair and re-use of existing buildings?
	24c. Will it reduce minerals extracted and imported?

SA Objective	Decision making question
	24d. Will it promote the use of recycled and secondary materials?
<b>25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources</b>	25a. Will it minimise the need for energy?
	25b. Will it maximise the production and/ or use of renewable energy?
	25c. Will it increase energy efficiency in buildings, transport modes etc?
	25d. Will it minimise the use of fossil fuels?
<b>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</b>	26a. Will it minimise the production of waste?
	26b. Will it increase waste recycling and reuse?
	26c. Will it reduce the amount of residual waste to landfill?



## 3 Appraisal Methodology

### 3.1 The Assessments

- 3.1.1 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.
- 3.1.2 The important points - or decision making points - have been identified at three instances in the Partial Review process:
- Issues consideration and options development;
  - Options assessment; and
  - Policy Assessment.
- 3.1.3 At these points key information needs to be made available to 4NW in order to adequately inform the plan and decision makers and to meet regulatory obligations.

### 3.2 Method

- 3.2.1 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 (see **Table 7** and **8**). 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 in **Appendix 1**.

#### Appraisal Groups

- 3.2.2 This appraisal was supplemented through the use of 'Appraisal Groups'. The Appraisal Groups are made up of key stakeholders in the development of the RSS. The aim of the groups is to 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 an 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.

3.2.3 The first Appraisal Group was held on the 3<sup>rd</sup> July 2008, the full report is available from 4NW.

3.2.4 The attendees included:

- Louise Maxwell – Environment Agency
- Sue Bradburne – Environment Agency
- Peter Wilson – North West Environment Link (pm only)
- Bruce Johnson – University of Central Lancashire
- Lillian Burns – North West Transport Roundtable
- Ken Burgess – Natural England (pm only)
- Michelle Young – Natural England (pm only)
- Janet Smith – Northern Network of Travelling People (am only)
- Alessandra Zucca – IMPACT
- Debra Holroyd – NWRA (now 4NW)
- Duncan McCorquodale – NWRA (now 4NW)
- Paul Iggulden – Ben Cave Associates
- Alex White – Scott Wilson Ltd.
- Mark Fessey – Scott Wilson Ltd.
- Liz Clarke – Scott Wilson Ltd.
- The key messages that arose in this appraisal group are included in the options summary tables in the following section.



*Table 7: Blank Matrix*

Policy Description:									
Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
<b>1. To reduce the disparities of sub-regional economic assemblies</b>									
1a. Will it provide job opportunities in areas with residents most at need									
1b. Will it reduce economic disparities within the region and with other UK regions?									
<b>2. To exploit the growth potential of business sectors</b>									
2a. Will it increase employment opportunities within the region?									
2b. Will it help to diversify the regions economy?									
2c. Will it promote									

growth in key sectors of the regional economy?																			
2d. Will it help to develop the regions knowledge base?																			
2e. Will it increase the economic benefit derived from the regions natural environment ?																			

*Table 8: Assessment key*

x	Objective not linked	++	Strongly positive effect	+	Positive effect	-	Negative effect	--	Strongly negative effect	?	Uncertain effect	0	Insignificant effect	✓	Occurs in this timescale
---	----------------------	----	--------------------------	---	-----------------	---	-----------------	----	--------------------------	---	------------------	---	----------------------	---	--------------------------

## 4 Appraisal Findings

### 4.1 Issues and Options

4.1.1 The Issues and Options were developed during Spring 2008. The options were subject to a comparative SA in May 2008. The options assessed and brief descriptions are provided in **Table 1** below.

*Table 9: Issues and Options*

Issue	Options
<b>Car parking standards</b>	Option A) Adopt the revised standards
	Option B) Keep existing parking standards as detailed in RPG13 and Draft RSS
<b>Gypsies and Travellers</b>	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
<b>Travelling Showpeople</b>	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

4.1.2 Summaries of the assessment findings are provided below, the full appraisal matrices can be found in **Appendix 1**.

#### Gypsies and Travellers

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 there would be benefits for local communities 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</p>

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, although this suggestion needs to be confirmed with hard evidence. 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

	<p>areas where there are acceptable relations between the Gypsy and Traveller and settled communities. If Option C 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.</p> <p>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.</p> <p>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> <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><b>Recommendations</b></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>
<p><b>Appraisal Group Comments</b></p>	<p><b>Key comments – Gypsies and Travellers</b></p> <ul style="list-style-type: none"> <li>• Clarify differences between Gypsy and Traveller sub-groups</li> <li>• Look at the sub-regional study – don’t use the NWRA study</li> <li>• Ethnic monitoring to identify culturally-suitable accommodation</li> <li>• Better assistance for LAs</li> <li>• Question assumptions about the importance of proximity to services and facilities.</li> <li>• Option C is best but needs genuine engagement</li> </ul>

- Gives choice of location and therefore proximity to services (remember: patchiness a result of no choice)
- Not enough stopping places
- Problem: Site footprints bigger than house footprints

## 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 C 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.
<b>Recommendations</b>	<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>
<b>Appraisal Group Comments</b>	<p><b>Key comments – Travelling Showpeople</b></p> <ul style="list-style-type: none"> <li>• Unauthorised sites are rare with travelling showpeople</li> <li>• Distinct from gypsies and travellers – needs to be recognised             <ul style="list-style-type: none"> <li>○ Less deprived</li> </ul> </li> <li>• Economic benefits brought to region need to be recognised</li> </ul>



## Car Parking Standards

<p><b>Summary</b></p>	<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 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<sup>18</sup>. 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<sup>19</sup>. 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<sup>20</sup>. 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><b>Recommendations</b></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>

<sup>18</sup> 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.

<sup>19</sup> Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at [www.london.gov.uk](http://www.london.gov.uk)

<sup>20</sup> 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>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>
<p><b>Appraisal Group Comments</b></p>	<p><b>Key comments – Car parking provision</b></p> <ul style="list-style-type: none"> <li>• People know what they are buying in to</li> <li>• Reconsider recommendation 1 ‘language need to be toned down’</li> <li>• Careful with recommendation 3 – Park &amp; Ride may be interpreted as the answer and P&amp;R is not always the answer it alludes to be (see minutes) without correct provisos in place</li> <li>• Parking at railways needs consideration and therefore rural regeneration</li> <li>• Car parking standards are very important in the short to medium term as they are achievable, where as large scale transport improvements are not on the immediate horizon</li> <li>• Need stronger/firmer wording and constant dialogue with LAs</li> <li>• Consider housing developments and where parking is located</li> <li>• Consider difference between rural and urban situations, and if there is sufficient evidence to change current policy</li> <li>• Fuel costs is a background element that should be kept in mind</li> </ul>

## 4.2 Habitats Regulations Assessment (HRA)

4.2.1 Habitats Regulations Assessment (HRA) aims to ensure that the integrity of sites of international nature conservation importance<sup>21</sup> 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.

4.2.2 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;

<sup>21</sup> Special Protection Areas, Special Areas for Conservation, Ramsar sites and European marine 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.

4.2.3 If the broad locations could lead to significant 'in combination' impacts on the integrity of European sites, we would 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.

4.2.4 The policies and broad locations were subject to a HRA screening and no changes are recommended in light of this screening as it is considered that they will have little or no impact on any European sites.

### 4.3 Health Impact Assessment (HIA)

4.3.1 Potential effects on health and well being and on health inequalities were considered as part of the early stages of the NW RSS partial review. The assessments were informed by stakeholder workshops along with evidence reviews. Key findings from the assessment of health and well being have informed this report.

### 4.4 Equality Impact Assessment (EqIA)

4.4.1 Impacts on equality have been considered as part of the Sustainability Appraisal due to the fact that specific objectives within the SA framework are directly related to issues of equality. As such a separate EqIA is not necessary.

### 4.5 Assessment of the Draft Policies

4.5.1 The assessment of the Draft Policies took place in January / February 2009. Again, the full matrices can be found in Appendix 1, summaries are provided below:

#### Gypsies and Travellers

4.5.2 The options assessment considered three alternative policy approaches to allocating Gypsy and Traveller pitches. The assessment found that there were pros and cons to

the different options, but that there was some suggestion that Option C – working to achieve a more balanced distribution across districts – would be most likely to achieve significant net benefits. Option C has been taken forward as the preferred policy.

- 4.5.3 The policy sets out a series of statements and requirements that should enable gypsy and traveller communities to benefit from increased access to a range of facilities, however in some cases this could be made more explicit. It also identifies the important issues of hidden households and is flexible in identifying future provision. However, it is difficult to pin down the exact nature of some impacts, particularly those relating to sites as these will be determined at a LDD level.
- 4.5.4 It would seem nonetheless that there are adequate provisions in the policy to ensure that the sites are selected appropriately. The policy should, provided the needs assessment is accurate, provide a suitable level of provision during the lifetime of this plan and beyond. On some of the more qualitative objectives it is difficult to ascertain precisely what the impact will be, specifically objective 12 and 14.
- 4.5.5 Whilst the policy sets out to promote co-existence this is not by any means guaranteed, furthermore it seems to be mentioned in the context of ‘countryside locations’ rather than across the board. This ties in neatly with some of the problems identified in objective 13. The promotion of coexistence may be facilitated by a greater level of consultation and communication by LPAs in determining the location of the sites.

### Travelling Showpeople

- 4.5.6 The options assessment considered three alternative policy approaches to allocating Travelling Showpeople plots. The assessment found that there were pros and cons to the different options, but that there was some suggestion that Option C – working to achieve a more balanced distribution across districts – would be most likely to achieve significant net benefits. Option C has been taken forward as the preferred policy.
- 4.5.7 The general performance of the policy is in line with that for the Gypsies and Travellers policy. However, there are some additional issues. Firstly, the yards or plots of Travelling Showpeople sites are not only used for habitation but also for storage. As the policy points out this presents some planning problems. Essentially the sites will need to accommodate living areas that are suitable, in close proximity to heavy goods vehicles (HGVs) and other mechanical plant. This provides some risk to the health of the occupants and thus any policy should ensure the safety and health of the occupants by having stringent design measures to separate these different uses.
- 4.5.8 Secondly, but again related to HGVs and plant, there is potential for these sites to cause disturbance in terms of noise, air pollution and visual impacts. There is a potential need for additional guidance on the locational criteria for these sites. Finally, this use of the

sites may create a more difficult situation in regard to promoting co-existence in the area.

### Car Parking Standards

- 4.5.9 The options assessment considered two alternative approaches to car parking standards. The assessment found clear evidence to suggest that Option A – adopting revised standards – would lead to significantly greater benefits in terms of a range of sustainability objectives than the alternative option, which was to keep with the existing standards. Option A has been taken forward as the preferred policy.
- 4.5.10 It is technically quite difficult at this level to provide a detailed assessment of the implications of the new standards as they are decided on a case-by-case basis. With this in mind, this policy generally performs better than the previous one, essentially due to the fact that there is more ‘granularity’ in the standards. With more accuracy comes greater certainty for developers and assumes an overall reduction in parking space provision. It could also be assumed that a greater accuracy in allocations could reduce the amount of car parking facilities actually needed. Finally there is a good emphasis on provision for cyclists and other forms of active transport and an emphasis on access for the disabled. It should also be noted that these standards provide one aspect of a multifaceted policy and that it should be seen holistically rather than stand alone.

## 4.6 Mitigation and Recommendations

- 4.6.1 A key recommendation that has emerged from the Gypsies and Travellers policy appraisal and affects several issues relates to the need to explicitly mention the need for coexistence in all locations, not just countryside locations. To this end, and generally, there is a need for close engagement and communication with Gypsy and Traveller communities. The policy would benefit from a paragraph discussing engagement and consultation with Gypsy and Traveller communities.
- 4.6.2 With regards travelling showpeople, there is a need for further guidance on the design and location of sites, especially those that will use HGVs, heavy plant or other noisy and polluting equipment. Again, consultation with these communities is essential and a paragraph within the policy on this would be beneficial.
- 4.6.3 No mitigation or recommendations are proposed for the car parking standards.
- 4.6.4 The table below lists further recommendations for the Partial Review in relation to Gypsies and Travellers and Travelling Showpeople:

## Further Recommendations

### To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home

- Some guidance for local authorities on the time period for which sites are granted planning permission may be required. There are benefits for the Gypsy and Traveller population from long term permissions, but local authorities may seek guarantees that sites can be subject to further development in the future.
- Local Authorities should consider not only CLG's Draft Guidance on the Design of Sites for Gypsies and Travellers: a consultation paper, (May 2007) when designing new sites but also follow the principles set out in other guidance on sustainable design and construction to allow for the highest standards to be met.
- Travelling Showpeople sites must be subject to the same level of requirement in terms of good design and construction.

### To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment

- As part of the design of sites water saving initiatives such as sustainable urban drainage systems and grey water recycling facilities should be installed especially in areas where there is a water deficit.
- In addition, given that sites allocated on Greenfield land often become permanent, site allocations should be 'future proofed' i.e. allocated based on an understanding of likely future changes in flood risk.

### To improve the health and well-being of the population and reduce inequalities in health

- Existing sites should be improved to meet health and safety standards, size standards, facilities for the disabled, access to health care where they may require expansion to meet pitch requirements.
- Local authorities should be directed to consider ways of providing for the specific needs of gypsies and travellers and travelling showpeople as part of developing their strategic policies on health in partnership with PCTs and other health consultees.
- When promoting health measures such as healthy eating, exercise and other measures for good health Local Authorities should target communities suffering the worst conditions, such as the Gypsy and Traveller community.

### To reduce poverty and social exclusion and close the gap between the most deprived areas in the North West and the rest of the region

- In partnership with social services and other relevant consultees and local authorities, there should be a proactive approach to improving the conditions for the Gypsy and Traveller community and the Travelling Showpeople community. Options that tackle the causes of social exclusion and poverty, such as barriers to education, health services and adequate site infrastructure should be addressed.

### To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work

- When creating new sites Local Authorities should aim to include requirements for accessibility to educational facilities, including libraries and adult education facilities.

### To reduce crime and the fear of crime

- Prior to the opening of new sites Local Authorities could be advised to undertake education and awareness workshops to improve relations between the settled and travelling communities and reduce

the fear of crime.

### To create and sustain vibrant communities

- When allocating, planning for and designing sites, recognition of the distinctions between the sub groups within different Gypsy, Traveller, and Travelling Showpeople communities (i.e. Romany, Irish and English) will assist in supporting vibrancy. This would also be in keeping with the principles set out in the Race Relations Act, and the Human Rights Act.
- This may include consideration of the size of pitches, improving buffering around existing pitches, and the provision of high quality communal facilities.
- Public sites should also be adequately buffered from the settled community with planting for example to allow for privacy for Gypsy, Traveller and Travelling Showpeople families.
- LPAs are likely to need place tailored initiatives to support the Gypsy, Traveller and Travelling Showpeople communities especially in areas already experiencing high levels of deprivation.

### To improve accessibility to all services and facilities

- Policy could be supported by guidance to ensure sites are located in proximity to educational, health facilities, public transport, and other essential facilities in line with CLG guidance.
- Guidance for LPA's should also consider requirements for on-site facilities and infrastructure, including water supply, toilet and washing facilities, drainage and waste facilities and services.
- When developing options for the allocation of Gypsy and Traveller and Travelling Showpeople sites, Local Authorities should host meetings with health, education and other service providers to discuss what measures can be put in place to improve access to these essential facilities.
- In order to facilitate accessible services Local Authorities should be encouraged to carry out some additional research on specific barriers which inhibit the Gypsy, Traveller and Travelling Showpeople communities in order to overcome these. This could help to overcome such barriers.
- Gypsy, Traveller and Travelling Showpeople sites should be subject to the same level of facilities, infrastructure and accessibility as permanent sites.

### To encourage increased engagement in cultural activity across all sections of the community in the North West

- Further research on Gypsy and Traveller cultures and sub-cultures and traditions by Local Authority cultural services may be beneficial.
- When developing policies on promoting engagement in culture Local Authorities should consider options on how they promote increased awareness and respect for the Gypsy, Traveller and Travelling Showpeople cultures and traditions, as well as improving access for Gypsies, Travellers and Travelling Showpeople to wider cultural activities in the North West.
- Measures to promote the positive cultural traditions of Gypsies and Travellers should be considered, which could lead to further requirements for the provision of facilities on sites.

### To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance

- Although a sequential approach should be applied, policy should avoid limiting the search for Gypsy and Traveller and Travelling Showpeople sites to brownfield land. The planning process will determine at the local level the most appropriate and efficient use of land given the pressures for settled accommodation



and the complex needs of the Gypsy, Traveller and Travelling Showpeople communities.

#### To conserve and enhance the region's biodiversity

- The allocation of sites should be in accordance with PPS9 and other national, regional, and local Biodiversity Action Plans.
- Ability to provide for appropriate grazing areas should be considered when allocating sites.

#### To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment

- It will be important that sites are allocated in accordance with PPG16 (Archaeology), PPS9 (Biodiversity and Geological Conservation), PPS7 (Sustainable Development in Rural Areas) and other relevant guidance
- It is likely that one of the main concerns regarding Gypsy and Traveller and Travelling Showpeople sites will be their visual intrusion on the surrounding countryside. Measures such as natural screening and landscaping of sites could mitigate these concerns.

#### To reduce waste generation and disposal and achieve the sustainable management of waste

- When designing Gypsy and Traveller and Travelling Showpeople sites, Local Authorities should work in partnership with the local waste services to include the most appropriate waste recycling and composting facilities to assist in meeting local targets.
- Any local promotional campaigns to encourage recycling and composting should also be targeted towards the Gypsy, Traveller and Travelling Showpeople communities to increase the levels of recycling and composting.

#### To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region

- Local authorities, when developing education, training, skills, employment and other related policies, should work with education providers to help improve access to those least likely to access skills training, such as the Gypsy and Traveller community.

## 4.7 Monitoring

4.7.1 The SEA Directive includes a specific requirement for monitoring the significant environmental effects of plans and programmes and the Environmental Report on the assessment (incorporated within the SA Report) should include a description of the measures envisaged for monitoring the plan.

4.7.2 Government guidance on the development of Regional Spatial Strategies Planning Policy Statement (PPS) 11 states that "in order to help focus on the key actions that are necessary to deliver the strategy, policies should be quantified and output targets and indicators set" wherever practicable. The guidance also advises that it's "important that progress against the output targets is monitored as a key element of the annual monitoring report". Contextual indicators should also be monitored. As previously mentioned, as part of the wider SA, and as required by the SEA Directive, "the significant effects of the RSS on society and the economy, as well as on the



environment, need to be assessed and monitored<sup>22</sup>. Detailed guidance for RSS monitoring can also be found in *Regional Spatial Strategy Monitoring: A Good Practice Guide*<sup>23</sup>.

- 4.7.3 The monitoring framework in the consolidated SA report of the North West RSS comprises four tiers of indicators to assess progress towards the RSS vision. It should be noted that the RSS is also subject to monitoring. Proposals for implementing and monitoring the sustainability effects of the North West Plan are set out in its Implementation and Monitoring framework.
- 4.7.4 The following indicators are drawn from the Monitoring Framework and are applicable to measuring the performance of the policies set out in the Partial Review:

*Table 10: Relevant Monitoring Indicators from the North West RSS Monitoring Framework*

Indicator	Target	Source
Percentage of people in employment's usual method of travel to work – by mode.	By 2010, increase bus use by 10%, rail by 50% (passenger kms), DFT Ten Year Transport Plan	Department for Transport
Percentage of people who feel that their local area is a place where people from different backgrounds and communities can live together harmoniously.	Increase	Indicator forthcoming
Percentage of residents finding it easy to access key local services.	Increase	New Indicator

<sup>22</sup> Office of the Deputy Prime Minister (2004) *Planning Policy Statement 11: Regional Spatial Strategies* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps11>

<sup>23</sup> Office of the Deputy Prime Minister (2005) *Regional Spatial Strategy Monitoring: A Good Practice Guide* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps11>

- 4.7.5 In addition, the document “*Regional Spatial Strategy and Local Development Framework: Core Output Indicators – Update 2/2008*” (CLG) identifies a further indicator of great relevance to the Partial Review. This is simply the “**Net additional pitches (Gypsy and Traveller)**” count which can be sourced from CLG or Local Authorities. This indicator can be directly compared against the targets set in the Partial Review.

## 4.8 Conclusions

- 4.8.1 In the SA of the options for the Partial Review it was concluded that, in terms of Gypsies and Travellers and Travelling Showpeople, the issues are complex and there is a 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.
- 4.8.2 The preferred options taken forward were all found to be generally sustainable, although specific issues regarding the policies for Gypsies and Travellers and Travelling Showpeople were raised. These can be rectified through the wording of policy or inclusion of guidance for Local Authorities on particular issues.
- 4.8.3 In relation to cumulative effects, no significant effects have been identified. The selection of Option C in both the Gypsies and Travellers and Travelling Showpeople policies mean that sites should be spread throughout the region, reducing the possibility of cumulative impact of several sites in one area. It also limits the likelihood of cumulative impacts with other uses, although the cumulative effect of how Local Authorities apply regional policy will need careful consideration to ensure that, in any given location, a cumulative effect is not created together with other uses.

## 5 Next Steps

- 5.1.1 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.
- 5.1.2 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.

### 5.2 Consultation

- 5.2.1 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

- 5.2.2 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**

5.2.3 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**

5.2.4 Please send comments on this report to:

**Peter Richards**  
Scott Wilson  
St James's Buildings  
Oxford Street  
Manchester  
M1 6EF

e - mail: [northwestplanpartialreview@scottwilson.com](mailto:northwestplanpartialreview@scottwilson.com)

## Appendix 1: Appraisal Matrices



## Appendix 2: Appraisal Group Report