

# Strategic Environmental Assessment of the Revocation of the North West of England Regional Strategy

## Environmental Report



AMEC Environment & Infrastructure UK Limited

December 2012

This Environmental Report is a consultation document on the likely significant environmental effects of revocation of the North West of England Plan and the Regional Economic Strategy (which together form the Regional Strategy in force for the North West of England). **Responses on any aspect of the report are invited by Monday 18 February 2013.**

This report succeeds the previous Environmental Report for the revocation of the North West of England Regional Strategy which was consulted on between October 2011 and January 2012. It is a stand alone document the intention of which is to provide the reader with an up-to-date comprehensive assessment of the environmental effects of the revocation of the North West of England Plan and the Regional Economic Strategy without the need to refer back to the previous Environmental Report. Any reader who has also read the previous Environmental Report should note that, insofar as there is any difference between the two documents, this Environmental Report is to be preferred.

A summary of responses to this consultation will be published on the DCLG website in due course. Unless you specifically state that your response, or any part of it, is confidential, we shall assume that you have no objection to it being made available to the public and identified on the DCLG website. Confidential responses will be included in any numerical summary or analysis of responses.

Responses and comments about this consultation may be sent by email to:

[SEAConsultation@communities.gsi.gov.uk](mailto:SEAConsultation@communities.gsi.gov.uk) or by post to:

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# Non Technical Summary

This **Non-Technical Summary** presents the findings of the **Strategic Environmental Assessment (SEA) of the plan to revoke the North West of England Regional Strategy** contained in the accompanying Environmental Report. The assessment, Environmental Report and Non-Technical Summary have been completed by AMEC E&I UK Ltd on behalf of DCLG.

The following sections:

- explain what the plan is and its implications for the North West of England region by revoking the North West of England Regional Strategy;
- provide a summary of the environment within the region;
- outline the likely significant environmental effects of the Plan, along with the reasonable alternatives;
- propose mitigating measures for likely significant environmental effects identified;
- propose monitoring measures; and
- provide an indication of the next steps.

## The plan to revoke Regional Strategies

The Government announced in the Coalition Agreement its intention to “*rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils*”. The objective was to make local plans, and where desired neighbourhood plans, the basis for local planning decisions.

The Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised regional strategies, and gave the Secretary of State powers to revoke in full or in part the existing strategies by order.

The Government’s proposal is to replace the eight regional strategies outside London with a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth.

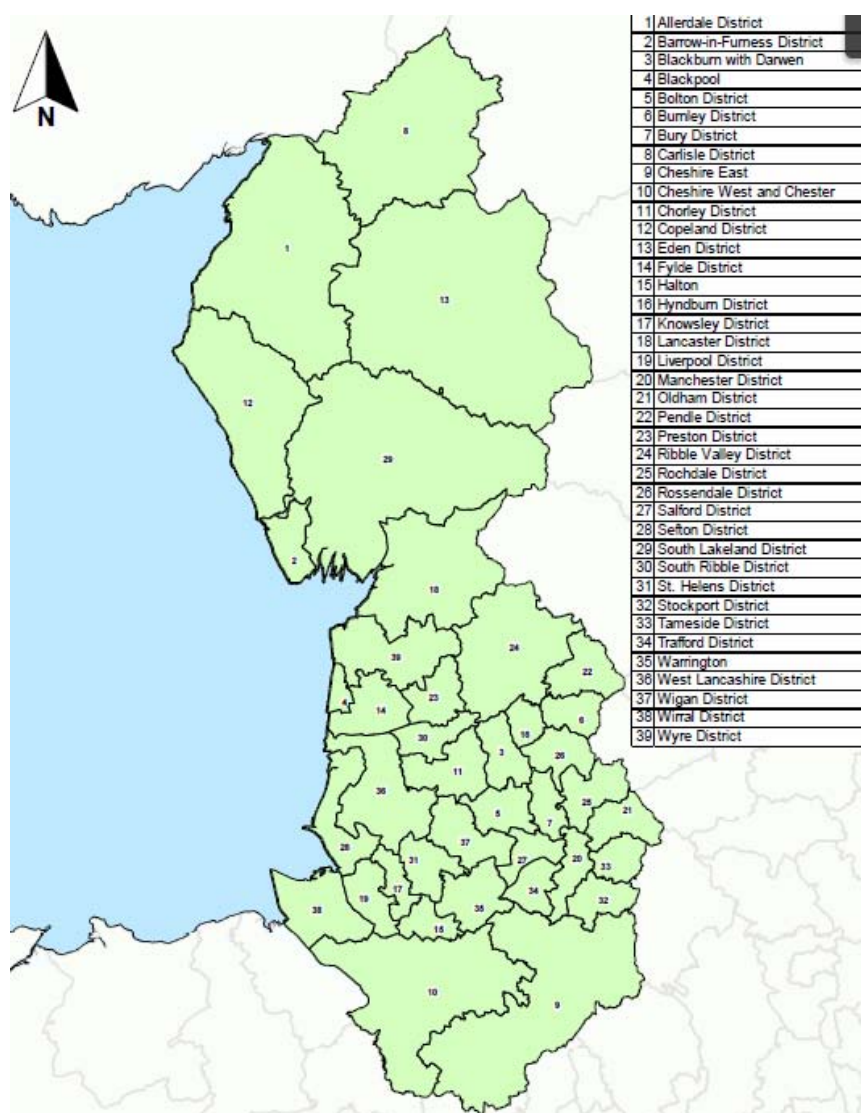
## The North West of England Regional Strategy

The North West Regional Strategy combines the contents of the **North West of England Regional Spatial Strategy** and the **North West of England Regional Economic Strategy**.

The **North West of England Regional Spatial Strategy** (published as the North West of England Plan in September 2008) was introduced under the Planning and Compulsory Purchase Act 2004 and, in accordance with Government policy at the time, provides a broad development strategy for the region up to 2021. In particular, it has sought to focus development towards the two regional centres of Manchester and Liverpool, promoting sustainable communities and economic development with complementary policies providing for the protection of the environment and for the mitigation and adaption to the effects of climate change. A key element of the Strategy is the focus upon the sub-regions. Four sub-regions are identified and the document provides specific policy for each.

The key ambition of the North West of England Plan is to allow the region to accommodate higher levels of growth in sustainable ways by focussing development firstly within the two regional centres referenced above followed by the inner areas surrounding these centres and then the towns and cities within the three city regions, followed by the other towns and cities. The North West of England Plan requires local planning authorities to provide at least 416 000 net additional dwellings over the period 2003 to 2021 with an indicative target of 70% to be located on brownfield land.

Figure NTS 1 The North West of England Area Covered by the North West of England Plan



The Plan contains:

- spatial principles which other sub-regional and local plans and strategies and all individual proposals, schemes and investment decisions should adhere to;
- the Regional Spatial Framework, which sets out the spatial policies for the region;
- policies covering specific topic areas such as housing, employment, transport, the environment, minerals and energy; and
- more location-specific policies on a number of sub-areas and key centres for development and change.

In total there are 10 policy areas. Further details of the individual policies are set out in **Appendix A**.

The **North West of England Regional Economic Strategy** (RES) was produced in compliance with the Section 7 of the Regional Development Act 1998. It provides a vision for the North West of England economy which is 'a dynamic, sustainable, international economy which competes on the basis of knowledge advanced technology and an excellent quality of life for all'. The RES identifies three main drivers to achieve the vision, these are to improve productivity and grow the market, grow the size and capability of the workforce and to create and maintain the conditions for sustainable growth. The RES sets out a series of actions under these drivers which are presented under five themed chapters. These themes are:

- Business;
- Skills and Education;
- People and Jobs;
- Infrastructure;
- Quality of Life.

The RES was developed with regional partners and was subject to a formal consultation and SEA process.

There is a strong and complementary relationship between the North West of England Plan and the North West of England RES:

- they share an understanding of the spatial priorities of the region, particularly around the two regional centres for development and change, Manchester and Liverpool. The RES adds an economic analysis of the scale and roles of key centres for development and change;
- the North West of England Plan includes policies to support economic growth, infrastructure and improve quality of life within the region which supports the themes outlined in the Regional Economic Strategy;
- the RES recognises the importance of linking areas of opportunity with areas of need;
- both the Regional Economic Strategy and North West of England Plan have been prepared in accordance with the region's sustainable development priorities with the RES setting out, against each theme the key social and environmental outcomes measured against the UK priorities for sustainable development.

The relationship between the RES and the North West of England Plan is set out in more detail in **Appendix H**.



## Strategic Environmental Assessment (SEA) of the plan to revoke the North West of England Regional Strategy

SEA became a statutory requirement following the adoption of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The objective of SEA, as defined in Directive 2001/42/EC is: *‘To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to contributing to sustainable development’*.

As part of its stated commitment to protecting the environment, the Government decided to carry out an assessment of the likely significant environmental effects of the revocation of the 8 regional strategies, on a voluntary basis. A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012. There were 103 responses to the consultation process.

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework (NPPF) and a planning policy on travellers sites, and has commenced provisions in the Localism Act and introduced a duty to co-operate in the Localism Act which contains strong measures for local co-operation.<sup>1</sup> In addition, in a judgement<sup>2</sup> by the Court of Justice of the European Union (CJEU), the Court held that ‘..in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment’. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent CJEU case law, to update and build on the assessments which were described in the previous Environmental Reports. This assessment is the result in relation to the revocation of the North West of England Regional Strategy - it is a stand-alone document and there is no requirement to refer back to the previous report on the revocation of the North West of England Regional Strategy published on 20 October 2011.

## The North West of England environment

To provide the context for the assessment, the SEA Directive requires that the relevant aspects of the current state of the environment and its evolution without the plan are considered, along with the environmental characteristics likely to be significantly affected. This information is presented in detail for each SEA topic considered in this assessment in **Appendix E**. Table NTS 1 provides a brief summary.

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<sup>1</sup> S110 of the Localism Act 2011 duty to co-operate in relation to planning for sustainable development.

<sup>2</sup> The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*.

Table NTS 1 Summary of state of the environment in the North West of England

SEA Topic	Summary of the Environment and Key Characteristics in the North West
<b>Biodiversity and Nature Conservation</b> (which includes flora and fauna, and the functioning of ecosystems)	Around 60% of the biodiversity habitat area of the North West lies within statutory designations of Sites of Special Scientific Interest (SSSIs), Special Protection Area (SPA), Special Area of Conservation (SAC) and/or Ramsar Sites and is thus protected by legislation. The region has the largest area of SSSI of all regions in England with 200,000 ha (18% of the region); of this 13% is also designated as SPA, SAC or Ramsar Site. The largest SSSIs cover intertidal or high moorland areas; elsewhere sites tend to be small and fragmented, particularly in the south of the region. The remaining 40% of biodiversity habitat area lies outside statutory designations and is largely unprotected. 90.25% of the SSSIs in the North West are in favourable or recovering condition.
<b>Population</b> (including socio-economic effects and accessibility)	<p>According to ONS figures, the North West had a population of 6.9 million in mid-2010 – the third largest English region. In the period 2001-2010 the population of the region grew 2.4 per cent, the lowest growth of all English regions. Within the North West, Manchester showed the largest population increase in the period 2001-2010 at 17.9 per cent, however the populations of Burnley and Sefton decreased by 4.7 and 3.5 per cent respectively during the same period.</p> <p>Local authority statistical returns indicate that there were 3,111,257 dwellings in the North West in 2008. The main source of additions to the dwelling stock is new construction. Dwelling starts built up to a peak in 2005/06 but subsequently fell as housing market uncertainties increased, with a very sharp reduction to 7,140 in 2008/09. Starts in 2010 ran well below 2,000 for three consecutive quarters.</p> <p>Economically, although the North West has the third largest population (6.9 million) and the third largest economy (£119bn), in GVA per capita terms it is ranked sixth out of the nine regions. Over the period 1997 to 2007 average annual GVA per capita growth in the North West of 4.7% lagged the England average of 4.9%.</p>
<b>Human Health</b>	<p>In the North West, the average life expectancy at birth rate in 2005/07 was 78.2 years compared with 79.7 years life expectancy in England as a whole.</p> <p>The death rate in the region whilst reducing continues to be higher than the national average. In comparison with other regions in England, the North West demonstrates the highest rate for deaths from heart disease and stroke, long-term mental health problems, alcohol related hospital stays, hospital admissions for depression, anxiety disorders and for schizophrenia, self-reported violence, violent injuries serious enough to require hospital treatment, incapacity benefit claimants for mental and behavioral disorders as well as the second highest rate for deaths from cancer and smoking related illnesses, death from suicide and injuries of undetermined intent, reported levels of feeling in poor health.</p> <p>The North West has over a fifth (20.4%) of all its Lower Super Output Areas (LSOAs)<sup>3</sup> classified as being in the 10% most deprived in England. The North West has a greater proportion of these areas classified as most deprived than in any other region.</p>

<sup>3</sup> Lower Super Output Areas (LSOA) are a geography designed to improve the reporting of small area statistics. They were introduced initially for use on the Neighbourhood Statistics (NeSS) website, but it was intended that they would eventually become the standard across National Statistics. LSOAs typically have a minimum population of 1,000 and a mean population of 1,500.



Table NTS 1 (continued) Summary of state of the environment in the North West of England

SEA Topic	Summary of the Environment and Key Characteristics in the North West
<b>Soil and Geology</b> (including land use, important geological sites, and the contamination of soils)	<p>The North West has a diverse range of soils, from blanket peat, to dune sands, to calcareous gley soils.</p> <p>With regard to land use, agricultural land covers the majority of the region. 80% of this is graded agricultural land whilst the remaining land is urban and non-agricultural (20%). The majority of the region's urban and non-agricultural 46 areas are concentrated around Merseyside and Greater Manchester.</p> <p>7.1% of the regional land mass is classified as being of high quality agricultural land, and is located in southern Lancashire. Cattle and sheep farming dominates farm types in Cumbria and Lancashire whilst horticulture, general cropping and 'other' farm types are most prevalent in locations around Manchester and Merseyside, and in Cheshire.</p> <p>There are 11,606 ha of Previously Developed Land (PDL) in the North West; this is the highest of all the English regions. The region is also home to a quarter of England's Derelict, Underused and Neglected (DUN) land.</p>
<b>Water Quality and Resources</b> (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	<p>There is 6,458 km of river in the North West and 866 surface water bodies covered by River Basin Management Plans (RBMP) within the North West River Basin District (North West region, Solway Tweed and Dee). All the water bodies in the region have been classified and had objectives set for 2015, 2021 and 2027.</p> <p>North West water chemical quality is now better than the average for England (based on rivers achieving a good or fair rating), but it is not as good for biological quality. Currently, 29% of groundwaters are achieving 'good' status, with 33% predicted to achieve 'good' status by 2015.</p> <p>In the North West 10% (89 of the 866) of surface water bodies are currently at risk from, or probably at risk from, too much abstraction and are consequently being damaged.</p>
<b>Air Quality</b>	<p>All the key air pollutants in the North West have shown major decreases, however carbon monoxide levels have increased due to growing traffic in the region. This is particularly evident around major cities at peak travelling times. Although currently carbon monoxide levels are considered to be high, it is predicted that they peaked in 2003 and the predicted future trend is downwards. Pollutant levels for NO<sub>2</sub> and PM<sub>10</sub> around congestion hot spots are however likely to continue to be high.</p>
<b>Climate Change</b> (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	<p>Carbon dioxide (CO<sub>2</sub>) is the most common greenhouse gas across all sub-regions within the North West accounting for about 88% of the regions total Global Warming Potential (GWP) in 2005. Methane and nitrous oxide are more significant in the sub-regions of Cheshire and Cumbria, where emissions from agriculture and nature are more intense. The amount of CO<sub>2</sub> produced in the region has fallen since 1990 and the regional economy is 'de-carbonising' as a whole as the result of the shift from manufacturing to services, rather than behavioural change.</p> <p>Environment Agency flood mapping indicates some 159,000 properties are at risk of flooding from rivers and/or the sea in the region. 37,200 are at significant risk, 48,700 are at moderate risk and 73,100 are at low risk.</p>
<b>Waste Management and Minerals</b>	<p>The total quantity of municipal waste peaked in year 2003/04 since when there has been progressive reduction in arisings which is also reflected in figures for England as a whole. In 2008/09 household waste, which accounts for 90% of municipal waste in the North West, reduced by 10.5% compared with 2003/04. Municipal waste in total, including non household waste arisings, reduced by 12% over the same period. In the national context the recycling rate for the North West region as a whole at 36.6% remains marginally below the average for England of 37.6%.</p> <p>The North West is a major producer of sand and gravel (mainly silica sand) for non-aggregate (industrial) uses. Silica sand has widespread use in general construction, glass, and foundry casting industries and industrial applications.</p>
<b>Cultural Heritage</b> (including architectural and archaeological heritage)	<p>The region has a large number of statutorily protected buildings, particularly industrial and commercial buildings, in comparison with many other regions. In 2011 there were 27,529 listed buildings in the region. English Heritage recorded that 5.2% of grade I and II* listed buildings were 'at risk' which is above the national average of 3%. 45% of buildings on the 1999 register have however been removed from the register. 1,316 scheduled ancient monuments were recorded of which 15.1% were identified as being 'at risk', a figure slightly below the national average of 16.9%. Farming and land management practices, particularly in the north of the region have a large impact upon rural historic assets, particularly, scheduled ancient monuments.</p>

Table NTS 1 (continued) Summary of state of the environment in the North West of England

SEA Topic	Summary of the Environment and Key Characteristics in the North West
Landscape and Townscape	<p>There is no single landscape type which could be considered to be typical of the North West region which is distinguished by a huge diversity within a relatively small area, e.g. wide coastal plains, rolling lowland pastures, woodlands, industrial townscapes and upland fells and mountains.</p> <p>Some 29% of the region is designated as 'protected landscapes' compared to 23% for England. This includes extensive areas of National Park (the Lake District National Park) which account for 18% of the entire region (only second to Yorkshire &amp; Humber) and 11% as Areas of Outstanding Natural Beauty (AONB) below the national average of 16%. (The North Pennines AONB spans across Cumbria, Northumberland and Durham and is also a European Geopark). The Lake District is the largest of England's National Parks covering 229,159 ha. The North West has only 6 km of Defined Heritage Coasts (around St Bees Head). Heritage Coasts are special coastlines managed so that their natural beauty is conserved; it is a non-statutory landscape designation.</p>

A more detailed description of issues and existing environmental problems that relate to sites designated under the Habitats Directive 92/43/EEC and the Birds Directive 79/409/EC is set out in **Appendix G**.

The evolution of the environmental baseline is likely to include the following changes:

- an increase in pressures on biodiversity from the levels of housing and employment growth;
- a growth in the population by approximately 840,000 or 12% reaching a total of 7.7 million by 2031;
- a growth in the number of households living in the region by 686,000 to 3,617,000 by 2031;
- water resource availability is forecast to decrease without further investment in infrastructure;
- hotter and drier summers and warmer and wetter winters (based on predictions for the effects of climate changes in the 2080's for the region);
- a rise in sea level of up to 63cm by the 2080's from climate change leading to coastal change and habitat loss and flooding.

**Appendix E** contains more detailed information on the evolution of the baseline.

## The relationship of the plan to revoke the North West of England Regional Strategy with other policies, plans and programmes

Consistent with the SEA Directive requirements, this assessment has identified and reviewed other relevant policies, plans and programmes at an international (European), national, regional and local level. The review has identified how these other policies, plans and programmes could influence the plan to revoke the regional strategy. It also identifies how the plan to revoke could contribute to the achievement of any environmental or sustainability objectives set out in these other policies, plans and

programmes. Of particular relevance is the National Planning Policy Framework, as well as the 35 saved structure plan policies, the 40 local plans and 22 plans that contain mineral and waste policies in the region. The relevant policies from the local plans and mineral and waste plans are presented in **Appendix C**.

The relevant environmental protection objectives are reviewed and provided in **Appendix E**. Examples include:

- protection and enhancement of the levels and variety of biodiversity, including designated sites, priority species and habitats;
- protection and enhancement of soil quality and landscape character;
- protection and enhancement of water supplies and resources; and
- promoting the efficient use of water.

The review also helped to inform the development of the baseline, aid the determination of the key issues and provide the policy context for the assessment.

## Which environmental topics has the plan to revoke the North West of England Regional Strategy been assessed against?

The plan to revoke the Regional Strategy has been assessed against the 12 topic areas, identified below. These include all of the topics set out in the SEA Directive. The methodology used within the assessment is in **Section 3** of the Environmental Report.

<b>1. Biodiversity</b>	<b>8. Air quality</b>
<b>2. Fauna</b>	<b>9. Climatic Factors</b> including climate change and adaptation and flood risk
<b>3. Flora</b>	<b>10. Material Assets</b> including waste management and minerals
<b>4. Population</b> including demographics, socio-economics	<b>11. Cultural Heritage</b> including architectural and archaeological heritage
<b>5. Human health</b>	<b>12. Landscape</b>
<b>6. Soil</b> including geology and land use	
<b>7. Water</b> quality (including surface and ground water quality and availability)	

The baseline data and information required under the SEA Directive for each of these topics is presented in **Appendix E** to the Environmental Report.

## What reasonable alternatives were identified and assessed?

Consideration of the reasonable alternatives for a proposed policy or plan is a fundamental aspect of policy and planning development and a pre-requisite for the preferred direction to gain wider and long term support. In turn, recording the reasons for the selection of the preferred option can also aid subsequent review, particularly if the assumptions that underpin any alternatives change over time.

Article 5(1) of the SEA Directive requires the identification, description and evaluation of reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme. On this basis, the starting point for identifying alternatives to the revocation of the North West of England Regional Strategy has been the scope of the powers of the Secretary of State to revoke, partially revoke or fully revoke the regional strategies. Responses to the consultation suggested a number of other alternatives (see **Appendix F** and Section 2.4 of the main report) including partial revocation.

Following the application of the reasonableness test in compliance with Article 5(1) of the SEA Directive, the following alternatives have been taken forward for assessment within the SEA:

- **Revocation** of the entire North West of England Regional Strategy;
- **Retention** of the North West of England Regional Strategy but not updating it in the future;
- **Partial revocation of the North West of England Regional Strategy either by:**
  - revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies, ambitions and priorities; or
  - retaining for a transitional period all the spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and revoking the non spatial policies, ambitions and priorities; or
  - retaining for a transitional period policies, ambitions and/or priorities the revocation of which may lead to likely significant negative environmental effects.

Under either revocation or retention, local authorities will need to prepare and implement their local plans and other planning policy documents and to take planning decisions having due regard to the NPPF. The importance placed on the retained Regional Strategy and the NPPF may change over time, particularly when the Regional Strategy is not revised and so becomes out of date and less relevant to local community circumstances. Revocation of the Regional Strategy also has the potential to affect local plans and planning decisions more immediately as in some cases, removing the Regional Strategy will remove a regional policy that the local planning authority used to make local development decisions and local policy. The implications and effects on relevant local plan policies have therefore also been considered in the assessment.

## What are the likely significant effects<sup>4</sup> of the plan to revoke the North West of England Regional Strategy and the reasonable alternatives?

The assessment of the revocation of the North West Regional Strategy has shown that **there will be significant positive environmental effects**, although these will be largely similar to those if the Regional Strategy were retained.

The only area where revocation of the Regional Strategy would lead to **significant negative effects is in relation to material assets** arising from development associated with policies for housing and employment provision. It should be noted that a similar policy performance is recorded for the retention alternative. The Government's encouragement to increase the supply of new housing, and promote economic growth is likely to lead to a requirement for a significant amount of construction aggregates and materials. Similarly increases in households could lead to increases in waste. However the effects are likely to be minimised as far as possible through the application of policies in the NPPF which seek facilitate the sustainable use of materials and the actions and ambitions set out within the Government's National Waste Policy Review (Government Review of Waste Policy in England 2011, Defra).

**For the majority of policies, it is difficult to identify clear differences** between the effects of retention and revocation. This reflects the broad strategic nature of the Regional Strategy policies and the degree to which responsibilities are already devolved to local authorities to reflect the principles in their local plans. It also reflects the provisions of the NPPF which mean that the basic framework for the delivery of sustainable development is in place and which are also compatible with the sustainable development principles employed in the North West of England Regional Strategy. Differences tend to be over the timing of effects, both positive and negative.

**Where it occurs, differences between retention and revocation are most clear in respect of employment, housing, transport and certain sub-regional policies.** Whilst the benefits to communities of housing and employment opportunities and the impacts on biodiversity, air quality, soils, water and material assets will be similar, a locally-led approach could ensure that the adverse effects are more effectively mitigated. This could be through a more detailed understanding of local environmental capacity issues and possibly more diverse and locally-specific spatial distributions of development. In the case of revocation, it is AMEC's view that there is some uncertainty about whether the benefits will be realised in the short to medium term for those local authorities that need to establish Local Plan policies for housing and economic development that reflect the objectively assessed and up to date needs of their respective local communities. This issue may be relevant for the 24 out of the 40 North West local planning authorities who adopted Local Plans before 2008 (the date of the adoption of the North West Plan). The application of the NPPFs presumption in favour of sustainable development and its policies to boost the supply of housing will help where Local Plans or policies are absent, silent or out of date.

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<sup>4</sup> This includes consideration of the effects in the short, medium and long term permanent and temporary and positive and negative effects. Secondary, cumulative and synergistic effects are also specifically considered in Table NTS3.

**Where a Regional Strategy policy provides a strategic direction whose requirements extend beyond the boundaries of a single authority, such as the sub-regional policies, there may also be a difference in the short and medium term between retention and revocation.** Retention of the policy and the resulting development is likely to have significantly positive effects on the community and potentially negative effects on biodiversity, air, water and material assets, depending upon the wording of the aims and objectives of the individual policy. However, as in the previous example, it is AMEC's view that the effects of revocation will be more uncertain until authorities define, agree and implement the duty to co-operate and then reflect them in their adopted plans. The application of the NPPFs presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date. Furthermore it is recognised that local authorities are already coming together, through the production of joint core strategies or through the establishment of sub-regional authorities such as the Greater Manchester Combined Authority which should expedite co-operation.

Many of the benefits of retention relate to spatial planning issues that cross local authority boundaries (e.g. green infrastructure) and require direction and co-operation from a number of stakeholders including local authorities to be realised. Therefore, in the case of revocation, it is AMEC's view that there may be more uncertainty about benefits coming forward in the short to medium term where local authorities need to establish arrangements under the "duty to co-operate" to deliver such strategic policies and then reflect them in their adopted Local Plans. So **whilst the duty to co-operate could well address a wide range of strategic issues**, such as the delivery of green infrastructure, **it is AMEC's opinion that there is uncertainty as to how this might work, particularly in the short to medium term, both by topic and geographically.** Some issues such as renewable energy or waste recycling which typically benefit from being planned at a wider geographical scale, may not have their full potential realised, particularly where regional targets that are set at a level which is higher than the corresponding national target, are revoked.

The plan to revoke the regional strategies is national in scope as well as applying to the eight regions. In consequence the national implications and effects of the plan have also been considered in the cumulative assessment (see NTS3). In respect of setting local housing targets, over the medium and longer term, the wider effects could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets.

It should be noted that the effects of the recent Government housing and planning package changes<sup>5</sup> have not been considered in detail in this assessment as policy detail is still being developed; however, it may prove that the increased emphasis on growth and development given by these proposals addresses some of the effects in the short and medium term arising from the uncertainties in those authorities without local plans in conformity with the Regional Strategy.

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<sup>5</sup> <http://www.communities.gov.uk/news/housing/2211918>



The following table presents a summary of the environmental effects of revocation, retention and partial retention of each of the 10 policy areas contained in the North West of England Plan. It includes consideration of the short, medium and long term permanent and temporary, positive and negative effects. These cover a broad range of policy issues and encompass those contained in the Regional Economic Strategy, namely: Business; Skills and Education; People and Jobs; and Infrastructure and Quality of Life.

**Table NTS 2 Summary of the effects of revocation, retention and partial revocation by topic**

North West of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and Spatially-specific Policies	Non Quantitative and Non-spatially Specific Policies	Policies with Significant Negative Effects
Spatial Principles (Policies DP1-DP9)	There are no areas where revocation of those policies which make up the Spatial Principles would have any negative effects. There may be a delay in realising the benefits in the short and medium term due to the time required to put in place up to date local plans and implement the duty to co-operate.	There would be similar range of effects to revocation. Positive effects in the short and medium term would be more pronounced as there would be no delay in implementation.	No quantifiable policies identified.	No difference in the significance of effect between retention and revocation.	No policies have been identified with significant negative effects, therefore this is not applicable.
Regional Spatial Framework (Policies RDF1-RDF4)	There are no areas where revocation of those policies which make up the Regional Spatial framework would have any significant negative effects. Revocation of RDF1 (Spatial Priorities) may reduce a significant negative effect on air quality arising from a concentration of development in those parts of the region with poorest air quality which has been identified under retention.	There would be similar range of effects to revocation with the exception of Policy RDF1. Effects in the short and medium term would be more pronounced as there would be no delay in implementation.	There would be a similar range of effects arising from revocation for RDF1 and RDF4 which are identified as spatially specific.	There would be a similar range of effects to revocation although it might result in some uncertainty over how to implement the intent of the NPPF and the retained policies.	No policies have been identified whose revocation would lead to significant negative effects that were not identified for retention. Indeed revoking RDF1 would remove a significant negative effect on air quality which has been identified.
Working in the North West (Policies W1-W7)	The revocation of the policy is unlikely to affect local authorities' provision and planning for economic development. No significant negative effects would result although there may be a delay in the delivery of any positive and negative effects in the short and medium term due to the time required to put in place up to date local plans and implement the duty to co-operate.	There would be similar range of effects to revocation (with the exception of W2 which provides a framework for the location and employment sites and where a significant positive effect on population is recorded). Effects in the short and medium term would be more pronounced as there would be no delay in implementation.	There would be a similar range of effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	There would be a similar range of effects to revocation although it might result in some uncertainty over how to implement the intent of the NPPF and the retained policies.	No policies have been identified whose revocation would lead to significant negative effects that were not identified for retention.

Table NTS 2 (continued) Summary of the effects of revocation, retention and partial revocation by topic

North West of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and Spatially-specific Policies	Non Quantitative and Non-spatially Specific Policies	Policies with Significant Negative Effects
Living in the North West (Policies L1-L5)	The revocation of the policy is unlikely to affect local authorities' provision for housing. There will continue to be significant positive effects on population and significant negative effects arising from the revocation of some policies upon material assets.	Similar positive and negative effects to revocation although effects in the short and medium term would be more certain as there would be no delay in implementation.	There would be a similar range of positive and negative effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	There would be a similar range of positive and negative effects to revocation but with the potential for a delay in effects resulting from the time taken required to put in place up to date local plans and implement the duty to co-operate.	No policies have been identified whose revocation would lead to significant negative effects that were not identified for retention.
Transport in the North West (Policies RT1-RT10)	The revocation of the policies is unlikely to affect local authorities transport infrastructure provision and planning. Significant positive effects for population and health, air and climatic factors have been identified in the revocation of some policies due to improved air quality and reduced potential for greenhouse gas emissions due to the emphasis on sustainable transport modes within the NPPF.	Similar positive and negative effects to revocation but with less possibility for delay.	There would be a similar range of positive and negative effects to retention but with the potential for a delay in effects resulting from the time taken required to put in place up to date local plans and implement the duty to co-operate.	There would be a similar range of positive and negative effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	No policies have been identified with significant negative effects, therefore this is not applicable.
Environment, Minerals, Waste and Energy (Policies EM1-EM18)	The revocation of the policies is unlikely to affect local authorities' provision and planning for the environment. There will be benefits across many SEA topic areas with many of the effects being significant due to a combination of existing statutory environmental protection and the application of the NPPF policies. Revocation of EM12 (Locational Principles) may lead to a minor negative effect against what would be a significant positive effect for air, climate and human health under retention. There may be uncertainty in the longer term with regard to mineral policy.	Similar effects to revocation but with less possibility for delay. Retention of Policies EM15 (Framework for Sustainable Energy) and EM17 (Renewable Energy) may deliver significant benefits to climate change that may not be realised to the same extent through revocation.	There would be a similar range of positive and negative effects to retention but with the potential for a delay in effects resulting from the time taken required to put in place up to date local plans and the duty to co-operate. A change from positive significant under retention to minor positive significant under revocation is recorded against climate change for Policy EM15 and 17 as a result of the removal of the regional target for renewable energy generation which is set higher than the national target.	There would be a similar range of positive and negative effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	No policies have been identified whose revocation would lead to significant negative effects that were not identified for retention.

Table NTS 2 (continued) Summary of the effects of revocation, retention and partial revocation by topic

North West of England Plan Policy Area	Revocation	Retention	Partial Revocation		
			Quantified and Spatially-specific Policies	Non Quantitative and Non-spatially Specific Policies	Policies with Significant Negative Effects
Manchester City Region (Policies MCR1-MCR6)	The revocation of the policies is unlikely to affect the positive and negative effects identified. No significant negative effects would result although there may be a delay in the delivery of any positive and negative effects in the short and medium term due to the time required to put in place up to date local plans and implement the duty to co-operate.	Similar positive and negative effects to revocation but with less possibility for delay.	There would be a similar range of effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	This alternative is not relevant to these policies as all policies are quantifiable or spatially specific.	No policies have been identified with significant negative effects, therefore this is not applicable.
Liverpool City Region (Policies LCR1-LCR5)	The revocation of the policies is unlikely to affect the positive and negative effects identified. No significant negative effects would result although there may be a delay in the delivery of any positive and negative effects in the short and medium term due to the time required to put in place up to date local plans and implement the duty to co-operate.	Similar positive and negative effects to revocation but with less possibility for delay.	There would be a similar range of effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	This alternative is not relevant to these policies as all policies are quantifiable or spatially specific.	No policies have been identified with significant negative effects, therefore this is not applicable.
Central Lancashire City Region (Policies CLCR1-CLCR3)	The revocation of the policies is unlikely to affect the positive and negative effects identified. No significant negative effects would result although there may be a delay in the delivery of any positive and negative effects in the short and medium term due to the time required to put in place up to date local plans and implement the duty to co-operate.	Similar positive and negative effects to revocation but with less possibility for delay.	There would be a similar range of effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	This alternative is not relevant to these policies as all policies are quantifiable or spatially specific.	No policies have been identified with significant negative effects, therefore this is not applicable.
Cumbria and North Lancashire (Policies CLN1-CLN4)	The revocation of the policies is unlikely to affect the positive and negative effects identified. No significant negative effects would result although there may be a delay in the delivery of any positive and negative effects in the short and medium term due to the time required to put in place up to date local plans and implement the duty to co-operate.	Similar positive and negative effects to revocation but with less possibility for delay.	There would be a similar range of effects to retention but with the potential for a delay in effects resulting from the time required to put in place up to date local plans and implement the duty to co-operate.	This alternative is not relevant to these policies as all policies are quantifiable or spatially specific.	No policies have been identified with significant negative effects, therefore this is not applicable.

## What are the secondary, cumulative and synergistic effects of the plan to revoke the North West of England Regional Strategy?

In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to (amongst others) the secondary, cumulative, synergistic effects on the environment. The following table summarises the secondary, cumulative and synergistic effects by assessment topic.

The plan to revoke the Regional Strategies is national in scope as well as applying to the eight regions. In consequence the national implications and effects of the plan have also been considered in the cumulative assessment. In respect of setting local housing targets, over the medium and longer term, the wider effects could yield increasing differences between regions with growth concentrated in those areas of greatest demand with consequential effects for infrastructure and environmental assets.

**Table NTS 3      Summary of secondary, cumulative and synergistic effects**

Assessment Topic	Summary Cumulative Effects
<b>Biodiversity and Nature Conservation</b> (which includes flora and fauna, and the functioning of ecosystems)	<p>The North West Plan includes a number of policies that provide protection and enhancement of biodiversity and nature conservation features. Revocation of the North West Plan could in theory affect this if the alternatives lessened existing levels of protection; however, the NPPF together with legislation and wider national policies on biodiversity provides a strong framework to maintain the current high level for protecting the existing biodiversity resource. For example, given the continued application of the legal and policy protection given to European and Ramsar sites and to SSSIs and further application of agri-environment schemes it is expected that revocation of the Plan would not change the positive direction of travel. Indeed the NPPF statement that encourages brownfield land for development providing it is not of high environmental value provides extra safeguard and is in synergy with other policy approaches contained within the Framework which seek to improve the environment.</p> <p>Effects upon the environment, including biodiversity arising from increased demand for water, and waste water treatment are summarised under Water Quality and Resource below.</p>
<b>Population</b> (including socio-economic effects and accessibility)	<p>The North West Plan contains a variety of policies which directly or indirectly support economic development. The North West Plan is complementary to the North West Regional Economic Strategy which seeks to promote economic development in the region. Together these documents provide a significant positive cumulative effect for population.</p> <p>Access to jobs and decent homes is supported by the locational and qualitative policies contained within the document, particular policies W3, L3 and L4. Although it should be noted that there is less direction provided within the NPPF towards the linking of economic opportunities to areas of greatest need, local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. It is also recorded that job availability and reductions in worklessness can have important secondary effects upon matters such as human health (see below).</p> <p>Under revocation, the quantum of development identified by local planning authorities is likely to be supported by complementary Government initiatives such as the New Homes Bonus which cumulatively should lead to an increase in housing completions in the region.</p>
<b>Human Health</b>	<p>National health related policies/strategies and programmes are primarily related to improving the health of populations and reducing health disparities. Revocation will not affect the intent of the policy; local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. Similarly, revocation will not remove the need for more houses within the region. Indeed it is Government policy to boost significantly the supply of housing, for example initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth. Improvements to the region's housing stock should deliver important secondary health benefits. Furthermore, as noted above, reductions in worklessness can be indirectly supportive of health.</p>

Table NTS 3 (continued)      Summary of secondary, cumulative and synergistic effects

Assessment Topic	Summary Cumulative Effects
<b>Soil and Geology</b> (including land use, important geological sites, and the contamination of soils)	<p>The main adverse impacts on soil are a result of development and changes in agricultural practice. As the effects of climate change become more pronounced, increased erosion through storm surge run-off is likely to be a factor. Regional policy protection for soils is mainly indirect, either through the use of high brownfield targets (a regional average of 70%) or via measures to mitigate climate change.</p> <p>The NPPF does not contain a target for the re-use of brownfield land, although it does encourage its reuse, and there is a possibility that a greater proportion of greenfield land could come forward for development, although this will be subject to the individual policy stances taken by local authorities.</p> <p>Policies in the NPPF seek to protect best and most versatile land (i.e. ALC Grades 1-3a) and support green infrastructure and mitigate climate change. 'Safeguarding our Soils. A Strategy for England (Defra 2009)' sets out government policy to protect and enhance soil, including building resilience to climate change. Furthermore the Natural Environment White Paper (NEWP) states that by 2030 all of England's soils will be managed sustainably and degradation threats tackled successfully. Cumulative positive effects are also recorded for important geological sites given the protection they may enjoy through SSSI designation.</p>
<b>Water Quality and Resources</b> (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	<p>Both the supply and treatment of water resources were identified as potentially significant issues in the preparation of the North West Plan. The effects arising from greater water demand can impact upon environmental receptors such as biodiversity and landscape. Policies within the existing North West Plan require that development is phased with regard to the provision of new water treatment and supply infrastructure and also call for integrated water management. However, revocation is not considered to affect the policy intent as it will be delivered via the NPPF and legislation by a range of organisations. Joint and partnership working between the Environment Agency, water industry bodies, local authorities and others must continue in line with the new duty to co-operate in order to cumulatively deliver water efficiency, management and infrastructure benefits.</p>
<b>Air Quality</b>	<p>The North West Plan did not have any policies concerning air quality, although it was a component of some sub-regional policies and in particular those policies concerning transport. Consequently effects identified upon air quality were often secondary in nature.</p> <p>The implementation of renewable energy and sustainable energy policies and policies seeking to reduce landfill would have a secondary or indirect effect upon emissions levels. National planning policies, including those on air quality, sustainable development and transport, will continue to apply and inform local plan policies. Greater sustainable transport provision and infrastructure and the promotion of sustainable locations for development should also be supported locally through land use and transport planning for example the Local Transport Plans Round 3. Furthermore, in areas of poor air quality - including those within, or adjacent to, an Air Quality Management Area - local authorities will continue to work closely with relevant partners to ensure that development has taken proper account of relevant air quality matters.</p>
<b>Climate Change</b> (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	<p>The North West Plan contains a suite of policies which together would mitigate and adapt the region to climate change effects. Policies designed to promote sustainable modes of transport, reduce distances to travel, become more energy efficient, generate renewable energy and re-use and recycle all have benefits in mitigating climate change.</p> <p>Revocation will not cumulatively affect the ability of the region to mitigate and adapt to the effects of climate change. For example paragraph 94 of the NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change in line with the provisions of the Climate Change Act 2008. Separately the Government's zero carbon buildings policy and legally-binding target to ensure that 15% of energy comes from renewable sources by 2020 will be important in this regard. The Environmental Agency will continue to monitor development applications in areas liable to flooding.</p> <p>Secondary effect will also arise from the continued implementation of EU Directives which seek to reduce the amount of non-recycled waste which will lead to a continued reduction in landfill and fewer emissions to atmosphere of methane and other greenhouse gases.</p>

Table NTS 3 (continued) Summary of secondary, cumulative and synergistic effects

Assessment Topic	Summary Cumulative Effects
<b>Waste Management and Minerals</b>	<p>Recycling targets throughout the region differ considerably from those set out within the North West Plan which sets targets of 45% by 2015 and 55% by 2020 which is above the level identified within the National Waste Policy Review and revised Waste Framework Directive. Revocation may therefore affect the extent to which recycling is undertaken although there will be no policy impediment to achieving rates above the Directive target.</p> <p>The NPPF does not include waste policy. However, EU Directives which seek to reduce the amount of waste landfilled and require greater levels of recycling will be cumulative supportive.</p> <p>Minerals will continue to be extracted in support of economic development following revocation. Apportionment targets will be in place for each mineral planning authority and, as plans are reviewed, they will be expected to take account of minerals extraction based on the more localist approach set out in paragraph 145 of the National Planning Policy Framework, including published National and Sub-National Guidelines.</p>
<b>Cultural Heritage</b> (including architectural and archaeological heritage)	<p>A particular feature of the region is the relatively large number of statutorily protected industrial and commercial buildings reflecting its role at the birth of the industrial revolution. These buildings are often located within the inner core of the region's towns and cities and their re-use and refurbishment can provide the catalyst for wider regeneration.</p> <p>Revocation will not affect the intent behind the policy as existing legislation protecting listed buildings, scheduled monuments, conservation areas and registered parks and gardens remains in place.</p> <p>In planning for the historic environment, local authorities should continue to draw on available information, including data from partners, to address cross boundary issues; they should also continue to liaise with English Heritage to identify and evaluate areas, sites and buildings of local cultural and historic importance.</p> <p>National policies and targets to mitigate climate change will have important, secondary effects upon the historic environment because the climatic changes predicted may lead to issues such as subsidence and flooding which can detrimentally affect historic assets.</p>
<b>Landscape and Townscape</b>	<p>The North West is home to several landscapes of national importance.</p> <p>Protection for valued landscapes and nationally designated areas (which are also subject to statutory protection) will remain. Paragraph 115 of the NPPF maintains the policy basis for the legislation. The NPPF also maintains the policy previously contained in PPS7 that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged (paragraph 113), while landscape character assessments should be prepared where appropriate (paragraph 170).</p> <p>Improved access to the certain parts of the countryside will be promoted via the Countryside and Rights of Way Act 2000.</p>

## Proposed mitigation measures

A number of mitigation measures have been identified in the detailed assessment in **Appendix D**.

Mitigation of the effects will be diverse and may need to be topic or sub-regionally specific. For example, in planning for water provision as part of new development, there may be greater reliance on Water Resource Management Plans, greater involvement of the Environment Agency at a local level and heightened co-operation between interested parties. Similarly, for issues such as biodiversity, continued co-operation and resources would be required to achieve similar commitments in relation to protecting and enhancing green infrastructure to that intended under the North West of England Regional Strategy.



Significant effects upon material assets will be mitigated through the NPPF guidance to authorities to encourage the sustainable use of materials.

## Monitoring proposals

It is a requirement of the SEA Directive to establish how the significant effects of revoking the Regional Strategy will be monitored. As set out in ODPM Guidance<sup>6</sup>, *“it is not necessary to monitor everything or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects.”*

CLG's Business Plan<sup>7</sup> under section 5 'Put Communities in charge of planning' includes specific monitoring actions for the department regarding the local plan making progress by authorities and regarding compliance with the duty to co-operate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised local plans. When reviewing the environmental effects of the final decision on revocation, it is proposed that CLG will make periodic reference to the following metrics and sources of information contained in Table NTS 4. Any resulting analysis of long term trends will be used to consider whether any further mitigation or intervention is needed for:

- The significant effects identified in the assessment that may give rise to irreversible damage where it is appropriate to implement relevant mitigating measures before such damage is caused; and
- Uncertain effects where monitoring would enable preventative or mitigating measures to be undertaken.

Taking this into account, of the 12 topics considered in this SEA, it is proposed that monitoring should focus on the following:

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<sup>6</sup> ODPM, September 2005: *Practical Guide to the Strategic Environmental Assessment Directive*.

<sup>7</sup> CLG May 2012, Business Plan 2012-2015.

Table NTS 4 Proposed monitoring indicators and sources of information

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
<b>Biodiversity, Flora and Fauna</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>Condition of designated sites;</li> <li>Threatened habitats and species;</li> <li>Populations of countryside birds;</li> <li>Surface water biological indicators.</li> </ul>	<p>Joint Nature Conservation Committee (JNCC) report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats</p> <p><a href="http://www.jncc.gov.uk/page-4241">http://www.jncc.gov.uk/page-4241</a></p> <p><a href="http://jncc.defra.gov.uk/page-4239">http://jncc.defra.gov.uk/page-4239</a></p> <p><a href="http://jncc.defra.gov.uk/page-4238">http://jncc.defra.gov.uk/page-4238</a></p> <p><a href="http://jncc.defra.gov.uk/page-4235">http://jncc.defra.gov.uk/page-4235</a></p> <p><a href="http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF">http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</a></p> <p>Department for Environment, Food and Rural Affairs (Defra)</p> <p><a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a></p> <p>The Environment Agency (EA) are responsible for monitoring water quality under the Water Framework Directive.</p>
<b>Population</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>Employment Information;</li> <li>Population;</li> <li>Housing and additional net dwellings.</li> </ul>	<p>Office of National Statistics (ONS) reports, specifically Regional Trends and Regional Gross Value Added.</p> <p>Department for Communities and Local Government (DCLG) statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region.</p>
<b>Human Health</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>National Statistics – Long term illness, etc;</li> <li>Crime;</li> <li>Deprivation;</li> <li>Access to and quality of the local environment.</li> </ul>	<p>ONS statistics on health.</p> <p>Home Office, Crime Survey for England and Wales.</p> <p>DCLG statistics: Indices of Deprivation.</p> <p>ONS (proposed measures of wellbeing).</p>
<b>Soil and Geology</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>Land use.</li> </ul>	DCLG statistics.
<b>Water</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>% of catchments with good ecological status;</li> <li>Water resource availability;</li> <li>Per capita water consumption.</li> </ul>	<p>EA and Defra</p> <p><a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a></p> <p>United Utilities.</p> <p>United Utilities.</p>
<b>Air</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>Number of AQMAs;</li> <li>Number of AQMAs where exceedances occurred.</li> </ul>	<p>Defra.</p> <p>Defra.</p>
<b>Climatic Factors</b>	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> <li>Emission of greenhouse gases;</li> <li>Number of properties at risk of flooding.</li> </ul>	<p>Department of Energy and Climate Change (DECC) Statistical Release: Local and regional CO2 emissions.</p> <p>EA.</p>

Table NTS 4 (continued) Proposed monitoring indicators and sources of information

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
<b>Material Assets</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Volume of construction waste and proportions recycled;</li> <li>• Volume of hazardous waste;</li> <li>• Volume of controlled wastes and proportions recycled;</li> <li>• Volume of minerals extracted.</li> </ul>	EA. EA. EA. North West of England Mineral Planning Authorities'.
<b>Cultural heritage, including architectural and archaeological heritage</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• % of heritage assets of different types that are at risk.</li> </ul>	English Heritage 'Heritage at risk report'.
<b>Landscape and Townscape</b>	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Change in AONBs (area, threats and quality);</li> <li>• Changes in Conservation Areas;</li> <li>• Percentage who are very or fairly satisfied with local area;</li> <li>• Trend in number of vacant dwellings.</li> </ul>	National Association of Areas of Outstanding Natural Beauty (AONBs). English Heritage (if 2003 survey repeated). ONS (proposed measures of wellbeing). DCLG. <a href="http://www.communities.gov.uk/documents/housing/xls/1815794.xls">http://www.communities.gov.uk/documents/housing/xls/1815794.xls</a>

## What were the challenges faced in completing this report?

A number of technical difficulties were incurred in carrying out the assessment. These reflect a number of factors, principally that undertaking an assessment of the effects of revocation is new and that there are some uncertainties over future effects. The environmental effects of revoking the Regional Strategy will clearly be dependent on future decisions by local authorities, individually and collectively. The uncertainty arising from local decisions has been reflected as appropriate in the assessment of the individual policies in **Appendix D** and in the consideration in the topic chapters contained in **Appendix E**.

## The next steps

This Environmental Report will be presented for consultation until Monday 18 February 2013. Feedback received from consultees in relation to the SEA will be documented and considered in reviewing the proposals to revoke the regional strategies. A Post Adoption Statement will summarise how the SEA and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the proposals to revoke the Regional Strategies.



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# 1. Introduction

## 1.1 The Plan to Revoke Regional Strategies

The Government announced in the Coalition Agreement its intention to “*rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils*”. The objective was to make local plans, and where desired neighbourhood plans, the basis for local planning decisions.

The Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised regional strategies. It gave the Secretary of State powers to revoke in full or in part the existing strategies by order.

The Government’s proposal is to replace the eight regional strategies (comprising the relevant regional spatial and regional economic strategies) outside London with a more localist planning system. Together with incentives such as the New Homes Bonus it aims to encourage local authorities and communities to realise their aspirations for housing and economic growth.

## 1.2 Strategic Environmental Assessment (SEA)

SEA became a statutory requirement following the adoption of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. This was transposed into UK legislation on the 20 July 2004 as Statutory Instrument No.1633 - The Environmental Assessment of Plans and Programmes Regulations 2004 (SI2004/1633). The objective of SEA, as defined in Directive 2001/42/EC is:

*‘To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to contributing to sustainable development’.*

Throughout the course of the development of a plan or programme, the SEA should seek to identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme and to propose measures to avoid, manage or mitigate any significant adverse effects and to enhance any beneficial effects.

### 1.2.1 Applying SEA to the Revocation of the Regional Strategies

Regional strategies are plans for the purpose of the European Directive 2001/42/EC because they are land use plans, are required by legislative, regulatory or administrative provisions and set the framework for future development consent of projects listed in Annexes I and II of the European Directive on environmental impact assessment. They are also subject to an appraisal of sustainability under the

Planning and Compulsory Purchase Act 2004. Both requirements were met in a single process called sustainability appraisal, as set out in guidance issued by the then Office of the Deputy Prime Minister in 2005.

As part of its stated commitment to protecting the environment, the Government decided to carry out an environmental assessment of the revocation of the existing regional strategies, on a voluntary basis. These assessments were prepared to be compliant with the procedure set out in the Strategic Environmental Directive. A 12 week consultation on the Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012.

Since the start of the consultation on the assessments there have been a number of developments that are relevant to assessing the likely significant environmental effects of the proposal to revoke the regional strategies. These are:

- the **National Planning Policy Framework** was published in March 2012. This sets out the government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. It includes Government's expectations for planning strategically across local boundaries and within that the role of the planning system in protecting the environment;
- the **planning policy for traveller sites** was published in March 2012 (to be read in conjunction with the NPPF);
- the provisions which create a **new duty to co-operate** were commenced when the Localism Act received Royal Assent on 15 November 2011. They require Local Planning Authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in local plans.

Additionally, the Court of Justice of the European Union (CJEU) gave judgment in March on the applicability of the SEA Directive to a procedure for the total or partial revocation of a land use plan<sup>8</sup>. It held that such a procedure in principle falls within the scope of the Directive and is subject to the rules relating to the assessment of effects on the environment as laid down by the Directive.

The public consultation on the Environmental Reports generated many helpful and informative responses. Some of these provided additional information and suggested other analysis to help improve the assessments. The Government has therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and CJEU jurisprudence, to update and build on the earlier assessments. Details of this additional analysis are given in **Section 3**. This Environmental Report reflects this decision and, in line with the requirements of the SEA Directive, is subject to consultation. As this is further to the consultation in 2011 on the environmental assessments, the Government considers it reasonable for the consultation period for this subsequent consultation to run for eight weeks.

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<sup>8</sup> The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*.

The assessment in this Environmental Report can be considered as stand-alone and has been intentionally written to provide sufficient information for consultees to consider whether the likely significant environmental effects have been identified of the plan to revoke the Regional Strategy (and reasonable alternatives) without recourse to the previous Environmental Report.

All responses to this consultation will be given careful consideration alongside those received in response to the earlier consultation. The Government would particularly welcome responses on:

- whether there is any additional information that should be contained with the baseline or review of plans and programmes;
- whether the likely significant effects on the environment from revoking the regional strategy for the North West of England<sup>9</sup> have been identified, described and assessed;
- whether the likely significant effects on the environment from considering the reasonable alternatives to revoking the Regional Strategy for the North West of England have been identified, described and assessed; and
- the arrangements for monitoring.

### 1.3 Purpose of this Report

The purpose of this Environmental Report is to:

- present relevant environmental baseline information, including a review of plans and programmes;
- identify, describe and assess the likely significant environmental effects associated with the plan to revoke the regional strategies and reasonable alternatives;
- propose measures to avoid, reduce and/or offset any potentially significant adverse effects and, where appropriate, to enhance any potential positive effects from the plan;
- outline and describe the measures envisaged for monitoring any significant effects identified by the Environmental Report; and
- demonstrate that the plan to revoke the regional strategies has been developed in a manner consistent with the requirements of the SEA Regulations.

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<sup>9</sup> For the purposes of this Environmental Report the regional strategy means the Regional Spatial Strategy for the North West of England, and the Regional Economic Strategy for the North West of England.

## 1.4 Habitats Directive Assessment

The Habitats Directive prohibits the adoption of plans or projects which have an adverse effect on the integrity of European sites unless there are no alternative solutions and the plan or project must be adopted for imperative reasons of overriding public interest.

The revocation of regional strategies does not affect the legal requirement set out in the Conservation of Habitats and Species Regulations 2010 that a competent authority, such as a local planning authority, in exercising any of their functions must have regard to the requirements of the Habitats Directive (Regulation 9). Part 6 of the Regulations also contains provisions which require the assessment of implications for European sites of any plan or project, which is likely to have a significant effect on it, before it proceeds in accordance with the Habitats Directive.

Where a competent authority other than the Secretary of State proposes to agree to a plan or project despite a negative assessment of the implications for a European site, they must notify the Secretary of State and they must not approve the plan or project. The Secretary of State may give directions to the competent authority in any such case prohibiting them from agreeing to the plan or project, either indefinitely or for a specified period (Regulation 62).

Given these safeguards, the Government's view is that the revocation of the regional strategies will therefore have no effects requiring assessment under the Habitats Directive.

## 1.5 Consultation and Stakeholder Engagement

### 1.5.1 Overview

As part of the environmental assessment of the revocation of the regional strategies, there has been consultation with the statutory consultation bodies on the scope and level of detail of the environmental reports, followed by a public consultation on the environmental reports on the effects of revoking each of the eight regional strategies.

Detailed responses to the environmental reports published in October 2011 were provided by consultees, and in the intervening period several key pieces of planning policy and legislation have been put in place. The Government has therefore decided to further consult on the environmental reports to allow the developments in policy and legislation, as well as the comments from respondents to be taken into account in the assessment of the likely significant environmental impacts of revocation of the regional strategies.

### 1.5.2 Scoping Consultation

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be



included in the environmental reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. Their comments on individual regions have been taken into account in the environmental reports.

They were consulted on the method proposed to assess the likely significant environmental effects of revoking the regional strategies which was to take as a starting point the environmental assessment components of the sustainability appraisals carried out when the regional strategies were being prepared. For those regions which had not completed an up-to-date regional spatial strategy, use was also made of the more recent appraisals of the emerging strategy. The assessments followed the format set out in Annex I of the Directive, assessing impacts taking into account that local plans would set the framework for decisions on planning applications following the proposed revocation of the regional strategies and saved structure plan policies.

The approaches taken in the appraisals during preparation of the strategies differed to some extent between regions, and the assessments inevitably reflect this. However, as far as possible, a broad assessment was made of the component policies in the regional strategy, identifying their objectives and any particular issues from the sustainability appraisals, so as to identify the key environmental issues arising in assessing the likely effects of revocation. The assessment focused on those aspects of the Plan which might be expected to lead to significant environmental effects.

The Environment Agency agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate. Natural England recognised that the SEA was unusual in that it applied to the revocation, rather than the creation of a plan, and that therefore many of the usual aspects of SEA did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation. Scottish Natural Heritage considered that the implications for strategic planning for green infrastructure and the interface with the marine environment should be considered.

In addition, since this is the first time an environmental assessment had been undertaken for the revocation (rather than the creation) of a plan, a draft of the previous environmental report was also sent to the statutory consultation bodies for their comments. Their comments on the previous draft reports are presented in summary in **Appendix F**, together with a response.

### 1.5.3 Public Consultation on the previous Environmental Reports

As part of the environmental assessment of the revocation of the regional strategies a public consultation on the environmental reports on the effects of revoking each of the eight regional strategies was undertaken. Consultation on the environmental reports was announced in both Houses of Parliament through a Written Ministerial Statement, copies were sent by email to the statutory consultation bodies, the equivalent organisations in the devolved administrations, all local planning authorities and organisations thought to have an interest in the process. Copies of the reports were also published on the DCLG website. The consultation ran from 20 October 2011 to 20 January 2012.

A total of 103 responses were received, of which half contained comments that were common to all the reports. The remaining responses made specific comments on the environmental reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government SEA Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). Only 2 responses were received from local planning authorities within the North West.

Of the 103 responses, 24 were identified as being relevant to all regions, while 10 dealt specifically with the environmental report for the North West. A further 64 dealt solely with environmental reports for regions other than the North West. A summary of the consultation responses relevant to the North West environmental report is set out at **Appendix F**.

The main issues raised by respondents on the initial environmental reports, which were relevant to the North West, are grouped into 6 broad themes as follows:

- The Overall Approach to SEA;
- Assessment;
- Reliance on the NPPF;
- Policy Gap;
- Reliance on the duty to co-operate;
- Individual Topics (covering data availability, Green Belt, gypsy and travellers, housing supply, heritage, waste, biodiversity, renewable energy, transport, water, brownfield land, the coast, flooding and managed woodland).

A high level summary of the issues raised and the response to those is set out below. A more detailed summary of the responses is presented in **Appendix F**.

Table 1.1 Summary of consultation responses

Issue	Summary of Consultation Responses to the Initial Environmental Report	Response
The Overall approach taken to SEA	The Statutory Consultees supported the broad approach to the analysis presented in the October 2011 environmental reports. English Heritage however had concerns about the potential impacts of the revocation of the North West Plan on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.	Section 1 of the Environmental Report sets out how the report meets the requirements of the SEA Directive.  The impacts of revoking, retaining or partially revoking the North West Plan have been assessed in detail in the short, medium and long term against the 12 SEA topics. This includes Cultural Heritage – including architectural and archaeological heritage.
Assessment	The Statutory Consultees drew attention to more up to date data that could be included in the environmental report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of local plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.	The Environmental Report updates the baseline evidence and provides a detailed analysis of the retention, partial revocation and revocation of the North West Plan in the short, medium and long term against all 12 SEA topics, taking into account the content of local plans. Mitigation measures are proposed where significant impacts are predicted. Arrangements for monitoring possible effects are set out and a non-technical summary is provided.
Reliance on the NPPF	A number of respondents thought that it was difficult to assess the impact of revocation of the regional strategies before the National Planning Policy Framework was finalised.	The Government published the National Planning Policy Framework in March 2012. The analysis presented in this Environmental Report takes account of the policies set out in the Framework.
Policy Change	Several respondents thought that the revocation of the North West plan would leave a policy gap, particularly for the delivery of strategic policies.	The National Planning Policy Framework states that local planning authorities should set out the strategic priorities for the area in the local plan. This should include strategic policies to deliver homes and jobs and other development needed in the area, the provision of infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
Reliance on the Duty to Co-operate	Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.	The Government has introduced a new duty to co-operate and supporting regulations are now in place. In addition the NPPF sets out the expectations for local planning authorities working across boundaries on strategic planning matters which form part of the test of soundness for local plans.
Individual Topics	Respondents raised a number of questions about individual topics and suggested certain RS or structure plan policies that they would like retained. In particular, respondents thought that the impact of the revocation of the North West could impact on topics such as the Green Belt, the provision of gypsy and traveller pitches, housing allocations, heritage, biodiversity, renewable energy, water, and managed woodland. Concern was also expressed with regard to potential trans-boundary effects resulting from the linkages between the region and neighbouring regions, particularly with regard to water supply.	Individual policies for the planning of individual topics are described in the Environmental Report, drawing on the policies set out in the NPPF.

## 1.6 Structure of this Report

The assessment in this Environmental Report builds on the earlier assessment that was published for consultation in October 2011 and in particular includes further work in response to consultees' comments. This includes additional work to revise and update the baseline and contextual information used in the assessment, a necessary strengthening of the evidence base used as well as providing greater detail in the assessment itself. The approach that has been undertaken is set out in **Section 3.1** with the resulting information presented in **Appendices C, D, E, G and H**.

**Table 1.2** sets out how the information requirements of Annex I of the SEA Directive are met in this Environmental Report. Reasonable alternatives are considered in Section 2 and the approach taken to the assessment is explained in Section 3. Section 4 summarises the likely significant effects of revoking the Regional Strategy along with reasonable alternatives, where identified, including any secondary, cumulative or synergistic effects in the short, medium and long term. Section 5 provides a summary of the key findings along with proposed monitoring measures.

**Table 1.2 SEA Directive requirements and where they are covered in the Environmental Report**

SEA Directive Requirements	Where Covered in the Environmental Report?
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Section 2 outlines the contents and main objectives of the plan.  Section 3 presents a summary of the relationship with other relevant plans and programmes.  Appendix E (the SEA topic information chapters) presents greater details the other plans and programmes that are relevant to the Plan.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Appendix E (the SEA topic information chapters) outlines the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
c) The environmental characteristics of areas likely to be significantly affected	Appendix E (the SEA topic information chapters) outlines the environmental characteristics of areas likely to be significantly affected.
d) 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.	Appendix E (the SEA topic information chapters) outlines any existing environmental problems.
e) The environmental protection, objectives, established at international, Community or national 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.	Appendix E (the SEA topic information chapters) outlines the relevant environmental protection objectives.

**Table 1.2 (continued) SEA Directive requirements and where they are covered in the Environmental Report**

SEA Directive Requirements	Where Covered in the Environmental Report?
f) The likely significant effects 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. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Appendix D, Appendix E and Section 4 outline the likely significant effects of the Plan on the SEA issues.
g) 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.	Appendix D, Appendix E and Section 4 outline the mitigation measures to prevent, reduce and as fully as possible offset any significant adverse effects of the Plan.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 outlines the reasons for selecting the alternatives. Section 3 contains a description of how the assessment was undertaken including any difficulties encountered.
i) A description of measures envisaged concerning monitoring in accordance with Art. 10.	Section 5 presents proposals for monitoring.
j) A non-technical summary of the information provided under the above headings.	A non-technical summary is provided.



## 2. The Plan to Revoke the Regional Strategies

### 2.1 Overview

The Government announced in the Coalition Agreement its intention to “*rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils*”<sup>10</sup>. The objective was to make local plans, and where desired neighbourhood plans, the basis for local planning decisions. The Government’s proposal is to replace the eight regional strategies outside London with a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to realise their aspirations for housing and economic growth.

The Localism Act 2011 repealed Part 5 of the Local Democracy, Economic Development and Construction Act 2009, thereby removing the legal framework for the review of regional strategies or the adoption of new or revised regional strategies, and gave the Secretary of State powers to revoke in full or in part the existing strategies by order.

The Regional Strategy under consideration for revocation comprises the North West of England Plan published by the then Secretary of State in September 2008 and the Regional Economic Strategy published by the North West Development Agency in 2006.

The individual policies from the North West of England Plan are presented in **Appendix A**. The whole Plan can be viewed at:

[http://www.4nw.org.uk/articles/article.php?page\\_id=457](http://www.4nw.org.uk/articles/article.php?page_id=457)

The vision, ambitions, priorities and implementation priorities from the North West Regional Economic Strategy are presented in **Appendix H** and can be viewed at:

[http://www.climatechangenorthwest.co.uk/assets/files/documents/jun\\_07/cli\\_1181147212\\_Regional\\_Economic\\_Strategy.pdf](http://www.climatechangenorthwest.co.uk/assets/files/documents/jun_07/cli_1181147212_Regional_Economic_Strategy.pdf)

This section sets out the key aspects of the plan to revoke the regional strategies, the implications for the North West region and the alternatives considered.

### 2.2 Key Aspects of the Plan to Revoke the Regional Strategies

The National Planning Policy Framework (NPPF) was published on 27 March 2012. This followed extensive consultation during 2011 and replaces government planning policy and mineral policy guidance for England. It provides ‘a framework within which local people and their accountable councils

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<sup>10</sup> HM Government (2010), The Coalition: our programme for government.



can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.’ Accordingly, local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It does not contain waste planning policy and nationally significant infrastructure and traveller policy, all of which are in separate policy documents but to be read in conjunction with the NPPF.

In the absence of the Regional Strategy, strategic and cross authority working will be delivered in the North West region through a variety of legislative and non-legislative means. This includes: the preparation of joint plans under the powers set out in the Planning and Compulsory Purchase Act 2004; through the new duty to co-operate under the powers set out in section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act 2011); and through the establishment of non-legislative Local Enterprise Partnerships. This combination of measures aims to ensure that strategic planning operates effectively in the absence of the Regional Strategies. The sections below describe some of the partnership working that is already taking place across the North West region.

### 2.2.1 Partnership Working on Strategic Planning Issues

The Planning and Compulsory Purchase Act 2004 provides for two or more councils to prepare joint local plans either through joint working under section 28<sup>11</sup> or through the establishment of a joint committee under section 29.

The NPPF sets out the Government's policy on strategic planning priorities, including the priorities on which authorities should work jointly. It makes clear that local planning authorities should work collaboratively to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in local plans, resulting in a final position where plans are in place to provide the infrastructure necessary to support current and projected future levels of development.

### 2.2.2 Duty to Co-operate

Section 110 of the Localism Act 2011 inserts new section 33A into the Planning and Compulsory Purchase Act 2004: the duty to co-operate. The duty is a new requirement<sup>12</sup> on local authorities and other public bodies to work together constructively, actively and on an ongoing basis in relation to planning for strategic, cross-boundary matters in local and marine plans. Local Plans should include

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<sup>11</sup> Where authorities work together under section 28 they have the option of establishing a joint committee under section 101 of the Local Government Act 1972. The authorities who are party to the joint committee must also comply with the requirements of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (SI2000 No. 853) as amended by the Local Authorities (Functions and Responsibilities) (Amendment) (No.2) Regulations 2005 (SI2000 No. 714). This means that the joint committee cannot make decisions which are the responsibility of the Authority and not its executive, these must be taken by each constituent authority individually (they include decisions about the submission, adoption and withdrawal of local plans).

<sup>12</sup> Through Regulations made under Section 33A of the PCPA 2004, which came into force on 6 April 2012, the duty to co-operate is extended to bodies such as the Environment Agency and Natural England.

strategic policies on certain issues in line with paragraph 156 of the NPPF; however, the list in 156 is not exhaustive and it is for authorities to determine whether there are additional strategic priorities in their areas and what strategic policies should cover.

The Localism Act requires authorities to demonstrate to an independent inspector how they have met the duty when their plans are submitted for examination in public. There is no prescribed way to meet the duty to co-operate, but compliance could for example be proved by plans or policies prepared as part of a joint committee, informal strategies such as joint infrastructure and investment plans, or a memorandum of understanding which is presented as evidence of an agreed position. Failure to demonstrate compliance will mean that authorities may not pass the examination process.

Over time, it is expected that the duty to co-operate will become an integral part of the preparation of sound local plans that are effective and deliverable in relation to strategic cross boundary matters. Ongoing engagement and joint working, for example in the form of strategic infrastructure assessments done in consultation with others, memorandums of understanding and statements of common ground should become much more common place in the evidence base to demonstrate how co-operation is securing delivery of objectively assessed plan needs.

### 2.2.3 Local Development Orders (LDOs)

The Planning and Compulsory Purchase Act 2004 allows for the establishment of local development orders. These allow local authorities to extend permitted development rights for certain forms of development with regard to a relevant local development document. The establishment of an LDO potentially speeds up the planning process and provides greater certainty to developers. LDOs are being used extensively across enterprise zones as the main means by which to simplify the planning process. Enterprise zones are geographically defined areas of approximately 50-150 hectares where incentives are being put in place with the objective of stimulating business and job growth. Enterprise zones have been located on sites where there is strong growth potential that can be reasonably expected by the incentives offered by Government. There are currently 38 LDOs in place across all enterprise zones and it is anticipated that there will be a further 40 in progress. Where enterprise zones straddle more than one local authority area, local planning authorities have been working in partnership to create a planning framework for the zone and to simplify planning.

### 2.2.4 Local Enterprise Partnerships

The Government has facilitated the establishment of Local Enterprise Partnerships (LEPs). These are business led locally-owned partnerships between local authorities and businesses providing strategic leadership in driving private sector growth and job creation in their area. There are 39 LEPs now in place covering the whole of the country. These are based around a locally determined economic geography which makes sense to the local business community. All are playing a central role in determining local economic priorities and undertaking activities to drive economic growth and the

creation of local jobs. Local Strategic Partnerships are non-statutory and hold no statutory powers but they are able to draw upon the powers held by their constituent public bodies.

LEPs and local planning authorities are able to work together to ensure economic activity and infrastructure delivery is coordinated across local authority boundaries. The duty to co-operate also requires local authorities and other public bodies to have regard to the activities of LEPs when they are preparing strategic policies in their local and marine plans and undertaking related activities. This is intended to strengthen strategic planning on economic activity and infrastructure delivery.

The Government has allocated £730m of Growing Places Fund to all 39 LEPs. The Growing Places Fund will enable targeted investment in pieces of infrastructure which unlock viable schemes that are not able to proceed because capital constraints have reduced the flow of investment in the physical infrastructure which unlocks development (e.g. transport, utilities and flood defence). The fund should also be used to establish revolving funds.

Beyond these broad parameters LEPs are free to decide for themselves how their allocation is best invested and where.

## 2.2.5 Examples of Cross-Authority Working in the North West Region

### Local Enterprise Partnerships in the North West

There are five Local Enterprise Partnerships in the North West region, covering Cumbria; Lancashire; Liverpool City Region; Greater Manchester and Cheshire and Warrington. These are described in more detail below.

#### *Cumbria*

The LEP area covers the county of Cumbria. The Partnership works to influence the key activities of housing and planning, transport and infrastructure, employment and skills, business and enterprise development, transition to the low carbon economy and support for key sectors. Its activities include:

- Championing the economic interests of Cumbria internationally, nationally, regionally and locally;
- Driving enterprise, innovation and growth in the Cumbrian economy, delivering real long-term growth in the most efficient and effective ways possible through both rural and urban-based businesses;
- Determining the areas of activity and opportunity which will deliver a real return on investment, as well as understanding the key long standing barriers to development;
- Stimulating job growth within the private, community and Third Sectors to compensate for job losses currently being experienced in the public sector (both directly and through the impact of spending cuts on public sector contracting) and rebalancing the economy;

- Through the partnership, providing the economic and business intelligence, including trend analysis and projections, needed to help inform constructive decision making, sharing this with prospective investors;
- Developing a prospectus of opportunity, as a “living document” setting out current and future opportunities and the support on offer to potential investors, both private and public sector, and promoting those opportunities;
- Setting out priorities for the Regional Growth Fund and other funding opportunities;
- Providing a single voice for Cumbria in influencing the development of EU policies which directly impact on Cumbria;
- Working to establish effective networks with other LEPs with similar issues, sharing best practice, addressing joint issues and pooling resources;
- Strengthening Cumbria’s social fabric through pursuing the Big Society agenda to unlock the energies and resources of our communities in delivering innovative solutions to local issues.

### *Lancashire*

The Lancashire Enterprise Partnership plays an important role in directing economic development activity, including a number of programmes to invest in economic growth. Its remit covers the whole of Lancashire, including the areas served by Lancashire County Council and the unitary local authorities for Blackburn with Darwen and Blackpool. The LEP is central to a number of economic development initiatives of both local and national significance. In partnership with BAE Systems it has established a new Enterprise Zone for advanced engineering and manufacturing at Samlesbury and Warton, which seeks to create thousands of new jobs in the coming years. It also has an important role in drawing investment into Lancashire through national government schemes such as the Growing Places and Regional Growth Funds.

### *Liverpool City Region*

The Local Enterprise Partnership covers the six local authorities of Halton, Knowsley, Liverpool, Sefton, St Helen’s and Wirral. The LEP’s core activities include:

- **Strategic Economic Development** – contributing to the development of spatial planning, housing, transport, infrastructure, education and training policies;
- **Business Growth** – assisting existing businesses to grow and increase productivity, promoting entrepreneurship and innovation, and advising and assisting businesses regarding available funds and additional indigenous investment;
- **Key Growth Sectors** – supporting the development of key growth sectors:
  - Knowledge Economy;
  - Visitor Economy;

- Low Carbon;
- SuperPort.

Daresbury Science Park and Mersey Waters are designated as separate Enterprise Zones.

### *Greater Manchester*

The City Region's strengths and challenges were set out within the Greater Manchester Strategy which was signed off by the Association of Greater Manchester Authorities (AGMA) in 2009. The LEP covers the local authorities of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan. The Greater Manchester LEP will play a key role in continuing to shape the strategy and overseeing its delivery in a number of areas:

- Employment and Skills;
- Business Support for New Businesses and Growth;
- Inward Investment and International Trade;
- Marketing and Tourism;
- European Funding;
- Low-Carbon Economy;
- Planning, Housing and Transport;
- Research and Strategy Development.

Manchester Airport is designated as an Enterprise Zone.

### *Chester and Warrington*

The LEP aims to make Cheshire and Warrington the best place to do business in the UK. It includes the local authorities of Cheshire East, Cheshire West and Chester, and Warrington. Businesses in the Partnership area have expressed the need to kick-start a growth programme and maximise new employment opportunities in the short-term through:

- Sector-focussed property developments geared to capturing business growth opportunities;
- Engendering entrepreneurship through business generation centres offering both incubation facilities and much needed on-the-ground business advice;
- Working with the Higher and Further Education sectors to ensure that adult courses reflect business needs;

- Helping rural areas to move to a low-carbon lifestyle through digital technologies;
- Promoting the development of a major transformational tourism project in Chester;
- Developing local supply chains for major manufacturers.

### Local Development Orders

Throughout England many LEPs are using special locally developed planning regimes known as 'Local Development Orders' to grant automatic planning permission for certain development, often in combination with the designation of enterprise zone status. In the North West region for example there is one LDO designated within the Lancashire Enterprise Zone (Warton). Prior to commencing development it is a requirement of the Order that information including the management of traffic and an ecological assessment (including avoidance, mitigation and compensation proposals) are submitted to the local authority for approval.

### Other Partnership Working

The Greater Manchester Combined Authority came into being in April 2011. It complements the Greater Manchester Local Enterprise Partnership and ensures a coordinated approach is delivered in the 10 local authorities that make up the Manchester City Region. Under the arrangements a new body, Transport for Greater Manchester, has been established to co-ordinate transport across the city region. Comprising one member from each local authority GMCA builds upon the partnership working already established through AGMA. The GMCA aims to improve the effectiveness and efficiency of transport services, economic development and regeneration.

The aims of the Combined Authority will be complemented by the work of AGMA which will continue to collaborate across the sub region on:

- Health;
- Public Protection;
- Housing;
- Strategic Planning;
- Environment;
- Improvement and Efficiency;
- Grants.

## Environmental Partnerships in the North West

**Local Nature Partnerships** (LNPs) are a key initiative in the Natural Environment Paper and their importance is identified in the National Planning Policy Framework. The ambition for LNPs is that they will help their local area to manage the natural environment as a system and to embed its value in local decisions for the benefit of nature, people and the economy. To do this effectively they will need to be self-sustaining strategic partnerships of a broad range of local organisations, businesses and people with the credibility to work with and influence other local strategic decision makers. Applications to become a Government-recognised LNP opened on 2 April 2012 and closed on 6 June 2012. Fifty applications were made, including several in the North West Region. The Government published a list of the first partnerships to gain LNP status in July 2012 and these were followed by an additional seven partnerships in October 2012. The final list included the Greater Manchester LNP, the Liverpool City Region LNP, the Cheshire LNP, the Cumbria LNP, Morecambe Bay and the Lancashire LNP.

The Natural Environment White Paper committed Government to assist partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new **Nature Improvement Areas** (NIAs), based on a local assessment of opportunities for restoring and connecting nature on a significant scale. The importance of NIAs is recognised in the National Planning Policy Framework and local authorities will be able to support them in their local plans. In February 2012 the Government announced 12 initial NIAs in England that will receive government funding. Two are located in the North West - the Morecambe Bay Limestones and Wetlands NIA restoring coastal and freshwater wetlands and woodlands and the Meres and Mosses of the Marches incorporating wetland, peat bogs and ponds in Cheshire.

Warrington, St Helens and Halton Councils agreed to undertake a collaborative cross boundary **Water Cycle Study** (WCS). It aims to provide strategic level advice on water infrastructure and environmental capacity to inform the development of the Local Development Frameworks and associated growth strategies.

## 2.3 Background and Description of the North West Regional Strategy to be Revoked

### 2.3.1 Legislative Background to Regional Strategies

The Town and Country Planning Act 1947 required local planning authorities to draft local plans setting out policies for the development and use of land. Prior to the Town and Country Planning Act 1968, which introduced county structure plans to co-ordinate and guide local plans, the focus of strategic planning was mainly at the regional level. A number of regional plans were prepared from the 1940s onwards and there were initiatives to link land use planning and regional economic development.

In 1988 regional planning guidance was introduced to provide a strategic framework for county structure plans. Regional planning guidance was not statutory and therefore structure plans and local plans were not required to be in conformity with it.



The Planning and Compulsory Purchase Act 2004 introduced a two tier statutory spatial development plan system consisting of regional spatial strategies and local development frameworks. The counties retained statutory planning powers for minerals and waste plans, but county structure plans were abolished.

Initially, the regional spatial strategy (RSS) for each region consisted of existing regional planning guidance. These were then reviewed, leading in most cases to publication of updated strategies, though only parts of the West Midlands strategy were reviewed, and the review of the South West plan was never completed. In revising their RSS, regional planning bodies were required to have regard to the regional economic strategy (RES) for the region.

Regional economic strategies (RES) were introduced by the Regional Development Agencies Act 1998. Until 1 April 2010, each regional development agency (RDA) was required to formulate, and keep under review, a strategy in relation to its purposes, and have regard to the strategy in exercising its functions. The purpose of RDAs included furthering the economic development and the regeneration of its area, promoting business efficiency and investment and contributing to the achievement of sustainable development where it is relevant to its area to do so.

The Local Democracy Economic Development and Construction Act 2009 introduced regional strategies (RS). These came into existence on 1 April 2010 for the eight English regions outside London. The intent was that each RS would initially consist of the existing RSS and the RES for the region but for the responsible authority in each region to bring forward a revised RS. However, no revised RS were adopted so each RS continues to consist of the existing RSS and the RES.

The Planning and Compulsory Purchase Act 2004 was amended so that local development documents were required to be in general conformity with the RS and the RS became part of the statutory development plan for the purposes of determining planning applications. For the purposes of the development plan however, the RS for a region consists of only the existing RSS and not the RES. This was originally intended to be for an interim period prior to adoption of a revised RS.

The Localism Act 2011 made significant changes to the 2009 Act repealing the requirement for there to be a RS in each region outside London and confirming that the RS for the purposes of the development plan includes only the existing RSS.

### 2.3.2 The Development of the North West of England Plan (Regional Spatial Strategy)

Regional Planning Guidance for the North West (RPG13) was published in 2003. The RPG became the statutory RSS in September 2004 when the Planning and Compulsory Purchase Act 2004 came into force. The RSS was revised and published in September 2008 as the North West of England Plan.

Preparation of the revision was informed by sustainability appraisal at both the submission draft and proposed changes stages, incorporating strategic environmental assessment. The Secretary of State's proposed changes were also assessed against the requirements of the European Habitats Directive. In response to representations on that assessment by the regional assembly, Natural England and others,

the assessment was revisited and a number of additional changes were made to ensure the Plan was fully compliant with the Directive. The emerging document was also subject to a Health and Equality Impact Assessment. The chronology is set out in the box below.

<b>Stage</b>	<b>Date</b>
Launch of Process	July 2004
On-line Consultation on issues	September- October2004
Development of Sustainability Appraisal (SA) Framework	November 2004
SA of RSS Objectives	December-January 2005
SA Scoping Report	January-February 2005
Development of Options Papers	January-March 2005
SA of Options	March-May 2005
Consultation on Options	March-April 2005
SA of Emerging Policies	June-November 2005
Drafting of RSS	April-January 2006
SA of Draft RSS Policies	November 2005
Draft Strategy and SA report submitted to Government	January 2006
Public Consultation	March-June 2006
Examination in Public (EIP)	October 2006-February 2007
Panel Report Published	May 2007
Secretary of State proposed changes	March-May 2008
Adoption of North West of England Plan and Consolidated Sustainability/Regulation 16 Statement	September 2008

Subsequent to the adoption of the North West of England Plan 4NW (the designated regional planning body for the North West) commenced a Partial Review covering three topics:

- Gypsy and Traveller Pitch Provision;
- Travelling Showpeople Provision;
- Regional Parking Standards.

The Partial Review was submitted for examination in July 2009. The EIP was held in March 2010 and a Panel Report completed but not published. Following a request under the Freedom of Information Act/Environmental Information Regulations the unissued Panel Report was made available. The Planning Inspectorate notes that this document does not form any formal part of the planning system.

Draft Policy L6 Scale and Distribution of Gypsy and Travellers Pitch Provision set out a policy requirement for 825 pitches to be provided between 2007-2016 with an additional 295 pitches to be provided between 2016-2021. Draft Policy L7 Scale and Distribution of Travelling Showpeople Plot Provision identified a requirement for 285 plots to be provided between 2007-2016 with an additional 122 plots between 2016-2021. For each policy a distribution of pitches and plots across all of the region's local planning authorities was provided.

The Partial review also set out Regional Parking Standards under the extant North West of England Plan Policy RT2.

### 2.3.3 The Content of the North West of England Plan

The Plan covers the period from 2008 to 2021 but sets a vision, objectives and core strategy for the longer term. In particular it seeks to reduce impact on, and exposure to, the effects of climate change and to put in place a development strategy with the potential to support continued sustainable growth beyond 2021.

The Plan is underpinned by a number of spatial principles:

- promote sustainable communities;
- promote sustainable economic development;
- make the best use of existing resources and infrastructure;
- manage travel demand, reduce the need to travel, and increase accessibility;
- marry opportunity and need;
- promote environmental quality;
- mainstreaming rural issues;
- reduce emissions and adapt to climate change.

The main aim of the Plan is to concentrate development at the regional centres of Manchester and Liverpool with the second priority being the inner areas which surround these centres followed by the towns and cities within the remaining three city-regions and finally the towns and cities that lie outside these city-regions. The Strategy confirms that there is no need for any exceptional substantial strategic change to Green Belt boundaries. It requires local planning authorities to provide at least 416,000 net additional dwellings over the period 2003-2021 with a regional target of 70% development upon brownfield land and buildings extending to 90% in the regional centres of Manchester/Salford and Liverpool.

The Plan contains:

- a 'core' Spatial Framework with generic policies that provide for sustainable development in the region, and that complement national planning policy statements;
- policies on economic development, housing, culture, transport, environmental aspects, waste and minerals; and
- more location-specific policies based around four sub-regions.

Also included is a framework for implementing, monitoring and reviewing the Plan. Further details of the individual policies are set out in **Appendix A**.

The Plan reflects the national policies on development at the time of its publication. It incorporates the Regional Transport Strategy and also takes account of and builds on the Regional Economic Strategy published by the North West Development Agency in 2006 and the Regional Sustainable Development Framework, which provides a high level statement of the regional vision for achieving sustainable development.

### 2.3.4 The Content of the North West Regional Economic Strategy 2006

The primary focus of the Regional Economic Strategy (RES) is to continue the transformation of the economy by building on the region's many assets and tackling areas of underperformance. It recognises that tough choices are needed if recent growth is to continue and the region is to succeed in its ambitions. It sets a clear vision for the economy and the actions needed to achieve this vision.

The RES vision expresses a clear direction of travel for the region:

**A dynamic, sustainable international economy which competes on the basis of knowledge, advanced technology and an excellent quality of life for all where:**

- 1** Productivity and Enterprise levels are high, in a low carbon economy, driven by innovation, leadership excellence and high skills.
- 2** Manchester and Liverpool are vibrant European Cities and, with Preston, are key drivers of city-regional growth.
- 3** Growth opportunities around Crewe, Chester, Warrington, Lancaster and Carlisle are fully developed.
- 4** Key Growth Assets are fully utilised (Priority Sectors, the Higher Education and Science Base, Ports/Airports, Strategic Regional Sites, the Natural Environment especially The Lake District, and the Rural Economy).
- 5** The economies of East Lancashire, Blackpool, Barrow and West Cumbria are regenerated.
- 6** Employment rates are high and concentrations of low employment are eliminated.

The RES sets out 'drivers for growth' which are:

- improving productivity and growing the market;
- conditions for sustainable growth;
- growing the size and capability of the workforce.

To deliver these 'drivers' the RES sets out a series of actions under the five themes of Business, Skills and Education, People and Jobs, Infrastructure and Quality of Life.

### 2.3.5 The Relationship between the North West of England Plan and the Regional Economic Strategy

There is a strong and complementary relationship between the North West Plan and the RES:

- they share an understanding of the spatial priorities of the region, particularly around the key centres of development and change such as the regional centres of Manchester, Liverpool and Central Lancashire. The RES adds an economic analysis of the scale and roles of key centres for development and change;
- the North West of England Plan includes policies to support economic diversity and business development that support the priorities outlined in the RES;
- the headline regional ambitions in the RES are consistent with the housing supply targets in the North West of England Plan with both documents also seeking to link areas of need with areas of opportunity;
- there are shared objectives for the development of infrastructure, and its phasing in support of new development;
- both the RES and North West of England Plan have been prepared in accordance with the region's sustainable development priorities, and both were the subject of separate Strategic Environmental Assessment; and
- the RES and the associated evidence base provided material input to the preparation of the North West of England Plan.

### 2.3.6 Structure Plans

In 2007 the Government wrote to local planning authorities under the transitional provisions of Schedule 8 to the Planning and Compulsory Purchase Act 2004 to advise them which policies from their existing structure plans would be saved after 27<sup>th</sup> September 2007. Policies were saved in the expectation that they would be replaced promptly by policies in the relevant regional spatial strategy, or development plan documents for the relevant local authorities. Section 109(5) of the Localism Act provides for the revocation of saved structure plan policies.

The analysis of the 35 saved structure plan policies in the North West of England has been updated, to take account of the publication of the NPPF, and the policies are listed in Appendix B. These saved structure plan policies were either found to be superseded by policies in local plans or reflected in national policy.

The Government is proposing to revoke these remaining 35 saved structure plan policies.

### 2.3.7 Local Plans

In relation to plan-making, development plan documents prepared by local authorities are required to be in general conformity with the regional strategy.

Regional spatial strategies<sup>13</sup> form part of the statutory development plan under the Planning and Compulsory Purchase Act (PCPA) 2004, until such time as the regional strategies are revoked.

Local Development Plan Documents developed in accordance with the PCPA 2004 include Core Strategies, Area Action Plans and Site Allocation Plans. Core Strategies set out the spatial planning vision, principles and key planning policies for an area. This portfolio of documents is known collectively as the Local Development Framework. 16 of the local planning authorities in the North West of England have adopted development plan documents under the PCPA 2004 along with 6 waste and mineral authorities (16 out of 40 and 6 out of 16 respectively).

The remaining local planning authorities in the North West of England, who were yet to adopt a development plan document under the PCPA 2004 have local plans and saved structure plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990.

On revocation of the regional strategy (and any saved structure plan policies), the statutory development plan would comprise any saved local plan policies and adopted development plan documents. The statutory development plan may in future include any adopted neighbourhood plans that are prepared under the powers brought forward by the Localism Act. Revocation does not affect the statutory duty on local authorities to keep under review the matters which may be expected to affect the development of their area or the planning of its development.

A list of local plans in the North West region and their current composition is included at **Appendix C**. There are a total of:

- 23 local plans adopted before September 2008;
- 1 local plan adopted in the same month as the North West of England Plan was adopted. This plan, the Carlisle District Local Plan 2001-2016, is a saved plan whose policies have been saved under the Planning and Compulsory Purchase Act, rather than a core strategy prepared under that Act;
- 15 core strategies adopted after September 2008, when the North West of England Plan was adopted (and in addition, 1 adopted earlier in 2008 (Lancaster));
- 6 minerals and waste plans which were adopted on or after September 2008;

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<sup>13</sup> By virtue of section 82(2) of the Local Democracy, Economic Development Act 2009 as amended by the Localism Act references to regional strategy in relation to the component of the development plan are to the regional spatial strategy that subsisted for that region immediately before 1 April 2010.

- 16 minerals and waste plans adopted prior to September 2008.

## 2.4 Reasonable Alternatives to the Plan to Revoke the Regional Strategies

Regional strategies set targets such as housing numbers for local authorities. In some areas this proved highly controversial, generated thousands of objections and is not consistent with the principles of localism. The Government believes that democratically elected local authorities working with their local people are better placed to assess and plan for the needs of their community, and make planning decisions, rather than unelected regional bodies. The Government therefore proposes revoking the regional strategies.

Consideration of the reasonable alternatives to a proposed policy or plan is a fundamental aspect of policy and planning development. Providing clear, reasoned justification for selection of a preferred planning policy following assessment of the alternatives is a pre-requisite for the preferred direction to gain wider and long term support. Recording the reasons for the selection of the preferred option can also aid any subsequent review, particularly if the assumptions that underpin any alternatives change over time.

In order to meet the requirements of the SEA Directive and the relevant UK transposing regulations, the Government is also required to present specific information concerning reasonable alternatives. Article 5 (1) of the SEA Directive 2001/42/EC requires that “*an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, **and reasonable alternatives** taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*”. Information to be provided includes “*an outline of the reasons for selecting the alternatives dealt with*” (Annex I (h)).

The European Commission guidance on the SEA Directive discusses possible interpretations of handling ‘reasonable alternatives’ as required by Article 5(1). It states that “*The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme...*”

On this basis, the starting point for identifying alternatives to the revocation of the North West England Regional Strategy has been the powers of the Secretary of State in regard to the regional strategies. As previously stated, the Secretary of State has the power to partially revoke or fully revoke the regional strategies by Order.

The previous Environmental Report on the proposed revocation of the North West of England Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke the North West of England Plan entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see **Appendix F**) including partial revocation. These were:

- reviewing the Regional Strategies;



- revoking the Regional Strategies but saving key policies;
- the retention of the regional strategy system with regional groupings of local authorities responsible for drafting them and adoption by the Secretary of State;
- maintaining the plans and revising certain policies in order to make the plans more acceptable, as well as the possibility of local authorities producing joint development plans to cover specific issues;
- revoking certain chapters or parts of the strategies and introducing transitional arrangements.

A number of alternatives are therefore considered as follows:

- **Retention:**
  - Retention of the North West of England Regional Strategy but not updating it in the future; or
  - Retention of the North West of England Regional Strategy and updating and maintaining it in the future. This would be done either by the Secretary of State; or regional groupings of local authorities followed by adoption by the Secretary of State; or by groups of local authorities working together to produce joint development plans to cover specific issues; or
- **Partial revocation of the North West of England Regional Strategy either by:**
  - Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies, ambitions and priorities; or
  - Retaining for a transitional period all the spatially specific policies (for instance where a quantum of development, land for development or amount of minerals to be extracted or waste disposal is allocated to a particular location in the region) and revoking the non spatial policies, ambitions and priorities; or
  - Retaining for a transitional period sub-regional policies and priorities and revoking the rest of the regional strategy; or
  - Retaining for a transitional period policies, ambitions and priorities, the revocation of which may lead to likely significant negative environmental effects; or
- **Revocation** of the entire North West of England Regional Strategy.

Each alternative is discussed below in regard to its reasonableness.

## 2.4.1 Retention

### Retention of the Regional Strategy but not updating it in the future

This option would mean that the Regional Strategy was not revoked, that all the policies within the North West of England Plan would remain part of the development plan for the purposes of determining planning applications and that local plans would continue to need to be in general conformity with the regional strategy, but that the strategy would not be updated in the future. It is assumed that the policies, ambitions and priorities would not be revoked when the existing lifetime of the Regional Strategy was reached.

Some policies in the North West of England Plan are potentially in conflict with the intent of the National Planning Policy Framework (NPPF) which sets the Government's planning policies for England and how these are to be applied e.g. L4 on regional housing provision, and W3 on the supply of employment land.

The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. The NPPF intends to ensure that the local plan is at the heart of the plan-led system and in preparing local plans local authorities should plan to meet objectively assessed needs for housing and other forms of development which should include collaboration with other bodies where appropriate. Since local plans are required to be in general conformity with the Regional Strategy, and planning decisions need to be in line with the North West of England Plan, unless material considerations indicate otherwise, this also adds potential conflict with the policies set out in the NPPF.

Since there is no statutory power available for the Secretary of State to update the Regional Strategy, over time the strategy would become increasingly out of date. Therefore it is expected that retention of the policies, ambitions and priorities in the Regional Strategy, without update, could gradually lead to a decline in the positive effects that the strategy aimed to deliver and potential conflicts with policies that local communities wish to pursue will increase. Nevertheless, since the retention of the Regional Strategy forms an alternative approach to strategic planning across the region **it is considered to be a reasonable alternative.**

### Retention, maintenance and updating of the Regional Strategy

This option would mean that the Regional Strategy was not revoked, that the North West of England Plan would remain part of the development plan for the purposes of determining planning applications, that local plans would continue to need to be in general conformity with the regional strategy and that it would continue to be maintained and updated in the future. However, the Localism Act has removed the regional planning tier and revoked the power to update the existing regional strategies. This means that the Secretary of State does not have the statutory powers to maintain or update the Regional Strategy and therefore, **the amendment of the regional strategies by the Secretary of State is not considered to be a reasonable alternative because there is no power to do it.**

The 2004 Planning and Compulsory Purchase Act does provide for joint working by local authorities and county councils. In addition the Localism Act introduces changes to section 33A of the Planning and Compulsory Purchase Act 2004 which require sets out the Duty to Co-operate, which requires local planning authorities to work together when preparing strategic cross boundary policies in their local and marine plans. This means that groups of local authorities can work together and formally adopt a statutory local plan covering their joint areas and could choose to work together to adopt and maintain a plan over the region. Whilst there is substantial evidence of local authorities already working at the regional scale on specific issues of responsibility and mutual benefit (such as waste management), it seems highly unlikely that all local authorities within the region, irrespective of background, circumstance and political composition would work in unison to update the Regional Strategy, particularly where such a position would place them in conflict with national government policy. **In consequence, this is not considered to be a reasonable alternative.**

#### 2.4.2 Partial Revocation of the Regional Strategy

##### Revocation of all the quantified and spatially specific policies

This option would mean that all quantified policies (such as for a renewable energy target) or policies that are spatially specific and which allocate a quantum of development or land for development to a particular location and/or local authority in the region (i.e. within the North West of England Plan policies for housing allocations; employment (both land and jobs), mineral allocations; waste disposal) would be revoked, but that the non spatial policies would be retained. This would leave the policies in place which would set out a spatial vision for the region as well as policies that encourage particular types of development or seek to protect environmental resources and services as well as seeking wider sustainability objectives. These policies would not be updated in the future as the Secretary of State no longer has the statutory powers to do this. These policies would therefore be retained for a transitional period to allow local authorities in the region to have time to update their plans. **This is considered to be a reasonable alternative.**

##### Revocation of all the non-quantitative and spatially specific policies

This option for partial revocation of the Regional Strategy would mean that all quantitative targets (such as the one for renewable energy) or the spatially specific policies which allocate a quantum of development or land for development to a particular location and/or local authority in the region (i.e. housing allocations; employment land and/or jobs, mineral allocations; waste allocations) would be retained and the non-spatially specific policies, ambitions and priorities would be revoked (such as protection and enhancement of biodiversity, the historic environment, the quality of the built environment).

As set out above, the policies in the Regional Strategy that establish a quantum of development or land for development to a particular location and/or local authority in the North West of England region may result in some confusion with the intent of the National Planning Policy Framework which sets the

Government's planning policies for England and how these are to be applied. Regard must be had to the NPPF in the preparation of local and neighbourhood plans, and the NPPF is a material consideration in planning decisions. The NPPF intends to ensure that the local plan is at the heart of the plan-led system and expects local authorities and communities to plan to meet objectively assessed needs for housing and other forms of development for their areas, and working collaboratively with other bodies where appropriate. Since local plans need to be in general conformity with the Regional Strategy, and planning decisions need to be made in line with the North West of England Plan, unless material considerations indicate otherwise, this could create confusion and potential conflict in the planning system.

Nevertheless, the retention of the quantified policies or the spatially specific policies which allocate a quantum of development or land for development to a particular location and/or local authority in the region, provides an alternative approach to strategic planning, particularly where local plans are out of date, and do not contain up-to-date quantified policies such as for housing. These quantified policies could therefore be retained for a transitional period, to allow local authorities in the region to have updated their plans. **This is considered to be a reasonable alternative.**

#### Revoking all regional policies, ambitions and priorities and retaining all sub-regional policies, ambitions and priorities

This option for partial revocation would retain the sub-regional policies, ambitions and priorities and revoke the rest of the strategy. However, as for the option above which considered retention of policies that set out a quantum of development to be delivered in a broad location or within a local planning authority area, this is in conflict with the intent of the National Planning Policy Framework. Since local plans need to be in general conformity with the Regional Strategy, and planning decisions need to be in accordance with the North West of England Plan (as part of the development plan) unless material considerations indicate otherwise. This creates confusion and potential conflict in the planning system.

Furthermore, it is questionable whether the sub-regional policies would function correctly in the absence of regional scale policies such as on spatial planning (RDF1), environmental protection, water resources and the high level apportionment policies on housing due to the integrated nature of the North West of England Plan. In addition, over time the policies are becoming increasingly out of date as the regional tier of planning has been removed and the regional strategies are not being kept up to date. **This is not therefore considered to be a reasonable alternative.**

#### Revoking all policies, ambitions and priorities except those where revocation would lead to significant negative environmental effects

The NPPF sets out national planning policies which support and protect the environment (for example: Green Belt land, meeting the challenge of climate change, flooding and coastal change and those policies conserving and enhancing the natural and historic environment, including policies to minimise impacts on biodiversity).

This option for partial revocation of the Regional Strategy would mean that individual policies, ambitions and/or priorities would be retained if revoking them may lead to likely significant negative environmental effects once mitigating measures have been taken account.

This reasonable alternative would lead to the retention of individual policies in the Regional Strategy which are not likely to be in conflict the National Planning Policy Framework, do not undermine the localist approach to plan making and decision making and, if removed, would result in a significant environmental impact taking account of mitigation. These policies could therefore be retained for a transitional period to allow local authorities in the region to have updated their plans. **This is considered to be a reasonable alternative.**

## 2.5 Summary

Following the application of the reasonableness test in compliance with Article 5(1) of the SEA Directive, the following have been taken forward for assessment within the SEA:

- **Revocation of the entire North West of England Regional Strategy;**
- **Retention of the North West of England Regional Strategy but not updating it in the future;**
- **Partial revocation of the North West of England Regional Strategy either by:**
  - Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies, ambitions and priorities; or
  - Retaining for a transitional period all the spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and revoking the non spatial policies, ambitions and priorities; or
  - Retaining for a transitional period policies, ambitions and/or priorities, the revocation of which may lead to likely significant negative environmental effects.

Each alternative has been assessed using the approach outlined in **Section 3**. The results of the assessment are presented in **Section 4**, with the detailed assessment contained in **Appendix D** and **E**.

### 3. SEA Methodology

3.1 Overview

This section sets out how the SEA has been carried out. This includes the steps in the SEA process, when it was undertaken and by whom (**Section 3.1**), the scope of the assessment and the topics considered (**Section 3.2**), the baseline and contextual information used (**Section 3.3**) and the approach taken to completing the assessment (**Section 3.4**). Technical difficulties encountered during the assessment are also summarised (**Section 3.5**).

The approach to this assessment builds on the methodology employed in the Environmental Report published in October 2011. The steps that have been undertaken to-date and their relationship to the requirements of the SEA Directive are summarised in **Table 3.1**.

**Table 3.1     The SEA process and key steps undertaken during the environmental assessment of the proposed revocation of the regional strategies**

SEA process	Key steps in the environmental assessment of the revocation of the regional strategies
<p><b>Article 3 (1)</b> requires that an environmental assessment shall be carried out for certain plans (as defined in Article 3 paragraphs 2-4) which are likely to have significant environmental effects.</p> <p>Member States are required to determine whether these plans are likely to have significant environmental effects either through case-by-case examination and/or by specifying types of plans in order to ensure that plans with likely significant effects on the environment are covered by the Directive (<b>Article 3(5)</b>).</p> <p>Member States must make their conclusions under Article 3(5), including the reasons for not requiring an environmental assessment, available to the public (<b>Article 3(7)</b>).</p>	<p>The Government announced its intention to carry out an environmental assessment of the revocation of the regional strategies in a Written Ministerial Statement on 5 April 2011. The requirements of Articles 3(5) and (7) did not therefore apply.</p>
<p><b>Article 5 (4)</b> requires that ‘designated environmental authorities’ for strategic environmental assessment are consulted when deciding the scope and level of detail which must be included in the environmental reports.</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 define these “Consultation Bodies” for plans that relate to England as the Countryside Agency and English Nature (now amalgamated to form Natural England), the Environment Agency and English Heritage.</p>	<p>The Consultation Bodies in England<sup>14</sup> were consulted on the scope and level of detail of the environmental reports on 6 May 2011, and were given 5 weeks as required by regulations to respond. The equivalent bodies in the Devolved Administrations were also consulted.</p> <p>Their comments were used as the basis for deciding the scope and level of detail of the material included in the environmental reports. Consideration was also given to more detailed textual comments provided by the consultation bodies.</p>

<sup>14</sup> The Environment Agency, English Heritage and Natural England.

**Table 3.1 (continued) The SEA process and key steps undertaken during the environmental assessment of the proposed revocation of the regional strategies**

SEA process	Key steps in the environmental assessment of the revocation of the regional strategies
<p><b>Article 5 (1)</b> states that where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and the geographical scope of the plan, are identified, described and evaluated.</p> <p>The environmental report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail of the plan, its stage in the decision making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication.</p>	<p>An Environmental Report was prepared for each region. Each considered the likely significant effects of revoking the regional strategy within the context of wider reforms to the planning system. This included the publication of the NPPF, decentralising planning powers to local authorities, and introducing a duty to co-operate to support local authorities in both delivering for their local communities and addressing strategic cross-boundary issues.</p>
<p><b>Article 6</b> requires that the draft plan and the environmental report shall be made available to the designated consultation bodies and to the public.</p>	<p>The completed Environmental Reports were sent to the Consultation Bodies in England and the equivalent bodies in the devolved administrations and simultaneously published for public consultation on 20 October 2011. The consultation period ended on 20 January 2012. As the Environmental Reports dealt with the effects of the revocation and not the adoption of plans, there were no draft plans to consult on.</p>
<p><b>Article 7</b> sets out provisions for consulting on draft plans which are likely to have a significant effect on the environment in another member State.</p>	<p>The Government did not consult any other Member State. The revocation of the regional strategies was not considered likely to have a significant effect on the environment of any other Member State, and no other Member States indicated otherwise.</p>
<p><b>Article 8</b> states that the environmental report prepared pursuant to Article 6 and the results of any trans boundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan and before its adoption or submission to the legislative procedure.</p>	<p>A total of 103 comments were received in response to the previous consultation. Annex F provides a summary of the responses that are relevant to the revocation of the regional strategy for the North West of England. Each response has been carefully considered and as appropriate informed this updated environmental assessment.</p>

As a result of considering the responses received, the changes made to the approach to this assessment have included:

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 SEA Directive Annex I(f) topics and presenting this in separate topic chapters;
- Providing additional information on the details of the plan to revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others;
- Providing additional information in the assessment of revocation and retention of each regional strategy policy explicitly against all 12 of the SEA Directive Annex I(f) topics;
- Identifying, characterising and assessing any likely significant effects of the plan and the reasonable alternatives, based on a common interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects;



- Providing additional information on likely secondary, cumulative and synergistic effects of the plan to revoke the regional strategies;
- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy;
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate;
- Providing further information that includes proposals to monitor any significant effects.

This SEA of the plan to revoke the North West of England Regional Strategy was undertaken in 2012 by AMEC on behalf of DCLG.

## 3.2 Scope of the Assessment

The scope of this assessment reflects the potential environmental effects of revoking the regional strategies. **Section 3.2.1** sets out the core topics required for consideration by the SEA Directive and their interpretation for the purposes of the assessment. **Section 3.2.2** sets out the geographic scope of the SEA.

### 3.2.1 Environmental Categories Included in the Scope of the Assessment

The range of potential environmental effects under consideration has been informed primarily by the SEA Directive and Regulations, using published government guidance<sup>15</sup>. Annex I of the SEA Directive and Schedule 2 of the SEA Regulation requires that the assessment includes information on the “*likely significant effects 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 inter-relationship between the issues referred to*”. These environmental categories have been used throughout this report.

In the absence of detailed guidance on their content, a number of these environmental categories (e.g. population, human health and material assets) can be subject to varying interpretation. Within this report:

- ‘population’ includes information on demographics and generic social and socio-economic issues including accessibility issues;
- ‘human health’ includes information on mortality, illness and indices of perceived well-being;
- ‘material assets’ includes information waste management and minerals.

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<sup>15</sup> Office of the Deputy Prime Minister (2005). A Practical Guide to the Strategic Environmental Assessment Directive.

Land use is not explicitly identified in the list of 12 SEA topics; however, for the purposes of this assessment and in particular given that these are assessments of strategies whose primary objectives include the determination of the location of development, it is included under the topic of soil. The soil topic has also been expanded to include consideration of geology.

**Table 3.2** shows how the categories in this report reflect those in the SEA Regulations.

**Table 3.2 Categories of effects considered by the SEA of the plan to revoke the regional strategies**

Categories in the SEA Regulations	Categories Used in the SEA of the Revocation of Regional Strategies
Biodiversity, Flora and Fauna	Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems).
Population	Population (including socio-economic effects and accessibility).
Human Health	Human Health.
Soil	Soil and Geology (including land use, important geological sites, and the contamination of soils).
Water	Water Quality and Resources (including inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality).
Air	Air Quality.
Climatic factors	Climate Change (including greenhouse gas emissions, predicted effects of climate change such as flooding and the ability to adapt).
Material assets	Waste Management and Minerals.
Cultural heritage, including architectural and archaeological heritage	Cultural Heritage (including architectural and archaeological heritage).
Landscape	Landscape and Townscape.

### 3.2.2 Geographic Scope of the Assessment

The SEA considers the effects revocation, partial revocation or retention of the regional strategies. In so doing, it examines the effects of each alternative for each policy contained in each regional strategy. Consideration of these effects therefore occurs at a number of geographic levels, dependent on the content, intent and specificity of the individual policy. This is at one (or more) of the following levels:

- **the national level** – the cumulative assessment includes consideration of the effects of the plan to revoke all eight regional strategies across England. This draws together the effects of the individual regional assessments and provides a view at the broader geographic scale;
- **the regional level** – the assessment includes the consideration of the effects of the plan to revoke individual Regional Strategy policies that apply at a regional level e.g. policies that

encourage an integrated approach to conserving and enhancing the landscape, natural environment and historic environment;

- **the sub-regional level** – the assessment includes consideration of the effects of the plan to revoke individual regional strategy policies that apply to an identified sub-region or area e.g. policies that seek to promote economic regeneration of a sub-region, recognised as having a specific identity or character;
- **the local level** – the assessment includes consideration of the effects of the plan to revoke regional strategy policies that will have a specific effect at a local planning authority level, or will affect a specific designated area or identified infrastructure project.

The range of effects considered by the assessment therefore span from the national to the local. To ensure comprehensive geographic coverage of the potential effects, contextual information has been collated at the appropriate levels; one at national level (England) and the other at the regional level that includes reference to specific local information and sites where relevant and appropriate to do so.

Notwithstanding this, the SEA is strategic, and does not assess the detailed local or site specific issues in the same degree of detail that would typically be required for an SEA of a local plan document (in line with Article 4(3) and 5(2) of the SEA Directive).

### 3.2.3 Short, Medium and Long-Term Timescales

When considering the timing of potential effects of the plan to revoke the regional strategies, the commentary classifies effects as ‘short,’ ‘medium’ or ‘long term.’ This reflects an intention to capture the differences that could arise from the plan to revoke regional strategies due to timing. For example, if the plan leads to the revocation of a specific policy that does not have an immediate equivalent (such as suitable piece of legislation or an alternate national policy) to effect ongoing delivery of the policy intent, there could be transitory effects until an alternative mechanism (such as additional policy guidance) was identified and implemented. It is also consistent with the direction contained in Annex II (2) of the SEA Directive where the characteristic of the effects should have regard to ‘the probability, duration, frequency and reversibility of the effects’.

Annex 1, paragraph 214 of the NPPF identifies a 12 month implementation period in which ‘decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework.’ The period began when the NPPF was published in March 2012 and will end in March 2013.

Given the time to prepare, consult and update a local plan, it is assumed that all local planning authorities in England will have adopted a local plan within 5 years of the NPPF being published. This is a pragmatic judgement (informed by the progress of local planning authorities to produce Core Strategies in compliance with the Planning and Compulsory Purchase Act 2004) and has been made solely for the purposes of this assessment.

Finally, for the purposes of this assessment, the overall duration of the regional strategy to be revoked provides a defined limit to the duration of the assessment (i.e. approximately out to 2021).

Using this as the basis, 'short term' is defined as the remaining time in the transition period (9 months or 0.75 years from when this assessment commenced), 'medium term' as more than 0.75 and no more than 5 years and 'long term' as over 5 years to the end of the regional strategy lifetime.

It should be noted that in practice when applying the definitions of the different terms within the assessment, the boundaries between terms are more flexible than a strict reading of the definitions implies. There are for example, instances where effects in the short term extend for a limited period into the medium term. Where this occurs, it is recorded in the assessment commentary although it will still be only assessed as short term in the assessment matrix itself (see Section 3.4 for an explanation of the approach to the assessment).

### 3.3 Context and Baseline

#### 3.3.1 Review of Plans and Programmes

The SEA Regulation requires a review of the plan to revoke the regional strategies "*relationship with other relevant plans and programmes*". One of the first steps in undertaking the SEA is to identify and review other relevant plans, programmes, policies and strategies (hereafter referred to as 'plans and programmes') that could have an effect on the plan to revoke regional strategies. These may be plans and programmes at an international/European, national, regional or sub-regional level, as relevant to the scope of the revocation plan. The summary within each topic section in **Appendix E** identifies the relationships between the revocation plan and these other documents; i.e. how the plan could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of any environmental and sustainability objectives and targets set out in these plans and programmes.

The review of plans and programmes also helped complete the environmental baseline and help determine the key issues. The review also provided the policy context for the assessment.

#### 3.3.2 Collecting Baseline Evidence

An essential part of the SEA process is to identify the current state of the environment and its likely evolution under a 'business as usual' scenario. Only with sufficient knowledge of the existing baseline conditions can the likely significant effects of the revocation plan be identified and assessed. The SEA also requires that the actual effects of implementing the revocation plan on baseline conditions are monitored.

All the environmental topics listed in the SEA Directive and Regulations have been found to be relevant for the revocation plan (see **Table 3.2**). These were consulted upon at the scoping stage and have been amended to reflect the views of the statutory consultees.

A primary source of information for this assessment has been the published sustainability appraisals, completed to accompany the consultation on the North West of England Plan and RES which have been used to provide information regarding the likely evolution of the current state of the environment without the implementation of the revocation plan. However, it is recognised that such information reflects data collected a number of years past and as such has been supplemented with more recent information from a variety of sources, including (amongst others) Department for Environment, Food and Rural Affairs, Department of Energy and Climate Change, the Environment Agency, English Heritage, Natural England and the Office of National Statistics.

### 3.3.3 Presenting the Context and Baseline Information

**Appendix E** sets out the collated contextual and baseline information, on a topic-by-topic basis, for each of the 10 assessment topics (see **Table 3.2**), structured as follows:

- **introduction** - provides an overview and definition of the topic;
- **summary of national and regional plans and programmes** - provides an overview of the policy context in which the revocation plan sits;
- **relevant aspects of the current state of the environment at a national and regional level** - provides an overview of the baseline and the key topic specific baseline factors which will need to be considered as part of the assessment;
- **the likely evolution of these baseline conditions without the implementation of the revocation plan** - provides an overview of how the baseline is likely to change in the absence of the revocation plan, an understanding of this is key to understanding the effects of the revocation plan on the topic area;
- **the environmental characteristics of areas likely to be significantly affected;**
- **current problems in areas of particular environmental importance** (such as those designated under the Wild Birds and Habitats Directives);
- **guidance as to how the significance of potential effects has been determined;**
- **the assessment of likely significant effects arising from the revocation plan** - including information on the potential nature and scale of effects, proposed mitigation measures (where appropriate) and measures for enhancement, assumptions and uncertainties and additional information that may be required;
- **proposed mitigation measures** – including an expansion of those measures identified including more detailed commentary on, for example, the duty to co-operate;

- **proposed measures to monitor** the effects of the revocation plan.

### 3.4 Approach to Assessing the Effects

#### 3.4.1 Prediction and Evaluation of Effects

In line with the ODPM (now CLG) *Practical Guide to the SEA Directive*<sup>16</sup>, the assessment process seeks to *predict the significant environmental effects of the plan or programme*. This is done by identifying the likely changes to the baseline conditions as a result of the implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or rare. Where numerical information has not been available, the assessment has been based on professional judgement and with reference to relevant legislation, regulations and policy.

To reflect the specific nature of the plan to revoke the regional strategies, the assessment has been completed in two stages:

- **A high level (or screening) assessment** of the effects of the proposals for each regional strategy policy against all SEA topics to identify those where there could be a likely significant effect (using definitions as outlined in **Table 3.4**); and
- **A detailed assessment of the likely significant effects** (both positive and negative) identified through the high level assessment process of each regional strategy policy, presented under each SEA topic.

The high level assessment is presented in **Appendix D** in an assessment matrix (see **Table 3.3**) and the detailed assessment is presented in **Appendix E** at the end of each topic chapter and summarised in **Section 4**, and **5** of this report.

The high level assessments record the following in the associated commentary:

- the identification and description of the potential effects;
- when the effect(s) could occur, and how long they could last (e.g. short, medium or long term);
- the assumptions and uncertainties that underpin the assessment (and any information needed to address uncertainties);
- potential avoidance or mitigation measures for any likely significant negative effects; and

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<sup>16</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available online at: <http://www.communities.gov.uk/publications/planningandbuilding/practicalguidesea>

- possible enhancement measures where positive effects are identified.

**Table 3.3 High Level Assessment Matrix**

Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil and Geology			Water Quality and Resources			Air Quality			Climatic Change			Material Assets			Cultural Heritage			Landscape and Townscape			Commentary
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	
Retention																												Likely Significant Effects of Retention Mitigation Measures Assumptions Uncertainty
Revocation																												Etc

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ?, this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</i></p>						
S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)						

### 3.4.2 Determining Significance

Topic-specific definitions have been developed for what constitutes a significant effect, a minor effect or a neutral effect for each of the 10 environmental issues; these can be found in the relevant topic chapters in **Appendix E**. **Table 3.4** shows an example of these definitions along with the symbols used to record the effects within the assessment.

**Table 3.4 Illustrative guidance for the assessment of significance for biodiversity and nature conservation**

Effect	Description	Illustrative Guidance
<b>++</b>	Significant positive	<ul style="list-style-type: none"> <li>Alternative would have a significant and sustained positive impact on European or national designated sites and/or protected species. (e.g. fully supports all conservation objectives on site, long term increase in population of designated species);</li> <li>Alternative would have a strong positive effect on local biodiversity (e.g. through removal of all existing disturbance/pollutant emissions, or creation of new habitats leading to long term improvement to ecosystem structure and function);</li> <li>Alternative will create new areas of wildlife interest with improved public access in areas where there is a high demand for access to these sites.</li> </ul>
<b>+</b>	Positive	<ul style="list-style-type: none"> <li>Alternative would have a minor positive effect on European or national designated sites and/or protected species (e.g. supports one of the conservation objectives on site, short term increase in population of designated species);</li> <li>Alternative may have a positive net effect on local biodiversity (e.g. through reduction in disturbance/pollutant emissions, or some habitat creation leading to temporary improvement to ecosystem structure and function);</li> <li>Alternative will enhance existing public access to areas of wildlife interest in areas where there is some demand for these sites.</li> </ul>
<b>0</b>	No (neutral effects)	<ul style="list-style-type: none"> <li>Alternative would not have any effects on European or national designated sites and/or any species (including both designated and non-designated species);</li> <li>Alternative would not affect public right of way or access to areas of wildlife interest.</li> </ul>
<b>-</b>	Negative	<ul style="list-style-type: none"> <li>Alternative would have minor short-term (direct or indirect) negative effects on non-designated conservation sites and species (e.g. through a minor increase in disturbance/pollutant emissions, or some loss of habitat leading to temporary loss of ecosystem structure and function);</li> <li>Alternative will decrease public access to areas of wildlife interest in areas where there is some demand for these sites.</li> </ul>
<b>--</b>	Significant negative	<ul style="list-style-type: none"> <li>Alternative would have a negative and sustained effect on European or national designated sites and/or protected species (e.g. prevents reaching all conservation objectives on site, long term decrease in populations of designated species). These impacts could not reasonably be compensated for;</li> <li>Alternative would have strong negative effects on local biodiversity (e.g. through an minor increase in disturbance/pollutant emissions, or considerable loss of habitat leading to long term loss of ecosystem structure and function).</li> </ul>
<b>?</b>	Uncertain	<ul style="list-style-type: none"> <li>From the level of information available the impact that the Alternative would have on this objective is uncertain.</li> </ul>

### 3.4.3 Specific Issues Considered When Assessing the Effects of the Plan to Revoke the Regional Strategies

When considering the effects of retention of a regional strategy policy, we have reviewed the prediction of effects contained in the relevant sustainability appraisal (for this report for the North West Plan and North West Regional Economic Strategy) of the regional strategy. Using this information does have limitations (in that the effects identified use an evidence base of varying age, are presented in differing forms and assess effects over differing timeframes) and where these occur, additional information has been identified to supplement the assessment; however, the principle remains consistent with the requirements of Article 5(3) of the SEA Directive, '*relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision making ... may be used*'.



When assessing the effects of revocation, the following has been considered:

- **Whether the purpose, intent or specific target could be delivered by other existing legislation or government policy?** Where the answer to this question is yes, the relevant legislation, policy or guidance has been identified, along with any relevant regionally specific evidence to substantiate the conclusion. In many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the NPPF have been referenced in the individual policy assessments to provide a substantial alternative source of planning policy relevant to the local plan. For a number of Regional Strategy policies it has also been considered relevant to reference the duty to co-operate. Where this is the case, specific local examples of current cooperation are also cited where available. Revocation of the Regional Strategy and the reliance on the NPPF creates a situation where there will be a delay, as some authorities will need to review and update their local plan to reflect NPPF policies and the needs of their local communities. In these instances where there is a lack of an up to date local plan, the uncertainty over policy, including the quantum and preferred location of development, is likely to affect whether developers submit planning applications for new development. As a result, it is AMEC's view that there will be a lessening in the short and medium term on development activity and the resulting effects occurring; although it is noted that the application of the NPPFs presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date;
- **If the purpose, intent or specific target of the regional strategy policy is not likely to be sustained beyond revocation, the effects have been identified, described and assessed.** Where such policy changes are determined, the effects identified, described and assessed will also be proportionate to the scope of the policy considered. For example, where the regional strategy policy applies uniformly across the region e.g. priorities to increase more sustainable modes of transport for passengers and freight, the promotion of agri-environment schemes or the provision of regional renewable targets, such effects will be described at the regional level. However, there are regional strategy policies that do have a direct and explicit consequence for local authorities such as housing, infrastructure projects, mineral and waste. In these instances, we have also considered the implications and effects on what we consider to be relevant individual local plans.

### Considering Effects on Local Plans

Where we have identified that revocation of a Regional Strategy policy will have an effect on the environment and that this will have a consequence for local plan policies and/or local areas, we have examined these effects in more detail. We have compared the policies in the North West of England Plan on housing allocations, employment (both jobs and employment land), renewable energy, land won aggregates and rock, waste apportionment and policies with the equivalent policies in local plan and /or core strategies in the region. This analysis is set out in **Appendix C** and has then been reflected, where relevant in the assessment of individual Plan policies (**Appendix D**).

It is also noted that the plans adopted after July 2006 are also highly likely to have been subject to SEA, given that the SEA Regulations came into effect in July 2004 with a two year transitional arrangement. Where SEA has been undertaken of local plans and the information is in the public domain, the assessments (usually presented as a combined Sustainability Appraisal and SEA) have been reviewed

when relevant to provide additional information and evidence within the assessment presented in **Appendix D**.

### Considering the Effects of the Regional Economic Strategy

The vision, targets, priorities, implementation priorities and growth areas of the former Regional Economic Strategy (RES) have been presented in **Appendix H**. The vision, targets, priorities, implementation priorities have been mapped onto the policies of the former Regional Spatial Strategy (RSS) for the North West of England. The mapping demonstrates that the RES and RSS are inextricably linked and in many instances the policies in the RSS are the same as the commitments in the RES. Where this occurs and in order to avoid duplication of assessment, the mapping demonstrates how the effects of both have been considered in detail in **Appendix D**.

#### 3.4.4 Secondary, Cumulative and Synergistic Effects Assessment<sup>17</sup>

SEA also requires that secondary, cumulative and synergistic effects of the options are assessed. These terms are explained in **Table 3.5**.

**Table 3.5 Definitions of secondary, cumulative and synergistic effects**

Type of Effect	Definition*
Secondary (or indirect)	Effects that do not occur as a direct result of the plan to revoke the Regional Strategy, but occur at distance from the direct impacts or as a result of a complex pathway. Examples of a secondary effect of the plan to revoke could include the materials (and embedded carbon) used in any development or infrastructure project identified.
Cumulative	Effects that occur where the revocation or retention of several individual Regional Strategy policies which each may have an insignificant effect, combine to have a significant effect. Examples of a cumulative effect of the plan to revoke Regional Strategy could include the potential effects on a European designated site, where a habitat or species is vulnerable and the cumulative effects of disturbance arising from uncoordinated development occurring simultaneously in adjacent local authorities causes a significant impact. Cumulative effects could also occur across a region or across more than one region.
Synergistic	Effects that interact to produce a new total effect that could be greater than the sum of the individual effects.

\*Adapted from SEA guidance, ODPM (2005).

For the assessment of secondary, cumulative and synergistic effects to be effective, they should be considered as part of each assessment, rather than to being seen as a separate assessment. For the purposes of brevity, these effects which tend to be grouped together are captured subsequently under the heading of cumulative effects.

<sup>17</sup> This includes consideration of the effects in the short, medium and long term; permanent and temporary and positive and negative effects.

### 3.4.5 Assumptions used in the Assessment

The assumptions that have been used in the assessment are as follows:

- **The effects and findings of the relevant Sustainability Appraisal are valid over the lifetime of the relevant regional strategy; however, that there may be some variation in the short term.** For example, all regional strategies contain housing allocations, quantified on an annual basis and over the lifetime of the plan at the region and local authority level. It is evident that since adoption of the regional strategies, actual housing completions per annum are below the levels expected in each strategy. In consequence, when considering the quantum of growth in the short term, based on the actual figures to date, retention will lead to a lessening of some effects (both benefits of increased housing provision and any negative effects arising from land take and loss of any natural resources); however, we have assumed that over the lifetime of the regional strategy that the housing policy will still be delivered and that the medium and long term effects would remain unchanged by the short term deviation. It is appreciated that whilst this appears to be reasonable assumption, it could be affected by the health of the economy or market changes. However, determining alternative credible views on the likely future outcome of regional strategies and their expectations for new development risks adding an extra layer of subjectivity to a process that is already relying heavily on judgements about future impacts in an uncertain world;
- **For revocation, the assessments anticipate that local plans will be put in place consistent with the principles and policies set out in the NPPF.** This includes the presumption in favour of sustainable development and the expectation that “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system” and that “the planning system should play an active role in guiding development to sustainable solutions”. These expectations are reflected in the assessment of effects at the local level. However, it will take time for local plans to be put in place which may result in some uncertainties over the effects of revocation in the short and medium terms. The application of the NPPFs presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date;
- **For the purposes of providing a consistent interpretation of short, medium and long term, the definitions, as set out in section 3.2.3, have been applied.** The definitions of short, medium and long term reflected the assumption that for the purposes of the assessment, revocation was considered to have occurred concurrent with when the assessment was undertaken. This minimised the need to speculate over when exactly the regional strategies could be revoked, was compatible with the Government’s proposal to rapidly abolish the regional strategies subject to the outcome of consultation process, enabled the assessment to optimise the use of baseline information as evidence to inform the assessment of effects and enabled the assessment to consider the effects during any transitional period. The approach was also consistent with current SEA guidance and practice.
- **It is assumed that local authorities will continue to work together on cross boundary strategic issues.** This will be supported by the new duty to co-operate in relation to the planning of sustainable development. The duty will ensure that local authorities and other public bodies are involved in a continual process of constructive and active engagement

which will maximise effective working on development planning in relation to strategic planning issues that cross administrative boundaries.

It should be noted that the effects of the recent Government housing and planning package changes<sup>18</sup> have not been considered in detail in this assessment as policy detail is still being developed; however, it may prove that the increased emphasis on growth and development given by these proposals addresses some of the effects on the short and medium term arising from the uncertainties in those 24 authorities (including former authorities) without local plans in conformity with the Regional Strategy.

### 3.5 Technical Difficulties

#### 3.5.1 Assessing the Effects of Revocation is a New Requirement

Until the European Court judgement<sup>19</sup> in March 2012, the legal understanding was that SEA was applied to the preparation and modification of relevant plans and programmes. The ruling confirms the application to the revocation of land use plans. Whilst there is guidance and relatively well established processes available to assess the effects of a plan's preparations, there is no equivalent for revocation and no established practice on how to undertake such an assessment. Necessarily then, this assessment is part of a body of emerging practice and is the first such that is in compliance with the SEA Directive requirements in the UK.

The method adopted to assess the likely environmental effects of revoking the regional strategies has therefore had to take account of this lack of established practice. The approach taken builds on the previous voluntary approach contained in the previous assessment of the plan to revoke the regional strategies published in October 2011 as well as the comments received from consultees.

#### 3.5.2 Ensuring Consistency

The assessment of effects, in particular of retention of the regional strategy has used information from the relevant sustainability appraisal of each regional strategy. Whilst each sustainability appraisal has been completed in a manner consistent with government guidance, they are different in approach, format and assessment of effects which has created difficulties in ensuring that the assessment of the plan to revoke regional strategies is consistent across all eight regions. For example, some appraisals have assessed the effects of each proposed policy (South East Plan, East of England Plan) whilst others present the assessment findings thematically (the North East). Furthermore, the SEA topics considered vary in depth and detail, and their assessment (through differing assessment frameworks comprising of assessment objectives which number from 14 to 25) is also marked different. Lastly, the sustainability

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<sup>18</sup> <http://www.communities.gov.uk/news/housing/2211918>

<sup>19</sup> The judgment in Case C-567/10 *Inter-Environnement Bruxelles ASBL v Région de Bruxelles-Capitale*.

appraisals were completed iteratively at different times between mid 2004 and mid 2009 and so used differing baselines to provide context for the respective assessments.

The Sustainability Appraisal of the North West of England Plan was undertaken iteratively reflecting the stages in the Plan's development (Draft Regional Spatial Strategy, Proposed Changes and Final Revisions). To support this assessment we have used information from the sustainability appraisal of the Final Revisions, a copy of which can be found at:

[http://www.4nw.org.uk/articles/article.php?page\\_id=470](http://www.4nw.org.uk/articles/article.php?page_id=470)

### 3.5.3 Varying Age and Status of the North West of England Regional Strategy

The Regional Strategy considered in this assessment consists of two single discrete documents, the RSS and the RES. It is recognised that in 2008 the regional planning body did undertake a Partial Review leading to a submission document in 2009 (see section 2.3.2 above). Notwithstanding the fact the Partial Review was not adopted, a small number of the region's local planning authorities have adopted targets for pitch and plot provision for travellers in line with those set out within the Partial Review. The effect of having these core strategy targets in place has been assessed against relevant policy.

### 3.5.4 Uncertainty and Future Effects

The assessments inevitably reflect the fact that until adopted local plans are in place there must be some uncertainty as to their likely effects, notwithstanding the expectation that they will be drawn up to be consistent with national policy and subject to rigorous environmental assessment through sustainability appraisal. The environmental effects of revoking the regional strategies will clearly be dependent, to a greater or lesser extent depending on the impact under consideration, on future decisions by local authorities, individually and collectively. The uncertainty arising from local decisions has been reflected as appropriate in the assessment of the individual policies in **Appendix D** and in the consideration in the topic chapters contained in **Appendix E**.



## 4. Assessment of Effects of Revoking the North West Regional Strategy and the Reasonable Alternatives

### 4.1 Overview

This chapter presents the results of the assessment which has been carried out with specific sections below dealing with the effects of revocation, retention and partial revocation. The assessment has been carried out using the methodology described in **Section 3** above.

This chapter draws in particular on detailed evidence in **Appendices D** and **E**. **Appendix D** presents the details of the assessment on a policy by policy basis and **Appendix E** presents detailed comments on each SEA topic including comments on significant effects where these have been identified.

### 4.2 Effects of Revoking the North West Regional Strategy

**Table 4.1** summarises the effects of revoking the North West Regional Strategy against the 12 SEA topics. As noted in section 3.4.3, the Regional Economic Strategy commitments have been mapped onto the RSS policies (**Appendix H**). Due to the intentional overlap between them, the RSS policies include those of the RES and in order to avoid duplication, the assessment summarised in **Table 4.1** has focussed on the North West of England Plan policies.

The following key has been used in completing the assessment.

Score Key:	++ Significant Positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ?, this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</i></p> <p><i>The reasons for the assessment are presented in Appendix D for each policy.</i></p>						
<p>S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (&gt; 5 years)</p>						

**Table 4.1 Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)**

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy DP1	Spatial Principles	Revocation	+	+	+	++	++	++	+	+	+	+	+	+	+	+	+	++	++	++	++	++	++	+	+	+	+	+	+
Policy DP2	Promote Sustainable Communities	Revocation	+	++	++	+	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	+	+	+	+
Policy DP3	Promote Sustainable Economic Development	Revocation	0	0	0	0	+	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy DP4, 5 and 6	Make the Best Use of Existing Resources and Infrastructure, Manage Travel Demand, Reduce the Need to Travel and Increase Accessibility and Mobility Opportunity and Need	Revocation	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	0	+



Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage					Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Policy DP7	Promote Environmental Quality	Revocation	+	++	++	+	+	++	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	++	++	+	++	++			
Policy DP8	Mainstreaming Rural Issues	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Policy DP9	Reduce Emissions and Adapt to Climate Change	Revocation	+	++	++	+	++	++	+	+	++	+	+	++	+	++	++	++	++	++	+	+	+	+	+	++	+	+	++		
Policy RDF1	Spatial Priorities	Revocation	+	+	+	+	+	+	+	+	+	?	?	?	-	-	-	+	+	+	+	+	+	?	?	?	+	+	+		
Policy RDF2	Rural Areas	Revocation	0	+	+	0	+	++	0	+	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
Policy RDF3	The Coast	Revocation	+	+	+	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+	+	0	+	+		
Policy RDF4	Green Belts	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	++	++	?			
Policy W1	Strengthening the Regional Economy	Revocation	?	?	?	0	+	++	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?		

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy W2	Locations for Regionally Significant Economic Development	Revocation	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	-	-	-	?	?	?	?	?	?
Policy W3 and 4	Supply of Employment Land and Release of Allocated Employment Land	Revocation	?	?	?	?	+	++	?	?	+	?	-	-	?	-	-	?	-	-	?	-	--	?	?	?	?	?	?
Policy W5	Retail Development	Revocation	+	+	+	0	+	++	0	+	+	0	0	0	0	+	+	0	+	+	0	-	-	?	?	?	0	+	+
Policy W6 and 7	Tourism and the Visitor Economy and Principles for Tourism Development	Revocation	0	0	0	0	+	++	0	0	0	0	0	0	0	?	?	0	0	0	0	0	0	0	+	+	?	?	?
Policy L1	Health, Sport, Recreation, Cultural and Educational Services Provision	Revocation	0	0	0	++	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy L2 and 3	Understanding Housing Markets and Existing Housing Stock and Housing Renewal	Revocation	0	0	0	+	+	++	0	0	0	0	0	0	0	0	0	0	-	+	0	?	?	0	?	?	0	0	+
Policy L4 and 5	Regional Housing Provision and Affordable Housing	Revocation	?	?	-	?	?	++	?	?	-	?	?	-	?	?	-	?	?	-	?	?	--	?	?	?	?	?	-
Policy RT1	Integrated Transport Network	Revocation	0	0	0	?	+	+	0	+	+	0	0	0	?	+	+	?	?	+	0	0	0	0	0	0	0	0	0
Policy RT2	Managing Travel Demand	Revocation	?	?	?	+	+	++	?	?	?	0	0	0	?	?	?	?	?	?	?	?	?	0	0	0	?	?	?
Policy RT3	Public Transport Framework	Revocation	+	+	+	++	++	++	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+
Policy RT4	Management of the Highway Network	Revocation	?	?	?	+	+	++	?	?	?	?	?	?	+	+	++	+	+	++	-	-	-	?	?	?	?	?	?

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape					
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
Policy RT5	Airports	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	0	0				
Policy RT6	Ports and Waterways	Revocation	?	?	?	?	+	+	?	?	?	?	?	?	?	?	+	?	?	+	?	?	-	?	?	?	?	?	?			
Policy RT7	Freight Transport	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
Policy RT8	Inter-Modal Freight Terminals	Revocation	0	?	?	0	0	+	0	0	-	0	0	0	0	0	?	0	0	?	0	0	-	0	0	?	0	0	-			
Policy RT9	Walking and Cycling	Revocation	+	++	++	+	++	++	0	0	0	0	0	0	+	++	++	0	+	+	0	0	0	0	0	0	+	+	+			
Policy RT10	Priorities for Transport Management and Investment	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?			
Policy EM1	Integrated Enhancement and Protection of the Region's Environmental Assets	Revocation	+		++	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	+	+	0	0	0	+	+	++	+	+	+	+

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air				Climatic Factors			Material Assets			Cultural Heritage				Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		S	M	L	S	M	L	S	M	L				
Policy EM2	Remediating Contaminated Land	Revocation	?	?	?	+	+	+	+	+	+	+	+	+	?	?	?	?	?	?	0	0	0	0	0	0	?	?	?		
Policy EM3	Green Infrastructure	Revocation	0	+	++	0	+	++	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	+	+	0	+	++		
Policy EM4	Regional Parks	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	+	+		
Policy EM5	Integrated Water Management	Revocation	+	+	+	+	+	++	0	0	0	+	+	++	0	0	0	+	+	++	0	0	0	0	0	0	0	0	0		
Policy EM6	Managing the North West's Coastline	Revocation	0	+	++	0	+	++	0	+	+	0	+	+	0	0	0	0	+	++	0	+	+	0	0	0	0	+	+		
Policy EM7, 8 and 9	Minerals Extraction , Land-won Aggregates and Secondary and Recycled Aggregates	Revocation	-	-	+	+	+	+	-	-	0	-	-	0	-	-	-	0	0	0	-	-	-	0	+	+	0	+	+		

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy EM10	A Regional Approach to Waste Management	Revocation	0	0	0	+	+	?	+	+	?	+	+	?	+	+	?	+	+	?	++	++	?	0	0	0	+	+	?
Policy EM11	Waste Management Principles	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	++	+	+	+	+	+	+
Policy EM12	Locational Principles	Revocation	0	0	0	-	-	-	0	0	0	0	0	0	-	-	-	-	-	-	0	0	0	0	0	0	0	0	0
Policy EM13	Provision of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities	Revocation	0	?	?	0	+	++	?	?	?	0	0	0	0	+	+	0	+	+	0	+	+	0	0	0	0	?	?
Policy EM14	Radioactive Waste	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy EM15	A Framework for Sustainable Energy in the North West	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy EM16	Energy Conservation and Efficiency	Revocation	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	+	++	+	+	+	?	?	?	+	+	+
Policy EM17	Renewable Energy	Revocation	+	+	+	+	+	++	0	0	0	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Policy EM18	Decentralised Energy Supply	Revocation	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	0	+	++	0	0	0	+	+	+	+	+	+
Policy MCR1	Manchester City Region Priorities	Revocation	+	+	++	+	+	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR2	Regional Centre and Inner Areas of Manchester	Revocation	0	+	+	+	++	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR3	Southern Part of the Manchester City Region	Revocation	0	0	0	+	+	++	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR4	South Cheshire	Revocation	0	0	0	0	+	++	0	?	?	0	-	-	0	-	-	0	?	?	0	-	-	0	+	+	0	0	0
Policy MCR5	Northern Part of the Manchester City Region	Revocation	0	0	0	+	+	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+

Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy MCR6	Strategic Framework for Warrington	Revocation	0	0	0	0	+	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR 1	Liverpool City Region Priorities	Revocation	0	+	+	0	+	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR2	The Regional Centre and Inner Areas of Liverpool City Region	Revocation	0	0	0	0	+	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR3 and 4	Outer Part of the Liverpool City Region and The Remaining Rural Parts of Liverpool City Region	Revocation	?	?	?	0	+	++	?	?	?	?	?	?	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy LCR5	West Cheshire – North East Wales	Revocation	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	0	0
Policy CLCR1	Central Lancashire City Region Priorities	Revocation	0	0	0	0	+	++	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?



Table 4.1 (continued) Summary of the effects of revoking the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy CLCR2	Focus for Development and Investment in Central Lancashire City Region	Revocation	0	0	0	0	+	++	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?
Policy CLCR3	Green City	Revocation	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	0	0	0	+	+
Policy CNL1	Overall Spatial Policy for Cumbria	Revocation	0	0	0	0	+	++	0	+	++	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
Policy CNL2	Sub-area Development Priorities for Cumbria	Revocation	0	0	0	0	+	++	0	+	++	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
Policy CNL3	Spatial Policy for the Lake District	Revocation	+	+	+	+	++	++	+	+	+	?	?	?	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy CNL4	Spatial Policy for North Lancashire	Revocation	+	+	+	++	++	++	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+

#### 4.2.1 Likely Significant Effects

Revocation of the RSS will lead to a range of effects across the different SEA topics and over short, medium and long terms as identified in **Appendices D and E**. A summary of the likely significant effects stemming from revocation are presented below.

#### Spatial Principles

Policies DP1-DP9 set out the principles that other regional, sub-regional and local plans and strategies and all individual proposals, schemes and investment decisions should adhere to. These principles are also considered applicable to development management in particular circumstances. The principles are set out within Policy DP1 with policies DP2-9 providing amplification. The matters covered by the principles are together considered to represent sustainable development. The principles cover issues such as sustainable communities, sustainable economic development, making the best use of existing resources, managing and reducing the need to travel, marrying opportunity and need, promoting environmental quality, mainstreaming rural issues and reducing and adapting to the effects of climate change.

The NPPF sets out the purpose of planning which is to help achieve sustainable development. The presumption in favour of sustainable development is at the heart of the NPPF and is reflected in plan making and decision taking. It is therefore concluded that the strong emphasis on sustainable development which presently permeates regional planning will continue following revocation.

The NPPF does not provide a direct replacement for Policy DP6 'Marrying Opportunity and Need'. This states that priority should be given, in locational choices and investment decisions, to linking areas of economic opportunity with areas in greatest need of economic, social and physical restructuring and regeneration. It is however considered reasonable to assume that local authorities will seek to maximise the opportunities for development in their areas, and where an area is identified as needing regeneration, seek the best opportunities to achieve this. The duty to co-operate provides authorities with clear encouragement to work with other authorities to the same end, yet, because the goal in DP6 is not explicitly contained within paragraph 156 of the NPPF, the benefits of this approach are slightly less than under DP6, although still positive.

The assessment has concluded that revocation of RSS Policy DP7 would lead to positive effects across many of the SEA topics but with those positive effects being significant in relation to biodiversity/flora/fauna, population/health, water, cultural heritage and landscape. This is because the NPPF provides a framework of guidance and policy that encourages balanced consideration against all three dimensions of sustainability.

The assessment has not identified any areas where revocation of those policies which make up the Core Spatial Strategy would have any negative effects – either minor or significant.

## Regional Spatial Framework

This section of the North West of England Plan contains four policies which together form the spatial framework for the region. The policies set out the spatial priorities for the region which firstly, are that development is focused upon the Manchester and Liverpool City regional centres, followed by the inner areas that surround these centres. The spatial strategy then seeks to direct development to the towns and centres in the three city regions and finally to the towns and centres outside the city regions. Subsequent policy provides direction with regard to Rural Areas, the Coast and Green Belt. With regard to Green Belt, no strategic releases are proposed up to 2011 with a continuing presumption against release post 2011, dependant upon need and subsequent RSS review.

With regard to RDF1 revocation would have similar but potentially less significant positive (population, soils) and negative (air) effects. This is because the NPPF lacks any specific locational guidance pertinent to the concept of regional centres or city regions, with local authorities encouraged to plan for the local needs of their areas. This could result indirectly, in a change in the distribution of development within the region. However the NPPF does state that development should be located in areas where they can support local business, respond to the needs of the market and support existing business centres. Often these areas will correspond with the region's main centres, particularly the key economic drivers of Manchester and Liverpool. Furthermore, new joint policy initiatives such as the Greater Manchester Strategy recognise the importance of the city centre and the implementation of this document would continue post revocation for example. Effects are therefore considered to be similar but in some instances slightly less significant based upon the lack of explicit direction contained within the NPPF.

Released from the prioritisation required by the RSS, (particularly the emphasis upon the stringent restriction of development in areas with strong rurality) it has been concluded that the minor positive benefits arising from policy RDF2 Rural Areas upon landscape and climatic factors will become uncertain depending upon the quantum of development now proposed by rural authorities in response to local need.

## Working in the North West

The RSS is complementary to the economic strategy set out within the Regional Economic Strategy. It seeks to strengthen and regenerate the regional economy and address problems of worklessness. This is to be achieved through the implementation of seven policies (Policies W1-7) that seek to provide policy direction on matters such as regionally significant development, employment land, retailing and tourism. Policy W3 sets out the regional provision for the supply of employment land broken down by sub-region.

One of the core planning principles identified in the NPPF is that planning should drive and support economic development to deliver the homes, businesses and infrastructure that the country needs. The NPPF states that '*local authorities should plan proactively to meet development needs of business and support an economy fit for the 21st century*'.

The Local Economic Partnerships which have been established in the region are supportive of the NPPF policy aims and objectives. Their commitments to champion economic interests regionally and nationally as well as locally represent a continuation of the aims and policies promoted by the Regional Economic Strategy. Designation of enterprise zones at Samlesbury and Warton and at Daresbury are evidence of their commitment in this regard. In consequence, and with revocation of the North West of England Plan, the strong emphasis on supporting economic development and the benefits accruing would continue under the NPPF and this would be cascaded through local plans and through implementing the duty to co-operate where cross boundary approaches are required.

The assessment has identified that with the continuity of approach as indicated above, the positive effects on population and health through improved job opportunities and other socio economic benefits including improved health would continue to be experienced. However the positive effect may be less in the short term, and potentially overall particularly with regard to Policy W2. This policy requires that regionally significant development is located in areas close to sustainable transport nodes related to areas of worklessness or in need of regeneration. It also requires a sequential approach to office development which would see it placed within the city and main towns in preference to potentially less accessible locations. One of the core planning principles set out in paragraph 17 of the NPPF is that patterns of growth should be actively managed to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable therefore matching some of the policy contained within RSS Policy W2. However the NPPF does not make the link between locations for economic development and areas of worklessness explicit, and without this link it has been assumed that significant positive effects with regard to population may be lessened, or at least delayed until such time as the local authorities put in place their local plans and LEPS take time to become fully established and effective. The fact that approximately one quarter of local authorities in the region have approved core strategies is considered to be relevant in this regard.

A further effect arising from revocation of Policy W2 and the attention it provides to linking areas of opportunity and need is that other authorities may now feel more capable of increasing the quantum of economic development in their areas (in response to identified need). This may effectively result in competition between allocated sites in identified areas of need and in more affluent parts of the region. Whilst the duty to co-operate will ensure that coordination does take place, the extent to which this duty will extend between the north and south of the region for example is less clear. Although there are uncertainties over the precise location of future employment areas and specific development sites that will be identified and brought forward through local plans, the assessment of the revocation of Policy W4 does acknowledge the continued emphasis on supporting economic development under the NPPF which, wherever it occurs, is likely to have negative effects on a number of SEA topic areas including water, air, climatic factors and material assets. These effects are also recorded for retention with the difference under revocation being that effects may be delayed in the short-term whilst local authorities move forward with their core strategy/local plan adoption.

In mitigation it should be noted that whilst the NPPF aims to proactively drive and support sustainable economic development it should be in accordance with other policies in the NPPF which seek to minimise environmental effects. These include minimising impacts on biodiversity and providing net

gains where possible (paragraph 109), having access to high quality public transport facilities (paragraph 35) and aiming for a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (paragraph 37).

Overall the revocation of the employment policy is unlikely to lead to local authorities not providing an enabling context for job growth, and therefore there are expected to be similar benefits to the population as with retention of the policies. Similarly similar adverse effects are expected subject to the mitigation measures set out in the NPPF.

### Living in the North West

Policies L1-L5 set out the spatial strategy with regard to housing provision, need and distribution but begin with Policy L1 which sets out the regional policy consideration for Health, Sport, Recreation, Cultural and Education Services Provision. Reference to Gypsies, Travellers and Travelling Showpeople is contained within the supporting text to Policy L2 Understanding Housing Markets which states that the Regional Planning Body, in partnership with the Regional Housing Board has undertaken research on future requirements which will inform a future review of both the North West of England Plan and the Regional Housing Strategy. As noted earlier in this document, that Partial Review was not adopted as regional policy and the current situation is that the most common local plan policy approach within the region is to consider applications for sites on a criteria basis. Those with targets, the authorities of Eden, Hyndburn, Manchester and St Helens reflect the distribution figure provided by the Partial Review whilst Lancaster and Rossendale also set targets albeit at a level before that suggested within the Partial Review Draft Policies L6 and L7.

No different significant effects arising from revocation have been assessed with regard to Policy L1. One of the overarching principles of the NPPF is that plans should take account of, and support, local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs. Both retention and revocation of this policy conclude with a significant effect upon population and health. Similarly performance against Policy L2, Understanding Housing Markets is considered to be the same following revocation. Paragraph 159 of the NPPF states that local planning authorities should have a clear understanding of housing needs in their area. They should prepare Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. This evidence base approach is already being adopted by authorities in the region. With regard to Gypsy, Traveller and Travelling Showpeople pitch and plot provision some authorities have targets set within up to date core strategies and they will continue to work towards these targets whilst those authorities without targets are required to undertake evidence based assessment of need in order to establish accommodation needs (as required by 'Planning policy for traveller sites' DCLG March 2012).

Revocation of Policy L3 may result in a delay in the delivery of positive effects which would otherwise occur as a result of regeneration in areas with poor housing conditions. The North West of England Plan required that local authorities identify areas appropriate for regeneration and set out within their

strategies policy to deal with them. A wide suite of tools to support housing regeneration continues to be available post revocation, as stated in paragraph 51 of the NPPF, such as including bringing empty homes back into use and using compulsory purchase powers where appropriate. With the policies set out in the NPPF fully implemented, therefore, the overall profile of impacts and benefits is likely to be similar. However, it is likely to take local authorities some time to absorb, plan for and implement the policies in the NPPF, and the effects of development may take longer to arise.

Regional housing provision, broken down to each local authority is set out within Policy L4. This sets targets to deliver 416,000 homes net of clearance in the period 2003-2021. By far the largest proportion of housing is identified for Manchester (63,000). Against each authority, a brownfield target ranging from at least 50% to at least 90% is provided with the regional average stated as 70%. The targets set out in the regional strategy are based on an assessment of need, and this need is unlikely to disappear with revocation. It is Government policy to boost significantly the supply of housing, for example through initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates which are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth.

Paragraph 47 of the NPPF states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. The revocation of Policy L4 of the North West of England Plan does not, therefore, remove either the need for more homes, or the requirement for this need should be assessed and met.

The removal of a specific brownfield target and its replacement within the NPPF by a general encouragement to re-use brownfield, subject to its environmental value, may result in fewer often inner urban sites coming forward for development. There could therefore be a consequential increase in development upon greenfield land. This change in emphasis is potentially most pronounced within those council areas identified as having the highest brownfield targets such as Liverpool and Manchester, although the recently adopted Manchester Core Strategy does maintain a target reflective of the RS. Overall it is considered that there will be a minor negative effect on soils resulting from revocation. It is unlikely to be significant because of the spatial approach which continues to be taken by authorities within those core strategies that are adopted. In addition, the amount of brownfield land that exists in the region is not likely to be ignored by authorities whilst the complementary aims and objectives to support economic development promoted by organisations such as the LEPs will inevitably continue to focus attention upon brownfield development opportunities in areas of need.

In the short term following revocation the impact for those local authorities that do not have a plan that was either in conformity with the regional strategy or which post-dates it is likely to be uncertain. For those authorities without an adopted up to date plan, the RS provided clarity on the quantum of development required; however, in the short term following its revocation, there is likely to be a temporary (short term) period where some local authorities revert to the original local plan whilst they

develop a replacement. In many cases these local plans are silent with regard to up to date housing targets. The amount of development anticipated in this period could therefore be lower than if the Strategy were retained, particularly as so few authorities have up to date plans in place. The application of the NPPF's presumption in favour of sustainable development and its policies to boost the supply of housing will help where plans or policies are absent, silent or out of date.

The effect of potentially delaying housing delivery is to lessen the resulting effects upon the environment in the short to medium term.

### Regional Transport Strategy

Policies RT1-RT10 set out the Regional Transport Strategy. The policies support the vision and objectives of the North West Plan by concentrating on the development of better transport links within the region, and between the North West and other parts of the UK, Ireland, mainland Europe and beyond. The policies also reflect priorities identified within the RES. They aim to do this by significantly improving the quality and provision of public transport and by promoting a more structured approach to managing and selectively improving the region's highway network. The Plan references policy compatibility with the RES and the Northern Way Growth Strategy (the NWDA, Yorkshire Forward and One North East) promoting improved connections between the North of England's ports and airports, and between City Regions. At the local level, the importance placed by the North West Plan on reducing greenhouse gas emissions by encouraging people to walk, cycle or use public transport is reflected within the NPPF. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Local authorities are encouraged to work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure (including public transport) to support sustainable developments. Transport networks transcend local authority boundaries and thus effective networks will require local authorities to work together to achieve sustainable approaches. Revocation will not affect the continuation of cross-boundary Local Transport Plans. The third round of Local Transport Plans (2011 to varying dates) have been published or are in preparation throughout the North West hence a difference in timescale of effect until the point at which they are all adopted.

Uncertainty in the effects of revocation are, however, recorded against Policy RT2 Managing Travel Demand. The NPPF does not explicitly emphasise reducing the number of car journeys (and instead talks about meeting travel demand) albeit that it can be assumed that demand is to be met in sustainable ways (paragraphs 35, 38). Parking is seen by the NPPF as a tool to boost the vitality of town centres, so this is less restrictive than the policy in RT2. This may benefit the economy of town centres whilst improving accessibility will also have positive economic and social benefits however there is a level of uncertainty recorded against air, climate, biodiversity and other, environmental SEA receptors.

Policy RT6 seeks to encourage a modal shift from road to water based transport with resulting positive environmental effects against SEA receptors, air and climate change. The policy also includes a series of criteria which seek to protect the environment from the effects of port expansion. The policy also seeks to safeguard ports and wharf facilities. The Government's Interim Port Policy Review 2007 has

the same presumptions and conditions regarding safeguarding as this policy. In addition, there is now a Ports National Policy Statement (2012), which sets out the framework for decisions on proposals for new port development. The Ports NPS includes clear environmental protection measures but it also includes a presumption in favour of development unless significant concerns/environmental issues cannot be appropriately addressed. The UK's Marine Policy Statement 2011 also recognises the importance of the UK's ports to economic growth but that individual decisions should also take account of environmental, social and economic effects. In the absence of specific protectionist policy criteria set out within the North West of England Plan, and the increased recognition within the NPS and Marine Policy Statement of the economic benefits of port development, the revocation is considered to result in a wider range uncertain impacts across a number of the remaining environmental receptors such as soil, water, biodiversity, cultural heritage and landscape due to the assumed potential for greater levels of development given the Government's encouragement towards infrastructure development.

### Environment, Minerals, Waste and Energy

The North West of England Plan recognises that whilst conserving and enhancing the North West's valued environmental and cultural assets is of utmost importance, plans and strategies should also recognise the role of the environment when seeking to achieve social and economic objectives and addressing the issue of climate change. Overall therefore the Plan views the environment within the overall context of sustainability.

Policy EM1 sets out the Plan's approach to the protection and enhancement of the region's environmental assets.

The conservation and enhancement of the natural environment and the reduction of pollution is one of the core planning principles in the NPPF together with conserving heritage assets in a manner appropriate to their significance. The assessment has shown that under revocation and with the application of the NPPF there will be benefits across virtually all of the SEA topic areas with many of the effects being significant.

It is assumed that local authorities will work together making use of the duty to co-operate and the local nature partnerships to optimise the benefits to biodiversity and that BAP partnerships continue to operate.

The legal requirement for local planning authorities to ensure that internationally and nationally designated sites are given the strongest level of protection and that development does not have adverse effects on the integrity of sites of European or international importance for nature conservation would be unchanged by revocation.

Uncertainty arising from revocation is limited to the remediation of contaminated land (the Plan seeks sustainable remediation whilst the NPPF is silent on appropriate remediation techniques) and the concept of Regional Parks because in the absence of Policy EM4 it is not clear (due to the lack of a



substantial number of core strategies) whether the statutory designation of the three regional parks will continue as planned.

## Water

Policy EM5 (Integrated Water Management) sets out the key plan policy for water. The policy requires that in line with the EU Water Framework Directive, plans and strategies should have regard to River Basin Management Plans, Water Company Asset Management Plans, Catchment Flood Management Plans, and the Regional Flood Risk Appraisal. Local planning authorities and developers should protect the quantity and quality of surface, ground and coastal waters, and manage flood risk. The NPPF reflects this wider policy framework, referencing at paragraph 94, the adoption of proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. In addition the operation of the sequential test, and retention of PPS25 ensures that the overarching policy context with regard to flooding will remain the same on revocation.

With regard to water supply and the phasing of development, the NPPF (paragraph 156) states that local planning authorities should set out the strategic priorities for the area in the local plan, including strategic policies to deliver the infrastructure for water supply and wastewater treatment. The NPPF also states at paragraph 99 that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, taking account of factors such as water supply. Paragraph 162 of the NPPF states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for water supply and waste water treatment, and its ability to meet forecast demands. This latter requirement will require cross-boundary working with water companies in adjoining regions or countries such as Wales and Scotland due to the trans-boundary impacts that can occur as a result of water demand within the North West and the potential for secondary impacts upon features such as shared Special Protection Areas in some of these locations.

The assessment has identified that with revocation and the application of the NPPF together with other national policies there will be significant benefits maintained against the water topic. The Government's 2011 White Paper 'Water for Life' maintains the commitment for Government to work with the Environment Agency and Ofwat to provide clearer guidance to water companies on planning for the long-term and keeping demand down. The requirements of the Water Framework Directive will still apply and the Environment Agency will continue to have responsibilities for the River Basin Management Plan, the Catchment Flood Risk Management Plan and Flood Risk Assessments. Under the Water Industry Act 1991 and amended by the Water Act 2003, United Utilities will continue to produce a Water Resource Management Plan for the region. The Final Water Resource Management Plan published by United Utilities in 2009 provides forecasts of the supply-demand balance to enable them to plan to maintain secure water supplies for their domestic and commercial customers. The building regulations will continue to apply. The Code for Sustainable Homes is a national standard for measuring the 'sustainability' of dwellings. It encourages amongst other things, higher levels of water efficiency. Local Authorities can require housing developments in their area to meet specified Code levels through existing policies within their local plans (for example Oldham's Joint Core Strategy and Development Management Policies DPD sets Code Levels under Policy 18 Energy). Investment is taking place in the

region in order to ensure that sufficient waste water treatment facilities are available into the future (see Liverpool City Region below).

## Minerals

Policy EM7, 8 and 9 set out the regional strategy's policy for minerals with Policy EM9 providing apportionment of the regional target for minerals and aggregates at the sub-regional level.

The assessment has identified positive effects for population (supporting economic development) and cultural heritage (explicit policy support within the Plan for materials to facilitate the repair of historic buildings) together with a significant negative for the effect upon material assets. These benefits are maintained and expanded upon for revocation with additional recognition being provided within the NPPF to biodiversity and landscape.

Revocation would lead to a lessening of the significant negative effect identified for material assets in the short to medium term, with a level of uncertainty a factor over the long term. This is because many of the minerals authorities are yet to adopt their DPDs with some halting production, either to transfer resources to the preparation of other documents (in the case of Cumbria CC) or to take into account the new national policy framework (Greater Manchester). The consequential effects for minerals and aggregates extraction are therefore less certain.

## Waste

There are three policies relating to waste. The revocation of policies EM10 and 11 is considered to differ little from the retention alternative with positive environmental effects against the majority of environmental receptors with significant positive effects upon material assets (national policy approaches to move up the waste hierarchy reflecting the North West Plan policy approach) maintained in the short and medium term.

The NPPF is silent with regard to waste, relying upon an extant PPS10. The Government's Waste Policy Statement references the revised Waste Framework Directive target of 50% recycling of municipal waste by 2020 which represents a 5% decrease in the target reflected by the RSS policy. In the short-term revocation is unlikely to lead to a change in the assessment. A review of existing waste DPDs shows that many of the region's waste planning authorities are supportive of higher waste targets than those set out either at the national level, or within the RSS. For example Cumbria and Lancashire are operating to higher targets at 2015 than the RSS, with Manchester's 2020 target of 50% only below the region at that timeframe by 5%, but reflective of the Directive. In the short to medium term, the assessment has identified significant positive effects for material assets changing to uncertain in the long term (2016 to 2021) as authorities review their individual waste targets.

As a result of revocation, there are a number of negative effect recorded for Policy EM12 Location Principles which differs from the positive assessment of this policy under retention. Minor negative effects are identified against population, air and climatic effects for revocation resulting from a lack of

location guidance within the NPPF or PPS10 in relation to the siting of waste management facilities explicitly close to source (with Policy EM12 requiring the avoidance of waste carriage over long distances and promotion of shipment by rail and water). A policy approach reflective of EM12 within the Government's proposed National Waste Management Plan would serve as appropriate mitigation.

## Sustainable Energy

Policies EM15-18 set out the Regional Strategy's policies for sustainable energy, including energy performance, and renewable energy targets.

The NPPF recognises the key role planning plays in helping to secure radical reductions in greenhouse gas emissions. The NPPF supports the move to a low carbon future and identifies a number of ways to help achieve this. Furthermore it puts forward policy approaches to help increase the use and supply of renewable and low carbon energy.

The assessment has shown that under revocation and with the application of the NPPF (and the National Planning Statement EN1 (Overarching Policy Statement for Energy) and EN3 (National Policy Statement for Renewable Energy Infrastructure) which can be material considerations in the determination of planning applications) positive benefits on climate change would be maintained with other benefits for environmental receptors arising from the mitigation of climate change.

Policy EM15 sets out a regional target for 20% of the region's energy to come from renewable sources by 2020 which is an increase on the existing nationally legally-binding target to ensure 15% of energy comes from renewable sources by 2020. The UK Renewable Energy Strategy 2009 sets out the path to meet this national target. Because the national target is 5% lower than that set out in the Plan, it is concluded that the positive effects of the policy could be lessened upon revocation. This conclusion is reinforced by the limited number of renewable energy targets at the local authority level with only five authorities including targets within their development plans, some of which are historic and below the national level. Without a regional target to pursue, it is assumed that individual local authorities may seek to rely upon other authorities to deliver against the national target with a corresponding weakening of the positive benefits that would derive from the mitigation of climate change.

Performance against other energy policies is broadly the same for both retention and revocation alternatives. A significant benefit to climate of revocation, over that identified for retention, however is to be found for Policy EM 18 Decentralised Energy Supply. The Policy sets a minimum percentage for predicted energy requirements to be met by renewable, de-centralised or low carbon sources. The NPPF (Paragraph 95) provides a stronger requirement for the sustainability of new buildings by referencing the Government's zero carbon buildings policy. It is expected that, in the longer term, this will lead to significant benefits in terms of carbon savings.

## Sub-Regions

### *The Manchester City Region*

Policies MCR1-6 set out the sub-regional policies for the Manchester City region. The region includes parts of Cheshire. The vision for the City Region is to simultaneously exploit its current assets and greatest opportunities to deliver accelerated economic growth; and to reduce social and economic disparities within the City Region, through regeneration initiatives. The North West of England Plan seeks to connect areas of greatest need with those of economic opportunity.

The environmental performance of revocation is broadly similar to retention. Difference is identified either with regard to the timing of significant effects for population, (as noted previously, a majority of Councils do not have up to date core strategies/local plans although coverage is higher here than in the rest of the region) or as a result of the high brownfield target set for the city-region (90% within Manchester and Salford) which reduces the level of significance predicted for soils. It should be noted that Manchester has an adopted core strategy that does place great emphasis on brownfield development and that the Salford Core Strategy as published has a similar 90% target, (although this was formally withdrawn in November 2012). There remains a potential for Salford and for other authorities within the sub-region without adopted core strategies to review their brownfield targets and whilst the discussion set out above in relation to the potential implication of an absence of a brownfield target at the regional level (Policy L4) considered there would be no regional effect, within certain sub-regions, the differentiation of effect may be slightly greater. In particular the NPPF emphasis towards protecting land that is of high environmental value may result in a significant effect for biodiversity under policy MCR1.

The City Region of Manchester, particularly Greater Manchester has acted quickly to provide a strategic framework against which cross-boundary strategy can be developed. The Greater Manchester Combined Authority was established on 1 April 2011 and it aims to co-ordinate key economic development, regeneration and transport functions. Consequently most policies are considered to be little affected by revocation.

Also within the City Region, but outside Greater Manchester, the effects upon South Cheshire and Warrington are also determined to be similar for both options. Whilst Cheshire East does not have an adopted Core Strategy, there is nothing contained within the NPPF which suggests that its spatial direction should depart from that set out within MCR4. Similarly development proposals set out within MCR4, such as improvements to Crewe Station are in the process of coming forward or at least unlikely to be prevented by changes in national policy. In Warrington, also without an adopted Core Strategy, effects are also considered similar for both options albeit slightly delayed. However it should be noted that the Cheshire and Warrington LEP Business Plan 2012-15 is complementary with the RS policy.

### *Liverpool City Region*

The North West of England Plan seeks to support Liverpool City Region's vision to create an economically and culturally vibrant city by 2025. In the absence of the Regional Strategy there will need

to be continued multi-local authority working to carry forward the strategy. At the economic level this is provided by the Liverpool City Region LEP covering the six authority areas of Halton, Knowsley, Liverpool, Sefton, St Helens and Wirral.

Benefits tend to be positive for population and health, soils and landscape (focus of development within urban centres) resulting from an increase in the number of jobs and homes, improving environmental conditions and improving accessibility both within the city region and beyond. With no adopted core strategies in place, the significant benefits to population are likely to be delayed to the longer term whilst partnerships and related joint local authority working under the duty to co-operate become fully effective and core strategies/local plans are adopted.

As with any policy promoting growth and development, there will be adverse effects on material assets resulting from the use of building materials. Given the proposed scale of development within centres of population, and existing levels of air quality there are potential adverse impacts resulting from an overall increase in traffic leading to additional pollutant emissions affecting air and climatic factors.

Liverpool City Region in particular has the potential to create trans-boundary effects with Wales given that water supplies are taken from Lake Vyrnwy and the River Dee. This issue has been identified by consultees who also suggest that the potential exists for indirect effects upon biodiversity. Furthermore there are issues in the region around accommodating growth within existing Waste Water Treatment Works consents limits without compromising Water Framework Directive requirements. The effect of revocation upon water is considered to be neutral providing that development continues to be planned in conjunction with phased improvements to water supply and treatment as set out within the NPPF, and that the water management arrangements of United Utilities recognise the demand requirements of the City Region. The recent announcement by United Utilities of a proposed £200 million extension to the existing water treatment works at Sandon Dock Liverpool is assumed to not exceed consent limits and is a demonstration of the upgrades being undertaken to the region's essential infrastructure.

### *Central Lancashire City Region*

Policies CLRC1-3 seek to provide the spatial direction in support of the sub-region's vision which is to achieve:

*'A globally competitive City Region offering a distinctive and diverse environment for prosperity.'*

The Policy sets out to support investment and sustainable development with a focus upon the City of Preston, Blackburn, Burnley and Blackpool. It references other overarching policies within the North West Plan. Policy LCRC2 seeks to address worklessness, enhances urban quality, and contributes to the enhancement of the natural setting of the city/towns.

The authorities of Preston, Chorley and South Ribble are close to adopting a joint core strategy following receipt of the Inspector's Report whilst a further three authorities have adopted strategies. Given the relatively high level of up to date plan coverage, the timing of effects is likely to be the same for both retention and revocation.

The assessment has identified significant positive effects of revocation under population and health arising from the benefits from more housing and jobs particularly in the medium to long term. As a pro-development strategy it will have adverse effects on material assets through the use of construction materials and energy and increased generation of waste. The establishment of the Lancashire LEP and the successful delivery of an Enterprise Zone focussed around the aerospace industry will also be positive in this regard.

### *Cumbria and North Lancashire*

This sub-region comprises the administrative county of Cumbria which includes the six district councils of Allerdale, Barrow, Carlisle, Copeland, Eden and South Lakeland the Lake District National Park Authority and Lancaster City Council. The North West of England Plan recognises that parts of Lancaster and southern Cumbria have economic and transport links with the Central Lancashire City Region; Cumbria has similar links with Scotland and the North East Region, and to a lesser extent with the Yorkshire and Humber Region. Therefore there is the potential for trans-boundary effects resulting from revocation. The spatial objectives for the sub-region are to reduce the requirement to access jobs outside of Cumbria and North Lancashire, increase the complementary nature of key towns and the development and maintenance of high quality transport networks.

The North West of England Plan contains four policies specific to this sub-region, (CLN1 Overall Spatial Policy for Cumbria, CLN2 Sub-area Development Priorities for Cumbria, CLN3 Spatial Policy for the lake District and CLN4 Spatial Policy for North Lancashire) and the effects of revocation are considered to be very similar to the alternative of retention. Positive environment effects are recorded against a range of environmental receptors with significant performance against population and human health. No negative effects are identified with air being the consistent receptor against which uncertainty is recorded.

The key differentiator is with regard to the timing of performance for some policies. For CLN1 timescales for certain initiatives are recorded within the Policy such as the University of Cumbria and revocation may have an effect on progress compounded by the unsuccessful bid for Enterprise Zone status which is assumed to slow down other economic (population) benefits.

For the Lake District National Park (CLN3), the presence of an adopted Core Strategy suggests that revocation will not affect positive performance against a range of objectives. NPPF paragraph 115 requires that great weight should be given to conserving the landscape and scenic beauty of national parks. Furthermore it allows local authorities to develop policy based upon robust local evidence which would allow the Lake District National Park to continue to support policies aimed at promoting local needs and affordable housing.

Spatial Policy for North Lancashire is contained within CLN4. Effects of revocation are considered the same as for retention. The NPPF paragraph 28 provides policy support for rural sustainable tourism, whilst town centres are identified as appropriate for larger tourism attractions. Education references within the NPPF are related more towards delivering sustainable provision to support residential development but support for the economy (of which establishments such as Lancaster University form a key part) is provided. There is no explicit reference within the NPPF to the CLN4 policy reference to



traffic management. However, the Lancashire Local Transport Plan 3 (2011-2021) recognises issues of congestion within Lancaster City and discusses opportunities to combat congestion through increased road space and park and ride.

#### 4.2.2 Other Effects

The effects of the revocation of the RS have been presented in **Appendix D** and summarised above in relation to the issues identified in the SEA Directive (Annex I). Where other potential effects have been identified these are referred to in **Appendix D**.

#### 4.2.3 Proposed Mitigation Measures

A number of mitigation measures have been identified in the detailed assessment in Appendix D.

Mitigation of the effects will be diverse and may need to be specific sub-regionally. For example, in planning for water provision and treatment as part of new development, there may be greater reliance on Water Resource Management Plans and co-operation between interested parties and this may include cross-boundary working. Other forms of policy mitigation are likely to come through the preparation of updated policy, such as the proposed National Waste Planning Policy Statement which may provide further advice on the location of waste management facilities and an encouragement to reduce waste movements by road and encourage a modal shift towards rail and water transport. The approach taken by Greater Manchester in the establishment of the Greater Manchester Combined Authority also provides an example of the ways in which local authorities are voluntarily engaging with one another to plan at the strategic level. This should ensure that the positive effects of North West Policy, particularly with regard to matching need with opportunity, can continue to be realised.

### 4.3 Effects of Retention of the Existing Regional Strategy

Retention of the Regional Strategy will lead to a range of effects across the different SEA topics and over short, medium and long terms as identified in **Appendices D** and **E**.

A summary of the likely significant effects of retention on the North West Midlands Regional Spatial Strategy policy areas are presented in **Table 4.2** and commented on below. **Table 4.2** summarises the effects of retaining the Regional Strategy against the 12 SEA topics. As noted in section 4.2, the Regional Economic Strategy commitments have been mapped onto the RSS policies (Appendix H). Due to the intentional overlap between them, the RSS policies include those of the RES and in order to avoid duplication, the assessment summarised in Table 4.2 has focussed on the North West of England Plan policies. Please note that within this alternative, retention is defined as the retention of all the policies within the North West of England Plan and all the commitments in the RES but without their future update. Local authorities would be expected to refer to the NPPF and to place greater weight on the NPPF, as the Regional Strategy ages, as without update it would gradually lose relevance to the changing circumstances of local communities.

The following key has been used in completing the assessment.

<b>Score</b>	<b>++</b>		<b>+</b>		<b>0</b>		<b>-</b>		<b>--</b>	<b>?</b>
<b>Key:</b>	<b>Significant</b> Positive effect		<b>Minor</b> effect	positive	No overall effect		<b>Minor</b> negative effect		<b>Significant</b> negative effect	Score uncertain
<p><i>NB: where more than one symbol is presented in a box it indicates that the SEA has found more than one score for the category. Where the scores are both positive and negative, the boxes are deliberately not coloured. Where a box is coloured but also contains a ?, this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</i></p> <p><i>The reasons for the assessment are presented in Appendix D for each policy.</i></p>										
S – short term (less than 0.75 year), M – medium term (between 0.75 and 5 years) and L – long term (> 5 years)										



Table 4.2 Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy DP1	Spatial Principles	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Policy DP2	Promote Sustainable Communities	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Policy DP3	Promote Sustainable Economic Development	Retention	0	0	0	0	+	+	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy DP4, 5 and 6	Make the Best Use of Existing Resources and Infrastructure, Manage Travel Demand; Reduce the Need to Travel, and Increase Accessibility and Marry Opportunity and Need	Retention	+	+	+	+	++	++	+	+	+	+	+	+	+	+	+	+	+	+	+	++	++	+	+	+	+	+	+
Policy DP7	Promote Environmental Quality	Retention	+	++	++	+	++	++	+	+	+	+	++	++	+	+	+	+	+	+	+	+	+	+	++	++	+	++	++
Policy DP8	Mainstreaming Rural Issues	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy DP9	Reduce Emissions and Adapt to Climate Change	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Policy RDF1	Spatial Priorities	Retention	?	?	?	+	+	+	+	+	+	?	?	?	-	-	--	+	+	+	+	+	+	?	?	?	+	+	+
Policy RDF2	Rural Areas	Retention	?	?	?	0	+	+	0	+	+	?	?	?	?	?	?	0	+	+	?	?	?	?	?	?	0	+	+
Policy RDF3	The Coast	Retention	0	+	+	0	+	+	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+	+	0	+	+
Policy RDF4	Green Belts	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	?

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy W1	Strengthening the Regional Economy	Retention	?	?	?	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy W2	Locations for Regionally Significant Economic Development	Retention	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	-	-	-	?	?	?	?	?	?
Policy W3 and 4	Supply of Employment Land and Release of Allocated Employment Lane	Retention	?	?	?	+	+	+	0	+	+	-	-	-	-	-	-	-	-	-	-	--	--	?	?	?	0	+	+
Policy W5	Retail Development	Retention	+	+	+	+	+	+	0	+	+	0	0	0	0	+	+	0	+	+	-	-	-	?	?	?	0	+	+

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy W6 and 7	Tourism and the Visitor Economy and Principles for Tourism Development	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	?	?	0	0	0	0	0	0	0	+	+	?	?	?
Policy L1	Health, Sport, Recreation, Cultural and Educational Services Provision	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy L2 and 3	Understanding Housing Markets and Existing Housing Stock and Housing Renewal	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	-	-	+	0	?	?	?	?	?	0	+	+

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy L4 and 5	Regional Housing Provision and Affordable Housing	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	+	+	+
Policy RT1	Integrated Transport Network	Retention	0	0	0	?	+	+	0	+	+	0	0	0	?	+	+	?	?	+	0	0	0	0	0	0	0	0	0
Policy RT2	Managing Travel Demand	Retention	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	+	+	+	-	-	-	0	0	0	+	+	+
Policy RT3	Public Transport Framework	Retention	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+
Policy RT4	Management of the Highway Network	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy RT5	Airports	Retention	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	0	0	
Policy RT6	Ports and Waterways	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?
Policy RT7	Freight Transport	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Policy RT8	Inter-Modal Freight Terminals	Retention	0	?	?	0	+	++	0	-	-	0	0	0	0	?	?	0	?	?	0	-	-	0	?	?	0	-	-
Policy RT9	Walking and Cycling	Retention	+	++	++	+	++	++	0	0	0	0	0	0	+	++	++	0	+	+	0	0	0	0	0	0	+	+	+
Policy RT10	Priorities for Transport Management and Investment	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy EM1	Integrated Enhancement and Protection of the Region's Environmental Assets	Retention	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	+	+	0	0	0	+	+	+	+	+	+
Policy EM2	Remediating Contaminated Land	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+
Policy EM3	Green Infrastructure	Retention	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	+	+	0	+	+
Policy EM4	Regional Parks	Retention	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	+	+
Policy EM5	Integrated Water Management	Retention	+	+	+	+	+	+	0	0	0	+	+	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0



Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy EM6	Managing the North West's Coastline	Retention	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	+	+	0	+	+	0	+	+	0	+	+
Policy EM7, 8 and 9	Minerals Extraction, Land-won Aggregates and Secondary and Recycled Aggregates and A Regional Approach to Waste Management	Retention	-	-	+	+	+	+	-	-	0	-	-	0	-	-	-	0	0	0	-	-	-	0	0	+	-	-	+
Policy EM10	A Regional Approach to Waste Management	Retention	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy EM11	Waste Management Principles	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Policy EM12	Locational Principles	Retention	0	0	0	-	+	++	0	0	0	0	0	0	-	+	++	-	+	++	0	0	0	0	0	0	0	0	0
Policy EM13	Provision of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities	Retention	0	+	+	0	+	++	+	+	+	0	0	0	0	+	++	0	+	+	0	+	+	0	0	0	0	+	+
Policy EM14	Radioactive Waste	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy EM15	A Framework for Sustainable Energy in the North West	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+
Policy EM16	Energy Conservation and Efficiency	Retention	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+	+	+	++	+	+	+	?	?	?	+	+	+
Policy EM17	Renewable Energy	Retention	+	+	+	+	+	++	0	0	0	0	0	0	+	+	+	+	+	++	+	+	+	+	+	+	+	+	+
Policy EM18	Decentralised Energy Supply	Retention	+	+	+	+	+	+	0	0	0	0	0	0	+	+	+	0	+	+	0	0	0	+	+	+	+	+	+
Policy MCR1	Manchester City Region Priorities	Retention	+	+	+	+	++	++	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy MCR2	Regional Centre and Inner Areas of Manchester	Retention	?	?	?	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	0	0	0	+	+	+	
Policy MCR3	Southern Part of the Manchester City Region	Retention	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR4	South Cheshire	Retention	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?
Policy MCR5	Northern Part of the Manchester City Region	Retention	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR6	Strategic Framework for Warrington	Retention	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy LCR 1	Liverpool City Region Priorities	Retention	0	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR2	The Regional Centre and Inner Areas of Liverpool City Region	Retention	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR3 and 4	Outer Part of the Liverpool City Region and the Remaining Rural parts of Liverpool City Region	Retention	?	?	?	0	+	+	?	?	?	?	?	?	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy LCR5	West Cheshire - North East Wales	Retention	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	0	0

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water				Air			Climatic Factors			Material Assets			Cultural Heritage				Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L		S	M	L	S	M	L	S	M	L	S	M	L		S	M	L
Policy CLCR1	Central Lancashire City Region Priorities	Retention	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	+	+	+	0	?	?		
Policy CLCR2	Focus for Development and Investment in Central Lancashire City Region	Retention	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+		
Policy CLCR3	Green City	Retention	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	0	0	0	+	+		
Policy CNL1	Overall Spatial Policy for Cumbria	Retention	0	0	0	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+			
Policy CNL2	Sub-area Development Priorities for Cumbria	Retention	0	0	0	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+			

Table 4.2 (continued) Summary of the effects of retaining the Regional Strategy (with reference to the North West of England Plan policies)

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy CNL3	Spatial Policy for the Lake District	Retention	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy CNL4	Spatial Policy for North Lancashire	Retention	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+

### 4.3.1 Likely Significant Effects

#### Development Principles

Retention of the Development Principles which are set out within in the North West of England Plan, in tandem with the NPPF, would provide a number of significant, positive environmental effects across a number of receptors. Positive effects for retention are felt most strongly for policies DP1, 2 7 and 9 but are complementary to the revocation alternative.

#### The Regional Spatial Framework

The Regional Spatial Framework states that most new development should be concentrated within urban areas (particularly the 'Main Development Locations' of Manchester and Liverpool) and recognises the economic and regeneration benefits that can accrue from such a targeting of development. Baseline evidence demonstrates that it is in these regional centres, towns and cities that the greatest pockets of economic and social exclusion occur. Importantly, the environmental performance of many of these centres is also weak and this resource could be increasingly pressured by an increased concentration of development. The RDF therefore seeks to promote environmental excellence, green infrastructure and good environmental management together with a requirement for the provision of local facilities and services that should provide the social infrastructure to support such development.

The sustainability appraisal (SA) of the North West of England Plan recognised that in broad terms the focus of development within the larger settlements was broadly sustainable. It welcomed the recognition that such development must take place in tandem with better environmental conditions and an improved social infrastructure.

The Regional Spatial Framework establishes an implied settlement hierarchy: below the 'Main Development Locations' lie the 'Key Service Centres' and beyond them the 'Rural Areas'. Policies seek to focus development towards these centres recognising the key role that they play in servicing the wider rural hinterland of the region. Continued recognition of the importance of Key Service Centres under the retention alternative should support and strengthen their role as service providers to the rural areas and thereby maintain the viability of the rural population.

Differences between retention and revocation are identified for Policy RD1 and are outlined in 4.2.1.

#### Working in the North West

The North West Plan contains seven policies relating the region's economy. These concern regionally significant development, the supply of employment land and particular sectors of the economy including retail and tourism. The policies complement the aims and priorities of the RES.

Policy W1 outlines the opportunities that should be taken to improve economic development. These include for a range of factors and are considered to significantly support the economy and hence score



positive for population. The policy places particular emphasis upon growth sectors and the need for linkages with sufficient and appropriate housing and the need to support skills and tackle skills deficiencies. The SA of the North West Plan considered that the policy was weaker when considered against the environmental objectives and this would continue under the retention alternative.

The remaining policies consider particular elements of the economy. Recognition within W2 to the possible alternative uses that allocated employment sites could be put to is potentially positive against certain environmental receptors.

Policy W5 retail development provides indicative floorspace requirements for the sub-regions. This concentrates upon non-food floorspace and food retailing is not referenced within the policy. The amount of floorspace identified within W5 was assumed, by the SA of the North West of England Plan, to be based upon 'predict and provide' projections. Achievement of the requirements would see a significant growth of retail development within many of the regions centres which would support economic development, NPPF retains the sequential approach for retailing which should ensure no conflict under the retention option.

Differences between retention and revocation are identified for Policy W2 and are outlined in 4.2.1.

### Living in the North West

This suite of policies begins with L1 which identifies the necessity for plans and strategies to ensure that there is appropriate health and educational provision for all members of the community. This policy was considered positive especially when including the requirement for provision to be provided at the outset of development.

The policies consider a number of linked issues including an identification of the overall numbers of houses to be constructed (net of clearance) in the region, a need to develop a greater understanding of housing markets and a requirement to better manage existing housing stock and support housing renewal were appropriate. Finally Policy L5 considers the issue of affordable housing.

Overall the policies are considered to be significantly positive for population. The provision of new housing, and the refurbishment of existing, should also indirectly support health in the region. If it can be assumed that under revocation, opportunities arise to further increase housing numbers due to Government initiatives such as the New Homes Bonus and the Growing Places Fund then whilst significant under retention, revocation could have the potential for further benefits.

Certain policies are considered to score either negative or significant negative against receptors such as material assets, air and biodiversity. This is because of the amount of development that would come forward within the region and in particular, the focus for the significant growth in housing numbers within the metropolitan conurbations of Manchester and Liverpool. These are parts of the region that under-perform the regional average in terms of waste recycling, air quality and biodiversity.

Differences between retention and revocation are identified as potentially arising from timing of future development and are outlined in 4.2.1.

## Transport in the North West

The transport policies form the Regional Transport Strategy within the North West Plan.

The over-arching aims of the Strategy are to significantly improve the quality and provision of public transport and management and the selective improvement of the region's highway network. At a more detailed level policies seek to improve the reliability and safety of public transport and to introduce the principles of demand management to the region's car users. Demand management measures can be both spatial, for example the better location of development; the increased tightening of maximum parking standards and fiscal.

The principles of demand management have not been extended to freight and air travel. Here policies seek to encourage more sustainable forms of transport (in the case of freight, by rail and/or water) or sustainable access strategies (in the case of airports) but do not seek demand restraint. In the case of airports this is to some extent related to the strategic policy framework outlined within the Government's Air Transport White Paper but the SA Report of the North West Plan concluded that there would be negative effects on air quality, this would continue under retention.

Under the retention alternative transport policies are considered to be positively supportive of population (economic development). The policies should also significantly improve accessibility to services and facilities.

Policy RT10 outlines the Regional Priorities for Transport Investment and Management. These priorities focus upon safety and security, maintenance and making the best use of existing networks. The Targeted Investment Priorities identified within Table 10.2 include for committed, contingency and priority interventions. These interventions were also the subject of an appraisal exercise undertaken by the then North West Regional Assembly in conjunction with consultants. This sought to identify and rank the economic, social and environmental performance of each intervention and it concluded that it is those that are related to public transport that are the most sustainable. The interventions did not form part of the RS and as such effects for both retention and revocation are considered to be uncertain dependent upon the extent to which they come forward.

Differences between retention and revocation are identified for Policies RT2 and RT8 and are outlined in 4.2.1.

## Environment, Minerals, Waste and Energy

### *Environmental Policies*

These set out a policy approach to land management, remediation, green infrastructure and regional parks together with water and shoreline management. The policies were considered to positively

support receptors concerned with environmental protection and enhancement but also those on population/health and climate change. Improvements in environmental quality can also complement economic development and support social improvement with the result that the policies perform positively when considered against the SA assessment objectives.

The main concern relating to EM1 when it was assessed by the SA of the North West of England Plan was the importance that will be placed upon it in connection with those sub-regional policies that seek to maximise economic growth and the potential for conflict therein. Whilst EM1 does provide a robust framework for better environmental management it is of crucial importance that what is taken forward in the implementation of plans and strategies in parallel with policies for growth. In this regard the requirement to consider the policies of the plan as a whole, in connection with the environmental policy protection support provided by the NPPF under the retention option is important.

Policy EM5 is considered to be particularly important in recognising and seeking to address some of the issues of climate change that face the region; particularly flooding and the protection and provision of an appropriate quantity of high quality water. Consultees expressed concern when consulted upon the North West Plan about the ability of the region's water infrastructure to support the growth requirements contained within RS, particularly the increase in housing numbers. The policy reference to phasing development to reflect existing supply and waste water treatment capacity unless new development can be provided ahead of the development was therefore very important. The NPPF also requires a phased approach to infrastructure development which, in conjunction with a retained North West of England Plan should provide sufficient safeguards under this alternative.

No significant differences have been identified between retention and revocation.

### *Water*

The approach to achieving water efficiency will be delivered by mechanisms outside the scope of the regional strategy such as the building regulations, fiscal measures and incentive schemes – these will all have significant benefits for water availability.

There are also significant positive effects arising in relation to flood risk due to the very positive approach to flood risk encouraged in the North West of England Plan and the NPPF (including the associated Technical Guidance).

The assessment identifies significant positive effects under population/health, climate and water as a result of continued effective flood risk management. This would also result in positive benefits for other SEA topics such as biodiversity and soils.

No significant differences have been identified between retention and revocation.

## Minerals and Aggregates

These policies seek to provide for a steady and adequate supply of minerals and to provide for the regional apportionment of aggregates to 2016. The SA of the North West of England Plan did appraise some of the policies as potentially negative against certain economic objectives due to the perceived imbalance between apportionments (governed by national policy within MPG6) and the levels of growth promoted by the document. It was considered that an insufficient supply of minerals and aggregates may either impact upon the delivery of the housing numbers promoted by the North West of England Plan (for example) or it may require the greater import of aggregates from outside the region, with a corresponding impact upon that SA objectives concerned with reducing the need to travel and accessibility. However those SA objectives are not replicated within this assessment methodology and overall, the extraction of aggregate will be supportive of economic development and as such a positive score is recorded for population under the retention alternative.

The potential concern over apportionments is also allayed by Policy EM9 which seeks to achieve a recycling rate of 25% by 2021. A policy framework consisting of the North West of England Plan and NPPF would maintain encouragement for recycling under this alternative.

Differences between retention and revocation are identified for Policies EM8 and 9 and are outlined in Section 4.2.1.

## Regional Waste Strategy

Policies EM10-14 form the Regional Waste Strategy, within the North West of England Plan. The policies are considered to support the population/health receptor given that they seek to minimise the production of waste and seek to use it as a resource rather than landfill. Historically the region exported much of its waste to landfill outside of the region and therefore policies would also provide positive trans-boundary benefits relating to the environment.

Differences between retention and revocation are identified for Policy EM12 and are outlined in Section 4.2.1. Retention of Policy EM12 provides locational principles for the siting of waste management facilities requiring that they be located so as to reduce waste movements by road transport. There is no similar explicit policy guidance within the NPPF whilst the locational principles set out within PPS10 are silent on these issues.

## Energy

Policies EM15-17 establish the Regional Framework for Energy, based on the principles of the energy hierarchy which seeks to prioritise the minimisation of demand and cut the unnecessary use of energy. The energy policies seek to implement the hierarchy focussing upon improved conservation and efficiency together with a continued promotion of renewable energy. The policies are considered to support SEA topic population (economy) by reducing fuel costs to business (through support for a reduction in energy use).

When appraised against other the environmental receptors the policies are considered to have marginally positive impacts in most cases due to the benefits to the environment arising from a reduction in the use of fossil fuels (the main source of energy generation) which helps to mitigate climate change. The majority of policies are considered to be significantly positive against the climate change receptor.

It should be noted that current onshore energy generation in the region stands at 784MW (operational or consented) with 231MW as submitted applications (<https://restats.decc.gov.uk/cms/planning-database/>). In order to attain the 2020 Plan target of 1345MW a further 561MW is required with the assumption that current applications are consented.

Differences between retention and revocation are identified for Policies EM15 - 17 and are outlined in section 4.2.1. Retention of targets which are higher than those required by Government policy would provide additional significant environmental, economic and social benefits with respect to climate change. A minor positive score for climate change under retention would increase to significant positive for Policy EM18 for decentralised energy networks, given the requirement for new development to comply with local requirements for decentralised energy supplies and a stronger requirement for the sustainability of new buildings which embeds the Government's zero carbon buildings policy.

## Sub-regional Policy Framework

### *Manchester City Region*

The policies combine to provide the spatial framework for the Manchester City Region. They include for overall priorities, and also provide individual policies for the individual sub-areas within the City Region. The priorities have an economic regeneration and transportation focus and there is less policy reference to quality of life or environmental protection and enhancement. The Manchester City Region suffers from some of the poorest environmental conditions in the region (air quality, noise pollution, failing SSSIs, high CO2 emission, community inequality).

All the sub-regional policies are considered to be supportive of population/health. Policy support for soils is also provided indirectly given the focus upon urban centres as the priority locations for development.

Policies have been assessed as being minor negative against receptors for air because there are significant areas within the city region which already suffer from poor air quality and which could be exacerbated by a focus of centres as the priority locations for development. Material assets, climate change and water are also recorded as experiencing negative effects although this is an inevitable effect arising from considerable development activity. It should be noted that a concentration of development within urban centres is considered to be broadly sustainable over one which seeks to promote a more dispersed approach to growth.

No significant differences have been identified between retention and revocation although effects in the short term are likely to be more pronounced (+ or -) under retention due to the continuation of joint working encouraged by the RS and more clarity over the quantum of new development required. Biodiversity protection may be more significant under the revocation alternative (Policy MCR1) due to the

NPPF reference which supports brownfield redevelopment providing sites are not of high environmental value.

### *Liverpool City Region*

These policies provide the spatial framework for the Liverpool City Region. Priorities differ slightly from Manchester and economic potential in conjunction with urban renaissance and social inclusion are promoted.

Economic performance (population) is considered to be supported by the policies and priorities. A concentration of development within the regional centre should also protect landscapes and good quality soils whilst objectives concerned with wider environmental protection are neutral or minor positive.

No significant differences have been identified between retention and revocation although effects in the short term are likely to be more pronounced under retention due to the clarity over the quantum of new development required. Significant performance under revocation for population (LCR3 and 4) is uncertain as none of the Council's have core strategies in place and may seek to re-consider their approach to development (in order to meet local needs) if the North West of England Plan and Regional Economic Strategy is revoked.

### *Central Lancashire City Region*

Policies CLCR1-3 provide the spatial framework for the Central Lancashire City Region. In common with the Manchester City Region, priorities are focused upon raising economic performance and improvements to the management and development of the transport infrastructure including Preston's role as a key transport interchange.

The performance of the policies is broadly positive for population and health.

This City Region has a more polycentric structure than Manchester and Liverpool and a key challenge during retention is to improve local accessibility, and to grow the economy without the creation of additional cross-commuting between the main towns. Strategic approaches to plan making, such as the Joint Core Strategy of Preston, South Ribble and Chorley are assumed to continue under the retention alternative and will support a co-ordinated policy response to such issues when adopted in the short-term. Reference to enhancing urban quality and the natural setting of these growth centres is supportive of certain environmental receptors.

Certain towns within this sub-region such as Blackpool and Rossendale have populations in very poor health (compared with the regional average).

No significant differences have been identified between retention and revocation although effects in the short term are likely to be more pronounced (+ or -) under retention due to the continuation of joint working encouraged by the Regional Strategy (exemplified by the Joint Core Strategy) and more clarity over the quantum of new development required.

### *Cumbria and North Lancashire*

The CNL policies provide the spatial priorities for Cumbria, the Lake District and North Lancashire. These include the more remote and rural parts of the region and face certain issues that differ from those within the rest of the North West. Obvious examples would be high quality landscapes, a larger role for agriculture within the economy but also a greater distance to travel to services and facilities and a declining share of the region's economy.

It is considered that the significant increase in housing figures identified for the counties will positively support their ability to achieve urban and rural renaissance. The relatively high brownfield percentages (between 50-80%) and the focus of development upon the major towns and areas of need should bring environmental benefits, (e.g. the re-use of brownfield land, environmental regeneration) and, in time, assist in addressing economic and social conditions. The policies are also supportive of the preservation of historic environments.

The spatial policy for the Lake District recognises the need to diversify the economic base and it is therefore appraised significantly positive for population. At the same time policy recognises that such diversification should have regard to the characteristics of different parts of the National Park. This reference, together with a policy commitment to enhance the urban fabric, public realm and to increase public transport use, cycling and walking has been recognised in the assessment of positive impacts for many environmental receptors.

The overall spatial policy for North Lancashire provides a focus upon regeneration in Morecambe and new development within Lancaster that enhances its historic character. New development that enhances the historic environment of the City should raise its image and thereby indirectly contribute to economic development.

No significant differences have been identified between retention and revocation although some effects in the short term are likely to be more pronounced under retention due to the continuation of joint working encouraged by the Regional Strategy and more clarity over the quantum of new development required. With regard to the Lake District, population is considered to be significant across all timescales under revocation as a result of an adopted core strategy combined with an ability for the Council to review development requirements based upon local need.

## **4.4 Effects of the Partial Revocation of the North West Plan**

The reasonable alternatives to revocation that have been assessed are:

- Revoking all the quantified and spatially specific policies (for instance where a quantum of development, land for development or amounts of minerals to be extracted or waste disposal is allocated to a particular location in the region) and retaining for a transitional period the non spatial policies; or



- Retaining for a transitional period all the spatially specific policies where a quantum of development or land for development is allocated to a particular location in the region and revoking the non spatial policies, ambitions and priorities; or
- Retention for a transitional period of policies, the revocation of which may lead to likely significant negative environmental effects.

#### 4.4.1 Revoking all the Quantified and Spatially Specific Policies

**Table 4.3** summarises the effects of revoking only those policies that are quantified or spatially specific.

**Table 4.3 Summary of the effects of revoking all the quantified and spatially specific policies**

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy RDF1	Spatial Priorities	Revocation	+	+	+	+	+	+	+	+	+	?	?	?	-	-	-	+	+	+	+	+	+	?	?	?	+	+	+
Policy RDF4	Green Belts	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	?
Policy W1	Strengthening the Regional Economy	Revocation	?	?	?	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy W2	Locations for Regionally Significant Economic Development	Revocation	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	-	-	-	?	?	?	?	?	?
Policy W3	Supply of Employment Land	Revocation	?	?	?	?	+	+	?	?	+	?	-	-	?	-	-	?	-	-	?	-	-	?	?	?	?	?	?
Policy W5	Retail Development	Revocation	+	+	+	0	+	+	0	+	+	0	0	0	0	+	+	0	+	+	0	-	-	?	?	?	0	+	+
Policy W6	Tourism and the Visitor Economy	Revocation	0	0	0	0	+	+	0	0	0	0	0	0	0	?	?	0	0	0	0	0	0	0	+	+	?	?	?
Policy L 3	Housing Renewal	Revocation	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	-	+	0	?	?	0	?	?	0	0	+
Policy L4	Regional Housing Provision	Revocation	?	?	-	?	?	+	?	?	-	?	?	-	?	?	-	?	?	-	?	?	-	?	?	?	?	?	-
Policy RT1	Integrated Transport Network	Revocation	0	0	0	?	+	+	0	+	+	0	0	0	?	+	+	?	?	+	0	0	0	0	0	0	0	0	0
Policy RT3	Public Transport Framework	Revocation	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+



Table 4.3 (continued) Summary of the effects of revoking all the quantified and spatially specific policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy RT5	Airports	Revocation	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	0	0	
Policy RT6	Ports and Waterways	Revocation	?	?	?	?	+	+	?	?	?	?	?	?	?	?	+	?	?	+	?	?	-	?	?	?	?	?	?
Policy RT7	Freight Transport	Revocation	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
Policy EM4	Regional Parks	Revocation	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	+	+
Policy EM 7-9	Minerals Extraction , Land-won Aggregates	Revocation	-	-	+	+	+	+	-	-	0	-	-	0	-	-	-	0	0	0	-	-	-	0	+	+	0	+	+
Policy EM10	A Regional Approach to Waste Management	Revocation	0	0	?	+	+	?	+	+	?	+	+	?	+	+	?	+	+	?	+	+	?	0	0	?	+	+	?
Policy EM13	Provision of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities	Revocation	0	?	?	0	+	+	?	?	?	0	0	0	0	+	+	0	+	+	0	+	+	0	0	0	0	?	?
Policy EM17	Renewable Energy	Revocation	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Policy MCR1	Manchester City Region Priorities	Revocation	+	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR2	Regional Centre and Inner Areas of Manchester	Revocation	0	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR3	Southern Part of the Manchester City Region	Revocation	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR4	South Cheshire	Revocation	0	0	0	0	+	+	0	?	?	0	-	-	0	-	-	0	?	?	0	-	-	0	+	+	0	0	0
Policy MCR5	Northern Part of the Manchester City Region	Revocation	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+

Table 4.3 (continued) Summary of the effects of revoking all the quantified and spatially specific policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy MCR6	Strategic Framework for Warrington	Revocation	0	0	0	0	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR 1	Liverpool City Region Priorities	Revocation	0	+	+	0	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR2	The Regional Centre and Inner Areas of Liverpool City Region	Revocation	0	0	0	0	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR3 and 4	Outer Part of the Liverpool City Region and The Remaining Rural Parts of Liverpool City Region	Revocation	?	?	?	0	+	+	?	?	?	?	?	?	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy LCR5	West Cheshire – North East Wales	Revocation	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	0	0
Policy CLCR1	Central Lancashire City Region Priorities	Revocation	0	0	0	0	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?
Policy CLCR2	Focus for Development and Investment in Central Lancashire City Region	Revocation	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?
Policy CLCR3	Green City	Revocation	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	0	0	0	+	+
Policy CNL1	Overall Spatial Policy for Cumbria	Revocation	0	0	0	0	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
Policy CNL2	Sub-area Development Priorities for Cumbria	Revocation	0	0	0	0	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
Policy CNL3	Spatial Policy for the Lake District	Revocation	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy CNL4	Spatial Policy for North Lancashire	Revocation	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+

## Likely Significant Effects

Two policies have been identified where a potentially significant negative environmental effect could occur if quantified and spatially specific policies are revoked. These are Policy W3 Supply of Employment Land and Policy L4 Regional Housing Provision. However, the effect is also identified for retention. The identified effect concerns the substantial increase in development that would occur as a result of revocation and the use of material assets (particularly construction materials) that would be required to facilitate such development. Whilst the effect upon material assets is significant negative, it should also be noted that significant positive effects arise from Policy W3 with regard to population as the intention of revocation is to boost significantly the supply of housing, for example through initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates which will allow communities to meet their local housing needs and share the benefits and mitigate the negative effects of growth.

The revocation of policies DP2, W1, W5 and 6, L3, EM13, EM17 and RT3 are also identified as having significant positive effects on the population topic. These policies contain a variety of policies concerning economic development, housing renewal, waste management, renewable energy and public transport. One of the key planning principles set out in the NPPF is to proactively drive and support sustainable economic development to support the delivery of new homes and businesses whilst ensuring that infrastructure is available to facilitate such development without undue strain being placed upon environmental assets. Local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. The duty to co-operate is expected to play a key role in this and Local Enterprise Partnerships can also play a key role in assisting local authorities to deliver. This is likely to provide the significant benefits to the community reflected in the 'population topic'.

The revocation of a range of sub-regional policies would also result in significant effects for population, these effects also being identified for revocation. Local authorities in the region are already co-operating, for example in Greater Manchester and in central Lancashire (the joint core strategy of Preston, Chorley and South Ribble) and this will continue following the revocation of the Regional Strategy given the joint planning structures which are already in place and the duty to co-operate. A significant effect has also been identified for biodiversity within the Greater Manchester sub-region (MCR1) as a result of Section 11 of the NPPF (Conserving and enhancing the natural environment) and the Core planning principle to re-use brownfield land provided that it is not of high environmental value.

Other significant effects are limited to the revocation of Policy RDF4 Green Belts and the positive effect this policy has for landscape together with Policy EM10 and the positive effect that it has upon material assets. For both policies the effect of revocation is the same as retention in that a similar level of protection is offered by the NPPF and in the case of EM10, by the Government actions set out within the Government Review of Waste Policy 2011.

## Proposed Mitigation Measures

Concerning the potentially significant negative effect on material assets as a result of significant levels of new development measures in the NPPF for the sustainable use of minerals together with the ambition and case for action set out within the Government Review of Waste Policy 2011 should encourage the minimisation of use and maximisation of recycled and re-usable materials.

### 4.4.2 Retaining all the Quantified and Spatially Specific Policies

**Table 4.4** summarises the effects of retaining only those policies that are quantified or spatially specific.

**Table 4.4 Summary of the effects of retaining all the quantified and spatially specific policies**

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape			
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	
Policy RDF1	Spatial Priorities	Retention	?	?	?	+	+	+	+	+	+	?	?	?	-	-	-	+	+	+	+	+	+	?	?	?	+	+	+	
Policy RDF4	Green Belts	Retention	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	?	
Policy W1	Strengthening the Regional Economy	Retention	?	?	?	0	+	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy W2	Locations for Regionally Significant Economic Development	Retention	?	?	?	+	+	+	+	+	+	?	?	?	?	?	?	?	?	?	-	-	-	?	?	?	?	?	?	
Policy W3	Supply of Employment Land	Retention	?	?	?	+	+	+	0	+	+	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	+	+	
Policy W5	Retail Development	Retention	+	+	+	+	+	+	0	+	+	0	0	0	0	+	+	0	+	+	-	-	-	?	?	?	0	+	+	
Policy W6	Tourism and the Visitor Economy	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	?	?	0	0	0	0	0	0	0	+	+	?	?	?	
Policy L 3	Housing Renewal	Retention	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	-	-	+	0	?	?	?	?	?	0	+	+	
Policy L4	Regional Housing Provision	Retention	-	-	-	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	?	?	?	+	+	+		
Policy RT1	Integrated Transport Network	Retention	0	0	0	?	+	+	0	+	+	0	0	0	?	+	+	?	?	+	0	0	0	0	0	0	0	0	0	

Table 4.4 (continued) Summary of the effects of retaining all the quantified and spatially specific policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy RT3	Public Transport Framework	Retention	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	0	0	0	+	+	+	
Policy RT5	Airports	Retention	?	?	?	+	+	+	?	?	?	-	-	-	-	-	-	-	-	-	-	-	?	?	?	0	0	0	
Policy RT6	Ports and Waterways	Retention	?	?	?	+	+	+	?	?	?	?	?	?	+	+	+	+	+	+	-	-	-	?	?	?	?	?	?
Policy RT7	Freight Transport	Retention	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	
Policy EM4	Regional Parks	Retention	+	+	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	+	+	+	+	+	
Policy EM 7-9	Minerals Extraction , Land-won Aggregates	Retention	-	-	+	+	+	+	-	-	0	-	-	0	-	-	-	0	0	0	-	-	-	0	0	+	-	-	+
Policy EM10	A Regional Approach to Waste Management	Retention	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	+	+
Policy EM13	Provision of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities	Retention	0	+	+	0	+	+	+	+	+	0	0	0	0	+	+	0	+	+	0	+	+	0	0	0	0	+	+
Policy EM17	Renewable Energy	Retention	+	+	+	+	+	+	0	0	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Policy MCR1	Manchester City Region Priorities	Retention	0	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR2	Regional Centre and Inner Areas of Manchester	Retention	?	?	?	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	0	0	0	+	+	+	
Policy MCR3	Southern Part of the Manchester City Region	Retention	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR4	South Cheshire	Retention	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?

Table 4.4 (continued) Summary of the effects of retaining all the quantified and spatially specific policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape		
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
Policy MCR5	Northern Part of the Manchester City Region	Retention	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy MCR6	Strategic Framework for Warrington	Retention	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR 1	Liverpool City Region Priorities	Retention	0	+	+	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR2	The Regional Centre and Inner Areas of Liverpool City Region	Retention	0	0	0	+	+	+	0	+	+	0	-	-	0	-	-	0	-	-	0	-	-	0	0	0	0	+	+
Policy LCR3 and 4	Outer Part of the Liverpool City Region and The Remaining Rural Parts of Liverpool City Region	Retention	?	?	?	+	+	+	?	?	?	?	?	?	0	-	-	0	-	-	0	-	-	?	?	?	?	?	?
Policy LCR5	West Cheshire – North East Wales	Retention	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	0	0
Policy CLCR1	Central Lancashire City Region Priorities	Retention	0	0	0	+	+	+	0	?	?	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	?	?
Policy CLCR2	Focus for Development and Investment in Central Lancashire City Region	Retention	0	0	0	0	+	+	0	0	0	0	-	-	0	-	-	0	-	-	0	-	-	0	+	+	0	+	+
Policy CLCR3	Green City	Retention	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	+	+	0	0	0	0	0	0	0	+	+
Policy CNL1	Overall Spatial Policy for Cumbria	Retention	0	0	0	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+
Policy CNL2	Sub-area Development Priorities for Cumbria	Retention	0	0	0	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+

Table 4.4 (continued) Summary of the effects of retaining all the quantified and spatially specific policies

RS Policy No.	RS Policy Title	Alternative	Biodiversity, Flora and Fauna			Population and Human Health			Soil			Water			Air			Climatic Factors			Material Assets			Cultural Heritage			Landscape			
			S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	
Policy CNL3	Spatial Policy for the Lake District	Retention	+	+	+	+	+	+	+	+	+	+	?	?	?	+	+	+	+	+	+	-	-	-	+	+	+	+	+	+
Policy CNL4	Spatial Policy for North Lancashire	Retention	+	+	+	+	+	+	+	+	+	+	-	-	-	-	-	-	-	-	-	-	-	+	+	+	+	+	+	

### Likely Significant Effects

Retaining, for a transitional period, policies which quantify levels of development or which are spatially specific will lead to potentially significant negative environmental effects upon air or material assets. Significant negative effects were identified for policies: Policy RDF1 Spatial Priorities; Policy W3 Supply of Employment Land; Policy L4 Regional Housing Provision and EM9 Minerals Extraction, Land Won Aggregates.

Policy RDF1 states that the first priority for growth and development in the region should be the regional centres of Manchester and Liverpool. The substantial levels of development anticipated by the Regional Strategy within these centres will lead to increases in traffic (both public and private) which is the main cause of poor air quality. Both centres currently experience relatively high levels of air pollution which is likely to increase as a result of Policy RDF1. Revocation of RDF1 was not considered to lead to a significant negative effect because the NPPF is less spatially specific when it comes to the allocation of development and it could allow for a greater proportion of development to come forward within other centres in the region. Furthermore the NPPF seeks to prevent development from contributing towards unacceptable levels of air pollution.

With regard to Policies W3 and L4, the increased demand for construction materials and energy together with additional waste generation are considered likely to have significant adverse effects on material assets. Policy EM9 seeks to ensure that sufficient materials are available to support growth in the region.

Policies RDF1, W1, W2, W3, W5, W6, L3, L4, EM13, RT3 and all sub-regional policies with the exception of LCR5, CLCR1, 2 and 3 are identified as having significant positive effects on the population and human health resulting from increased opportunities for employment, more homes and better infrastructure. Policy EM17 Renewable Energy is considered to have significant positive effects on

climatic factors through its support for the development of new facilities for renewable power generation, with the aim that by 2010, 10% of the region's energy rising to 15% by 2015 and 20% by 2020 of the region's energy should come from renewable sources. Policy support (EM13) to increase recycling and to re-use of waste as opposed to disposal has a similar significant positive effect for climate and for air with EM10 having significant positive effects on material assets.

Of the sub-regional policies, MCR1 is considered to have significant positive effects for soil (in addition to population) as a result of the very high brownfield targets which are likely to lead to the decontamination of land within this regional centre. RDF4 provides a similar level of protection for Green Belts as with revocation although the long term effects upon landscape are considered to be uncertain given that the policy did reference the potential for possible future alterations.

### Proposed Mitigation Measures

Retaining just the quantitative and spatially specific policies and revoking the rest of the Regional Strategy would remove the measures which were included in the Regional Strategy to mitigate the adverse effects of proposed development. However, as with revocation of the whole Regional Strategy, measures to protect the environment are provided through the NPPF, other national policy and legislation. For example, under the Renewables Energy Directive, there is a legally-binding target to ensure 15% of energy comes from renewable sources by 2020 in the UK which whilst lower than the regional target would provide a level of mitigation.

#### 4.4.3 Retention of Policies, the Revocation of Which May Lead to Likely Significant Negative Environmental Effects

The assessment has found that there are no policies in the North West of England Plan or Regional Economic Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit. As noted above for Policies W3 and L4, there is a significant negative effect on material assets under revocation; however, the same effect is identified for retention. These significant negative effects will be mitigated if authorities implement the policies in conjunction with the NPPF, PPS10 and the ambition and case for action set out within the Government Review of Waste Policy 2011.

### 4.5 Secondary, Cumulative and Synergistic Effects

In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to the secondary, cumulative, synergistic nature of the effects. As a consequence, the potential for the plan for the revocation of the North West Plan to have cumulative effects on the region and in conjunction with other regional plans has been considered as part of each assessment and a summary of those effects identified is presented in **Table 4.5** against each of the SEA topics. This assessment is relative to the legislative and policy framework that remains in place once the regional strategies are revoked.



Table 4.5 Cumulative effects of the plan to revoke the Regional Strategy

Assessment Topic	Score	Summary
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)	++	<p>Key indicators for biodiversity are the number and extent of protected areas and their condition. In particular, the Natural Environment White Paper states that 90% of priority wildlife habitats should be in recovering or favourable condition by 2020. According to the baseline figures, the 2020 target has already been achieved in the North West (90% in favourable or recovering condition).</p> <p>The Regional Strategy includes a number of policies that provide protection and enhancement of biodiversity and nature conservation features. <b>Revocation of the Strategy could in theory affect this if the alternatives lessened existing levels of protection; however, the NPPF together with legislation and wider national policies on biodiversity provides a strong framework to maintain the current high level for protecting the existing biodiversity resource.</b> For example, given the continued application of the legal and policy protection given to European and Ramsar sites and to SSSIs and further application of agri-environment schemes it is expected that revocation of the Strategy would not change the positive direction of travel. Indeed the NPPF reference to only releasing brownfield sites for development providing they are not of high environmental value provides extra safeguard.</p> <p>Achievement of legally binding targets for water and air quality will also be significant contributory factors in improving the quality of areas important for wildlife, while enhanced provisions on aspects such as the delivery and protection of green infrastructure will play an important role in increasing the overall area with significant biodiversity value. Statutory and policy protection for AONBs and National Parks will continue to protect the biodiversity value with these areas, at least in so far as the planning system is concerned.</p> <p>Preparation of the North West of England Plan identified consultee concerns with regard to the level of water supply and treatment required to facilitate the amount of development proposed. Too much abstraction or insufficient treatment could have implications for biodiversity. These impacts may extend beyond the regional boundary, examples cited by consultees being the abstraction of water from Wales to supply Liverpool for example. Further pressure may be placed on water as a result of climate change. The North West of England Plan therefore required the phasing of development with infrastructure provision. This requirement is retained within the NPPF and the Water Resource Management Plan of the region's water company, United Utilities, and neighbouring water companies seek to balance such demands. As they are subject to an appropriate assessment in accordance with the Habitats Directive, the likelihood of post mitigated residual effects remains small, although if they do occur they are most likely to affect non-designated sites and their associated biodiversity.</p>
Population (including socio-economic effects and accessibility)	++	<p>The Regional Strategy contains a variety of policies which directly or indirectly concern economic development. These policies include targets for the provision of employment and housing land and many seek to focus areas of economic opportunity with areas of greatest need. This is a particular theme running through the sub-regional policies of the Manchester and Liverpool City Regions which support the actions previously established within the Regional Economic Strategy.</p> <p>Other population benefits include access to services and facilities reflected in many regional policies. Similarly access to jobs and decent homes is supported by the locational and qualitative policies contained within the document. <b>In consequence, there are a range of significant positive benefits anticipated to accrue to communities. Revocation is unlikely to affect this significantly although it should be noted that there is less direction provided within remaining policy towards the Regional Strategy's intention to link economic opportunities to areas of greatest need.</b> In mitigation however local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. This is already happening within the various LEPs which have been established in the region and co-operative working is probably best exemplified by the establishment of the Greater Manchester Combined Authority. A level of uncertainty does remain however over the extent to which local authorities will seek to maximise economic opportunities in their areas as this may detract from similar initiatives in other parts of the region where the attractiveness of the environment, or qualities of the workforce are less apparent.</p>

Table 4.5 (continued) Cumulative effects of the plan to revoke the Regional Strategy

Assessment Topic	Score	Summary
Human Health	+	<p>National health related policies/strategies and programmes are primarily related to improving the health of populations and reducing health disparities. The disparities referred to are primarily geographic, ethnic and economic. The Regional Strategy established sub-regional policies to address specific sub-regional issues associated with employment and regeneration which would have indirect health benefits through creating local employment opportunities, improving housing quality, improving local environmental quality, and seeking to afford greater access to green infrastructure. In addition, some of the less spatially specific policies concerned with creating conditions to enable people to lead healthy lifestyles, improving the environment for walking and cycling, improving access to sport and recreation can be beneficial to health.</p> <p><b>Revocation will not affect the intent of the policy;</b> as noted above, local authorities are expected to work collaboratively with neighbouring authorities and Local Enterprise Partnerships to determine the regeneration needs of their areas. Similarly, revocation will not remove the need for more houses within the region. Indeed it is Government policy to boost significantly the supply of housing, for example initiatives such as the Community Infrastructure Levy, New Homes Bonus and the local retention of business rates are intended to encourage a more positive attitude to growth and allow communities to share the benefits and mitigate the negative effects of growth.</p> <p>Paragraph 114 of the NPPF provides policy supports for the creation, protection, enhancement and management of networks of green infrastructure. Indeed, paragraph 117 goes further and states that planning policies should minimise impacts on biodiversity and geodiversity. In addition, the introduction of Local Nature Partnerships announced in the Natural Environment White Paper which will complement existing local partnerships which deal with matters such as provision of green infrastructure will improve the chances of the delivery of the policy.</p>
Soil and Geology (including land use, important geological sites, and the contamination of soils)	?	<p>The main adverse impacts on soil are a result of development and changes in agricultural practice. As the effects of climate change become more pronounced, increased erosion through storm surge run-off is likely to be a factor. Policy protection for soils through the Regional Strategy is mainly indirect, either through the use of high brownfield targets (a regional average of 70%) or via measures to mitigate climate change.</p> <p>The NPPF does not contain a target for the re-use of brownfield land and the policy requirement to ensure that brownfield sites released for development are not of a high environmental quality suggests that the proportion of development on brownfield may decrease. In combination with government encouragement towards greater levels of development, particularly housing, this suggests that a greater proportion of greenfield land could come forward for development, although this will be subject to the individual policy stances taken by local authorities and the overall conclusion is that the synergistic effects of other policies, aims and objectives set by economic organisations such as the region's LEP will continue to promote a high level of development within the areas which most require it; often those inner urban areas with the highest levels of brownfield development..</p> <p>Policy protection for soils is in place as policies in the NPPF seek to protect best and most versatile land (i.e. ALC Grades 1-3a) and support green infrastructure and mitigate climate change. 'Safeguarding our Soils. A Strategy for England (Defra 2009)' sets out government policy to protect and enhance soil, including building resilience to climate change. Furthermore the Natural Environment White Paper (2011) states that by 2030 all of England's soils will be managed sustainably and degradation threats tackled successfully. <b>At this stage the cumulative effects are uncertain for the North West given the lack of explicit brownfield targets.</b></p>

Table 4.5 (continued) Cumulative effects of the plan to revoke the Regional Strategy

Assessment Topic	Score	Summary
Water Quality and Resources (including as inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)	+	<p>Water resources, both supply and treatment, were identified as potentially significant issues in the preparation of the North West Plan (as part of the wider Regional Strategy). The effects arising from greater water demand can impact upon environmental receptors such as biodiversity and landscape. Policies within the existing Regional Strategy require that development is phased with regard to the provision of new water treatment and supply infrastructure and also call for integrated water management. <b>However, revocation is not considered to affect the policy intent as it will be delivered by other policy and legislation by a range of organisations.</b></p> <p>The NPPF requires under paragraph 94 that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations. Paragraph 143 also sets out that local planning authorities will need to establish environmental criteria to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health, including from impacts on the flow and quantity of surface and groundwater and migration of contamination from the site; and take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality.</p> <p>Water companies, through the completion of their Water Resource Management Plans have a duty to assess water supply and demand in their region. The water resource planning process sets out, for those water resource zones in deficit (i.e. where demand exceeds supply) the measures needed to address the short fall. In determining future demand, population projections, housing needs and occupancy rates are used along with the effects of climate change on water availability. Preferred management options for each zone are usually a mix of water demand management measures (water metering, voluntary measures), leakage control and supply measures (boreholes, reservoirs, bulk transfers, desalination plants). For the North West, United Utilities has estimated the water demand levels for an addition 645,000 households by 2034/35 within its WRMP 2009. Providing identified measures are put in place, including significant leakage reduction, the WRMP concludes that there will be a demand/supply balance throughout the period. Uncertainty only arises therefore if there is an increase in households over the period beyond that modelled by United Utilities.</p> <p>Statutory requirements under the Water Framework Directive will continue to apply and be implemented principally in accordance with River Basin Management Plans, supported by national planning policy. Local authorities should work co-operatively with other authorities, the Environment Agency and water companies to ensure the spatial planning aspects of River Basin Management Plans are applied and the distribution and scale of growth have regard to the capacity of waste water treatment works and WFD requirements.</p> <p>Joint and partnership working between the Environment Agency, water industry bodies, local authorities and others must continue in line with the new duty to co-operate in order to deliver water efficiency, management and infrastructure benefits.</p>
Air Quality	0	<p>The Regional Strategy did not have any policies concerning air quality, although it was a component of some sub-regional policies and in particular those policies concerning transport and within the RES it would fall to be considered within the theme 'Quality of Life'. In addition implementation of renewable energy and sustainable energy policies and policies seeking to reduce landfill would have an indirect effect upon emissions levels. Air quality in the North West is an issue, particularly in urban areas the majority of which are covered by Air Quality Management Areas (AQMAs) with 27 local authorities in the North West designating AQMAs within their boundaries. The key contributor to poor air quality is carbon monoxide, with levels increasing due to growing traffic in the region, although the recent trend is downward. Regional Strategy policies to site new development in accessible locations and promote sustainable travel may offset any growth in emissions arising from new development across the region although individual centres such as Liverpool and Manchester may still be negatively affected.</p> <p><b>Revocation of the Strategy will not affect the current trend in air quality</b> but could potentially lead to fewer effects in the regional centres if those authorities chose to reduce their levels of development. However the Manchester Core Strategy follows Regional Strategy targets for housing, whilst Liverpool is unknown. National planning policies, including those on air quality, sustainable development and transport, will continue to apply and inform local plan policies. More sustainable transport provision and infrastructure and sustainable locations for development should be supported locally through land use and transport planning. Furthermore, in areas of poor air quality - including those within, or adjacent to, an Air Quality Management Area - local authorities will continue to work closely with relevant partners to ensure that development has taken proper account of relevant air quality matters.</p>

Table 4.5 (continued) Cumulative effects of the plan to revoke the Regional Strategy

Assessment Topic	Score	Summary
Climate Change (including greenhouse gas emissions, predicted effects of climate change and the ability to adapt)	+	<p>Like all regions, the North West could be substantially affected by the effects of climate change. The central estimate for the North West region suggests that climate change could increase winter and summer temperatures by a minimum of 3°C and lead to an increase in precipitation in winter with an almost corresponding decline in the summer. Flooding and erosion is likely to increase. Climate change will affect the economic, social and environmental health of the region.</p> <p>The Regional Strategy contains a suite of policies which together would mitigate and adapt the region to climate change effects. Policies designed to promote sustainable modes of transport, reduce distances to travel, become more energy efficient, generate renewable energy and re-use and recycle all have benefits in mitigating climate change.</p> <p><b>Revocation need not affect the ability of the region to mitigate and adapt to the effects of climate change.</b> One of the 12 core principles of planning set out in paragraph 17 of the NPPF is to support the transition to a low carbon future, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy). Similarly, paragraph 94 of the NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change in line with the provisions of the Climate Change Act 2008.</p> <p>The NPPF seeks to support the move to a low carbon future, by stating that local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions; actively support energy efficiency improvements to existing buildings; and when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. Specifically, local planning authorities are expected to identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supplies.</p> <p>There is a legally-binding target to ensure 15% of energy comes from renewable sources by 2020 and the UK Renewable Energy Strategy 2009 set out the path to meet it. This target is however 5% lower than that set out in the Regional Strategy, if this higher target is abandoned due to revocation then the additional benefits that would arise from its achievement could be lessened. <b>Revocation may therefore affect the extent to which energy is sourced from renewable means although there will be no policy impediment to achieving rates above the Directive target .</b></p> <p>Following revocation of regional strategies, local authorities will be expected to continue to work together across administrative boundaries and with the Environment Agency to plan development that properly minimises the effects of climate change, particularly from flooding and coastal change. For flooding matters, local authorities already have a duty to co-operate under the Floods and Water Management Act 2010. This contains provisions that cover regional working and co-operation such as the establishment of Regional Flood and Coastal Committees and the bringing together of lead local flood authorities (unitary and county councils), who will have a duty to co-operate, to develop local strategies for managing local flood risk. In addition, the Flood Risk Regulations 2009 imposes a duty on the Environment Agency and lead local flood authorities to determine whether a significant flood risk exists in an area and if so to prepare flood hazard maps, flood risk maps and flood risk management plans.</p>

Table 4.5 (continued) Cumulative effects of the plan to revoke the Regional Strategy

Assessment Topic	Score	Summary
Waste Management and Minerals	+	<p>Regional Strategy policies reinforce aspects of national policy that will need to apply across the region if waste generation is to be successfully decoupled from economic growth. Regional Strategy policies reflect the European and national policy context and, in seeking to achieve the required shift towards more sustainable waste management, build upon principles set out in the Waste Strategy for England and PPS10. Particular reference is given within the North West of England Plan to the Waste Hierarchy for example.</p> <p>Reducing the amount of waste transported out of the region to landfill will reduce traffic levels and benefit air quality along those transport corridors. Greater use of recycled materials reducing the amount of waste to be landfilled will also reduce the risk of water contamination and emission of green house gases (i.e. methane). However, modern waste management practice seeks to prevent this.</p> <p>Recycling targets throughout the region differ considerably from that set out within the North West of England Plan which sets targets of 45% by 2015 and 55% by 2020 which is above the level identified within the National Waste Policy Review and revised Waste Framework Directive. <b>Revocation may therefore affect the extent to which recycling is undertaken although there will be no policy impediment to achieving rates above the Directive target.</b></p> <p>The NPPF does not include waste policy instead it continues to rely upon PPS10. Whilst not a material assets issue per se, the lack of locational guidance for waste management facilities at revocation could remove the existing policy requirement to shift transportation of waste to more sustainable modes of travel and to better co-locate treatment and generation.</p> <p>Minerals will continue to be extracted in support of economic development following revocation. Apportionment targets will remain in place for each mineral planning authority and, as plans are reviewed, they will be expected to take account of minerals extraction based on the more localist approach set out in paragraph 145 of the National Planning Policy Framework, including the most up-to-date national and sub-national targets prepared by the Department. In the medium term as extant minerals policies continue to have effect and new policies, such as those contained within the Greater Manchester Joint Minerals Plan, react to the NPPF by removing policy support for peat abstraction consequential beneficial effects upon climate change, biodiversity and landscape may occur.</p>
Cultural Heritage (including architectural and archaeological heritage)	++	<p>A particular feature of the region is the relatively large number of statutorily protected industrial and commercial buildings reflecting its role at the birth of the industrial revolution. These buildings are often located within the inner core of the region's towns and cities and their re-use and refurbishment can provide the catalyst for wider regeneration.</p> <p><b>Revocation will not affect the intent behind the policy as existing legislation protecting listed buildings, scheduled monuments, conservation areas and registered parks and gardens remain in place.</b></p> <p>Paragraphs 126 - 141 of the NPPF set out strong national policy on conserving and enhancing the historic environment. It states that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</p> <p>When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.</p> <p>The most important cultural heritage sites are subject to statutory protection. This is supported by national planning policy for the protection and conservation of the historic environment. Following revocation of regional strategies, local authorities would still need to continue to work together on conservation, restoration and enhancement of the heritage and historic environment.</p> <p>In planning for the historic environment, local authorities should continue to draw on available information, including data from partners, to address cross boundary issues; they should also continue to liaise with English Heritage to identify and evaluate areas, sites and buildings of local cultural and historic importance.</p> <p>Policies which seek to mitigate climate change, such as those contained within the NPPF and national targets to reduce emissions and promote renewable energy will have secondary, positive effects upon cultural heritage by potentially reducing threats from erosion and flooding.</p>

Table 4.5 (continued) Cumulative effects of the plan to revoke the Regional Strategy

Assessment Topic	Score	Summary
Landscape and Townscape	+	<p>The North West is home to several landscapes of national importance such as its AONB's and the Lake District National Park with other National Parks such as the Peak District and Yorkshire Dales extending into the region. Its townscapes include historic areas such as Chester, Castlefields (Manchester) and Liverpool Waterfront.</p> <p>Protection for valued landscapes and nationally designated areas (which are also subject to statutory protection) will remain. Paragraph 115 of the NPPF maintains the policy basis for the legislation. The NPPF also maintains the policy previously contained in PPS7 that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged (paragraph 113), while landscape character assessments should be prepared where appropriate (paragraph 170). The removal of brownfield targets and more importantly the potential for an increase in development over and above levels set out within the Regional Strategy suggest that positive benefits of landscape protection reduce slightly.</p>
Score Key:	Significant Positive ++	Positive +
	No significant effects 0	Negative -
	Significant negative --	Uncertain?
	No relationship n/a	

The plan to revoke the regional strategies is national in scope as well as applying to the eight regions. In consequence the wider implications and effects of the plan have also been considered.

A key principle of regional planning was to seek to provide consistency and efficiency in the provision of housing, employment and associated infrastructure, along with the protection and enhancement of environmental resources. Notwithstanding counter arguments as to the effectiveness with which a Regional Strategy might be implemented, their revocation raises issues as to the cumulative impacts and unintended consequences of their replacement through a localised approach.

In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing differentiation between local authorities and clusters of local authorities. In the North West, this could maintain or create disparities which the North West of England Plan sought to reconcile where areas with traditionally attractive housing markets are able to maximise the opportunities presented by developer interest potentially at the expense of traditionally less attractive areas, often in need of regeneration. A similar pattern could emerge at the national scale with the potential for an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences and reliance on other policy instruments for their resolution. National policies and programmes such as HS2 connecting Manchester and potentially Liverpool with Birmingham and London and other measures to improve the effectiveness of national transport networks together with support for LEPs will become increasingly important to counter such potential effects as will the duty to co-operate which will require adjoining authorities in what were previously different regions to engage with one another.

If an effect of revocation is associated with increasing regional differentiation of housing provision, in response to local or sub-regional market demands, then environmental effects could be exacerbated in



certain regions. This is critical for resources such as water which, whilst addressed at a catchment level through mechanisms such as Water Resource Management Plans, could be compromised in the absence of the strategic overview of regional planning which could seek to match regional environmental capacity with development pressures and aspirations. More widely, infrastructure provision could be made less certain or integrated as a result of individual authorities setting targets and the difficulty which water companies may have in keeping abreast of the 'global' figure for their area of control. This cumulatively could inhibit the delivery of sustainable communities and place pressure upon the natural environment.

For the protection and enhancement of environmental resources more generally, the cumulative effects of the absence of regional policy frameworks and associated resources is harder to determine over the longer term. Whether regional strategies specifically relating to biodiversity and landscape resources, for example, can adequately realise their potential in the absence of a unifying policy framework is uncertain whilst a similar conclusion is also reached for soils in the absence of a requirement for brownfield targets.

The provision of renewable energy has been an issue which regional planning arguably seemed to be particularly fitted to help guide. Development of strategic renewable energy-generating capacity, whilst to some extent modified through co-operation, could over the longer term lead to sub-optimal provision as localised interests perhaps come to the fore, and issues over the equity of provision and national interests are increasingly difficult to reconcile. In the case of the North West a 25% reduction in the development plan target for renewable energy generation by 2020 as a result of revocation could present a lost opportunity, only recognised over the longer term particularly if the pattern is repeated in other regions. A similar situation is also likely to apply as a result of the revocation of the regional household waste recycling targets which also in the case of the North West set at level higher than the Directive target of 50%. Whilst the revocation would not prevent local authorities from retaining the higher target, or adopting their own based on local circumstances it does again suggest a potentially lost opportunity.

#### 4.6 In summary

For many policies, it is difficult to identify specific differentiation between the effects of retention and revocation, given the strategic nature of the policies and the degree to which the RS devolved to local authorities. The provisions of the NPPF mean that a basic framework for the delivery of sustainable development is in place which largely replicates the principles employed in the RS. In principle therefore, local plans can readily deliver the aspirations and proposals of the Regional Strategy, using additional mechanisms such as the duty to co-operate.

Where it occurs, differentiation is found with regard to some of those policies which provide locational advice for development whilst the removal of certain regional targets could lead to a reduction in certain positive significant effects or a change in the types of effect experienced; in the latter case, brownfield land. These issues are expanded upon below.

Where policies provide locational advice, for example to prioritise Manchester and Liverpool as the prime locations for development, they are complemented by supporting policies, such as those concerning the allocation of employment land, office development or housing. The revocation of regional apportionment across individual local authority areas will enable each local area to establish its own development priorities, based upon local evidence. This could potentially result in either a greater or lesser quantum of development overall in the region (although Government encouragement for growth is recognised), or a change in emphasis as certain authorities potentially raise and others reduce their development targets. Furthermore whilst one authority may maintain or even increase its allocations, the fact that another, potentially more attractive location has done the same, may result in the unfulfilment of demand at the former.

Timing of effect is a second differentiator between retention and revocation. This is particularly the case for policies concerned with housing and employment where uncertainty or no effect may result in the short to medium term due to the transition period required for those authorities who need to establish the arrangements under the duty to co-operate to deliver policy and then reflect them in their adopted plan. This is especially the case in the North West where only 16 out of 40 local plans (including the local plans of former local planning authorities) are in conformity with the North West of England Plan.

The benefits accruing from conformance with regional targets, which in the case of the North West are set higher than equivalent national targets, have the potential to be less significant under revocation. Regional targets are based upon evidence which reflects regional capacity in matters such as recycling and renewable energy. Removal of these targets from the development plan and reliance upon national targets or sometimes no statutory targets at all is likely to reduce the urgency for local authorities to act and it does raise the prospect of local environmental considerations receiving greater weight than the wider, often more significant, national benefits.

The assessment does not always conclude that the removal of targets necessarily results in fewer positive effects. Sometimes there are balances which accrue. An example would be the case of brownfield land where the regional target of 70% has been apportioned between individual authorities resulting in some with higher (Liverpool at 90%) or lower (Copeland and Allerdale at 50%) targets. Encouragement to focus development on brownfield sites results in positive policy performance against indicators such as landscape, including townscape and soils. Removal of the requirement for brownfield targets following the withdrawal of PPS3 has the potential to lead to negative effects, but these may be potentially offset to a degree as a result of the NPPF focus upon preserving brownfield sites of high environmental value.

Mitigation of the effects of revocation is likely to be diverse and perhaps specific sub-regionally. For example, in planning for water provision and treatment as part of new development, there is likely to be greater reliance on Water Resource Management Plans and co-operation between interested parties with regard to the provision of infrastructure. A recent example of this would be the proposed £200 million extension to the Liverpool Wastewater Treatment Works (WwTW) by United Utilities at Sandon Dock. Similarly, for issues such as biodiversity, greater sub-regional co-operation and guarantees of funding could be required to achieve a similar outcome to that intended under the



Regional Strategy. Strategic policy structures such as the Greater Manchester Combined Authority represent alternative ways in which local authorities are coming together voluntarily to plan for development at the sub-regional level.



## 5. Conclusions and Key Findings

### 5.1 What Are the Environmental Effects of Revocation of the North West Regional Strategy?

The assessment has identified that the revocation of the North West Regional Strategy will be likely to result in a range of environmental effects across all of the topics identified in the SEA Directive.

The overall spatial vision of the North West Regional Strategy is to deliver sustainable communities supported by sustainable economic development which itself takes place within the context of minimising resource use, promoting environmental quality, reducing emissions and adapting to climate change. The policies in the North West of England Plan and the Regional Economic Strategy are designed to achieve this vision.

With the revocation of the North West of England Plan and Regional Economic Strategy, local authorities and others will need to prepare and implement their local plans and other planning policy documents and to take planning decisions having due regard to the NPPF. The assessment of the revocation of the Regional Strategy has shown that there will be significant positive effects, although these will be largely similar to those if the Regional Strategy were retained. This reflects the fact that in some areas, the intent to provide for local employment and housing needs, whilst protecting and enhancing environmental capital will be continued through other government policy, notably the NPPF, which in some areas strengthens commitments.

The revocation of the Regional Strategy removes a number of quantitative based policies based around topics such as housing and employment land provision where specific allocations are made to individual local authorities. In the absence of this regional context it will be the responsibility of local authorities to work together under the duty to co-operate to best meet the needs of their areas in the most appropriate way having regard to the NPPF and where appropriate other policy and legislation. The duty to co-operate will require new ways of working for local authorities and this may lead to some delay in putting in place local plans and other planning policy or in establishing the development needs of their area having regard to the needs of others areas as well, such as in their housing market area which is likely to include a number of local authorities. The net effect of this may be a short to medium term slowing down of development as the new approaches are implemented - this in turn may lead to a reduction in the positive and negative environmental effects over this time period, particularly as little more than a quarter of authorities have up to date core strategies/local plans. This issue may be addressed by the application of the NPPF's presumption in favour of sustainable development and its policies to boost the supply of housing which will help support development which accords with the NPPF where local plans or policies are absent, silent or out of date.

The only area where revocation of the Regional Strategy would lead to significant negative effects is in relation to material assets. Government encouragement to increase the number of homes built is likely

to see a substantial requirement for construction materials. Furthermore, new households generate additional waste which requires processing. Similarly economic development promoted by local authorities and LEPs, supported by the provision of employment sites, will lead to a requirement for construction materials. However the effects are likely to be minimised as far as possible, in the case of materials by following guidance contained within Section 13 of the NPPF and for waste through PPS10, and the ambition and case for action set out within the Government Review of Waste Policy 2011.

The assessment has also considered the reasonable alternative of retaining the Regional Strategy. This has resulted in the identification of similar environmental effects to revocation although there are important differences in short term effects as indicated above and potentially longer term as well. One difference is Policy RDF1 which is predicted to have a significant effect upon air as a result of the focus of development towards the regional centres of Manchester and Liverpool. Other reasonable alternatives assessed were partial revocation of the Regional Strategy either by:

- Revoking all the quantified and spatially specific policies and retaining for a transitional period the non spatial policies, ambitions and priorities; or
- Retaining for a transitional period all the spatially specific policies where a quantum of development or land for development is allocated to a particular location in the region and revoking the non spatial policies, ambitions and priorities; or
- Retention for a transitional period of policies, ambitions and/or priorities, the revocation of which may lead to likely significant negative environmental effects.

The effects of revoking all the quantified and spatially specific policies were identified to be very similar to retaining the Regional Strategy as neither alternative will remove the need for more houses, jobs and employment land within the region. Similarly, the retention of the spatially specific policies will also result in these negative effects but there could be some confusion initially with the intent of the NPPF and how the policies are to be applied and this may delay the resulting positive or negative effects.

The assessment found that there are no policies in the North West of England Plan or Regional Economic Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit.

## 5.2 **Proposals for Monitoring**

It is a requirement of the SEA Directive to establish how the significant effects of revoking the regional strategy will be monitored. Article 10(2) of the SEA Directive specifically states that, where appropriate, existing monitoring arrangements may be used to assess the success of the appropriate plan in achieving its objectives. It does not require that targets be developed for the SEA itself.

CLG's Business Plan<sup>20</sup> under section 5 'Put Communities in charge of planning' includes specific monitoring actions for the department regarding the local plan making progress by authorities and on compliance with the duty to co-operate. The results of this monitoring will provide clarity over the extent of any delay in adoption of revised local plans. When reviewing the effects of the final decision on revocation, it is proposed that CLG will make periodic reference to the following metrics and sources of information contained in **Table 5.1**. The proposed indicators reflect those identified in the course of the gathering the evidence for this assessment, namely the review of plans, strategies and programmes and collation of baseline information. They are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

Any resulting analysis of long term trends in the indicators will be used to consider whether any further mitigation or intervention is needed for the two categories identified in the SEA Directive, namely:

- The significant effects identified in the assessment that may give rise to irreversible damage, where appropriate, relevant mitigating measures can be taken; and
- Uncertain effects where monitoring would enable preventative or mitigating measures to be undertaken.

Based on the findings of this assessment, the effects that should therefore be monitored include:

- Significant effects on material assets (RS Policy W3, L4).

Monitoring measures have also been proposed where there have been uncertain effects identified and these include:

- Uncertain effects on biodiversity (RS Policy RDF1, W1, W2, W3/4, W5, L4/5, RT2, RT4, RT5, RT6, RT7, RT8, RT10, EM2, EM4, EM7/8/9, EM13, LCR3/4);
- Uncertain effects on population and human health (RS Policy L4/5, RT1, RT7, RT10, EM4, EM10);
- Uncertain effects on soil (RS Policy L4/5, RT2, RT4, RT5, RT6, RT7, RT10, EM4, EM10, EM13, MCR3, MCR4, LCR3/4, CLCR1);
- Uncertain effects on water (RS Policy RDF1, RDF2, W2, L4/5, EM4, EM10, RT4, RT6, RT7, RT10, LCR3/4, CLCR1);
- Uncertain effects on air (RS Policy W2, W6/7, L4/5, RT1, RT2, RT6, RT7, RT8, RT10, EM2, EM4, EM10, CNL1, CNL2);
- Uncertain effects on climatic factors (RS Policy RDF1, RD2, W2, L4/5, RT1, RT2, RT6, RT7, RT10, EM2, EM4, EM7/8/9, MCR4, CNL2);

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<sup>20</sup> CLG May 2012, Business Plan 2012-2015.

- Uncertain effects on materials assets (RS Policy RDF1, RDF2, L2/3, L4/5, RT2, RT6, RT7, RT10, EM4, EM7/8/9, EM10) ;
- Uncertain effects on cultural heritage (RS Policy RDF1, RDF2, W1, W2, W3/4, W5, L2/3, L4/5, RT6, RT7, RT8, RT10, EM4, EM16, LCR3/4);
- Uncertain effects on landscape (RS Policy RDF2, RDF4, W1, W2, W3/4, W6/7, L4/5, RT2, RT4, RT6, RT8, RT10, EM2, EM4, EM10, EM13, CLCR1, CLCR2).

Taking this into account, of the 12 topics considered in this SEA, it is proposed that monitoring should focus on the following indicators and sources of information, as set out in **Table 5.1**.

**Table 5.1 Potential environmental monitoring indicators**

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
Biodiversity, Flora and Fauna	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Condition of designated sites;</li> <li>• Threatened habitats and species;</li> <li>• Populations of countryside birds;</li> <li>• Surface water biological indicators.</li> </ul>	Joint Nature Conservation Committee (JNCC) report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats <a href="http://www.jncc.gov.uk/page-4241">http://www.jncc.gov.uk/page-4241</a> <a href="http://jncc.defra.gov.uk/page-4239">http://jncc.defra.gov.uk/page-4239</a> <a href="http://jncc.defra.gov.uk/page-4238">http://jncc.defra.gov.uk/page-4238</a> <a href="http://jncc.defra.gov.uk/page-4235">http://jncc.defra.gov.uk/page-4235</a> <a href="http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF">http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</a> Department for Environment, Food and Rural Affairs (Defra) <a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a> The Environment Agency (EA) are responsible for monitoring water quality under the Water Framework Directive
Population	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Employment Information;</li> <li>• Population;</li> <li>• Housing and additional net dwellings.</li> </ul>	Office of National Statistics (ONS) reports, specifically Regional Trends and Regional Gross Value Added. Department for Communities and Local Government (DCLG) statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region.
Human Health	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• National Statistics – Long term illness, etc;</li> <li>• Crime;</li> <li>• Deprivation;</li> <li>• Access to and quality of the local environment.</li> </ul>	ONS on health. Home Office, Crime Survey for England and Wales. DCLG statistics: Indices of Deprivation. ONS (proposed measures of wellbeing).
Soil and Geology	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>• Land use.</li> </ul>	DCLG statistics.

Table 5.1 (continued) Potential environmental monitoring indicators

SEA Topics	Proposed Monitoring Indicators	Source(s) of Information
Water	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>% of catchments with good ecological status;</li> <li>Water resource availability;</li> <li>Per capita water consumption.</li> </ul>	EA and Defra. <a href="http://www.defra.gov.uk/statistics/environment/inland-water/">http://www.defra.gov.uk/statistics/environment/inland-water/</a> United Utilities United Utilities
Air	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>Number of AQMAs;</li> <li>Number of AQMAs where exceedances occurred.</li> </ul>	Defra
Climatic factors	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>Emission of greenhouse gases;</li> <li>Number of properties at risk of flooding.</li> </ul>	Department for Energy and Climate Change (DECC) Statistical Release: Local and regional CO2 emissions. EA.
Material Assets	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>Volume of construction waste and proportions recycled;</li> <li>Volume of hazardous waste;</li> <li>Volume of controlled wastes and proportions recycled;</li> <li>Volume of minerals extracted.</li> </ul>	EA. EA. EA. North West of England Mineral Planning Authorities.
Cultural Heritage, Including Architectural and Archaeological Heritage	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>% of heritage assets of different types that are at risk.</li> </ul>	English Heritage 'Heritage at risk report'.
Landscape and Townscape	Annual (where information allows) trends in: <ul style="list-style-type: none"> <li>Change in AONBs (area, threats and quality);</li> <li>Changes in Conservation Areas;</li> <li>Percentage who are very or fairly satisfied with local area;</li> <li>Trend in number of vacant dwellings.</li> </ul>	National Association of AONBs. English Heritage (if 2003 survey repeated). ONS (proposed measures of wellbeing). DCLG. <a href="http://www.communities.gov.uk/documents/housing/xls/1815794.xls">http://www.communities.gov.uk/documents/housing/xls/1815794.xls</a>

### 5.3 Next Steps

This Environmental Report will be presented for consultation until Monday 18 February 2013. Feedback received from consultees in relation to the SEA will be documented and considered in reviewing the proposals to revoke the regional strategies. A Post Adoption Statement will summarise how the SEA

and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the proposals to revoke the regional strategies.



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