

Appendix F: North West

Responses to the scoping stage of the preparation of the Environmental Report.

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. The statutory bodies agreed that the scope and level of detail proposed for the analysis of environmental effects of revocation of the regional strategies was appropriate.

In addition, since this is the first time an environmental assessment had been proposed for the revocation, rather than the creation of a plan, a draft of the Environmental Report was also sent to the statutory consultation bodies for their comments. Since the comments on these drafts were given, a significant amount of policy and legislation has been developed (for instance the publication of National Planning Policy Framework and the introduction of the Duty to Co-operate) and so some of these comments have inevitably been overtaken by events. The comments relevant to the draft report for the North West are presented in summary below, together with how they have been addressed in this Environmental Report.

Table 1: Summary of statutory body's responses at the scoping stage

No	General	Detailed comments	Raised by	Response
1	Scope and Detail	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	Environment Agency, Natural England, English Heritage, Scottish Natural Heritage, Historic Scotland, Scottish Environment Protection Agency, Countryside Council for Wales, Cadw (Welsh Heritage Body).	The Environmental Report has been produced consistent with the requirements of the SEA Directive. Responses to the detailed points raised at scoping stage are set out in the rest of the Table.

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments	Raised by	Response
		SEA did not apply. English Heritage focussed their comments on the implications for the historic environment (historic buildings and landscapes) of the proposed revocation.		
2	Reliance on the Duty to Co-operate and the NPPF	<p>The Environment Agency, Natural England and English Heritage questioned whether the reliance on the draft Duty to Co-operate was sufficient to capture and address cross-boundary issues or cumulative effects of multiple local authorities' local plans. Scottish Natural Heritage thought there should be consideration of the impacts on the protection and enhancement of networks to allow species dispersal throughout Britain.</p> <p>They also commented that references to planning policy assumed existing policies would be carried forward to the new National Planning Policy Framework (NPPF). Since the NPPF was still in its draft form, this needs to be more fully considered. It is also difficult to predict what local authorities will do post revocation of regional strategies so that the environmental effects of their revocation is more likely to be "uncertain" rather than positive.</p>	Environment Agency, Natural England, English Heritage, Scottish Natural Heritage, Scottish Environment Protection Agency, Countryside Council for Wales.	The Government has now published the NPPF and developed the statutory instruments to put into place the Duty to Co-operate through the Localism Act and the supporting legislation and policy.
3	Topics to be	The Environment Agency and the	Environment Agency,	Appendix D of the Environmental Report

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments	Raised by	Response
	considered	Countryside Council for Wales considered that the impacts on climate change; water quality and water resources should be fully assessed. The Water Framework Directive should be considered as well as strategic planning of water resources.	Countryside Council for Wales.	contains an assessment of the effects of retention and revocation of individual policies on climate change, water quality and water resources. Appendix E reviews the baseline condition for each of the SEA topics (including climatic factors and water) and assesses the likely effects on the baseline of retaining and revoking individual policies, the revocation of the North West Regional Strategy as a whole and reasonable alternatives.
4	Water Quality	There are currently issues around accommodating growth within existing Waste Water Treatment Works consent limits, and without compromising Water Framework Directive requirements. This issue should be acknowledged in the assessment. The assessment could usefully inform the allocation of growth across catchments, which are likely to be wider than an individual local authority boundary. The assessment should also consider how strategic cross-boundary water quality issues will be dealt with following the revocation of the Regional Strategy.	Environment Agency.	Water quality issues have been assessed under the SEA topic "Water". This includes the consideration of the topics in Appendix E of the report, and as part of the assessment of the retention and revocation of individual policies and the overall assessment of the revocation of the North West Regional Strategy and reasonable alternatives. This also takes account of the strategic planning cross-boundary issues.
5	Water resources	The Environment Agency and the Countryside Council for Wales considered that the demand for water is dependent on the number of households, number of occupants and the per capita	Environment Agency, Countryside Council for Wales.	Water resources have been assessed under the SEA topic "water". This includes the consideration of the topics in Appendix E of the report, as part of the assessment of the retention and revocation of individual

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>consumption of occupants. If the post Regional Strategy forecast housing numbers increase, even with the same population and thus lower occupancy, then per capita consumption of water is likely to be higher, resulting in a higher demand for water. Similarly, if the number of houses forecast remained the same and the per capita consumption of water increased, or occupancy increased, then this would also increase the demand for water.</p> <p>Change in water use will be influenced by the post Regional Strategy policies of individual local authorities. These effects may not be uniform for all local authorities. Therefore, the net effects on water resources of having a Regional Strategy or not could be zero, more or less. Increases in housing numbers could be considered against the relevant water companies Water Resources Management Plan to ensure that the company is able to supply the additional households. The same applies to any redistribution of households within the existing overall housing numbers. Moving planned builds to another local authority area or within a local authority area may shift the demand into a different water company water resource zone. The effects of this on the company's ability to</p>		<p>policies and the overall assessment of the revocation of the North West Regional Strategy and reasonable alternatives. This also includes taking account of the strategic planning cross-boundary issues including through assessment of the water companies' Water Resources Management Plan.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		supply the 'additional' houses should be considered.		
6	Waste	Waste plans, required to meet the requirements of the Waste Framework Directive, will need a strong evidence base to support them.	Environment Agency.	<p>The National Planning Policy Framework was published in March 2012. Paragraph 153 of the framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst Section 17 of the Planning and Compulsory Purchase Act 2004 makes it clear that two or more local planning authorities may agree to prepare one or more local development documents. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the Framework including for the planning of waste infrastructure.</p> <p>The NPPF also makes it clear that local planning authorities may continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up-to-date, robust local evidence. The NPPF (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The NPPF states that local planning authorities should work</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				with other authorities and providers to assess the quality and capacity of infrastructure for waste and its ability to meet forecast demands.
7	Climate Change	<p>Climate risk and associated adaptation actions should be assessed to help ensure resilience to future climate change. Local authorities could put monitoring mechanisms in place, as action or inaction by one local authority could impact on neighbouring authorities. We suggest that possible mechanisms for monitoring resilience to climate change are considered within the assessment.</p> <p>The Environmental Report stated that local authorities may find it useful to draw on regional data including assessments of the potential for renewable and low carbon energy. This should be considered in greater detail at the next stage of the environmental assessment. Strategic issues need to be addressed</p>	Environment Agency, Scottish Natural Heritage, Scottish Environment Protection Agency, Countryside Council for Wales.	Climate change issues are assessed as part of the climatic factors SEA topic, set out in Appendix E of the Environmental Report, and proposals for monitoring including for climatic factors are set out in Chapter 5.
8	Growth	Assumptions on future growth, including for housing allocations, are important when making assessments of the potential impacts of revocation of the regional strategies. An assumption that lower levels of growth (than that proposed by the Regional Strategy) may	Environment Agency, English Heritage.	<p>In order to better understand the content of local plans, the Environmental Report has taken into account local plan policies on housing, pitches for gypsies and traveller sites, renewable energy, employment, minerals and waste.</p> <p>Baseline data has been expanded and</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>be pursued by local authorities may lessen pressures on negative regional trends. It is possible that some local authorities may decide to increase their housing figures above Regional Strategy targets which could potentially result in significant environmental effects.</p> <p>It may become more challenging to accommodate growth in certain river catchments - all available, up-to-date information should be utilised when carrying out the next stage of the assessment.</p>		updated in the Environmental Report, including for heritage assets and river basin management plans.
9	Marine Planning	<p>The North West Regional Strategy was adopted before the marine planning process started. It therefore did not account for the role that marine planning can play, not just within the marine environment, but also on land. Many of the Sustainability Appraisal objectives could be compared to the aims of the marine planning process. It was suggested that the Marine Management Organisation (MMO) be consulted at all stages of the assessment, given that their plans could potentially apply to the areas covered by this environmental assessment.</p> <p>In considering these wider strategic objectives consideration we believed</p>	Environment Agency, Scottish Natural Heritage, Scottish Environment Protection Agency.	The consultation on the Environmental Report is a public one and comments from all parties with an interest are welcome. The Environmental Report published in October 2011 was sent to the MMO for comment. This Environmental Report has also been sent to the MMO.

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>should be given to addressing potential impacts on the shared marine and coastal environment of the potential loss of strategic planning to deliver benefits or reduce impacts from individual plans and actions. The Environmental Reports refer to the requirement for Shoreline Management Plans and Integrated Coastal Zone Management and it was agreed that these provide a degree of strategic planning for the coastal and marine environment.</p> <p>Scottish Natural Heritage commented that the Environmental Reports for the revocation of the Regional Strategies for the North East and North West of England should examine potential significant impacts to shared Special Protection Areas (SPA) and Special Areas of Conservation (SAC) such as the River Tweed SAC and the Berwickshire North Northumberland Coast SAC in North East England and South East Scotland.</p>		
10	Cumulative Effects	The Environmental Report should effectively assess cumulative impacts and mitigation measures of many small adverse impacts on the environment for instance on climate change including	Environment Agency, Scottish Natural Heritage, Scottish Environment Protection Agency, Countryside Council for	Cumulative impacts are taken into account in the assessment presented in the Environmental Reports. The approach to the analysis is set out in the methodology in Chapter 3, and a discussion of the impacts is included in Chapter 4. Mitigation

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		greenhouse gas emissions.	Wales.	measures are considered throughout the report including for individual SEA topics, and the retention and revocation of individual regional policies.
11	Regional Heritage Policies	<p>English Heritage noted that some policies are only in regional strategies, not in local plans hence the risk of “policy gaps” if these regional policies are not saved. They questioned the assumption that local authorities will carry forward regional policies to secure the boundaries of Green Belts around historic settlements, and whether existing national heritage policies will be carried forward to the NPPF. They thought that regional heritage policies do not just repeat national policy, but include regionally specific detail. They asked for more material to be included in the historic environment baseline data.</p> <p>They considered that the revocation of the regional strategies will result in significant adverse effects which should be mitigated, in particular:</p> <p>The national and regional overview of the significance of historic assets (summarised in the historic environment policy) will be lost, although the NPPF could underline English Heritage’s role in identifying historic character of more</p>	Environment Agency, Cadw.	<p>Also, see lines 24 and 27 in Table 2.</p> <p>The National Planning Policy Framework, published in March 2012, continues to provide protection for historic heritage assets and designated heritage assets throughout the country. By definition, heritage assets include areas and landscapes, as well as individual buildings and monuments, which have a degree of significance meriting consideration in planning decisions, because of their heritage interest. The significance of a heritage asset is stated to derive not only from its physical presence, but also from its setting.</p> <p>The Government attaches great importance to Green Belts and has maintained strong protection for them in the NPPF. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.</p> <p>The NPPF makes clear, as with previous Green Belt policy, that inappropriate development is, by definition, harmful to the</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>than local significance; and</p> <p>The uncertainty in relation to housing numbers could result in planning by appeal, which is more likely to be harmful to historic environment interests. English Heritage state that transitional arrangements should be considered.</p> <p>Regarding the historic environment more specifically, English Heritage suggested that there may be potential harm to the heritage of the North West with the loss of Policy DP4 and its sequential approach to development prioritising the use of existing buildings, together with Policy L4 on regional housing provision requiring maximising the re-use of vacant and underused buildings and Policy EM1 on the Integrated Enhancement and Protection of the Region's Environmental Assets which underlined that first loss or damage to assets should be avoided, unavoidable damage mitigated and compensated with a foundation of no net loss in resources as a minimum requirement. Few of the Local Plans in the North West have policies that take these sub-national policies down to the local level.</p> <p>Cadw (Welsh Heritage Body) anticipated</p>		<p>Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The NPPF also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the NPPF, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The NPPF is also clear that once established, Green Belt boundaries should only be altered in exceptional circumstances. A change to a Green Belt boundary would need to take place through the local plan process, which would involve public consultation and an independent examination. At that time, authorities should consider the Green Belt boundaries having regard to their intended</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		that there would be no impacts from revocation of North West Regional Strategy.		<p>permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green belt are also included.</p> <p>The NPPF states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt. Implementation arrangements are set out in Annex 1 of the NPPF</p>
12	Site Specific Analysis	<p>Natural England thought that there needed to be more analysis of site specific policy issues in the local plans.</p> <p>Countryside Council for Wales stated that reasonable alternatives should</p>	Natural England, Countryside Council for Wales.	The Environmental Report includes an analysis of the content of local plans, where Regional Strategy policies include the allocation of a quantum of development or land to an individual local authority or is locationally specific.

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments	Raised by	Response
		include keeping selected Regional Strategy environmental policies on matters crossing local authority boundaries, and which form the framework for Local Plans. Impacts outside regions should be considered, for example, English developments requiring water supply from Wales is an ongoing issue. The Duty to Co-operate is likely to be inadequate to deal with effects remote from individual local authority areas. In general, planning at local level only reduces the effectiveness of SEA and limits alternatives. The Habitats Directive: while revocation does not change legal protection, removing the regional tier could adversely affect actual protection via policies – HRA could perhaps be required.		

Representations received in response to the first public consultation on the proposed revocation of the North West Regional Strategy

The representations received on the proposed revocation of the North West Regional Strategy have been summarised in the two following tables. The first provides a headline summary of the issues. The responses are grouped under the following themes:

- The Overall Approach to SEA;
- Assessment;
- Reliance on the NPPF;
- Policy Change;
- Reliance on the Duty to Co-operate;
- Individual Topics (covering greenbelt, gypsies and travellers, housing supply and growth, heritage, waste, biodiversity, renewable energy, transport, water, Brownfield land, the coast, flooding and woodland).

Table 2: Summary of consultation responses – headline issues

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
The Overall approach taken to SEA	The Environment Agency supported the broad approach to the analysis presented in the October 2011 Environmental Reports. 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 did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the North West Regional Strategy 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.	Chapter 1 of this 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 Regional Strategy have been assessed in detail in the short, medium and long term against the 12 SEA topics listed in Annex 1 to the SEA Directive. This includes ‘cultural heritage – including architectural and archaeological heritage’.
Assessment	The Statutory Consultees drew attention to more up-to-date	The Environmental Report updates the baseline

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	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.	evidence and provides a detailed analysis of the retention, partial revocation and revocation of the North West Regional Strategy 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 the Environmental Report takes account of the policies set out in the Framework.
Policy Change	Several respondents thought that the revocation of the North West Regional Strategy would weaken certain policies, particularly 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. Council's who cannot demonstrate that they have complied with the duty may fail the local plan independent examination. In addition the NPPF sets out the strategic priorities on which the Government

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
		expects joint working to be undertaken by authorities. The NPPF also sets out the requirements for sound local plans, including that plans are deliverable and based on effective joint working in cross boundary strategic priorities.
Individual Topics	Respondents raised a number of questions about individual topics. In particular, respondents thought that the revocation of the North West Regional Strategy could impact adversely on Green Belt, the provision of gypsies and traveller pitches, housing allocations, heritage, waste management, biodiversity, renewable energy, transport, water, brownfield land, coast, flooding and managed woodland.	The Environmental Report contains an assessment of the effects of revocation of the Regional Strategy on each of the topics raised by consultees.

More detailed information on each respondent's comments is provided in Table 3. Information in the table includes the:

- The overall issue;
- Detailed information on the comments made;
- The respondents who raised the issue; and
- A response.

Table 3: Responses to the consultation on the initial Environmental Report (published in October 2011)

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
1	The Overall Approach to SEA	The Environment Agency supported the broad approach to the analysis presented in the Environmental Reports published in October 2011. 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 did not comment on the overall approach taken to the assessment, but had concerns about the potential impacts of the revocation of the North West Regional Strategy 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.	Environment Agency, Natural England and English Heritage.	Noted. The impact of retaining, partially revoking and fully revoking the North West Regional Strategy has been assessed in detail in the short, medium and long term against the 12 SEA topics. This includes an assessment of cultural heritage – including architectural and archaeological heritage.
2	The Overall Approach to SEA	The consultation on the assessment of the revocation of regional strategies which ran from October 2011 was contrary to the requirements of Article 6(5) of the Directive.	Clyde and Co LLP and Iceni Projects.	The Government disagrees that the consultation process undertaken in October 2011 was contrary to the requirements of Article 6(5) of the Directive which

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>states that the “detailed arrangements for the information and consultation of the authorities and the public shall be determined by Member States”. This requirement is transposed into English law by regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>The Environmental Report which was published for public consultation in October 2011, and this further Environmental Report, which takes account of consultation responses, demonstrates the Government’s desire to consult fully on the assessment of the impacts of revocation of the Regional Strategy.</p> <p>Chapter 1 of this Environmental Report sets out the purpose of the consultation and sets out a number of questions on which the Government would particularly welcome responses.</p>
3	The Overall	CPRE and the North West Wildlife Trusts disagreed	Council for the	On 22 March 2012 in the case of

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
	Approach to SEA	<p>with the Government's view that SEA was not necessary and therefore considered that Government was not at liberty to undertake the environmental assessment voluntarily. The Environmental Report should have considered the need for strategic planning for the environment at a spatial tier above that of the individual local authority.</p> <p>Cumbria County Council stated that the Environmental Reports were couched nearly entirely on the consideration of environmental impacts, and hence failed to give proper assessment to the socio-economic and sustainability implications of the revocation of the North West Regional Strategy is a significant weakness.</p>	Protection of Rural England (CPRE), North West Wildlife Trusts, Cumbria County Council.	<p>Bruxelles, the Court of Justice of the European Union (CJEU) considered whether the SEA Directive applied to a procedure for the total or partial revocation of a land use plan. The Court concluded that where revocation of a plan may modify the state of the environment as examined at the time of adoption of the plan, an SEA will be required to aid consideration of such effects. The Environmental Report assesses the retention, partial revocation and revocation of the North West Regional Strategy which includes a consideration of the impact of removing regional scale environmental strategic policies.</p> <p>This report is prepared in accordance with the SEA Directive.</p>
4	The Overall Approach to SEA	The environmental assessment had been carried out too late in the process, and should have been conducted prior to the initial decisions to revoke the regional strategies. SEA carried out at an early stage and with an open mind helps to identify the	RenewableUK, Royal Society for the Protection of Birds (RSPB), Wildlife and	The Government signalled its proposed intention to remove the regional tier of Government and return decision making on housing and planning to local authorities in

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		environmental consequences of revocation and steps which could be taken to mitigate any adverse impacts (such as saving significant environmental policies).	Countryside Link, CPRE, North West Wildlife Trusts.	<p>the coalition agreement. Parliament subsequently agreed to the removal of the legal framework for Regional Strategies through the repeal of Part 5 of the Local Democracy, Economic Development and Construction Act 2009 (through section 109 of the Localism Act 2011) and gave the Secretary of State powers to revoke the whole or any part of a Regional Strategy by order.</p> <p>Any decision to revoke the regional strategies has always been dependent on and subject to the outcome of the environmental assessments.</p> <p>The Environmental Report which was published for public consultation in October 2011, and this further Environmental Report, which takes account of responses, demonstrates this and is in accordance with the requirements of the SEA Directive and its objectives.</p> <p>The outcome of the consultations</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				on the Environmental Reports will form part of the matters that will be taken into account in deciding whether or not to revoke the regional strategies.
5	The Overall Approach to SEA	The Town and Country Planning Association were concerned that the Environmental Reports did not represent an analytically robust and rigorous assessment of the likely impacts or how they may be mitigated. They considered that not all of the Directive's provisions had been addressed with sufficient robustness to provide an appropriate means of assessment, with reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. The Environmental Reports did not explore the potential short-term impacts that could arise in the interim period while the Regional Strategy is revoked, but before adopted local plans are in place. The reports do not project what the future might be like under local plans prepared with a minimum of national guidelines. The reports should contain more analysis of minerals and waste, infrastructure, town centre development, new settlements and major urban expansions.	Town and Country Planning Association.	The October 2011 Environmental Report was structured around the individual requirements of the SEA Directive. Chapter 1 of this Environmental Report sets out which parts of the report address the requirements of the Directive.
6	Assessment – likelihood of effects	The environmental assessment had placed unquestioning faith in the environmental benefits of the Government's planning reforms, and seemed to be a justification for revocation rather than objective analysis. The assumptions within the Environmental Report that revocation of the Regional Strategy will	Levett-Therivel, Trewick Environmental Consultants, Collingwood Environmental	The short, medium and long term impacts of retaining, partially revoking and revoking the North West Regional Strategy have been assessed in detail in this Environmental Report for each of

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>have no significant adverse environmental effects were untested and unsupported by evidence.</p> <p>Countryside Council for Wales noted that baseline information was 'restricted' to the Regional Strategy area and did not include consideration of environmental facets out with the Regional Strategy boundary but which may be affected by the Strategy's implementation. For example, a considerable proportion of the water resources for the urban areas of the North West are derived from spatially distant sources in Wales. No consideration had been given to water resources and abstraction and demand in this baseline.</p> <p>The Environment Agency was unclear whether the potential impacts of the revocation on the neighbouring Welsh environment had been assessed, for example, effects on the rivers flowing from Wales into England. They considered that a more robust assessment of the implications for Wales could help improve the future working arrangements across these borders.</p>	<p>Planning, CPRE North West, North West Wildlife Trusts, Countryside Council for Wales, Environment Agency.</p>	<p>the 12 SEA topics</p>
7	Assessment – cumulative impacts	<p>The Environmental Report should assess the cumulative effects of revocation, in particular the consequent capacity for 'linked or cumulative, synergistic or secondary effects' coupled with the need for environmental assessment to adapt to the</p>	<p>Clyde and Co LLP; Levett-Therivel, Treweek Environmental</p>	<p>Chapter 3 of the Environmental Report sets out the assessment methodology for cumulative, synergistic or secondary effects. Chapter 4 contains a consideration</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>scale and nature of the plan in question. The assessment should include a consideration of the impact of the revocation of all the Regional Strategies.</p> <p>The Countryside Council for Wales suggested identification of those measures to avoid/mitigate and the effects of changes that were made to the final North West Regional Strategy to ensure compliance with the aims of the Habitats Directive. They stated that they would welcome reassurance that all relevant mitigation and avoidance measures would be deferred down to local plans, and suggested that the revocation of policies including measures aimed at ensuring compliance with the Habitats Directive might constitute a potential adverse effect on the integrity of European Sites.</p> <p>The Countryside Council for Wales also suggested that the removal of plans and their relevant assessment processes at the upper and strategic level and deferral down to local level may compromise the efficacy of the environmental assessments (SEA and HRA) notably in the context of constraining options and alternatives and preventing robust consideration of cumulative and 'in combination' effects. Many of the environmental goods, services and functions that enable development at the local level (water resources, minerals etc) do not respect local authority boundaries and planning of development based on material assets can only be</p>	<p>Consultants, Collingwood Environmental Planning, Countryside Council for Wales, Scottish Natural Heritage.</p>	<p>of these effects.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>enabled by consideration at the regional level.</p> <p>Scottish Natural Heritage suggested that the Environmental Report of the revocation of the North West Regional Strategy should have covered the impacts on areas outside the plan area such as southern Scotland and the in-combination impacts with plans or projects outside the plan area, both on areas in and outside the North West.</p>		
8	Assessment - mitigation	<p>No mitigation measures are presented in the Environmental Reports because no impacts have been identified. Explanation and evidence should be presented to support statements in the report that 'These policies could be delivered by other means than through a Regional Strategy.'</p>	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.	Appropriate mitigation measures are proposed in Chapter 4 of this report, as well as in Appendix D.
9	Assessment – strategic planning	<p>The Regional Strategies provided strategic policies to ensure that development can be planned in a way that is compatible with biodiversity targets. There are similar issues with water supply/demand, for example, under the Water Framework Directive, to ensure that housing development will be compatible with the requirements for favourable status and there are knock on implications for European protected sites.</p> <p>The Town and Country Planning Association considered that the Environmental Reports understated the benefits of regional policy which all the original SEAs had identified. They also considered</p>	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Town and Country Planning Association.	The NPPF, published in March 2012, states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply,

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		that there was insufficient detail to show how the new planning reform measures would deal effectively with strategic spatial issues.		<p>wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); 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.</p> <p>The impact of retaining, partially revoking and revoking the North West Regional Strategy has been assessed in detail in the short, medium and long term for each of the 12 SEA topics.</p>
10	Assessment - baseline data	Statutory Agencies identified more recent environmental data than that used in the Environmental Reports - such as data used to inform the preparation of the River Basin Management Plans, and on climate change and sea level rise. Other respondents asked for other baseline data to be updated, for data on human health to be included and for data to better reflect the economic climate. Some respondents asked for maps to be included to better illustrate spatial impacts.	Natural England, Environment Agency, Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Clyde and Co LLP, Town and	The baseline data has been updated and expanded in the Environmental Report, and described for the 12 SEA topics in Annex E. Maps have been included. This data has been used to inform the assessment the strategic environmental impacts of the revocation of the North West Regional Strategy and a number of alternatives.

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
			Country Planning Association.	
11	Assessment – material assets	The analysis of material assets could include the full range of infrastructure, employment sites, waste, energy and water use etc.	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.	The Environmental Report includes an assessment of all 12 SEA topics. This incorporates assessment of waste and minerals, energy, water use, and employment land.
12	Assessment – likely evolution of the environment	The likely evolution of the environment in the absence of the plan should be set out.	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.	In compliance with Annex 1(b) of the SEA Directive, this Environmental Report presents for each of the 12 SEA topics, an assessment of the likely evolution of the baseline without implementation of the plan or programme. Uniquely (to date) in this case, “without implementation of the proposed plan or programme” actually refers to the plan to revoke the Regional Strategy. So the evolution of the environmental baseline without the plan will mean in this instance, the evolution of the baseline with the retention of the existing Regional Strategy on place. Therefore, and where appropriate in addition to using projections, this assessment

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				has used the findings of the relevant sustainability appraisal and appropriate assessment to help provide an informed understanding of the likely future evolution of the baseline. This information is contained in Appendix E and presented within each topic chapter.
14	Assessment – SPAs and SACs	<p>Information on the existing impacts on SPAs and SACs should be provided.</p> <p>Scottish Natural Heritage also states that if there is a HRA of the revocation of the North West Regional Strategy, it should identify what Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites should be considered for 'likely significant effects', and the report of the HRA should be clear why sites have been scoped in or scoped out. Luce Bay and Sands SAC and the Upper Solway Flats and Marches Ramsar Site, SPA and SAC should be considered.</p>	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Scottish Natural Heritage.	The Environmental Report contains an Appendix G listing all SPAs and SACs and the impact on particular sites has been drawn out where relevant.
14	Assessment – method statement	Information should be provided on who has carried out the assessments, details of the consultation with statutory agencies, responses to scoping responses and what problems were faced.	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.	Detail of the preparation of the report, consultation with the statutory agencies, responses to scoping comments, and difficulties faced with the analysis are set out in Chapters 1 and 3 and Appendix F of this Environmental Report.

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
15	Assessment – non technical summary	The non- technical summaries are not consistent with the SEA Directive requirements. They are generic and make assertions that are not based on evidence.	Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning.	A non-technical summary which is based on the findings of the assessment and consistent with the requirements of the SEA Directive is included in this Environmental Report.
16	Assessment – local plans	<p>CPRE stated that the reports should have considered appropriate evidence that currently exist, such as changes to Core Strategies made subsequent to the announcement that Regional Strategies would be abolished. They suggested that no such assessment had been made. As a result there were no recommendations about how the plan making process might be improved to address environmental issues, for example, by strengthening the Sustainability Appraisal process at local authority level.</p> <p>FOE were concerned that the statement in the Environmental Reports that local authorities would deal with environmental issues was not based on a full analysis of whether local plans do have strong local environmental policies in place similar to those in the Regional Strategies in a situation where they were specifically not supposed to duplicate regional policy; or in areas where there are no local plans. In addition, the assumption that there are ‘strong protections’ for the environment in national planning policy had been disputed by several NGOs.</p>	CPRE, Friends of the Earth (FOE), Professor Alan Townsend, Cumbria County Council.	<p>The Environmental Report includes an analysis of the content of local plans at Appendix C, focussing on housing allocation, gypsies and traveller pitches, renewable energy, employment land, minerals and waste.</p> <p>The area covered by Cumbria County Council is a two tier local authority area. There are seven local authorities covering Cumbria. None of these local authorities submitted representations requesting that Saved Structure Plan policies and policies from the North West Regional Strategy should be saved:</p> <p>1. Allerdale Borough Council 2. Barrow in Furness Borough Council</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Professor Alan Townsend considered the reference in the reports that the removal of the Regional Strategies would create 'opportunities for securing environmental benefits' to be unfounded. Referring to the North East, as an example, he commented that the experience of CPRE was that economic and commercial pressures would act as a serious threat to a balanced approach to the environment and to development. He also referred to paragraph 1.25 in the Environmental Report where it is stated that environmental effects cannot be predicted for certain because they depend on local decisions, but disagreed with the view that decisions taken locally will look to maximise positive environmental outcomes for the local area.</p> <p>Cumbria County Council pointed to the resource constraints which local authorities are currently operating under, making the statement that it is highly likely that the revocation of the North West Regional Strategy in the current resource context rather than having an environmental benefit, as argued, will have many dis-benefits, resulting in policy fragmentation and encouraging strategic policy gaps to appear across the North West in not only policy development, but also in implementation. The Council were concerned that the Environmental Report did not consider that there are currently no suitable alternatives to many saved policies in the Cumbria and Lake District Joint Structure Plan and the North</p>		<p>3. Carlisle City Council 4. Copeland Borough Council 5. Eden District Council 6. Lake District National Park 7. South Lakeland District Council</p> <p>All these local authorities are making progress in preparing their local plans. For example, Eden District Council adopted a Core Strategy in May 2007; Lake District National Park adopted a Core Strategy in October 2010 and South Lakeland adopted a Core Strategy in October 2010.</p> <p>Allerdale, Barrow in Furness, Carlisle and Copeland are yet to publish draft Core Strategies.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>West Regional Strategy, the development of strategic planning policy alternatives will take a considerable period of time, and their revocation will create a planning policy vacuum in Cumbria.</p> <p>The Council requested that 24 Structure Plan policies should be saved:</p> <p>Policies DP1, DP2, DP3, DP5, and DP8 Spatial Principles</p> <p>Policy W1 Strengthening and regional economy</p> <p>Policy W2 Locations for regional significant economic development</p> <p>Policy W3 Supply of employment land</p> <p>Policy W4 Release of allocated employment land</p> <p>Policy L1 Health, sport, recreation, culture and education service provision</p> <p>Policy L3 Existing housing stock and housing renewal</p> <p>Policy L4 Regional housing provision</p> <p>Policy RT2 Managing travel demand</p> <p>Policy EM1 Integrated enhancement and protection of the region's environmental assets</p> <p>Policy EM3 Green Infrastructure</p> <p>Policy EM4 Regional Parks</p> <p>Policy EM6 Managing the North West's Coastline</p> <p>Policy EM9 Secondary and recycling aggregates</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p> Policy EM11 Waste management principles Policy EM13 Provision of nationally, regionally and sub-regionally waste management facilities Policy EM14 Radioactive Waste Policy EM15 A framework for sustainable energy in the North West Policies CNL1 and CNL2 Cumbria. </p> <p> The Council also requested that 15 Regional Strategy policies from the North West Regional Strategy be saved: </p> <p> Policy ST4 Major Development Proposals Policy ST5 New development and key service centres outside the Lake District National Park Policy EM13 Employment land provision Policy EM14 Development of employment land for other purposes Policy EM16 Tourism Policy H19 Affordable housing outside the Lake District National Park Policy T29 Safeguarding future transport schemes Policy T30 Transport assessment Policy T31 Travel plans Policy T33 Telecommunications Policy E35 Areas and features of nature conservation interests other than of national and international </p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>importance</p> <p>Policy E37 Landscape character</p> <p>Policy E38 Historic environment</p> <p>Policy R44 Renewable energy outside the Lake District National Park</p> <p>Policy 45 Renewable energy in the Lake District National Park and AONBs.</p>		
17	Assessment – reasonable alternatives	<p>The environmental assessment had considered too narrow a range of alternatives. The only alternative considered was no revocation. This in turn means that there are no clear recommendations to address the practical question of whether the proposed planning system, centred on the NPPF and local plans, should be modified to address environmental issues that arise from the abolition of regional planning.</p> <p>Other alternatives suggested were:</p> <ul style="list-style-type: none"> • 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 	<p>RSPB, Wildlife and Countryside Link, CPRE, Renewable UK, Clyde and Co LLP, Irish Travellers Movement in Britain; Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Countryside Council for Wales, North West Wildlife</p>	<p>The Environmental Report draws on the consultation responses and the findings of the assessment to develop a number of alternatives and identifies three reasonable alternatives to complete revocation for assessment.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>authorities producing joint development plans to cover specific issues;</p> <ul style="list-style-type: none"> • revoking certain chapters or parts of the strategies and introducing transitional arrangements. <p>Countryside Council for Wales suggested that an additional alternative should have been considered in respect of keeping those strategic and spatial policies guiding environmental goods, resources and services, e.g. water resources, minerals etc, which ultimately form the framework for Local Plans policies and which would be relevant to planning decisions at the local authority level (as material considerations) and which relate to material assets such as water resources, transport infrastructure etc, which do not recognise local authority boundaries.</p> <p>The North West Wildlife Trusts considered that the Environmental Report on the revocation of the North West Regional Strategy should have identified and tested reasonable alternatives, and identified four 'reasonable alternatives' which could have been addressed in the Environmental Reports.</p> <p>The Woodland Trust considered that the consultation on the Environmental Report on the revocation of the North West Regional Strategy is tokenistic, which demonstrated by the fact that there has been no assessment in the Environmental Report of</p>	<p>Trust, Woodland Trust, Lancashire County Council.</p>	

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>reasonable alternatives to the revocation of the North West Regional Strategy.</p> <p>Lancashire County Council does not believe that the Environmental Report on the revocation of the North West Regional Strategy adequately captures the potential negative impacts of revoking the region's Regional Strategy. They illustrate the negative impacts on delivery of strategic planning policy covering issues like waste, landfill and large waste treatment plants, infrastructure, transport for example airport development.</p>		
18	Assessment - monitoring	<p>Natural England, CPRE and the Town and Country Planning Association considered that it was not clear whether the local authorities, Government or any other body would collate the authorities' monitoring information and assess it to determine where more than local gaps in policy or problem areas were arising.</p> <p>The Town and Country Planning Association suggested that there was a need to monitor the general impact of the Government's planning changes. Consistent and effective monitoring on the effects of the 'Duty to Co-operate' over the next 2-3 years was particularly important, for example, by tracking local plan progress on local authority websites in a systematic but simple way.</p>	<p>Natural England, CPRE, Town and Country Planning Association, Levett-Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, Clyde and Co LLP, Forestry Commission.</p>	<p>Proposals for monitoring are set out in Chapter 5 of the Environmental Report.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>Levett- Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning suggested that the effects of revocation should be monitored, for example, to track housing completions and development on Greenbelt.</p> <p>Clyde and Co LLP considered that not clearly identifying additional, specific methods of monitoring undermined the consultation process.</p> <p>The Forestry Commission commented that the monitoring and sharing of information was far easier with the Monitoring Group established by the Regional Assembly. Local authorities were unlikely to monitor if this is not a requirement given funding constraints. The Annual Monitoring report was extremely valuable for seeing what was being achieved, and believed that it was unclear now how national targets for carbon reduction could be met. Whilst Local authorities may be responsible for monitoring: they asked who they reported to and how (a) cumulative effects or (b) actions in one authority being undermined in another could be assessed.</p>		
19	Reliance on the draft NPPF	<p>Natural England, the Environment Agency, the Town and Country Planning Association and CPRE noted that it was difficult to come to a view on the significance of the environmental effects of revocation, prior to the publication of the final NPPF and the implementation of the new "Duty to Co-operate". CPRE for example, commented that as a</p>	<p>Natural England, Environment Agency, Town and Country Planning Association, CPRE, Levett-</p>	<p>The NPPF was published in March 2012. The NPPF is consistent with the Government's Natural Environment White Paper, and makes it clear that the planning system should contribute to and enhance the natural and local</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>result of the wider changes in planning it was inherently difficult to assess the likely impact of the revocation of Regional Strategies. In particular, the content of the final NPPF and future local plans were uncertain and neither of these statements could currently be fully tested. They expressed concern that the Environmental Reports did not give a comprehensive overview of the potential environmental impact of the Government's intentions.</p> <p>Levett- Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning questioned the evidence that the NPPF will be so favourable to the environment or sustainable development, as the NPPF has not been subject to SEA.</p> <p>Natural England agreed with the assessment that there was an inherent difficulty in providing an assessment of the NPPF as an alternative, as it was not known how the final version would differ from the consultation draft.</p> <p>Scottish Power Renewables were of the view that the Regional Strategies have a key role in ensuring that national policy objectives are met and encouraged the wider deployment of renewable energy, making an important contribution to the UK's legally binding renewable energy targets. In particular, the Regional Strategies do and could continue to play</p>	<p>Therivel, Treweek Environmental Consultants, Collingwood Environmental Planning, North West Wildlife Trusts, CPRE.</p>	<p>environment by protecting and enhancing valued landscapes, and sets out as a core planning principle that planning should recognise the intrinsic character and beauty of the countryside. The Framework also maintains protection for designated areas such as the Green Belt, Areas of Outstanding Natural Beauty, National Parks, and Sites of Special Scientific Interest. It sets out policy for the support of delivery of renewable energy development as well as leisure facilities for the community including theatres.</p> <p>The NPPF is not subject to SEA as it is high level policy and does not fall within the scope of the SEA Directive.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>a key role in the strategic planning of onshore wind and the infrastructure to support the development of offshore wind. They were therefore concerned that the process for the revocation of Regional Strategies pre-empted the final NPPF and requested that the Government require local authorities to put in place policies to ensure a contribution to the national renewable energy targets, in line with the National Policy Statement.</p> <p>RenewableUK shared the concern about the reliance on the draft NPPF and were concerned that the draft NPPF did not contain a sufficient level of detail to support renewable energy planning.</p> <p>The RSPB and Wildlife Link considered it misleading for the Environmental Reports to imply that the planning reform would usher in new policies that, on balance, would make up for the loss of Regional Strategies. They considered, for example, that even though 'top-down' housing targets were being removed, the stated purpose of planning reform was to create more growth and to deliver more housing. There was no criticism of Regional Strategy housing figures being too high, only that they were 'top-down'. It therefore followed that local authorities would use similar methodologies and arrive at similar figures when 'objectively assessing' housing need.</p> <p>FOE stated that local authorities will have to be</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>guided by the policies in the NPPF. Based on the draft NPPF text, in many cases, local authorities will struggle to take decisions on a 'local' basis to protect the environment. They stated that legal advice obtained by them showed that the concept of local decision-making was outweighed by the wording used in the draft NPPF which is directive on the need to approve development. They also pointed to shortcomings in the draft NPPF on sustainable development, countryside and biodiversity, transport, water, and climate change mitigation and adaptation.</p> <p>The Wildlife and Countryside Link were concerned that the Environmental Reports relied so heavily on the draft NPPF, which had not been finalised and was therefore subject to change.</p> <p>The Theatres Trust suggested that suitable policy within the NPPF and other measures needed to be in place to ensure the pooling of knowledge on physical and social cultural infrastructure, particularly theatres, if the plans are revoked.</p> <p>The Woodland Trust commented that the SEA implies that the NPPF and planning reform in general will lead to less development, particularly in the absence 'top down targets', but felt this is contradictory to the Government's policy, as the stated purpose of the current planning reforms is to encourage economic growth. Paragraph 1.6 of the</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>Environmental Report states that the NPPF sits within the broader context of national policy and legislation such as the National Environment White Paper (NEWP). The draft NPPF did not however reflect the NEWP.</p> <p>The North West Wildlife Trusts stated that the Regional Strategy contained very strong policies for environmental protection which would be lost on revocation. These policies would not be replaced by other, equally strong environmental policies, if the consultation draft NPPF is adopted, as the replacement policies in the NPPF are weak and deeply flawed and those local authorities which have Core Strategies in place were instructed not to repeat Regional Strategy policies, thereby leaving a policy vacuum. The Trusts stated that the assertion that the revocation of the North West Regional Strategy will have positive environmental outcomes rests on two assumptions:</p> <ul style="list-style-type: none"> • that local authorities will both seek and be able to maximise positive environmental outcomes in the absence of a Regional Strategy and in the face of other pressures; and • that adequate protections for the natural environment actually exist at a national level. <p>They stated that these assumptions have been taken</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>as self-evident in the Environmental Report and have not been tested. In their opinion both assumptions were questionable, which undermined the credibility of the Environmental Report. They also considered that the Environmental Report should have tested alternatives such as partially revoking the North West Regional Strategy, by removing the top-down housing figures, while retaining the agreed broad framework of the Regional Strategy, in particular the policies relating to the natural environment or transposing relevant regional environmental policies which were not repeated at the local level into the Core Strategies of local authorities for example.</p> <p>CPRE stated that the Environmental Report rests on the assumption that local authorities will be able to maximise environmental benefits in the face of development pressures without the Regional Strategy and that national protections in the emerging NPPF were adequate. This assumption had not been tested in the Environmental Report. For example, without a clear definition in the NPPF of what constitutes Sustainable Development, local authorities would not be able to plan for development where it would provide the greatest benefit at the least environmental cost. They believed that the Environmental Report was fundamentally flawed, fairly meaningless because it fails to test reasonable alternatives, and the preparation of the report was too late in the process to affect the decision, assess only one set of possible</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		effects rather than the likely effects.		
20	Assessment - policy change	<p>Natural England noted that the revocation of the Regional Strategies would require local planning authorities to incorporate relevant environmental policies, previously included in the Regional Strategy, into their local plans or to rely on NPPF policies. The full effect of revoking individual Regional Strategy policies was therefore likely to depend greatly on where individual local planning authorities were in their local plan-making process. Where local authorities had not yet adopted Core Strategies, in the absence of regional strategies, they considered that it may be much more difficult for them to develop locally tailored evidence-based policies.</p> <p>The Environment Agency welcomed the Environmental Report highlighting which parts of current national policy and guidance were important to help avoid significant adverse environmental impacts. Where local authorities had adopted Core Strategies that were developed with a backdrop of the Regional Strategy, a robust NPPF would need to ensure that any potential policy gaps were filled.</p> <p>The RSPB proposed that the Government should not revoke the Regional Strategies in full. They suggested that saving key environmental policies until they were replaced by equivalent local plan policies</p>	<p>Natural England, Environment Agency, RSPB, Wildlife and Countryside Link, Theatres Trust, RenewableUK, FOE, English Heritage, North West Wildlife Trusts, Woodlands Trust, CPRE, Lancashire County Council, Cumbria County Council.</p>	<p>The NPPF, published in March 2012, sets out the Government's planning policies for England.</p> <p>The NPPF emphasises the need for local planning authorities to plan strategically. The NPPF states that local planning authorities should set out their strategic priorities for their area in their Local Plan. This should include strategic policies to deliver the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation,</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>would significantly mitigate the risk of environmental harm. Saved policies should be kept in place during a transitional period while local plans were updated, which could easily coincide with the transitional period in which the NPPF was translated into local plans.</p> <p>The Wildlife and Countryside Link suggested that Government and its agencies should work together with local authorities and their partners in each region to identify which Regional Strategy policies should be saved, while local plans were updated to incorporate those policies.</p> <p>The RSPB and the Wildlife and Countryside Link considered that revocation would remove a raft of policies on issues, such as those on the natural environment and renewable energy, that were largely not contentious, and the product of close cooperation between local authorities and other interested parties.</p> <p>The Theatres Trust stated that the proposed revocation of the Regional Strategies could have adverse social effects. The Regional Strategies included measures for local authorities to work collaboratively 'to increase investment in physical and social infrastructure'. This may not take place on such a scale, even with the Duty to Co-operate, if Regional Strategies are revoked. The Theatres Trust believes that this would have ensured that cultural facilities were in place for communities to share and that</p>		<p>conservation and enhancement of the natural and historic environment, including landscape.</p> <p>The NPPF also makes clear that, where it would be appropriate and assist the process of preparing or amending Local Plans, Regional Strategy policies can be reflected in Local Plans by undertaking a partial review focusing on the specific issues involved. Local planning authorities may also continue to draw on evidence that informed the preparation of Regional Strategies to support their Local Plan policies, supplemented as needed by up-to-date, robust local evidence.</p> <p>Climate change is one of the core land use planning principles which the NPPF expects should underpin both plan-making and decision-taking. Local planning authorities are expected to adopt proactive strategies to mitigate climate change and co-operate to deliver strategic outcomes which include climate change. They should plan</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>places exchange knowledge when creating new buildings or networks, so that resources were not squandered by the repetition of mistakes. Thus, it was suggested that measures needed to be in place to ensure the pooling of knowledge on physical and cultural infrastructure, which also affect theatres, if the Regional Strategy is revoked.</p> <p>RenewableUK were of the view that the revocation of the Regional Strategies would create a policy gap which would affect the ability of local authorities to make informed decisions. They did not believe that a reliance on national policy and the Duty to Co-operate was sufficient to ensure that the UK met its renewable energy generation and carbon emissions reduction targets.</p> <p>FOE were concerned that the SEAs of the revocation of the Regional Strategies do not fully assess the environmental impacts of the incoherent policy context that would arise. They recommended that to fill the gap left by the Regional Strategies, local plans should absorb the regional evidence bases for renewable energy resources, and 'save' renewable energy target and adaptation policies where this would otherwise leave a gap in local frameworks. They added that the loss of the Regional Strategy left a gap in the consideration of the global impacts of a local authority's areas consumption/ indirect impacts. They were of the view that the footprint approach at a</p>		<p>for new development in locations and ways which reduce greenhouse gas emissions (including through transport solutions which support reductions in greenhouse gas emissions); actively support energy efficiency improvements to existing buildings; and promote energy from renewable and low carbon sources. These strategies are expected (paragraph 94 of the NPPF) to be in line with the objectives and provisions of the Climate Change Act 2008. There is a legal requirement on local planning authorities to ensure their Local Plan (taken as a whole) includes policies designed to tackle climate change and its impact. This complements the sustainable development duty on plan-makers and the expectation that neighbourhood plans will contribute to the achievement of sustainable development. The NPPF has underlined (paragraph 93) that responding to climate change is central to the economic, social and environmental</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>regional level specifically aimed to counter a strictly localist approach of local authorities. They were concerned that local authority plans would only consider local resource management and the whole footprint approach would be lost. They considered it essential that the evidence base section of the draft NPPF was revised to include the concept of foot printing to acknowledge the burden of resource use within a local authority on other areas. They therefore recommended that local authorities 'save' relevant policies where this would plug a gap in their existing local planning framework until the next appropriate review date; and DCLG should maintain the regional evidence bases for local authorities to draw upon for local plans and cross boundary co-operation.</p> <p>English Heritage considered that the Environmental Report should have had greater regard for the historic environment. There may be potential harm to the heritage of the North West with the loss of Policy DP4 and its sequential approach to development prioritising the use of existing buildings, together with L4 on regional housing provision requiring maximising the re-use of vacant and underused buildings and EM1 on the Integrated Enhancement and Protection of the Region's Environmental Assets which underlined that loss or damage to assets should be avoided, unavoidable damage mitigated and compensated with no net loss in resources as a minimum requirement. Few local plans on the North</p>		<p>dimensions of sustainable development.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>West have policies that take these sub-national policies down to the local level.</p> <p>The North West Wildlife Trusts stated that the North West Regional Strategy contains many policies for the protection environment which will be lost on revocation, creating a policy vacuum. These policies will not be replaced by other equally strong environmental policies in the emerging NPPF or core strategies creating a policy vacuum. Further the Government should transpose broad environmental policy objectives for the natural environment (such as the 'step change increase biodiversity') into the NPPF.</p> <p>The Woodlands Trust cited the Lawton Report that planning for environmental conservation needs to operate at geographical scale greater than the local. Environmental issues such as water management and quality, biodiversity, forestry, green wedges and Green Belt demand to be addressed by strategic planning policies at a regional and sub regional level. The loss of regional strategies, regional evidence base and monitoring risks inconsistency and bad management of the environment emerging.</p> <p>CPRE believes that the revocation of the North West Regional Strategy without a robust NPPF in place and up to date local plans will have an adverse impact on the environment due to a policy vacuum. These adverse impacts will emerge from a loss of policies on</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>the regeneration of the region's conurbations, brownfield first development principle, protection for undesignated countryside and the removal on environmental policies in the Regional Strategy.</p> <p>Lancashire County Council pointed to a policy vacuum covering strategic planning issues caused by abolition of the Regional Strategy, local authorities are not at the right geographical scale to address strategic planning issues given the scale they operate at. To address this issue of scale with the introduction of the NPPF and abolition of the Regional Strategy, the Government should put transitional arrangements in place so the preparation of local plan are not held up due to any policy vacuum.</p> <p>Cumbria County Council stated that rather than the whole scale removal of policy it would be more appropriate to create arrangements whereby each local authority can be empowered to manage locally the removal of areas of Saved Structure Plan or Regional Strategy policies where they are considered to be adequately covered by new local plans, transitional arrangements of this nature should be put in place.</p>		
21	Reliance on the Duty to Co-operate	Natural England and the Environment Agency welcomed the emphasis given to cross boundary working which could potentially promote partnership working and offer a more strategic approach to spatial	Natural England Environment Agency, English Heritage , RSPB,	The Government recognises the importance of strategic planning. The NPPF, published in March 2012, makes clear that strategic

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>planning. However, both organisations commented that the Environmental Reports did not identify how the Duty to Co-operate would work in practice or replace the co-ordination provided by the regional strategies and the various working groups that existed within this structure. Natural England also considered that there was too much reliance on the assumption that local planning authorities would continue to work together on strategic issues under the Duty to Co-operate. It was noted that the Duty would not apply to private sector companies who provide public services such as water and sewerage, energy and telecommunications, many of which would have a key role to play in infrastructure planning. The Environment Agency stated that common intelligence and joint working arrangements were needed between partner local authorities and other key organisations to develop an integrated approach to planning.</p> <p>The Environment Agency referring to the Duty to Co-operate accepted that local authorities would work with adjacent councils, but not at a range of scales including a catchment scale. They considered that this was important as building development at the top of a catchment could increase run-off and cause flooding many miles downstream. They suggested that this is recognised so that the Duty to Co-operate could fully support strategic planning at a local level.</p>	<p>RenewableUK, TCPA, FOE, Clyde and Co LLP, Professor Alan Townsend, CPRE, Lancashire County Council, North West Coastal Forum, North West Environmental Link, Cumbria County Council.</p>	<p>priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans.</p> <p>Strategic matters such as housing, infrastructure and transport connections are vital to attract investment into an area and generate economic growth. However, for strategic planning to work on the ground, councils need to work together and with a range of bodies. In some cases, such as planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>Many local authorities are already working collaboratively to produce sound plans. The Duty to Co-operate formalises those arrangements by creating a statutory requirement to co-operate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>Natural England accepted that it was possible that cross-boundary impacts may be assessed between adjoining authorities, but were unclear how the cumulative impacts of multiple authorities' plans would be assessed to take into account issues occurring within broader environmental boundaries, such as water catchments. Both the Environment Agency and Natural England sought further clarification on mechanisms which could be employed to ensure that likely cumulative, in-combination and cross-boundary environmental impacts, are identified, assessed and monitored as part of the Local Plan process and Duty to Co-operate.</p> <p>English Heritage noted how critical it was that the Duty to Co-operate was taken forward by local authorities and public bodies to ensure that the strategic planning issues are successfully addressed, based on a shared understanding of local needs and the wider context. However, they saw a danger that the wider perspective gained through strategic planning would be lost. They suggested that the NPPF and any guidance issued to support it; may assist with this by encouraging strategic analysis through sub-national partnerships in appropriate circumstances.</p> <p>While the RSPB welcomed the strengthening of the Duty to Co-operate during its Parliamentary passage, they remained sceptical that the duty would deliver</p>		<p>and on an ongoing basis in relation to strategic cross-boundary issues in local plans.</p> <p>The Government recognises that the duty needs to be sufficiently robust to secure effective planning on cross-boundary issues, and the legislative requirement was strengthened during the development of the Localism Act, working with a broad range of external expert bodies. The stronger duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. This could be, for example, by way of 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 may mean that local authorities may not pass the examination process. This is a powerful sanction. Where</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>contentious forms of development where it is needed or effective strategic planning for the natural environment. They were concerned by the unsubstantiated assumption that the Duty to Co-operate would overcome the strategic vacuum left by the revocation of the Regional Strategies. They stated, as an example, that there was no recognition of the shortcomings caused by having multiple plans being developed over multiple time and spatial scales, and the difficulties this would cause in terms of assessing the cumulative impacts of development.</p> <p>RenewableUK also expressed the view that the Duty to Co-operate provisions in the Localism Act appear weak, with no clear means of ensuring that local authorities would co-operate productively. They considered that a lack of strategic action on mitigation and adaptation to climate change was likely to result in significant and unpredictable effects on biodiversity, flora and fauna. Other elements, such as population, human health etc. would also be adversely affected.</p> <p>The Town and Country Planning Association indicated that it had made clear that the Duty to Co-operate had a range of significant limitations - having a narrow remit, a retrospective sanction and no defined or specific outcomes. They considered that even where joint cooperation was enthusiastically entered into by local authorities the nature of cooperation would be on a smaller spatial scale and</p>		<p>local planning authorities have failed to co-operate on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such they may be found unsound.</p> <p>As a further check, the Localism Act and local plan regulations require local authorities to prepare a monitoring report to be published and made available at least once every 12 months. This includes a requirement to report action taken under the duty and these reports may also indicate where action has not been taken. This will ensure that local authorities are fully accountable to local communities about their performance under the Duty to Co-operate.</p> <p>In recognition of the breadth of bodies involved in effective strategic planning, the duty's requirements extend beyond local planning authorities and county councils to include a wide range of bodies that are critical to local plan</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>with a tighter remit and much less resource than the statutory Regional Strategy process. They considered that this may lead to increased environmental impacts and may limit effective responses on renewable energy and catchment scale or coastal flood risk.</p> <p>FOE considered that revocation would leave a gap in both planning policy on environmental issues and in a regional understanding of them. They considered that the Duty to Co-operate was unlikely to provide an effective response to the wider pattern of unsustainable pressures and growing regional inequalities in England. They suggested that the duty does not require co-operation on any specific issues. Issues which are by their nature spatial and cross-boundary, for example, river basin management, flood risk, green infrastructure, and transport, would suffer from the removal of the Regional Strategy. While, for example, river basin management plans are developed by the Environment Agency, local authorities and others, the context for local decision-making on planning applications will still lack regional spatial awareness of the larger than local and cumulative impacts of decisions. This will lead in many cases to poor planning, and increased negative environmental impacts. They were concerned that there are no sanctions for local authorities who fail to co-operate, while local authorities who have failed to persuade neighbouring authorities to co-operate would suffer if the Inspector judged their plan to be</p>		<p>making. The bodies, which are listed in local plan regulations, are:</p> <ul style="list-style-type: none"> • the Environment Agency; • the Historic Buildings and Monuments Commission for England; • Natural England; • the Mayor of London; • the Civil Aviation Authority; • the Homes and Communities Agency; • Primary Care Trusts; • Marine Management Organisation • Office for Rail Regulation • the Highways Agency; • Transport for London; • Integrated Transport Authorities; and • Highway authorities <p>The NPPF makes clear that local planning authorities should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As indicated above, the NPPF</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>unsound as a result.</p> <p>Clyde and Co LLP considered that it was not adequate to base the environmental assessment on the expectation that authorities would co-operate. It was therefore inappropriate for the assessment of likely effects, as encapsulated within the Environmental Reports, to be predicated on that basis.</p> <p>Another consultee (Professor Alan Townsend) suggested that a number of policy areas would be under threat from relying on the Duty to Co-operate, such as, climate change, river flooding, AONBs, reducing unnecessary travel, congestion and emissions, reducing deprivation and retailing.</p> <p>Lancashire County Council believe that with the abolition of the North West's Regional Strategy and the introduction of the NPPF local authorities including County Councils will need additional resources to undertake positive forms of strategic planning. For example funding of regional Aggregate Working Parties and recognition of the role of regional Technical Advisory Bodies for waste, for the Duty to Co-operate to be implemented effectively local authorities will require additional resources as illustrated.</p> <p>The North West Coastal Forum stated that the</p>		<p>states that local planning authorities should set out the strategic priorities for their area in their Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); 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.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>revocation of the North West Regional Strategy will have a negative impact on Shoreline Management Plans and related marine issues. The Forum makes the point that it is a voluntary organisation, needing resources to participate in partnership planning initiatives following the revocation of regional strategies and the introduction of the Duty to Co-operate and the NPPF. So that they are in a good position to promote marine and coastal management planning issues across the many coastal local authorities in the North West.</p> <p>North West Environmental Link stated that the Duty to Co-operate should be strengthened to refer to Local Nature Partnerships and that these bodies should be made statutory consultees on local plan preparation and major development applications which will have an impact on the Natural environment.</p> <p>Cumbria County Council stated that the Environmental Report places too much reliance on the NPPF to fill any policy vacuum which may result from the revocation of the North West Regional Strategy and any negative environmental impacts which may emerge. While some Regional Strategy and Saved Structure Plan policies share similarities with guidance contained in current PSSs, PPGs and future NPPF, however these documents may fail to adequately reflect the unique character of Cumbria and in particular the strategically important sustainability,</p>		

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>socio-economic and environmental considerations relevant to the County.</p> <p>Hence the proposed revocation will lead to the creation of a significant policy vacuum in respect of sustainability, social and economic development, transport and housing, along with natural environment; the retention of a number of Saved Structure Plan and Regional Strategy policies as identified by Cumbria County Council are essential for the sustainability and well being of Cumbria. Hence Cumbria believes that their removal of important strategic planning policies without appropriate replacements is likely to give rise to significant detrimental outcomes.</p>		
22	Individual Topics - Access to Data	Referring to the comment in the Environmental Reports that local authorities can continue to draw on available information, including data from partners, to address cross-boundary issues, it was not clear whether data previously collated as part of the Regional Strategy preparation process would remain up-to-date, or whether coordinated monitoring mechanisms would continue to exist in the future.	Town and Country Planning Association.	The NPPF, published in March 2012 makes it clear that local planning authorities may also continue to draw on evidence that informed the preparation of regional strategies to support Local Plan policies, supplemented as needed by up -to-date, robust local evidence. The NPPF (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
23	Individual Topics - Green Belt	<p>JC Consultants considered that the Environmental Report misrepresented the intended effect of revoking Regional Strategies by saying that it “will provide opportunities for securing environmental benefits because their revocation would remove threats to local environments” and that (through Green Belt policy) revocation “brings many environmental benefits including safeguarding the countryside and preventing urban sprawl.”</p> <p>CPRE commented on the statement in the Environmental Report that “the revocation of top-down housing targets will remove pressure to review Green Belt to accommodate growth” and that it is now up to local authorities to review their Green Belt boundaries. They felt the assertion that the Green Belt would be ‘safer’, was debatable. They took the view that this was based on the NPPF making clear that a key objective of the planning system is to increase significantly the delivery of new homes; and therefore the tenor of wider Government policy (for example the New Homes Bonus) is that local authorities will be under greater pressure than before to provide new housing. Local authorities would therefore be obliged to “maintain a rolling supply of deliverable sites sufficient to provide five years worth of housingthe supply should include an additional allowance of at least 20%...” (draft NPPF, clause109).</p> <p>Transport Activists’ Roundtable North West made</p>	JC Consultants, CPRE, Transport Activists’ Roundtable North West.	<p>The NPPF, published in March 2012, makes it clear that the Government attaches great importance to Green Belts, and overall that the planning system should recognise the intrinsic character and beauty of the countryside. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:</p> <ul style="list-style-type: none"> (i) to check the unrestricted sprawl of large built-up areas; (ii) to prevent neighbouring towns merging into one another; (iii) to assist in safeguarding the countryside from encroachment; (iv) to preserve the setting and special character of historic towns; and (v) to assist in urban regeneration, by encouraging the recycling of derelict and

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>the point that it was not the Regional Strategy process in the North West which exerted top down pressure to review the Green Belt, but the Government of the day which overturned the panel recommendation ceiling housing figures into minimum targets, placing development pressure on the Green Belt.</p> <p>CPRE stated that the threat to the Green Belt would not be reduced due to the revocation of the Regional Strategy. In their opinion the Regional Strategy posed little threat but development pressures remained and national policy as expressed in the NPPF could undermine the integrity of the Green Belt.</p>		<p>other urban land.</p> <p>The NPPF states that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.</p> <p>If proposing a new Green Belt, local planning authorities should: demonstrate why normal planning and development management policies would not be adequate; set out whether any major</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				<p>changes in circumstances have made the adoption of this exceptional measure necessary; show what the consequences of the proposal would be for sustainable development; demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and show how the Green Belt would meet the other objectives of the NPPF .</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. The NPPF also states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				<p>plan period.</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p>Additional policies are set out to be applied when defining boundaries. Policies for the development of a village in a Green Belt are also included. The NPPF makes clear, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				<p>planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.</p> <p>The NPPF also states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Limited exceptions to this are set out in the NPPF, together with other forms of development that are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt.</p> <p>The NPPF also includes specific policy on renewable energy projects and Community Forests in the Green Belt.</p> <p>The housing policies in the NPPF clearly state that when local</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				<p>planning authorities are ensuring their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, this is consistent with the policies set out in the NPPF, including policies on the protection of Green Belts.</p> <p>In addition, the presumption in favour of sustainable development makes a clear reference to Green Belts when it lists policies in the NPPF that indicate that development should be restricted.</p>
24	Individual Topics - Gypsies and Travellers	<p>The Garden Court Chambers Gypsy & Traveller Team considered that the revocation of Regional Strategies would have a detrimental effect upon the provision of sites for Gypsies and Travellers. They considered that the view in the Environmental Reports that sufficient sites would be delivered by local authorities without regional or national supervision was misconceived. They were therefore disappointed that consideration had not been given to the alternative option of retaining those regional policies relating to the provision of sites for Gypsies and Travellers. Community Law Partnership supported</p>	<p>The Garden Court Chambers Gypsy & Traveller Team, Community Law Partnership, Friends, Families and Travellers, National Federation of Gypsy Liaison Groups.</p>	<p>It is the Government's view that local authorities are best placed to understand the needs of their communities. The Government has produced new planning policy for traveller sites that reflects this. The policy published in March 2012¹ makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life</p>

¹ <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>these comments and added that revocation would lead to a decrease in the provision of new sites which would have an inevitable result in the numbers of Gypsies and Travellers on unauthorised encampments and unauthorised developments increasing. Friends, Families and Travellers also supported these comments and stated that they objected most strongly to the proposals to abolish Regional Strategies and, at the very least, considered that an option which retains a regional perspective should be retained for the provision of Gypsy and Traveller sites.</p> <p>The National Federation of Gypsy Liaison Groups also disagreed with the conclusions in the Environmental Reports that revocation was unlikely to have any significant environmental effect on human health, population, cultural heritage or the historic environment. The revocation of policies relating to the provision for Gypsies, Travellers and Travelling Showpeople, would have a significant impact as a direct result of the fact that without a regional framework, local authorities were likely to, and already were, including reduced pitch numbers in their Development Plan Documents. The resulting lack of suitable accommodation was directly related to poor health and lower life expectancy, difficulty in accessing education opportunities, which contributed to poor living conditions, for example, on unauthorised sites. Unauthorised sites also impacted on the</p>		<p>while respecting the interests of the settled community.</p> <p>Local planning authorities when preparing their Local Plans should set pitch targets for gypsies and travellers and plot targets for travelling show people which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. The policy makes it clear that local authorities should set their targets based on robust evidence of need that will be tested at the Local Plan examination.</p> <p>This includes:</p> <p>(i) identifying and updating annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;</p> <p>(ii) identifying a supply of specific, developable sites or broad locations for growth, for years six</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		environment, for example if they were not suitably located there could be local impacts on the landscape.		<p>to ten and, where possible, for years 11-15;</p> <p>(iii) considering the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.</p> <p>The Duty to Co-operate will ensure that local authorities work together constructively, actively and on an ongoing basis in relation to these cross boundary matters in local plans.</p> <p>The proposal to abolish Regional Strategies is part of a wider package of measures that will work alongside the reformed and decentralised planning system and are aimed at securing fair and effective provision of authorised sites for travellers. This includes the new traveller policy, Traveller Pitch Funding, the New Homes Bonus, reforms to enforcement</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				measures to tackle unauthorised sites (via the Localism Act); improved protection from eviction for local authority traveller sites (via application of the Mobile Homes Act) and training for local authority councillors on their leadership role in site provision.
25	Individual Topics –Housing Supply	<p>The Town and Country Planning Association referred to the statement in the Environmental Report that under the regional strategies the overall direction was expected to be a widening gap between housing provision in the strategy and the level of need. They considered that the assertion that local authorities planning for housing to reflect "the needs of their communities" would achieve this level was completely unsupported. The text asserts that "where drivers of growth are local, decisions should be made locally", but the new system failed to identify any mechanisms equivalent to the national growth areas or new growth points for accommodating in-migrants. They considered this to be a key issue in the region, the most economically buoyant in the country outside London.</p> <p>CPRE believed that the Government's continued policy of not allowing local authorities to include windfalls in their housing allowance (except in very prescribed circumstances) would, in practice, lead to an inevitable allocation of more greenfield sites.</p>	Town and Country Planning Association, CPRE.	<p>The NPPF, published in March 2012, and the Duty to Co-operate address this issue. The NPPF makes clear that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. These strategic priorities include the need to develop strategic policies to deliver the homes and jobs needed in the area.</p> <p>The NPPF states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				<p>capacity or because to do so would cause significant harm to the principles and policies of the NPPF. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.</p> <p>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.</p> <p>The NPPF states that Local planning authorities may make an allowance for windfall sites in their five-year supply if they have compelling evidence that such</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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				<p>sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. This policy, together with the approach to the use of brownfield land and other policies aimed at the protection and enhancement of the environment, aims to ensure that housing development is located in a way that is consistent with the principles of sustainable development.</p>
26	Individual Topics - Waste	<p>The Environment Agency commented that the assessment of waste policies was quite comprehensive, but they were concerned with the second sentence in the last paragraph on page 61 which stated that, "local waste authorities already work together, and with other bodies, on strategic issues that cross local authority boundaries and may work together to produce joint waste plans if they wish". As waste plans are currently produced at county and unitary level, they questioned whether the Government was suggesting wider than county waste</p>	Environment Agency, Woodland Trust.	<p>The National Planning Policy Framework was published in March 2012. Paragraph 153 of the framework makes clear the expectation that local planning authorities should produce a local plan for the area, whilst Section 17 of the Planning and Compulsory Purchase Act 2004 makes it clear that two or more local planning authorities may agree to prepare</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>plans. If that was the case, they recommended that further details are provided on how this will be applied.</p> <p>The Woodland Trust commented that the draft NPPF had stated that waste would be considered in a National Waste Management Plan. No date has yet to be given for the publication of this plan. Therefore there will be a lack of environmental protection in the interim which has not been accounted for.</p>		<p>one or more local development documents. This allows unitary authorities and county councils to work together if they wish. However such plans must still meet the legal and procedural requirements, including the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the NPPF.</p>
27	Individual Topics - Biodiversity	<p>On the basis of the content of the consultation draft of the NPPF, Natural England disagreed with the statement in Section 1.2 of the Environmental Reports that the NPPF “maintains protection of the Green Belt, Areas of Outstanding Natural Beauty, National Parks, Sites of Special Scientific Interest and other environmental designations which protect landscape character, stop unsustainable urban sprawl and preserve wildlife”.</p> <p>The Woodland Trust highlighted how in ‘Making Space for Nature’ Lawton set out that planning at different geographical scales was vital to inform conservation decisions. It also sets out that planning is pivotal in maximising the contributions of the existing network and ensuring that new components are sited in effective locations. The Trust believed that ‘Nature Improvement Areas’ recommended by Lawton would be very difficult to implement without the Regional Strategy in place.</p>	Natural England, Woodland Trust, Scottish Natural Heritage, the Environment Agency, North West Wildlife Trusts.	<p>The NPPF was published in March 2012. The finalised version makes it clear that the planning system should protect and enhance valued landscapes, minimise impacts on biodiversity, provide net gains in biodiversity where possible, and contribute to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are resilient to current and future pressures.</p> <p>The NPPF also states that local plans contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

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		<p>Scottish Natural Heritage suggested that the Environmental Reports should address the protection and enhancement of networks to allow species dispersal throughout Britain. They considered that value could be added to the Environmental Reports if they identified a framework for establishing networks of green infrastructure across all the regions of England, with the potential to link with Wales and Scotland, rather than just to propose partnerships across local authority boundaries.</p> <p>The Environment Agency suggested that the significance of new emerging initiatives set out in the Natural Environment White Paper, such as Local Nature Partnerships (LNPs) and Nature Improvement Areas (NIAs) should be highlighted. They pointed out that the overall purpose of LNPs is to bring a diverse range of individuals, businesses and organisations together at a local level to create a vision and plan of action for how the natural environment can be taken into account in decision making. In the absence of regional policies, LNPs and NIAs could offer a good opportunity to strengthen local action, enable local leadership and operate across administrative boundaries.</p> <p>North West Wildlife Trusts stated that the revocation of the North West Regional Strategy will have a negative impact on biodiversity conservation and</p>		<p>Areas where they have been identified.</p> <p>The NPPF also asks that, in order to minimise impacts on biodiversity and geodiversity, planning policies should: plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.</p> <p>The NPPF also states that local planning authorities should work with Local Nature Partnerships to assess existing and potential components of ecological networks.</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		action within the region. The Environmental Report in the Trust's opinion takes a complacent view that statutorily protected sites will still have protection and that national planning policy on biodiversity will still apply. This is based on a generous reading of the draft NPPF where it doesn't appear to weaken national environmental protection policies.		
28	Individual Topics - Renewable Energy	<p>RenewableUK were concerned that the SEA process failed to fully account for the impact that the removal of the Regional Strategies would have on the ability of local authorities to plan for renewable energy infrastructure, and the corresponding ability of the UK to meet its target of generating 15% of all energy from renewables by 2020. Overall, they suggested that there will be significant environmental effects of revoking the Regional Strategies, if guidance and support for renewable energy development was not strengthened. Under existing proposals, the key mechanisms for strategic planning and renewable energy would be lost.</p> <p>Lancashire County Council identified two policies from the North West's Regional Strategy, EM17 and EM18, which they argued should be retained to prevent a shortfall of renewable energy generation.</p>	RenewableUK, Lancashire County Council.	<p>The NPPF, published in March 2012, includes as one of the core land-use planning principles that planning should support the transition to a low carbon future in a changing climate, including to "....encourage the use of renewable resources (for example, by the development of renewable energy)". The NPPF makes clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p> <p>The NPPF contains a number of</p>

Appendix F: SEA of the Revocation of the North West of England Regional Strategy

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>polices aimed at encouraging the development of renewable energy development including that local planning authorities should : have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts; consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and in line with the objectives and provisions of the Climate Change Act 2008.</p> <p>In addition, NPPF policies on strategic planning for infrastructure</p>

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				include the need to plan for energy infrastructure including heat.
29	Individual Topics - Transport	FOE considered that the removal of the Regional Strategies would in some cases have a negative environmental effect as their transport policies were stronger than those presented in the draft NPPF.	FOE	The NPPF, published in March 2012, includes a number of core planning principles. These include the need to actively manage patterns of growth 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. The NPPF makes it clear that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development

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				<p>which, where reasonable to do so, facilitates the use of sustainable modes of transport. The NPPF also states that local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.</p> <p>The NPPF is clear that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also says that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey</p>

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				lengths for employment, shopping, leisure, education and other activities.
30	Individual Topics Brownfield	CPRE's position was that revocation, combined with the Government's wider reforms to the planning system, had seen the abandonment of policies aimed at making re-use of previously developed land a priority. They submitted that this was likely to lead to increased urban sprawl and environmental degradation. They also highlighted research by CPRE showing that very substantial amounts of brownfield land remained in the region and continues to be produced. They felt that the goal of urban regeneration would suffer significantly through the abandonment of this 'brownfield first' policy - with negative consequences for the environment.	CPRE.	The NPPF was published in March 2012. One of the 12 planning principles set out in the NPPF is that planning should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. The NPPF makes it clear that local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land (paragraph 111).
31	Flooding and marine planning, water management	The Environment Agency welcomed the recognition that local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' (LLFA) duties on flood risk management and the complementary duty in the Floods and Water Management Act on bodies to cooperate. The provision of technical guidance, including on flood and coastal erosion risk, to complement the NPPF would support LLFAs and help achieve the Duty to Co-operate.	Environment Agency, North West Coastal Forum, Countryside Council for Wales.	In March 2012 the Government published the NPPF which contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The NPPF 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:

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		<p>The North West Coastal Forum considers that the revocation of the North West Regional Strategy will inhibit the delivery of Shore Line Management Plans because of the policy vacuum created. They identify Policies RDF3 and EMR6 which should be retained because they cover marine issues such as Shoreline Management Plans. Without Policy RDF3, a policy vacuum on the revocation of the North West Regional Strategy would emerge.</p> <p>The Country Council for Wales notes that development in the North West is dependent on water resources originating in Wales, in many cases, are subject to protection under European environmental legislation and may be at 'abstraction limit'. The dispersal of responsibility for considering the environmental effects on fundamental resources from a strategic to local level might compromise the effectiveness of assessments process and disable the 'prudent use of natural resources'.</p> <p>The 'environmental' footprint of the North West conurbation extends well beyond its administrative boundaries and in terms of 'sustainability', consideration must be given to the environmental and ecological processes and services which serve the regions and or which may be compromised by a lack of strategic planning.</p>		<p>the provision of infrastructure for flood risk and coastal change management.</p> <p>The core planning principles recognise that planning should support the transition to a low future in a changing climate, taking full account of flood risk and coastal change. The NPPF also asks that local planning authorities should set out the strategic priorities for their area in their Local Plan, and that this should include strategic policies to deliver the provision of infrastructure for coastal change management. In coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes. Local planning authorities should reduce risk from coastal change by avoiding inappropriate development in</p>

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				<p>vulnerable areas or adding to the Coastal Change Management Area is not impacted by coastal change by limiting the planned life-time of the proposed development through temporary permission and restoration conditions.</p> <p>Further the NPPF also clearly states that planning policies decisions must reflect and where appropriate promote relevant EU obligations – which include, for example, obligations under the Water Framework Directive.</p>