



Department for
Communities and
Local Government

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

Post Adoption Statement

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Summary of Key Facts

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Address where documents can be consulted:	Eland House Bressenden Place London SW1E 5DU

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Preface

This document is the Post Adoption Statement for the plan to revoke the Regional Strategy for the North West (“the Plan to Revoke”). The Post Adoption Statement is a requirement¹ of the Strategic Environmental Assessment process to which the Plan to Revoke the Regional Strategy has been subject. Strategic Environmental Assessment is an assessment process that supports decision making by identifying, characterising and evaluating the likely significant effects of a plan or programme on the environment and determining how any adverse effects may be mitigated or where any beneficial effects may be enhanced.

The Regional Strategy being revoked comprises the regional spatial strategy for the region (published by the then Secretary of State in 2008 as the North West of England Plan - Regional Spatial Strategy to 2021), and the regional economic strategy for the region (published by the Northwest Regional Development Agency in 2006 as the Northwest Regional Economic Strategy 2006).

The Post Adoption Statement is being published in parallel with the laying of The Regional Strategy for the North West (Revocation) Order 2013 (S.I. 2013/934)², which will come into force on 20 May 2013.

¹ Article 9 of the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and Part 4 of The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004/1633).

² The Order also revokes all directions preserving policies contained in saved structure plans in the region to which the Regional Strategy relates.

Introduction

1.1 Regional Strategies

The policy to abolish regional strategies fits into the Government's overall public commitment to deliver a fundamental shift of power from Westminster. For planning, this has meant radically reforming the planning system to give local councils and the communities that they represent more control in shaping the places in which they live. The policy to revoke regional strategies is a key element of the Government's decentralisation agenda.

The Coalition Agreement makes clear the Government's priority to promote decentralisation and democratic engagement and to end the era of top-down government by giving new powers to local councils, communities, neighbourhoods and individuals. Regional strategies imposed development upon local communities; the Government wants to return decision-making powers on housing and planning to local councils.

Currently, the North West Regional Strategy provides the statutory regional framework for development and investment across the region, including setting targets for housing delivery that apply to constituent local councils.

Since their creation by the Planning and Compulsory Purchase Act 2004, regional strategies, sitting alongside local plans prepared by local authorities, form the statutory development plan for an area. This means that the North West Regional Strategy sets the framework for local plan-making and local councils in the region must ensure that their local plan is in general conformity with the Strategy at the time their local plan is submitted for examination. It also means that planning applications should be determined in accordance with the development plan (which includes the relevant regional strategy in the local planning authority's region) unless material considerations indicate otherwise.

In order to localise the planning system, section 109 of the Localism Act provides for the abolition of the regional planning tier as a two-stage process. The first stage, to remove the framework of regional planning, took effect when the Act received Royal Assent on 15 November 2011. This prevents further regional strategies from being created or revised. Section 109 also removed the responsible regional authorities. The second stage is the proposal to abolish each of the existing regional strategies outside London by secondary legislation, subject to the outcomes of the environmental assessment process.

The revocation of the North West Regional Strategy would leave a more localist planning system comprising of local and where adopted neighbourhood plans and give local councils responsibility for strategic planning. It makes the local plan the keystone of the planning system,

becoming the vehicle for strategic planning and the framework for neighbourhood plans.

On revocation of the North West Regional Strategy (and any saved structure plan policies), the statutory development plan would comprise any saved local plan policies and adopted development plan documents. The statutory development plan may in future include any adopted neighbourhood plans that are prepared under the Planning and Compulsory Purchase Act 2004, inserted by the Localism Act 2011.

In developing local plans, local planning authorities must have regard to national policies and advice contained in guidance issued by the Secretary of State:

- The **National Planning Policy Framework** was published in March 2012. This sets out the Government's planning policies for England and provides a framework within which local communities can produce their own distinctive local and neighbourhood plans reflective of the needs and priorities of their communities. Accordingly, local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction. It includes Government's expectations for planning strategically across local boundaries and within that the role of the planning system in protecting the environment.
- The **planning policy for traveller sites** which was published in March 2012.
- The **planning policy statement 10: Planning for Sustainable Waste Management (Planning Policy Statements 10)** until it is replaced with the national waste planning policy, to be published as part of the National Waste Management Plan for England.

In addition, local councils will need to comply with existing national and European legislation in preparing their plans. Importantly, councils also need to comply with the duty to co-operate introduced in section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by the Localism Act 2011) in order for their plan to be found sound at examination.

1.2 The Plan to Revoke the North West Regional Strategy

The North West Regional Strategy combines the contents of the regional spatial strategy for the region and the regional economic strategy for the region.

The regional spatial strategy (published as the North West of England Regional Spatial Strategy to 2021 in September 2008) was introduced under the Planning and Compulsory Purchase Act 2004 and, in accordance with Government policy at the time, provides a broad development strategy for the

region for 15-20 years. In particular, it has sought to focus development towards the two regional centres of Manchester and Liverpool, promoting sustainable communities and economic development with complementary policies providing for the protection of the environment and for the mitigation and adaptation to the effects of climate change. A key element of the Strategy is the focus upon the sub-regions. Four sub-regions are identified and the document provides specific policy for each.

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

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

Revocation of the North West Regional Strategy (and the 35 saved structure plan policies) would leave the statutory development plan as comprising of any saved local plan policies and adopted development plan documents. Approximately 17 of the 40 local planning authorities in the North West have adopted development plan documents under the Planning and Compulsory Purchase Act 2004. The remaining 23 local planning authorities in the North West (this number does not account for the subsequent establishment of unitary authorities for Cheshire West and Chester and East Cheshire) who were yet to adopt a development plan document under the Planning and Compulsory Purchase Act 2004 have local plans and saved structure plan policies, developed under the earlier requirements of the Town and Country Planning Act 1990. These authorities are more likely to be affected by the revocation of the Regional Strategy as some, if not all, will need to review and update their local plan to reflect National Planning Policy Framework policies and the objectively assessed needs of the local community.

Once the regional strategy is revoked, local councils should, in line with the presumption in favour of sustainable development set out in the National Planning Policy Framework, and in accordance with section 38(6) of the

Planning and Compulsory Purchase Act 2004, approve development that accords with the local plan unless material considerations indicate otherwise. Where that plan is out of date, councils must, unless material considerations indicate otherwise, grant planning permission for development that is sustainable without delay. Out of date local plans will leave councils vulnerable to speculative development; the Government is encouraging local councils to put in place local plans as soon as possible.

In the absence of the North West Regional Strategy, strategic and cross authority working will be driven by local councils who must now show the leadership required to work across boundaries to plan for strategic matters. The new duty to co-operate requires local councils and other public bodies to work together actively, constructively and on an ongoing basis when planning for strategic matters in local and marine plans. This might involve both formal arrangements, such as joint plan-making or joint working partnerships, and less formal processes of close and ongoing dialogue to work through planning for strategic matters.

In the North West region, there are already good examples of joint working through a variety of legislative and non statutory means.

- In **Central Lancashire**, Preston City Council, Chorley Borough Council and South Ribble Borough Council, using the powers in the Planning and Compulsory Purchase Act 2004, produced a joint core strategy which was adopted in July 2012.
- The **Greater Manchester Combined Authority** came into being in April 2011. It complements the Greater Manchester Local Enterprise Partnership and ensures a coordinated approach is delivered in the 10 local authorities that make up the Manchester City Region. Under the arrangements a new body, Transport for Greater Manchester, has been established to co-ordinate transport across the city region. Comprising one member from each local authority Greater Manchester Combined Authority builds upon the partnership working already established through Association of Greater Manchester Authorities. The Greater Manchester Combined Authority aims to improve the effectiveness and efficiency of transport services, economic development and regeneration.
- **Warrington, St Helens and Halton Councils** agreed to undertake a collaborative cross boundary Water Cycle Study. It aims to provide strategic level advice on water infrastructure and environmental capacity to inform the development of the Local Development Frameworks and associated growth strategies.

In addition, there are non-statutory Local Enterprise Partnerships (of which there are 5 in the region). This combination of measures aims to ensure that strategic planning operates effectively in the absence of the Regional Strategies.

1.3 Applying Strategic Environmental Assessment to the Revocation of the Regional Strategies

The Plan for the purposes of the Strategic Environmental Assessment is the Plan is to Revoke the North West Regional Strategy (the North West Plan and Regional Economic Strategy) and to leave in place a more localist planning system, together with incentives such as the New Homes Bonus, to encourage local authorities and communities to increase their aspirations for housing and economic growth. The Plan to Revoke is set out in more detail in Chapter 2 of the updated Environmental Report published in December 2012.

As part of its stated commitment to protecting the environment, the Government initially carried out environmental assessments of the revocation of the Regional Strategies. These initial assessments were undertaken to be compliant with the procedure set out in the Strategic Environmental Assessment Directive). A 12 week consultation on the initial Environmental Reports of these assessments commenced on 20 October 2011 and ended on 20 January 2012.

Since the completion of the consultation, the Government has published the final version of the National Planning Policy Framework and a planning policy on Travellers sites, and has commenced the duty to co-operate provided for in the Localism Act. In addition, in a judgement by the Court of Justice of the European Union in the case of *Bruxelles*, the Court held that 'in as much as the repeal of a plan may modify the state of the environment as examined at the time of adoption, it must be taken into consideration with a view to subsequent effects that it might have on the environment'. The Government therefore decided to use the additional information gained through the public consultation process, as well as the developments in policy and recent case law, to update and build on the assessments which were described in the previous Environmental Reports.

AMEC Environment and Infrastructure Ltd were commissioned to carry out the further assessment and to prepare updated Environmental Reports. A public consultation exercise undertaken on the updated Environmental Report for the North West ran from 17 December 2012 until 18 February 2013. Updating of, and consultation on, the Environmental Reports for the other seven regions has been staggered. The North West Regional Strategy is the last of the eight to have completed consultation on the updated Environmental Report. This has enabled the Secretary of State to understand the environmental effects of revoking the regional strategy and reasonable alternatives to revocation, including partial revocation, and to consider the views of the statutory bodies and the public who responded to two public consultations.

In accordance with Article 8 of the Strategic Environmental Assessment Directive, the Government has taken into account findings of the two Environmental Reports (on the revocation of the Regional Strategy and the reasonable alternatives assessed as part of that process) and the consultation

responses to those reports in coming to its decision to revoke the Regional Strategy.

1.4 Purpose of the Post Adoption Statement

Article 9 of the Strategic Environmental Assessment Directive requires that when a plan or programme is adopted (in this case, the Plan to Revoke the Regional Strategy), the consultation bodies, the public and any other Member States consulted on the Environmental Report are informed and the following specific information is made available:

- the plan as adopted;
- a statement summarising:
 - **(i)** how environmental considerations have been integrated into the Plan to Revoke the North West Regional Strategy;
 - **(ii)** how the Environmental Report has been taken into account;
 - **(iii)** how opinions expressed in response to the consultation on the Environmental Report have been taken into account;
 - **(iv)** the reasons for choosing the Plan to Revoke the North West Regional Strategy, as adopted, in the light of the other reasonable alternatives dealt with; and
 - **(v)** the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan to Revoke the North West Regional Strategy.

The purpose of this Post Adoption Statement is to provide the specific information outlined under each of the points listed (i) to (v) above and which is presented in the following chapters of this statement.

How environmental considerations have been integrated into the plan

2.1 Environmental Considerations in the Plan to Revoke the North West Regional Strategy

Environmental considerations have been integral to the Plan to Revoke the North West Regional Strategy. Policy changes developed alongside the Plan to Revoke provide protections in the context of revocation. For example, within the National Planning Policy Framework, sustainable development is described as a 'golden thread' running through both plan making and decision making. The National Planning Policy Framework makes clear that the planning system should contribute to and enhance the natural environment, including by protecting and enhancing valued landscapes, minimising impacts on biodiversity and providing net gains in biodiversity where possible. The Framework underlines that pursuing sustainable development means moving from a net loss of biodiversity to achieving net gains for nature.

During its development, the National Planning Policy Framework was also subject to consultation, with many of the responses focusing on aspects of environmental protection and enhancement.

Environmental considerations are also key to other ongoing regional planning processes identified in the region. For example, water companies and their respective Water Resource Management Plans which set out how future demand for water resources will be met. Similarly, River Basin Management Plans for the region which identify the pressures that the water environment faces and include action plans requiring cross boundary co-operation and input from a range of organisations. The duty to co-operate came into force on 15 November 2011. This statutory duty, inserted by the Localism Act 2011 into the Planning and Compulsory Purchase Act 2004, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters.

The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely planned, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues.

2.2 Environmental Considerations in the Strategic Environmental Assessment

To provide the context for the assessment, and in compliance with the Strategic Environmental Assessment Directive, the relevant aspects of the current state of the environment and its evolution without the Plan to Revoke were considered, along with the environmental characteristics likely to be significantly affected. Key environmental considerations identified from this process included:

- The region has the largest number of Sites of Special Scientific Interests of all regions in England with 90% of them in favourable or recovering condition. The region also includes a significant area of European protected sites. Indices for all native birds, woodland birds, sea birds and those migrating indices are increasing. However, declines have been reported for breeding birds in upland heathland, furthermore, these species are more likely to be affected by climate change.
- Issues associated with population increase; it is projected that by 2031 the North West will have an additional 842,700 people, which equates to a 12.3% proportional increase since 2006. Population growth will be accompanied by changing age-structure and the age group expected to grow most in size is expected to be persons aged 65 or over. Housing completions have failed to keep pace with housing demand.
- Changes in the employment base; the North West was the largest contributor to total manufacturing GVA in England in 1989, however the GVA share in the North West has largely declined since then and the regional economy has shifted away from manufacturing industries to more service based sectors largely in line with the national average.
- Health and life expectancy; in the North West, the average life expectancy at birth is lower than the English average. The most common cause of death in North West is coronary heart disease. Mortality rates related to coronary heart disease are reducing, however the North West continues to record higher rates of mortality from heart disease than the national average.
- Soils; the North West continues to have a high proportion of previously developed (brownfield land) when compared with the national average.
- Water quality in the North West; this is improving and is likely to continue to improve to meet regulatory targets. Water resource

availability is forecast to decrease without appropriate investment in infrastructure.

- Air quality, especially on main transport routes; 27 local authorities in the North West have designated Air Quality Management Areas within their boundaries, and these are mainly found around busy roads within the region. The air quality is of a higher quality in the northern part of the region (Cumbria) and in other rural areas of the region.
- Flooding and climate change: it is estimated that approximately 55,000 properties could be at risk from flooding extending to 75,000 by 2100. By 2080, average summer temperatures in the North West will increase by 3.7C whilst summer rainfall will decrease by 21%. Meanwhile average winter rainfall will increase by 16%, sea levels will rise by 30 cm and there will be more extreme weather events.
- Renewable energy generation; in 2010 the biggest generator of renewable energy in the region was from wind and wave which accounted for more than half the total installed capacity within the region.
- Waste generation and recycling; the North West produced more residual waste than any other region, well above the average for England and the recycling rate for the region remains below the average for England.
- The use of aggregates; sales have declined in the region since 2006 possibly in response to the downturn in the economy.
- Historic assets; the region possesses a relatively high proportion of statutorily protected industrial and commercial buildings compared to most of the other regions. Many of these buildings are subject to development pressure.
- Landscape; the region contains a higher proportion of protected landscape than the average for England. Landscape character is diverging from the baseline largely around major centres of population and transport corridors.

These factors were then reflected in the range of topics that were considered in detail by the Strategic Environmental Assessment, as are outlined in **Table 2.1**.

Table 2.1 Environmental topics which were considered in the Strategic Environmental Assessment

Topics included in the Strategic Environmental Assessment of the revocation of regional strategies
Biodiversity and Nature Conservation (which includes flora and fauna, and the functioning of ecosystems)
Population (including socio-economic effects and accessibility)
Human Health
Soil and Geology (including land use, important geological sites, and the contamination of soils)
Water Quality and Resources (including inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality)
Air Quality
Climate Change (including greenhouse gas emissions, predicted effects of climate change such as flooding and the ability to adapt)
Material Assets (including waste management and minerals)
Cultural Heritage (including architectural and archaeological heritage)
Landscape and Townscape

All the environmental topics listed in the Strategic Environmental Assessment Directive and the Environmental Assessment of Plans and Programmes Regulations 2004 were found to be relevant for the assessment of the revocation plan.

In line with the requirements of the Directive and Regulations and the guidance in the Office of the Deputy Prime Minister (now Department for Communities and Local Government) Practical Guide to the Strategic Environmental Assessment Directive, the assessment process predicted the significant environmental effects of the Plan to Revoke the North West Regional Strategy against all of the topic areas listed in **Table 2.1**. This was done by identifying the likely changes to the baseline conditions as a result of the implementing the proposed plan (or reasonable alternative). These changes are described (where possible) in terms of their geographic scale, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, likely or unlikely, frequent or rare. Where numerical information was not available, the assessment was based on professional judgement and with reference to relevant legislation, regulations and policy.

Where it was identified that revocation of a Regional Strategy policy would have an effect on the environment and that this would have a consequence for Local Plan policies and/or local areas, the assessment examined those effects in more detail. Comparisons were made between the policies in the North West Plan on housing allocations, allocations of pitches for gypsies, travellers and travelling showpeople, employment (both jobs and employment land), renewable energy, land won aggregates and rock, waste apportionment and policies on the Cambridge green belt and the heritage environment with the equivalent policies in local plans and /or core strategies in the region. This analysis was set out in Appendix C of the updated Environmental Report and was reflected, where relevant in the assessment of individual plan policies in Appendix D of the updated Environmental Report.

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted for a period of five weeks on the scope and level of detail to be included in the Environmental Reports in May 2011. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries.

Both initial and updated Environmental Reports (issued in October 2011 and in December 2012) documented the findings of the assessment, outlining where any likely significant effects were identified and proposing where appropriate mitigation measures. These findings have then been taken into account during the preparation of the Plan to Revoke and before the final decision was taken to adopt the Plan.

How the Environmental Reports have been taken into account

The Environmental Reports and Plan to Revoke the North West Regional Strategy have developed in tandem. **Table 3.1** details key stages of the Strategic Environmental Assessment and its relationship with the development of the Plan to Revoke the Regional Strategy.

Table 3.1 Key stages in the development of the Environmental Report and its relationship with the Plan to Revoke the Regional Strategy

Strategic Environmental Assessment	Plan to Revoke	Relationship
Scoping		
The scoping stage of the Strategic Environmental Assessment identified other relevant plans, programmes and environmental protection objectives which could be affected by, or which could affect the Plan to Revoke the Regional Strategy.	The development of the National Planning Policy Framework and its adoption in March 2012 removed the need to reference the planning policy statements (listed in Annex 3 of the National Planning Policy Framework, 'Documents replaced by this Framework')	The links between the other relevant plans, programmes, policies and strategies that were applicable to the Plan to Revoke were outlined. These included plans and programmes at an international, European or national level covering a variety of topics (including spatial and resource planning).
Assessment		
Initial assessment of the impact of revocation of the regional strategies undertaken before the National Planning Policy Framework was adopted resulting in assumptions over the final contents of the National Planning Policy	The Government published the National Planning Policy Framework in March 2012. The analysis presented in the updated Environmental Report takes account of the policies set out in the Framework.	Assumptions that underpin the National Planning Policy Framework are clarified in the updated assessment, documented in the updated Environmental Report (published in December 2012).

Strategic Environmental Assessment	Plan to Revoke	Relationship
Framework and its influence.		
Initial assessment of the impact of the duty to co-operate took place prior to the commencement of the new duty and required outline of assumptions with regard to operation.	The provisions which create a new duty to co-operate were commenced when the Localism Act received Royal Assent on the 15th November 2011. They require local planning authorities to work collaboratively to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.	Commencement of the duty to co-operate provided greater certainty to the assessment, reflected in updated assessment, documented in the updated Environmental Report (published in December 2012).
Assessment considered the effects of revocation on local planning authorities and provided analysis of local plans highlighting where plans were out of date or silent on key planning policy matters.	The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'.	The Strategic Environmental Assessment provided up to date summary of current position on the adoption and status of local plans, with indication of the number of authorities who needed to take action within each region regarding the revision and update of local plan policies.
Reporting		
The key findings of the Environmental Report are presented along with the Government's responses in Table 4.2 below. The extent to which the findings have informed the final Plan to Revoke is detailed in Chapter 5 of this Post Adoption Statement.		
Consultation		
The consultation responses to the consultation on the initial and updated Environmental Reports are presented along with the Government's responses in Tables 4.1 and 4.2 in Chapter 4. The extent to which the consultation has informed the final Plan to Revoke is detailed in Chapter 5 of this Post		

Strategic Environmental Assessment	Plan to Revoke	Relationship
Adoption Statement.		
Monitoring		
Proposals for monitoring	Section 5 'Put Communities in charge of planning' of the Department for Communities and Local Government business plan 2012 – 2015 includes specific monitoring actions for the Department regarding the local plan making progress by authorities and on compliance with the duty to co-operate.	The Department for Communities and Local Government is able to jointly meet requirements for monitoring environmental effects of the implementation of the Plan to Revoke with business plan commitments and by undertaking periodic review of data for specific monitoring information.

Key findings of the updated Environmental Report are summarised in **Table 3.2** together with the Government response and how these have been taken into account in the Plan to Revoke.

Table 3.2 Key findings of the updated Environmental Report

No	Key Environmental Report findings	Response
1.	Significant positive environmental effects will occur from the revocation of the North West of England Regional Strategy although these will be relatively similar to those if the strategy were to be retained.	The Government notes the findings of the updated Environmental Report and considers that the Plan to Revoke is largely positive in its effect although it is acknowledged that these effects are largely similar to those of retention.
2.	Revocation of the Regional Strategy could lead to significant negative effects in relation to material assets which would result from	The Government notes the findings of the updated Environmental Report and that similar negative effects on material assets due to retention of the North West Regional Strategy could occur due to development pressure created by growth.

No	Key Environmental Report findings	Response
	<p>development supported by local plan and National Planning Policy Framework policies for housing and employment provision. A similar environmental performance is recorded for the retention alternative.</p>	<p>The Government considers that these potentially negative impacts on material assets can be positively addressed by authorities, including local planning authorities, working collaboratively within the policy context set by the National Planning Policy Framework.</p> <p>The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues, including those set out in paragraph 156 of the National Planning Policy Framework (including waste management and the provision of minerals).</p> <p>Appendix E of the updated Environmental Report identified waste management and minerals are material assets to which this finding applies.</p> <p>The National Planning Policy Framework sets out a set of core land use planning policies which should underpin both plan-making and decision-taking – including that planning should encourage the re-use of existing resources and the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework’s policies and the statutory duty to co-operate. The Framework also expects local planning authorities to set out the strategic priorities for the area in the local plan and include strategic policies to deliver the provision of infrastructure for waste management and the provision of minerals.</p> <p>The National Planning Policy Framework states that local planning authorities should identify and include policies for extraction of mineral resource of local and</p>

No	Key Environmental Report findings	Response
		<p>national importance in their area and, so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously. Insofar as aggregates are concerned, the Framework expects local planning authorities to consider the contribution of secondary, recycled and marine dredged sources as part of the preparation of Local Aggregate Assessments. Technical advice will still be provided through Aggregate Working Parties and the duty to co-operate, along with the practice guidance on the Managed Aggregate Supply System, should assist in ensuring minerals planning authorities work together with the industry to ensure that a steady and adequate supply of minerals is provided in a sustainable manner.</p> <p>Planning Policy Statement 10 makes it clear that waste planning authorities should plan for waste management needs in their area, seeking to drive waste management up the waste hierarchy (i.e. prevention, reuse, recycled, other recovery and disposal) which will help reduce the volume of waste generated by new development and support the reuse/recycling of construction and demolition waste, replacing primary aggregate. Planning Policy Statement 10 also requires planning authorities to set out its ambitions for additional waste management capacity required, based on an assessment of existing and forecast waste arisings, and expects planning authorities to undertake monitoring to enable them to adapt to changing circumstances if required.</p> <p>The proactive plan-led approach of the National Planning Policy Framework and Planning Policy Statement 10 sits within a</p>

No	Key Environmental Report findings	Response
		<p>wider set of requirements on resource use. Member States are required under European Law to recycle 50% of household waste and 70% of non-hazardous construction and demolition waste by 2020. In addition Member States are required to meet targets for the diversion of biodegradable municipal waste from landfill by 2013, 2016 and 2020. Local planning authorities, through the preparation of sound, up-to-date plans, and working together through the duty to co-operate, play a pivotal role in providing the infrastructure required to meet these needs.</p> <p>There are a number of authorities who are working together to produce joint minerals and/or waste plans, for example Blackburn with Darwen, Blackpool and Lancashire, and the ten Greater Manchester Authorities - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan are working together to prepare a joint Minerals Plan.</p>
3.	<p>Revocation could introduce uncertainty about whether environmental benefits will be realised in the short to medium term. This is particularly pertinent for those local authorities that need to establish Local Plan policies for housing and economic development that reflect the objectively assessed and up- to-date needs of their respective local communities.</p>	<p>The Government notes the findings of the updated Environmental Report. In noting the findings of the updated Environmental Report, the Government considers any uncertainty of impacts until plans are in place are mitigated by measures outside the Plan to Revoke</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in respect of decision-taking. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development,</p>

No	Key Environmental Report findings	Response
		<p>taking into account all relevant planning considerations. The presumption in favour of Sustainable Development is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking. Since March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may be given.</p> <p>Government notes the findings of the Environmental Report on progress of plan-making in the North West of England. Across the North West region seventeen councils have adopted Local Plans – 40% of councils have a plan adopted post-2004 and overall 54% of councils now have a published plan.</p> <p>There is a package of advice and support being offered to all councils, from the Local Government Association, the Planning Inspectorate and the Department, to support councils get local plans updated or in place. The Planning Inspectorate is working in particular with authorities with published plans about to be examined, and the Local Government Association's Planning Advisory Service is offering support to councils working towards plan publication. The Inspectorate continues to work quickly to examine plans already submitted, and the focus now is on maintaining a strong pipeline of plans coming through for examination.</p> <p>Furthermore, the Government has already introduced, or is introducing, a range of measures to make the planning system work more effectively and efficiently. These measures are designed to create the conditions that support local economic</p>

No	Key Environmental Report findings	Response
		<p>growth, increase building and remove barriers that stop local businesses creating job. Specific measures build on the measures in the Localism Act and the introduction of the National Planning Policy Framework and include:</p> <ul style="list-style-type: none"> • proposals to extend permitted development rights for a trial period of 3 years; • instructing the Planning Inspectorate to respond quickly to all major economic and housing-related appeals; • proposals to speed up the process for determining planning appeals; • giving developers extra time to get their sites up and running before planning permission expires; and • through the Growth and Infrastructure Bill, giving new powers to the Planning Inspectorate to take over the role of making planning decisions in an area if the local authority has a record of consistently slow or poor quality decisions. <p>The Government continues to monitor housing supply across England at local authority level.</p> <p>Wider policy is in place, in addition to the National Planning Policy Framework, which directs significant development towards the most sustainable locations. For example, 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.</p> <p>An evidence and local plan-led approach towards identifying and meeting the future infrastructure requirements of an area is essential. The tariff-based, and locally set, Community Infrastructure Levy provides a faster, more certain and transparent way of helping localities fund that infrastructure</p>

No	Key Environmental Report findings	Response
		<p>than the system of planning obligations where lengthy negotiations often create severe delays.</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources, such as:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the European Habitats Directive (92/43/EEC), Conservation (Natural Habitats) Regulations 1994, Water Framework Directive (2000/60/EC), The Water Directive (Water Framework Directive) (England and Wales) Regulations 2003, the Flood and Water Management Act 2010); • existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 and 11, and Planning Policy Statement 10: Waste Management); • other government policy (such as that articulated in the Natural Environment White Paper); and • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning. <p>In conclusion, the Government considers that any uncertainty of impacts until local plans are in place are mitigated by measures outside the Plan to Revoke the North West Regional Strategy.</p>
4.	The effects arising from the revocation of policies which provide strategic direction and whose requirements extend	<p>The Government notes the findings of the updated Environmental Report.</p> <p>In noting the findings of the updated Environmental Report, the Government</p>

No	Key Environmental Report findings	Response
	<p>beyond the boundaries of a single authority,(such as the city-region), will be uncertain until all participating local authorities define and agree areas of co-operation and implement the duty to co-operate reflect them in their adopted plans.</p>	<p>considers that the uncertain nature of the effects are mitigated by measures outside the Plan to Revoke.</p> <p>The statutory duty to co-operate, set out in the Planning and Compulsory Purchase Act 2004 inserted into the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The Government expects authorities to be working collaboratively whatever stage of local plan preparation they are at. The National Planning Policy Framework makes clear that the planning system should be genuinely plan led, and that plans should be kept up to date and based on joint working and cooperation to address larger than local issues, including those set out in paragraph 156 of the Framework (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) and taking account of paragraph 160. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the duty to co-operate in preparing the development plan.</p> <p>The duty to co-operate reflects the Government's broader approach to locally-driven cooperation to address the challenges of growth, including the</p>

No	Key Environmental Report findings	Response
		<p>strategic role played by Local Enterprise Partnerships. There are five Local Enterprise Partnerships in the North West of England region: the Cumbria, Lancashire, Greater Manchester, Liverpool City Region and Cheshire and Warrington Local Enterprise Partnerships. Their remit is to drive growth across their area making the most of its inherent strengths.</p> <p>Other examples of joint working include the Association of Greater Manchester Authorities commission 'New Economy Manchester' whose work includes influencing planning strategies across the City Region through research on employment sites, town centres and economic development.</p> <p>The Government have introduced broader policy measures outside of the Plan to Revoke, for example, the New Homes Bonus which complements broader policy on growth, including the role of Local Enterprise Partnerships whose remit is to drive growth across their area making the most of its inherent strengths.</p> <p>The National Planning Policy Framework directs significant development towards the most sustainable locations. For example, 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.</p> <p>An evidence and local plan-led approach towards identifying and meeting the future infrastructure requirements of an area is essential. The tariff-based, and locally set, Community Infrastructure Levy provides a faster, more certain and transparent way of helping localities fund that infrastructure than the system of planning obligations where lengthy negotiations often create severe delays.</p>

No	Key Environmental Report findings	Response
5.	<p>Some issues such as renewable energy generation or waste recycling which typically benefit from being planned at a wider geographical scale may not have their full potential realised as a result of revocation particularly as regional targets are set at a level which is higher than the corresponding national target.</p>	<p>The Government notes the findings of the updated Environmental Report.</p> <p>In noting the findings of the updated Environmental Report, the Government considers that it has put in place measures to reduce the uncertainty of effects through measures outside the Plan to Revoke.</p> <p>The Government has put in place the duty to co-operate which came into force on 15 November 2011. This statutory duty, set out in the Planning and Compulsory Purchase Act 2004 inserted by the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters, such as planning for renewable energy generation or waste recycling, strategic planning issues which benefit from being planned for at a wider geographical scale than a single local authority area.</p> <p>The National Planning Policy Framework makes clear cross boundary co-operation should apply in particular to the strategic priorities set out in paragraph 156. These matters include provision of minerals and energy (including heat) waste management, wastewater, water supply, climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. The duty to co-operate not only means that authorities are required to work collaboratively when developing their local plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of Local Plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>The National Planning Policy Framework sets out a set of core land use planning</p>

No	Key Environmental Report findings	Response
		<p>principles which should underpin both plan-making and decision-taking – including encouraging the use of renewable resources. To be found sound, local plans need to reflect this principle and enable the delivery of sustainable development in accordance with the National Planning Policy Framework’s policies and the statutory duty to co-operate. These include the requirements for local authorities to have a positive strategy to promote energy from renewable sources; design their policies to maximise renewable energy developments while ensuring that adverse impacts are addressed satisfactorily; approve applications for renewable energy if the impacts are (or can be made acceptable); and co-operate to deliver strategic outcomes which include mitigating climate change. The National Planning Policy Framework’s proactive, plan-led approach sits within a wider set of requirements and policy initiatives to deliver renewable energy. These include the UK’s legally binding target that by 2020 15% of energy should come from renewable energy. Additionally, there is a specific duty on Local Planning Authorities to ensure their local plan includes policies designed to mitigate climate change.’</p> <p>Six Energy National Policy Statements (including one on nationally significant renewable energy infrastructure) set out the need for certain infrastructure and policies against which applications for development consent for energy projects will be considered. These documents include the requirements for applicants to address economic, social and environmental impacts of a scheme; they also enable potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted.</p> <p>Again when planning for waste</p>

No	Key Environmental Report findings	Response
		<p>management and recycling the National Planning Policy Framework, 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 National Planning Policy Framework 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 National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions, for example local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for waste and its ability to meet forecast demands.</p>
6.	<p>Reliance upon locally-generated housing figures could yield an increasing differentiation between local authorities and clusters of local authorities. In the North West, this could maintain or create disparities which the Regional Strategy had sought to reconcile.</p>	<p>The Government notes the findings of the updated Environmental Report.</p> <p>In noting the findings of the updated Environmental Report, the Government considers that the potential for increasing differentiation between local authorities in the North West resulting from reliance upon locally-generated housing figures in the absence of the North West Regional Strategy are mitigated by measures</p>

No	Key Environmental Report findings	Response
		<p>outside the Plan to Revoke.</p> <p>The National Planning Policy Framework asks authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies set out in the Framework (such as the protections on Green Belt, high grade agricultural land, Areas of Outstanding Natural Beauty etc). They should prepare Strategic Housing Market Assessment to assess this need, working with neighbouring authorities where housing market areas cross administrative boundaries. They should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The practice guidance on Strategic Housing Land Availability Assessment states that the study area should preferably be a sub regional housing market area, but may be a local planning authority area, where necessary. The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place' and, where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply.</p> <p>The National Planning Policy Framework makes clear that cross boundary cooperation should apply in particular to the strategic priorities set out in paragraph 156 which include strategic policies to deliver the homes needed in the area. Local Plans are prepared in this context – in addition to the tests of soundness the examination will determine whether the local planning authority has complied with the statutory duty to co-operate in</p>

No	Key Environmental Report findings	Response
		<p>preparing the development plan.</p> <p>The Government has put in place the duty to co-operate which came into force on 15 November 2011. This statutory duty to co-operate requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters. The duty to co-operate not only means that authorities are required to work collaboratively when developing their Local Plans, but also that they will be held accountable for their cross-boundary working when their plan is examined. The examination of Local Plans will determine whether the local planning authority has complied with the duty to co-operate.</p> <p>Local planning authorities are expected to work collaboratively through the duty to co-operate to set their local housing numbers and consider how to mitigate the potential impact of growth on infrastructure and their environmental assets.</p>
7.	<p>At the broader scale there is the potential for an increasing diversification of regional circumstances across the country, accentuating issues such as the north-south divide with wider socio-economic consequences and reliance on other policy instruments for their resolution.</p>	<p>The Government notes the findings of the updated Environmental Report. The Government considers that there are other, broader drivers of spatial change.</p> <p>We note the judgement that there could be a reliance on other policy instruments. The Local Growth White Paper 2010, "Realising Every Place's Potential" established the Government's position on regional economic circumstances and set the framework for the ongoing activity of Local Enterprise Partnerships and investments such as the Growing Places Fund and the Regional Growth Fund. In March 2013 Government also set out its acceptance in full or in part to 81 of the 89 recommendations made by Lord Heseltine in his report 'No Stone Unturned'.</p> <p>There are five Local Enterprise Partnerships in the North West of England</p>

No	Key Environmental Report findings	Response
		<p>region: the Cumbria, Lancashire, Greater Manchester, Liverpool City Region and Cheshire and Warrington Local Enterprise Partnerships.</p> <p>Their remit is to drive growth across their individual areas making the most of their inherent strengths, with a broad objective to maximise their contributions to national economic growth and rebalancing the national economy.</p> <p>Each of the five Local Enterprise Partnerships in the North West have developed their own strategies to prioritise growth in their areas, building upon their own unique strengths.</p> <p>For example, Cumbria Local Enterprise Partnership wishes to prioritise growth in nuclear industries, specialist manufacturing, low carbon and renewable energy, the visitor economy and agriculture and food and drink industries. They are promoting skills and access to finance for businesses and enterprises. Lancashire Local Enterprise Partnership has identified five priorities it is addressing to grow the area's economy (raising the profile and visibility of Lancashire; attracting inward investment and strategic development; providing business support; promoting supply chain and related sector development and skills development so that there is better alignment between skills available and those required by the sectors of the economy which are growing). Greater Manchester Local Enterprise Partnership are emphasising skills, a low carbon economy and business support and planning, housing and transport to support growth.</p> <p>Liverpool City Region Local Enterprise Partnership, states that the Liverpool City Region has one of the fastest growing economies in the UK, driven by: low carbon and knowledge economy,</p>

No	Key Environmental Report findings	Response
		<p>promoting the visitors economy and the development of Liverpool's Port.</p> <p>Cheshire and Warrington Local Enterprise Partnership established six priorities including infrastructure and connectivity and growing the rural economy. Crewe is a major growth opportunity identified by both the Local Enterprise Partnership and the local authority for both business and housing (complemented by Macclesfield and Congleton opportunities).</p>

How consultation on the Environmental Reports has been taken into account

4.1 Overview

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

Detailed responses to the initial Environmental Report on the revocation of the North West Regional Strategy, published in October 2011, were provided by consultees and summarised in the updated Environmental Report, published in December 2012.

The consultations and how they have been taken into account is summarised below.

4.2 Scoping Consultation

The designated consultation bodies for strategic environmental assessment in England (the Environment Agency, English Heritage and Natural England) were consulted on the scope and level of detail to be included in the Environmental Reports in May 2011 for five weeks. The corresponding bodies for Scotland and Wales were also consulted on the reports for regions on their boundaries. Their comments on individual regions have been taken into account in the Environmental Reports for each region.

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 Strategic Environmental Assessment 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 Strategic Environmental Assessment did not apply. English Heritage focussed their comments on the implications for Heritage on the proposed revocation. Scottish Natural Heritage considered that the implications for strategic planning for green infrastructure and the interface with the marine environment should be considered.

Annex A provides more detailed information on the responses to the scoping consultation and the Government response (which has been updated for inclusion in this Post Adoption Statement).

4.3 Public Consultation on the initial Environmental Report

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

A total of 103 responses were received, of which 24 contained comments that were common to all the reports. The remaining responses made specific comments on the initial Environmental Reports for particular regions. The Woodland Trust provided individual responses for each of the eight regions as did the Scottish Government Strategic Environmental Assessment Gateway (enclosing responses from Scottish Heritage, the Scottish Environmental Protection Agency and Scottish Natural Heritage). Only 2 responses were received from local planning authorities within the North West. 10 of the 103 responses dealt specifically with the initial Environmental Report for the North West. A further 64 dealt solely with the initial Environmental Reports for regions other than the North West.

A high level summary of the issues raised on the initial report and the Government response to those is set out in **Table 4.1** below. **Annex A** presents more detailed information on the issues raised and the Government's responses.

Table 4.1 Summary of consultation responses to the initial Environmental Report and the Government response

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
The overall approach taken to Strategic Environmental Assessment	The Environment Agency supported the broad approach to the analysis presented in the October 2011 environmental reports. Natural England recognised that the Strategic Environmental Assessment was unusual in that it applied to the revocation, rather than the	Chapter 1 of the updated Environmental Report sets out how it met the requirements of the Strategic Environmental Assessment Directive. The impacts of revoking, retaining or partially revoking the North West

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	<p>creation of a plan, and that therefore many of the usual aspects of Strategic Environmental Assessment 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 Plan on heritage assets. Other respondents thought the analysis was undertaken too late in the plan making process and was not consistent with the requirements of the Directive.</p>	<p>Plan have been assessed in detail in the short, medium and long term against the 12 Strategic Environmental Assessment topics. This included Cultural Heritage – including architectural and archaeological heritage.</p>
Assessment	<p>The Statutory Consultees drew attention to more up to date data that could be included in the environmental report, for instance in River Basin Management Plans. Other respondents asked for a revised non-technical summary, for baseline data to be updated, for a more extensive analysis of the potential effects taking into account the content of local plans, the reconsideration of the likelihood of effects and, where significant effects were identified, to set out mitigation measures and give more consideration to monitoring the impacts.</p>	<p>The updated Environmental Report updated the baseline evidence and provided a detailed analysis of the retention, partial revocation and revocation of the North West Plan in the short, medium and long term against all 12 Strategic Environmental Assessment topics, taking into account the content of local plans. Mitigation measures were proposed where significant impacts were predicted. Arrangements for monitoring possible effects are set out and a non-technical summary was provided.</p>
Reliance on the National Planning Policy Framework	<p>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</p>	<p>The Government published the National Planning Policy Framework in March 2012. The analysis presented in the updated</p>

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
	was finalised.	Environmental Report took account of the policies set out in the Framework.
Policy Change	Several respondents thought that the revocation of the North West plan would leave a policy gap, particularly for the delivery of strategic policies.	The National Planning Policy Framework states that local planning authorities should set out the strategic priorities for the area in the local plan. This should include strategic policies to deliver homes and jobs and other development needed in the area, the provision of infrastructure, minerals and energy as well as the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
Reliance on the duty to co-operate	Some respondents thought that it was unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries at a sufficiently large scale.	The Government has introduced a new duty to co-operate and supporting regulations are now in place. In addition the National Planning Policy Framework sets out the expectations for local planning authorities working across boundaries on strategic planning matters which form part of the test of soundness for local plans. Councils who cannot demonstrate that they have complied with the

Issue	Summary of consultation responses to the October 2011 Environmental Report	Response
		<p>duty may fail the Local Plan independent examination. In addition the National Planning Policy Framework sets out the strategic priorities on which the Government expects joint working to be undertaken by authorities. The Framework also sets out the requirements for sound Local Plans, including that plans are deliverable and based on effective joint working on cross boundary strategic priorities.</p>
Individual Topics	<p>Respondents raised a number of questions about individual topics and suggested certain Regional Strategies or structure plan policies that they would like retained. In particular, respondents thought that the impact of the revocation of the North West could impact on topics such as the Green Belt, the provision of gypsy and traveller pitches, housing allocations, heritage, biodiversity, renewable energy, water, and managed woodland. Concern was also expressed with regard to potential trans-boundary effects resulting from the linkages between the region and neighbouring regions, particularly with regard to water supply.</p>	<p>The updated Environmental Report contains an assessment of the effects of revocation of the Regional Strategy on each of the topics raised by consultees. Individual policies for the planning of individual topics are described in the updated Environmental Report, drawing on the policies set out in the National Planning Policy Framework.</p>

As a result of considering the responses received, the changes made to the approach to the updated assessment were as follows:

- Providing additional contextual information for the assessment including the review of plans and programmes and updated baseline for each of the 12 Strategic Environmental Assessment Directive Annex I(f) topics and presenting this in separate topic chapters.
- Providing additional information on the details of the Plan to Revoke the regional strategies and the reasonable alternatives to them, including reasons for the selection of some alternatives and the discontinuation of others.
- Providing additional information in the assessment of revocation and retention of each regional strategy policy explicitly against all 12 of the Strategic Environmental Assessment Directive Annex I(f) topics.
- Identifying, characterising and assessing any likely significant effects of the plan and the reasonable alternatives, based on a common interpretation of what constitutes a significant effect for each topic and reflecting the possible timing effects.
- Providing additional information on likely secondary, cumulative and synergistic, short, medium and long-term, permanent and temporary, positive and negative effects of the Plan to Revoke the regional strategies.
- Assessing the likely significant effects at a number of geographic levels (national, regional, sub-regional and local) depending on the content, intent and specificity of the individual policy.
- Providing further information that includes proposals to mitigate effects including more sub-regional information on an understanding of the duty to co-operate.
- Providing further information that includes proposals to monitor any significant effects.

The updated Strategic Environmental Assessment of the Plan to Revoke the North West Regional Strategy was undertaken in 2012 by AMEC on behalf of the Department for Communities and Local Government.

4.4 The Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the North West Regional Strategy ran from 17 December 2012 until 18 February 2013.

The updated Environmental Report indicated that the Government welcomed, in particular, views on:

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

In total 19 written responses were received, summarised by interest group:

- 7 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Countryside Council for Wales, Historic Scotland, Scottish Natural Heritage and Scottish Environment Protection Agency);
- 4 Local planning authorities (Cumbria County Council, Cheshire East Council, Cheshire West and Chester Council and Lancashire County Council);
- 1 Parish Council (Tattenhall & District Parish Council (with the Tattenhall & District Parish Council's Parish Neighbourhood Planning Steering Group)).
- 3 Non Government Organisations and local pressure groups (Campaign to Protect Rural England North West (with the Ramblers North West), Transport Activists' Roundtable North West and the Town and Country Planning Association);
- 2 Industry representatives (RenewableUK and EDF Energy);
- 2 elected members (Councillor David Brickhill (Cheshire East Council) and Councillor Jill Houlbrook (Cheshire West and Chester Council)).

A summary of the comments and the Government's response is presented in **Table 4.2** below. Comments are structured by the questions asked above. Details of the comments are set out in **Annex B**.

Table 4.2 Summary of consultation responses to the updated Environmental Report

Issue	Summary of consultation responses to the updated Environmental Report	Response
<p>The overall approach taken to Strategic Environmental Assessment</p>	<p>The Countryside Council for Wales, Natural England, the Environment Agency, and English Heritage support the approach taken.</p> <p>EDF Energy, Cheshire West and Chester Council and Lancashire County Council considers that the Strategic Environmental Assessment has been undertaken in line with legislative requirements.</p> <p>The Town and Country Planning Association (Town and Country Planning Association) welcomed the adoption of a methodology more closely aligned with the Strategic Environmental Assessment Directive although concerns remained over how the method has been applied.</p> <p>Cheshire East and Campaign to Protect Rural England considered that the approach taken was flawed and set out a number of instances where they considered that the approach deviated from the requirements of the Strategic</p>	<p>The Government welcomes the comments on the updated Environmental Report, which has been supported by a number of consultees.</p> <p>The Government disagrees with the points raised by the Town and Country Planning Association, Cheshire East and Campaign to Protect Rural England. It is of the opinion that the approach is consistent with the requirements of the Strategic Environmental Assessment Directive and that it has been applied in a robust manner.</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>Environmental Assessment Directive</p> <p>Scottish Natural Heritage, the Scottish Environment Protection Agency and Historic Scotland did not anticipate any significant environmental effects from the revocation.</p>	<p>The Government recognises the comments made by the Scottish Environmental bodies.</p>
Reasonable Alternatives	<p>The Environment Agency, Natural England and Lancashire County Council consider the identification of alternatives to be reasonable.</p> <p>Cheshire East consider that the alternatives as selected present the revocation option falsely as appearing to have substantially positive impacts.</p> <p>The Campaign to Protect Rural England comment that the assessment does not appear to consider modifications to the new planning regime or institutions to ensure account is taken of strategic planning in the round.</p>	<p>The Government welcomes the acknowledgement by certain consultees, including statutory consultees, that the alternatives selected are reasonable.</p> <p>Cheshire East appears to recommend a focus on the assessment of the relative effects. Such an approach would provide Government (and consultees) with only a partial understanding of the effects.</p> <p>The Government is of the opinion that Local Planning Authorities will make decisions in accordance with their development plan and the National Planning Policy Framework will be a significant material consideration. Strategic planning will be supported via the statutory duty to co-operate.</p>
Additional Information	<p>The Countryside Council for Wales considers that reference should be made to those water supplies for the North West which are</p>	<p>The Government considers that recognition of trans-boundary effects is provided.</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>derived from sources in Wales.</p> <p>The Environment Agency welcomes recognition of the Water Framework Directive whilst Renewables UK provides additional detail with regard to climate change and renewable energy.</p> <p>Cheshire East Council considers that important aspects of the baseline are out of date.</p>	<p>The Environment Agency and Renewables UK comments are noted.</p> <p>The Government considers that the information provided identifies the key issues which continue to pertain to the current baseline.</p>
Monitoring	<p>Natural England recommends additional monitoring.</p> <p>Countryside Council for Wales seeks clarification as to whether any monitoring will be undertaken on areas 'shared' across the England/Wales border.</p> <p>English Heritage welcomes the inclusion of heritage at risk figures as a monitoring indicator and the Environment Agency</p>	<p>The Government agrees with Natural England that the loss of Best and Most Versatile Land should be monitored as set out in Annex C to this Post Adoption Statement.</p> <p>The Government notes the comments from the Countryside Council for Wales. Further information concerning the Government's intention around this matter is set out within section 5.3, chapter 6 and additional sources of information are identified in Annex C of this Post Adoption Statement.</p> <p>The Government welcomes English Heritage's comment on the use of the heritage at risk figures. The approach to monitoring in relation to the comments raised by</p>

Issue	Summary of consultation responses to the updated Environmental Report	Response
	<p>strongly recommends closer monitoring for climate change, water quality and water resources.</p> <p>The Town and Country Planning Association seeks a clearer statement is given as to how this information will be brought together, and where it will be published.</p> <p>Renewables UK wishes to see renewable energy generation needs to be monitored as well.</p>	<p>English Heritage and other consultees is expanded upon within Annex B to this report.</p>
Reliance on the duty to co-operate	<p>The Countryside Council for Wales expresses concern over the time to action a duty to co-operate.</p> <p>The Campaign to Protect Rural England does not believe that it will result in better co-operation between councils.</p> <p>The Environment Agency supports to duty to co-operate.</p> <p>The Town and Country Planning Association considers the use of the duty to co-operate as a mitigating factor reduces what would be otherwise significant environmental effects.</p>	<p>The Government notes the comments of the Countryside Council for Wales, Campaign to Protect Rural England and the Environment Agency.</p> <p>In response to the Town and Country Planning Association, it should be noted that the assessment of effects arising from revocation considers the likelihood for significant effects based upon the extant policy and legislative framework currently in place – this includes for the duty to co-operate. Mitigation in the Assessment process is defined as additional measures that would be recommended to address any identified significant effects.</p>
Individual Topics	A number of topics relating	Government acknowledges

Issue	Summary of consultation responses to the updated Environmental Report	Response
	to housing, Habitats Regulations, the weight to be given to the National Planning Policy Framework, renewable energy, brownfield development, Local Enterprise Partnerships and geographical areas within the region such as Cumbria were raised by consultees.	the comments made and responds to each at Annex B. It is of the opinion that fiscal measures combined with a simplification of planning policy will support housebuilding, that brownfield development and renewable energy deployment will continue to be supported and that the National Planning Policy Framework will support councils in delivering sustainable development which will include protection of the environment.

Cheshire West and Chester, Tattenhall & District Parish Council and Councillor Brickhill call for the Regional Spatial Strategy to be revoked given that it was prepared in a time of economic prosperity and consider to be now out of date.

In light of the findings of the assessment as reported in the Environment Report, the comments received from consultees and the framework for environmental protection and planning that is in place, the Government is content that environmental considerations have been adequately incorporated into the Plan to Revoke the regional strategy. As explained in Chapter 5 below, where significant effects and/or uncertainty have been identified, a programme of monitoring has been proposed to enable future consideration of whether any further mitigation or intervention is needed.

The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with

5.1 Policy background

The Government proposed the Plan to Revoke the North West Regional Strategy because it believes that planning works best when the people it affects are placed at the heart of the system – and that when they are empowered, there is a greater stimulus for growth.

Every local area has its own set of needs and priorities, its aspirations, unique features and heritage. Only local people understand this so when they have the tools to plan, development happens through consensus by recognition of the benefits of development to the community and with wider benefits for growth. Local empowerment can lead to development that is more sensitive and responsive to the character of the communities in which we live, including to habitats and the natural environment.

While the Government believes that local empowerment can support growth, it also recognises that cross-boundary development, such as housing or transport, are critical to driving economic growth. So, the revocation of the North West Regional Strategy would not signal an end to strategic planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans.

The Localism Act 2011 has complemented the powers to remove regional strategies with a new statutory duty to co-operate (inserting a new section 33A of the Planning and Compulsory Purchase Act 2004). The duty to co-operate requires local councils and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic matters in local and marine plans.

Through national planning policy, we will ensure that local plans are effective vehicles for strategic planning and growth. Local plans, produced by local people, are the keystone of the planning system. They are now the channel for strategic planning and set the framework for neighbourhood plans. In particular, the National Planning Policy Framework is clear that:

- the planning system should be genuinely plan-led and support sustainable economic growth, proactively driving the homes and jobs that we need.
- local councils should plan to meet their housing need, based upon objectively assessed evidence, and should identify a 5 year supply of deliverable sites.

- in line with the presumption in favour of sustainable development, local councils should approve development that accords with the local plan. Where that plan is out of date, councils must grant planning permission for development that is sustainable without delay.
- local councils must plan in their local plans for strategic development, reflecting the strategic priorities set out at paragraph 156 of the Framework.

The policies in the National Planning Policy Framework, and in particular the presumption in favour of sustainable development, provide certainty for local councils, developers and communities about the role of local plans in planning for growth and planning decisions.

The new **Planning policy for traveller sites** (March 2012) requires that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. It asks local authorities to:

- use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities.
- set pitch targets for Gypsies and Travellers which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets, and a supply of specific, deliverable sites or broad locations for growth for years six to ten and where possible for years 11-15.

The Government's planning reforms also include a package of incentives to encourage growth. These include the New Homes Bonus which rewards communities for each new home built; the Community Infrastructure Levy which enables councils to levy money on new development; and the Business Rates Retention which allows authorities to directly profit from business rates raised in their area.

This policy background sets in context the reasons for the Government's adoption of the Plan to Revoke the Regional Strategy and illustrates the structure of the planning system that will be left in place post revocation.

5.2 The Reasonable Alternatives

The initial Environmental Report on the proposed revocation of the North West Regional Strategy, published for consultation in October 2011, suggested two alternatives – either to revoke the Regional Strategy entirely, or to retain it. Responses to the consultation suggested a number of other alternatives (see Appendix F to the updated Environmental Report) including partial revocation. In considering these responses and following the application of the reasonableness test in compliance with Article 5(1) of the Strategic Environmental Assessment Directive, the following alternatives to the Plan to Revoke were taken forward for the updated assessment within the Strategic Environmental Assessment:

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

5.3 The Reasons for Choosing the Plan to Revoke the North West Regional Strategy in light of the other Reasonable Alternatives dealt with

The Government has carefully considered each of the reasonable alternatives and the environmental effects assessed in relation to those reasonable alternatives, set out in the updated Environmental Report³. In doing this the Government has taken account of the consultation responses to both the initial and the updated Environmental Reports. The Government welcomes the comments on both of those reports and notes that the opportunity to use the additional information gained through the public consultation process, as well as the developments in policy and Court of Justice of the European Union jurisprudence to update and build on the earlier assessments, have been an important contribution to making the final decision on the Plan to Revoke the North West Regional Strategy. The summary of consultation responses set out in this Post Adoption Statement show that consultees broadly welcomed the rigorous approach to assessment of environmental effects.

In spite of the more rigorous approach, some respondents expressed some concern with some aspects of how the Strategic Environmental Assessment process was carried out. As detailed in this Post Adoption Statement (including at Table 3.2 and Annex B), the Government considers that these have been adequately covered in the updated Environmental Report, including the assessment at Chapter 4.

In particular, one respondent (Cheshire East Council) disagreed with the overall approach to the assessment for six reasons: failure to identify environmental issues for Cheshire East and impacts of revocation, and propose mitigation measures; a flaw in the logic (assessing the impact of revocation and the reasonable alternatives in absolute terms, rather than relative to retention); reliance on implausible and unevidenced assumptions; reliance on some out of date evidence; an inadequate framework for appraisal; undertaken too late to influence the decision. As detailed in Annex B to this Post Adoption Statement, the Government disagrees with this view, since:

- It considers that the updated Environmental Report set out the impacts of revocation of policies identified by the respondent, and that the assessment was based on robust baseline evidence from a mix of information sources with dates ranging from 2008-2010/11.
- It considers that the National Planning Policy Framework and statutory duty to co-operate, together with a comprehensive, integrated hierarchy of legislation and policy to be implemented by local authorities and other organisations with an statutory interest in resource management and protection, leave in place a more localist

³ Strategic Environmental Assessment of the Revocation of the North West Regional Strategy: AMEC Environment & Infrastructure UK Limited: December 2012

- planning system comprising of local and, where made, neighbourhood plans and give local councils responsibility for strategic planning.
- It does not agree that the logic and framework for assessment which is considered is flawed. The updated Environmental Report presents the assessment against all the Strategic Environmental Assessment topics of retention and revocation of all the Regional Strategy policies. In particular, Chapter 3 of the updated Environmental Report sets out the methodology for carrying out the assessment, Appendix D presents the assessment of the effects of retention and revocation of each policy against each topic set out in the Strategic Environmental Assessment Directive and Appendix E set out definitions of significance and examines any significant effects in more detail. The assessment is of the absolute effects of each alternative, accompanied by a commentary in the main report which comments on both absolute and relative effects. The Government does not agree that the framework for assessment in the environmental report is inadequate.
 - It considers that although the updated Environmental Report presents the Government's preferred option (as is standard in a Strategic Environmental Assessment) the Government has not been inflexible in its approach to the plan to revoke and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and retention of each policy in the Regional Strategy and the assessment of reasonable alternatives), the extensive consultation and consideration of consultation responses in the final decision to revoke the North West Regional Strategy. The Government has shown that where necessary it is willing to save policies (e.g. in partially revoking the Yorkshire and Humber Regional Strategy and the South East Regional Strategy) where revocation could lead to significant negative effects.

One respondent (Countryside Council for Wales) thought that the Secretary of State's view that there is no likely significant effect on Habitat sites should be supported by a Habitats Regulations Assessment of the Plan to Revoke the Regional Strategy for the North West. They also considered that the potential for any adverse effects on certain European habitat sites including those partially within Wales, could not be addressed by individual competent authorities. As detailed in Annex B to this Post Adoption Statement, the Government disagrees with this view. It reached its conclusion that a full Habitats Regulations Assessment was not required on the base of a screening exercise. Additionally, the assessment contained in the updated Environmental Report was informed by baseline information that included consideration of designated European Sites within Wales such as the Dee Estuary Special Protection Area. It considered the effects of revoking the North West Regional strategy on biodiversity which included the potential for adverse impacts on European designated sites and found that there would be no significant effects as a result of revocation. The Government considers that there are legislative and policy protections for European designated sites in the absence of the Regional Strategy.

Some respondents thought it unlikely that the duty to co-operate would be able to provide a framework robust enough to enable strategic planning across local government boundaries. One respondent suggested that an alternative of modifying the new planning regime to ensure strategic planning in the round, whilst another questioned the outcome of the national policy, compared to the regional policy, and the weight attached to environmental protection. A further respondent raised particular concern about the management of strategic planning between Wales and England, especially when dealing with sites of shared responsibility. The Government disagrees with this view in light of the policies on strategic planning set out in the National Planning Policy Framework and the fact that councils that have not complied with the duty to co-operate may fail the local plan independent examination. The Government also notes that key environmental protections remain in place (which are set out in more detail in Table 3.2 and Annex B of this Post Adoption Statement).

With specific regard to cross working across national boundaries, whilst the National Planning Policy Framework and duty to co-operate do not extend to neighbouring authorities in other countries, this is not an obstacle to any English authority working across national boundaries. Where local planning authorities have failed to co-operate on cross boundary matters, it is likely that their Local Plan will not be deliverable and as such it may be found unsound. There is also a tradition of collaborative planning between English and the local planning authorities of other countries. For example, guidance on local development plan preparation in Wales⁴ sets out a number of tests of soundness including that plans should have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas, including neighbouring authorities in England. Further, local plans (and land use plans of other local planning authorities in neighbouring countries) are also subject to Strategic Environmental Assessment and, alongside certain planning decisions, Habitats Regulations Assessment which require consideration of potential cross-boundary environmental effects where appropriate to do so. Beyond the statutory planning systems, there are also initiatives and other non-land use plans including, for example, River Basin Management Plans that provide a vehicle for strategic planning across national boundaries.

It was also noted that a number of respondents considered that the revocation of the Regional Strategy for the North West would lead to a strengthening of joint local authority working and cited examples of such joint working.

Four respondents suggested specific additional monitoring measures and, together with other respondents, provided broader comments on the monitoring framework. The proposals for monitoring, which take account of these responses, are set out in Chapter 6 and Annex C of this Post Adoption Statement. This includes monitoring the loss of Best and Most Versatile Land as requested by Natural England. The Government will continue its ongoing dialogue with the Welsh Government to assess and monitor any potential impacts of the revocation of the Regional Strategy upon Wales, including the

⁴ Local Development Plans Wales, 2005 (Welsh Government)

effect on habitats. This will include working through the 5 Administrations Forum and directly with the Welsh Government to keep under review any potential impacts and to implement appropriate mitigation as necessary.

Some respondents asked for policies in the Regional Strategy to be retained. One respondent (Cheshire East Council) suggest that these concerns could be overcome by partial revocation, leaving Regional Strategy policies relating to housing development and regeneration in Cheshire East in force until the Cheshire East Core Strategy is adopted. One respondent asked for the policies relating to climate change, sustainable communities, conserving and enhancing the environment and energy generation to be retained to deliver Regional Strategy outcomes on renewable energy deployment and climate change mitigation. One respondent asked for a number of Regional Strategy and saved structure plan policies to be retained. The Government also notes that this response was received from a county council in a two tier area, and no district councils requested retention. As detailed in this Post Adoption Statement (including at Table 3.2 and Annex B), the Government considers that these issues have all been adequately addressed in the updated Environmental Report, mainly in Appendix D and E. The Government does not believe that retaining any such policies is necessary because it will be for local authorities to determine local responses to the various issues raised, having regard to the National Planning Policy Framework, existing legislation and using the statutory duty to co-operate.

Finally, there were also questions from some respondents on individual topics such as biodiversity, soils and landscape, the overall approach to strategic planning and the role of Local Enterprise Partnerships, regeneration and steering of strategic development, sustainable development, landscape, housing (including impacts on the environment), climate change and renewable energy. The Government considers that these issues have all been adequately addressed in the updated Environmental Report, mainly in Appendix D and Appendix E. Responses to the individual points raised are set out in Annex B and Table 3.2 of this Post Adoption Statement.

In conclusion, none of the responses to the consultation on the updated Environmental Report has led the Government to reconsider the adequacy of the assessment of the environmental effects of the Plan to Revoke the North West Regional Strategy, and the reasonable alternatives to the Plan, set out in the updated Environmental Report.

In light of this conclusion the Government considered each of the reasonable alternatives, and the environmental effects assessed in relation to those reasonable alternatives, as follows:

(i) On the **retention** of the North West Regional Strategy but not updating it in the future it was noted in the updated Environmental Report that there will be significant positive environmental effects, although these will be largely similar to those if the Regional Strategy were revoked. The only areas where retention of the Regional Strategy would lead to significant negative effects is in relation to air and material assets arising, in the case of air quality, from a

policy approach to concentrate development within the regional centres, followed by second, third and fourth tier centres. Air quality within the region's main centres is poor in some locations and this may be exacerbated by substantial levels of development. With regard to material assets, significant effects arise from development associated with policies for housing and employment provision, although the Government notes that a similar policy performance is recorded for the revocation alternative. For the majority of policies, the updated Environmental Report found it difficult to identify clear differences between the effects of retention and revocation. The Government considers that the retention of the Regional Strategy would lead to a strategy that was a consideration in plan-making and decision taking but with policies based on increasingly out of date evidence or which run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning and does not therefore consider that it should pursue this alternative.

(ii) On **partial revocation**, the updated Environmental Report noted that there were two **quantified and spatially specific policies** where potential significant negative environmental effects were identified on material assets in the long term for the **revocation of these policies**. However, the effects were also identified for retention of these policies. The Government does not therefore consider that it should pursue this alternative, in particular given that those policies retained would become increasingly out of date or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning. The National Planning Policy Framework makes clear the evidence on which Local Plans should be based, including quantified demand for housing and other uses, and where the duty to co-operate is particularly relevant.

(iii) Specific effects for **retention for a transitional period of policies which set the quantum for development or which are spatially specific** were identified in the updated Environmental Report. These include potential significant negative environmental effects on air and material assets from some policies in the medium and long term. The Environmental Report also noted that retention of these policies for a transitional period may result in some confusion with the intent of the National Planning Policy Framework and how they are to be applied. The Government does not therefore consider that it should pursue this alternative, in particular given that those policies retained would be based on increasingly out of date evidence or run contrary to the National Planning Policy Framework and fail to promote a locally-led approach to planning.

(iv) **Regarding retention of policies, the revocation of which may lead to likely significant negative environmental effects**, the updated Environmental Report also found that there are no policies in the Regional Strategy where the act of revocation will cause a significant negative effect whilst retaining the same policy will maintain a significant environmental benefit. Where there is a potential significant negative effect this is the same issue for retention and revocation and will require a similar concerted effort by all interested parties to resolve, irrespective of the presence of the Regional

Strategy itself. The updated Environmental Report noted that for those policies where there is a significant negative effect on material assets under revocation (and retention) these will be mitigated if authorities implement the policies in conjunction with the National Planning Policy Framework, Planning Policy Statement 10 and the ambition and case for action set out within the Government Review of Waste Policy 2011.

In relation to each of the reasonable alternatives assessed there has not been found to be a significant difference in the environmental effects overall as against those for the preferred option of revocation (as evidenced in Appendix D of the updated Environmental Report). Although for partial revocation while retaining the quantified and spatially specific policies there would be potential significant negative effects from the policy on spatial priorities on air quality in the long term. For retaining quantified and spatially specific priorities there were found to be potential positive and negative effects, but recognition that policies are based on evidence that would become increasingly out of date and could gradually lead to a decline in the positive effects that the strategy aimed to deliver and potential conflicts with policies that local communities wish to pursue will increase. For these reasons and given the structures and framework already in place the Government does not consider that the retention of any of the policies in the North West Regional Strategy is necessary.

Therefore in light of the policy background and reasons for the Plan to Revoke the North West Regional Strategy, consideration of the environmental effects of the Plan to Revoke and the reasonable alternatives, and consideration of responses to the Environmental Reports, the Government has decided to proceed with its preferred option to revoke the North West Regional Strategy.

The measures decided concerning monitoring

Monitoring of the effects of the Plan to Revoke the North West Regional Strategy will focus on:

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

Consistent with the proposals of the updated Environmental Report, potential effects against all the environmental topics have been included in the monitoring framework. Specific additional monitoring suggestions were made by consultees and are outlined in the summary of consultation in **Annex B**. The final measures are presented in **Annex C**.

The monitoring programme will use existing regulatory regimes and data collection processes to provide information for these potential environmental impacts. For example, the Environment Agency's requirements under the Water Framework Directive (2000/60/EC), the Department for Environment, Food and Rural Affairs' requirements with regard to Air Quality Management Areas and the Department for Communities and Local Government's commitments regarding the local plan making progress by authorities and on compliance with the duty to co-operate. The metrics are proposed in part to minimise any additional burdens associated with collection and analysis of monitoring data.

The Government will continue ongoing dialogue with the Welsh Government to assess and monitor any potential impacts of the revocation of the Regional Strategy upon Wales, including the effect on habitats. This will include working through the Five Administrations Forum and directly with the Welsh Government to keep under review any potential impacts and to implement appropriate mitigation as necessary.

The Department for Communities and Local Government will make periodic reference to the metrics and sources of information contained in **Annex C** to review the effects of revocation.

ANNEX A

Consultation and Partner Engagement – Initial Environmental Report

Responses to scoping stage of the preparation of the Initial 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.

More detailed information on each respondent's comments is provided in Table A2. Information in the table includes:

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

Table A1 Summary of statutory body's responses at the Strategic Environmental Assessment scoping stage (this Table has been revised following the close of consultation on the updated Environmental Report)

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 Strategic Environmental Assessment 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 Strategic Environment Assessment did not apply. English Heritage focussed their comments on the implications for the historic environment (historic buildings and landscapes) of the proposed revocation.	Environment Agency, Natural England, English Heritage, Scottish Natural Heritage, Historic Scotland, Scottish Environment Protection Agency , Countryside Council for Wales (Countryside Council for Wales), Cadw (Welsh Heritage Body)	The updated Environmental Report has been produced consistent with the requirements of the Strategic Environmental Assessment Directive. Responses to the detailed points raised at scoping stage are set out in the rest of the Table.
2	Reliance on the duty to co-operate and the National Planning Policy Framework	Environment Agency, Natural England and English Heritage , as did Scottish Natural Heritage, Scottish Environment Protection Agency and Countryside Council for Wales questioned whether the reliance on the draft duty to co-operate was sufficient to capture and address cross-boundary issues or cumulative effects of	Environment Agency, Natural England , English Heritage , Scottish Natural Heritage, Scottish Environmental Protection Agency,	Since the scoping report was prepared the Government has now published the National Planning Policy Framework and Framework in March 2012 and commenced provisions in the Localism Act 2011 implementing duty to co-operate.

No	General	Detailed comments	Raised by	Response
		<p>multiple local authorities' local plans.</p> <p>They also commented that references to planning policy assumed existing policies would be carried forward to the new National Planning Policy Framework. Since the National Planning Policy Framework 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>	Countryside Council for Wales	
3	Topics to be considered	<p>The Environment Agency and the 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.</p>	Environment Agency, Countryside Council for Wales	<p>Climate change impacts have been assessed under the Strategic Environmental Assessment topic "climatic factors. Water issues have been assessed under the Strategic Environmental Assessment topic "Water". This includes the consideration of the topics in Appendix E of the updated Environmental 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.</p>

No	General	Detailed comments	Raised by	Response
4	Water Quality	There are currently issues around accommodating growth within existing Waste Water Treatment Work's 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 Strategic Environmental Assessment topic "Water". This includes the consideration of the topics in Appendix E of the updated Environmental 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 includes taking 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 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,	Environment Agency, Countryside Council for Wales	Water resources have been assessed under the Strategic Environmental Assessment topic "water". This includes the consideration of the topics in Appendix E of the updated Environmental Report, 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 includes taking account of the

No	General	Detailed comments	Raised by	Response
		<p>then this would also increase the demand for water.</p> <p>Change in water use will be influenced by the individual local authorities post regional strategy policies; these effects may not be uniform for all local authorities. Therefore, the net effects on water resources of having a regional strategies or not or 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 supply the 'additional' houses should be considered.</p>		strategic planning cross-boundary issues.
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	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

No	General	Detailed comments	Raised by	Response
				<p>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 National Planning Policy Framework 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 National Planning Policy Framework (paras 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions. The National</p>

No	General	Detailed comments	Raised by	Response
				Planning Policy Framework states that local planning authorities should work 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 states 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.</p>	Environment Agency, Scottish Natural Heritage, Scottish Environmental Protection Area, Countryside Council for Wales	Climate change issues are assessed as part of the climatic factors Strategic Environmental Assessment topic, set out in Appendix E of the updated Environmental Report, and proposals for monitoring are set out in Chapter 5, including for climatic factors.
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	Environment Agency, English Heritage	In order to better understand the content of local plans, the updated Environmental Reports have taken into account local plan policies on housing, gypsy and traveller sites,

No	General	Detailed comments	Raised by	Response
		<p>that proposed by the regional strategy) may 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>		<p>renewable energy, employment, minerals and waste.</p> <p>Baseline data has been expanded and updated in the environmental reports, including for heritage assets and river basin management plans.</p>
9	Marine Planning	<p>The North West Plan 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. We suggest that the Marine Management Organisation is 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 in our responses to the Draft Environmental Report for revocation of the</p>	Environment Agency , Scottish Natural Heritage, Scottish Environmental Protection Agency,	<p>The consultation on the Environmental Reports is a public one and comments from all parties with an interest are welcome. The initial Environmental Report published in October 2011 was sent to the Marine Management Organisation. The updated Environmental Report has also been sent to the Marine Management Organisation.</p>

No	General	Detailed comments	Raised by	Response
		<p>Regional Plans for North East and North West of England we referred more to the consideration we believed should be given to addressing potential impacts on our 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 we acknowledge these provide a degree of strategic planning for the coastal and marine environment.</p> <p>The Environmental Report for revocation of the Regional Spatial Strategies for the North East and North West of England should examine potential significant impacts to shared Special Protection Areas and Special Areas of Conservation such as the River Tweed Special Areas of Conservation and the Berwickshire North Northumberland Coast Special Areas of Conservation 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	Environment Agency, Scottish Natural Heritage,	Cumulative impacts are taken into account in the assessment presented in the environmental

No	General	Detailed comments	Raised by	Response
		the environment for instance on climate change including green house gas emissions.	Scottish Environmental Protection Agency , Countryside Council for Wales	reports. The approach to the analysis is set out in the methodology Chapter 3, and a discussion of the impacts is included in Chapter 4 of the updated Environmental Report. Mitigation measures are considered throughout the report including for individual Strategic Environmental Assessment 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 National Planning Policy Framework. 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</p>	English Heritage, Cadw (Welsh Heritage Body)	<p>Also, see line 24 and 27 of the Table A3.</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; that have a degree of significance meriting consideration in planning decisions, because of its heritage interest. The significance of a heritage asset is stated to derive not only from its</p>

No	General	Detailed comments	Raised by	Response
		<p>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 National Planning Policy Framework could underline English Heritage's role in identifying historic character of more 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>With regard to the historic environment more specifically, we suggest 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</p>		<p>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 National Planning Policy Framework. 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 National Planning Policy Framework 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 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</p>

No	General	Detailed comments	Raised by	Response
		<p>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), no impacts anticipated from revocation of North West regional strategy.</p>		<p>harm, is clearly outweighed by other considerations.</p> <p>The National Planning Policy Framework 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 National Planning Policy Framework, 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 National Planning Policy Framework 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; that would involve public consultation and an independent examination. At that time, authorities should consider the Green Belt boundaries having regard to their intended</p>

No	General	Detailed comments	Raised by	Response
				<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 National Planning Policy Framework 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</p>

No	General	Detailed comments	Raised by	Response
				set out in Annex 1 of the National Planning Policy Framework
12	Site Specific Analysis	<p>Natural England though 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 include keeping selected Regional Strategy environmental policies on matters crossing local authority boundaries, and which form 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 effectiveness of Strategic Environmental Assessment and limits alternatives. The Habitats Directive: while revocation does not change legal protection, removing regional tier could adversely affect actual protection via policies – Habitats Regulation Assessment could perhaps be required.</p>	Natural England, Countryside Council for Wales	The updated 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.

No	General	Detailed comments	Raised by	Response

Table A2 Responses to the consultation on the initial Environmental Report (published in October 2011) (this table has been revised following the close of consultation on the updated Environmental Report)

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
1	The Overall Approach to Strategic Environmental Assessment	The Environment Agency agreed with the overall approach taken to assess the likely environmental impacts of revoking the regional strategies. Many of their scoping comments had been taken into account in the initial Environmental Reports, although English Heritage, in particular, had concerns that not all the potential impacts on the historic environment were fully assessed. The Environment Agency regarded the assessments as an opportunity to highlight issues that local authorities could address in partnership to achieve sustainable development.	Environment Agency, Natural England and English Heritage	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 against the 12 Strategic Environmental Assessment topics. This includes an assessment of cultural heritage, including architectural and archaeological heritage assets.
2	The Overall Approach to Strategic Environmental Assessment	The October 2011 consultation on the assessment of the revocation of regional strategies was contrary to the requirements of Article 6(5) of the Directive.	Clyde and Co LLP and Icen 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 states that the “detailed arrangements for the information

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>and consultation of the authorities and the public shall be determined by Member States". This requirement is transposed into English law by regulation 13.</p> <p>The initial Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of consultation responses, demonstrates the Government's desire to consult fully on the revocation and the assessment of the impacts.</p> <p>Chapter 1 of the updated 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 Approach to Strategic Environmental Assessment	Campaign to Protect Rural England, Campaign to Protect Rural England North West, North West Wildlife Trusts (the Wildlife Trusts for Cheshire, Cumbria, and Lancashire, Manchester and North Merseyside) disagreed with the Government's view that Strategic	Campaign to Protect Rural England, Campaign to Protect Rural England North West,	On 22 March 2012 in the case of Bruxelles, the Court of Justice of the European Union (CJEU) considered whether the Strategic Environmental Assessment 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

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Environmental Assessment was not necessary and therefore considered that Government was not at liberty to undertake the environmental assessment voluntarily. The Environment 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 initial 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>	North West Wildlife Trusts, Cumbria County Council	<p>may modify the state of the environment as examined at the time of adoption of the plan, an Strategic Environmental Assessment will be required to aid consideration of such effects.</p> <p>The updated 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 Strategic Environmental Assessment Directive.</p>
4	The Overall Approach to Strategic Environmental Assessment	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. Strategic Environmental Assessment carried out at an early stage and with an open mind helps to identify the environmental consequences of revocation	RenewableUK, Royal Society for the Protection of Birds, Wildlife and Countryside	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 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

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		and steps which could be taken to mitigate any adverse impacts (such as saving significant environmental policies).	Link, Campaign to Protect Rural England, Campaign to Protect Rural England North West, North West Wildlife Trusts,	<p>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 initial Environmental Report which was published for public consultation in October 2011, and the updated Environmental Report, which takes account of responses, demonstrates this and is in accordance with the requirements of the Strategic Environmental Assessment Directive and its purpose.</p> <p>The outcome of the consultations on the updated environmental reports will form part of the matters that will be taken into account in deciding whether or not to revoke the regional strategies.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
5	The Overall Approach to Strategic Environmental Assessment	The Town and Country Planning Association were concerned that the initial 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 – e.g. reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. The initial 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 Strategic Environmental Assessment Directive. Chapter 1 of the updated Environmental Report sets out which parts of the report address the requirements of the Strategic Environmental Assessment Directive.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
6	Assessment – likelihood of effects	<p>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 initial Environmental Report that revocation of the regional plan will 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 Spatial Strategies area and did not include consideration of environmental facets out with the Regional Spatial Strategies boundary but which may be affected by the Regional Spatial Strategies implementation. For example, a considerable proportion of water resources for 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>Hives Planning Ltd, The East of England Environment Forum; Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning, Campaign to Protect Rural England North West, North West Wildlife Trusts, Countryside Council for Wales,</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 the 12 Strategic Environmental Assessment topics.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		The Environment Agency were 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.	Environment Agency	
7	Assessment – cumulative impacts	<p>The initial Environmental Report should have assessed 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 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>Countryside Council for Wales suggested identification of those measures to</p>	Clyde and Co LLP; Levett-Therivel; Trewick Environmental Consultants; Collingwood Environmental Planning, Countryside Council for Wales,	Chapter 3 of the updated report sets out the assessment methodology for cumulative, synergistic or secondary effects. Chapter 4 of the updated Environmental Report contains a consideration of these effects.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>avoidance/mitigation and changes that were made to the final North West regional strategy to ensure compliance with the aims of the Habitats Directive. Countryside Council for Wales 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>Countryside Council for Wales 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 (Strategic Environmental Assessment and Habitats Regulation Assessment) notably in the context of constraining options and alternatives and preventing robust consideration of cumulative and 'in combination' effects. Many of the</p>	Scottish Natural Heritage,	

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>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 enabled by consideration at the regional level.</p> <p>Scottish Natural Heritage suggested that the initial 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 initial Environmental Reports because no impacts have been identified. Every section or policy of the regional strategy except one (the core spatial strategy) Annex A of the initial Environmental Report stated that 'These policies could be</p>	Levett-Therivel; Treweek Environmental Consultants; Collingwood	<p>Mitigations measures are set out in Chapter 4 of the updated reports, as well as for individual regional policies in Annex D.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		delivered by other means than through a regional strategy.’ However, no evidence had been provided to show that this would actually take place.	Environmental Planning	
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 e.g. 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 sites.</p> <p>The Town and Country Planning Association considered that the initial Environmental Reports understated the benefits of regional policy which all the original Strategic Environmental Assessments had identified. They also considered that there was insufficient detail to show how the new planning reform measures would deal effectively with strategic spatial issues.</p>	Levett-Therivel; Treweek Environmental Consultants; Colllingwood Environmental Planning, Town and Country Planning Association	<p>The National Planning Policy Framework, published in March 2012, 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: 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>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				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 the 12 Strategic Environmental Assessment topics.
10	Assessment - Baseline Data	The consultation bodies identified more recent environmental data than that used in the initial 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, Treweek Environmental Consultants (TEC), Clyde and Co LLP, Town and Country Planning Association, Levett-Therivel	The baseline data has been updated and expanded in the updated Environmental Report, and described for the 12 Strategic Environmental Assessment topics in Appendix 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.
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 Environment	The updated Environmental Report includes an assessment of all 12 Strategic Environmental Assessment topics. This incorporates assessment of waste and

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
			al Consultants	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; Colllingwood Environmental Planning	In compliance with Annex 1(b) of the Strategic Environmental Assessment Directive, the revised updated Environmental Report presents for all 12 of the Strategic Environmental Assessment topics considered in the assessment, 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 in place. Therefore, and where appropriate in addition to using projections, the assessment 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 of the

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				updated Environmental Report.
13	Assessment – Special Protection Areas and Special Areas of Conservation	<p>Information on the existing impacts on Special Protection Areas and Special Areas of Conservation should be provided.</p> <p>Scottish Natural Heritage also states that if there is a Habitats Regulation Assessment of the revocation of the North West regional strategy, it should identify what Special Protection Areas, Special Areas of Conservation and Ramsar sites should be considered for ‘likely significant effects’, and the report of the Habitats Regulation Assessment should be clear why sites have been scoped in or scoped out. Luce Bay and Sands Special Area of Conservation and the Upper Solway Flats and Marches Ramsar Site, Special Protection Area and Special Area of Conservation should be considered.</p>	Levett-Therivel; Treweek Environmental Consultants; Colllingwood Environmental Planning, Scottish Natural Heritage	The updated Environmental Report contains an Appendix G listing all Special Protection Areas and Special Areas of Conservation and the impact on particular sites in drawn out in the reports 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	Levett-Therivel; Treweek Environment	Detail of the preparation of the report, consultation with the statutory agencies, response to scoping comments, and difficulties faced with the analysis are set out

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		problems were faced.	al Consultants; Collingwood Environmental Planning	in Chapters 1 and 3 of the updated Environmental Report and Appendix F.
15	Assessment – non technical summary	The non- technical summaries are not consistent with the Strategic Environmental Assessment 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 is provided with the updated Environmental Report.
16	Assessment – local plans	Campaign to Protect Rural England 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,	Campaign to Protect Rural England, Friends of the Earth, Professor Alan Townsend, Cumbria County Council	<p>The updated 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 7 local authorities covering Cumbria, who are the local planning authorities for Cumbria,</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>by strengthening the Sustainability Appraisal process at local authority level.</p> <p>Friends of the Earth were concerned that the statement in the initial 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 Non Government Organisations.</p> <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 he commented that the experience of Campaign to Protect Rural</p>		<p>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> <ol style="list-style-type: none"> 1. Allerdale Borough Council 2. Barrow in Furness Borough Council 3. Carlisle City Council 4. Copeland Borough Council 5. Eden District Council 6. Lake District National Park 7. South Lakeland District Council <p>The authorities either have, or are working towards up to date plan coverage for their areas. The current situation is as follows:</p> <p>Allerdale Borough Council – Consulted on the Core Strategy Preferred Options in 2012 and is currently working towards the publication of its submission documentation.</p> <p>Barrow in Furness Borough Council – The Council's Local Development Scheme 2013 identifies publication of the Local Plan in 2014</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>England 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 initial 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</p>		<p>with submission in 2015.</p> <p>Carlisle City Council – Preferred options consultation on the Council’s Local Plan is proposed for Spring 2013.</p> <p>Copeland Borough Council – on 31st October 2012 the Council submitted its Core Strategy and Development Management Policies document for examination.</p> <p>Eden District Council - The Core Strategy was adopted in 2010</p> <p>Lake Distinct National Park – The Core Strategy was adopted in October 2010 and is due to be reviewed in 2013.</p> <p>South Lakeland Distinct Council – The Core Strategy was adopted in October 2010.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>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 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 Policy W1 Strengthening and regional economy Policy W2 Locations for regional significant economic development Policy W3 Supply of employment land Policy W4 Release of allocated employment land Policy L1 Health, sport, recreation, culture and education service provision Policy L3 Existing housing stock and</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>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> <p>Policy EM11 Waste management principles</p> <p>Policy EM13 Provision of nationally, regionally and sub-regionally waste management facilities</p> <p>Policy EM14 Radioactive Waste</p> <p>Policy EM15 A framework for sustainable energy in the North West</p> <p>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</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Policy ST5 New development and ket service centres outside the Lake District National Park</p> <p>Policy EM13 Employment land provision</p> <p>Policy EM14 Development of employment land for other purposes</p> <p>Policy EM16 Tourism</p> <p>Policy H19 Affordable housing outside the Lake District National Park</p> <p>Policy T29 Safeguarding future transport schemes</p> <p>Policy T30 Transport assessment</p> <p>Policy T31 Travel plans</p> <p>Policy T33 Telecommunications</p> <p>Policy E35 Areas and features of nature conservation interests other than of national and international 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 Areas of Outstanding Natural Beauty</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
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 National Planning Policy Framework 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 	<p>Royal Society for the Protection of Birds, Wildlife and Countryside Link, Campaign to Protect Rural England, Renewable UK, Clyde and Co LLP, Irish Travellers Movement in Britain; Levett-Therivel; Treweek Environmental Consultants; Collingwood Environment</p>	<p>The updated Environmental Report draws on the consultation responses to develop a number of alternatives and identifies 3 reasonable alternatives to complete revocation for assessment.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>the possibility of local 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 initial Environmental Report on the revocation of the North West regional</p>	<p>al Planning, Countryside Council for Wales, North West Wildlife Trusts, North West Woodlands Trust, Lancashire County Council</p>	

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>strategy should have identified and tested reasonable alternatives, and identified four 'reasonable alternatives' which could have been addressed in the initial Environmental Reports.</p> <p>The North West Woodlands Trust believes that the consultation on the initial 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 initial Environmental Report of reasonable alternatives to the revocation of the North West regional strategy.</p> <p>Lancashire County Council does not believe that the initial 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</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		development.		
18	Assessment - monitoring	<p>Natural England, Campaign to Protect Rural England and 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, e.g. by tracking local plan progress on local authority websites in a systematic but simple way.</p> <p>Levett- Therivel; Treweek Environmental Consultants; Collingwood Environmental</p>	<p>Natural England, Campaign to Protect Rural England, Town and Country Planning Association, Levett-Therivel; Treweek Environmental Consultants; Collingwood Environmental Planning, Clyde and Co LLP,</p>	Proposals for monitoring were set out in Chapter 5 of the updated Environmental Reports

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Planning suggested that the effects of revocation should be monitored e.g. to track housing completions and development on Green Belt.</p> <p>Clyde and Co LLP considered that not clearly identifying additional, specific methods of monitoring undermined the consultation process.</p>		
19	Reliance on the draft National Planning Policy Framework	<p>Natural England, the Environment Agency, the Town and Country Planning Association and Campaign to Protect Rural England 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 National Planning Policy Framework and the implementation of the new “duty to co-operate”. Campaign to Protect Rural England for example, commented that as a 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 National Planning Policy Framework and future local</p>	<p>Natural England, Environment Agency, Town and Country Planning Association Campaign to Protect Rural England, Levett-Therivel; Treweek Environmental</p>	<p>The National Planning Policy Framework was published in March 2012. The National Planning Policy Framework 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 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</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>plans were uncertain and neither of these statements could currently be fully tested. They expressed concern that the initial 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 National Planning Policy Framework will be so favourable to the environment or sustainable development, as the National Planning Policy Framework has not been subject to Strategic Environmental Assessment.</p> <p>Natural England agreed with the assessment that there was an inherent difficulty in providing an assessment of the National Planning Policy Framework as an alternative, as it was not known how the final version would differ from the consultation draft.</p>	<p>Consultants; Collingwood Environmental Planning, North West Wildlife Trusts, Campaign to Protect Rural England North West</p>	<p>renewable energy development as well as leisure facilities for the community including theatres.</p> <p>The National Planning Policy Framework is not subject to Strategic Environmental Assessment as it is high level policy and does not fall within the scope of the Strategic Environmental Assessment Directive.</p>

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		<p>Scottish Power Renewables were of the view that the regional plans have a key role in ensuring that national policy objectives are met and encourage the wider deployment of renewable energy, making an important contribution to the UK's legally binding renewable energy targets. In particular, the regional plans do and could continue to play 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 plans pre-empted the final National Planning Policy Framework 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 National Planning Policy Framework and were concerned that the draft National Planning Policy Framework did not contain a sufficient level</p>		

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		<p>of detail to support renewable energy planning.</p> <p>The Royal Society for the Protection of Birds and Wildlife Link considered it misleading for the initial 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>Friends of the Earth stated that local authorities will have to be guided by the policies in the National Planning Policy Framework. Based on the draft National Planning Policy Framework text, in many</p>		

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		<p>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 National Planning Policy Framework which is directive on the need to approve development. They also pointed to shortcomings in the National Planning Policy Framework 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 initial Environmental Reports relied so heavily on the National Planning Policy Framework, which had not been finalised and was therefore subject to change.</p> <p>The Theatres Trust suggested that suitable policy within the National Planning Policy Framework and other measures needed to be in place to ensure the pooling of</p>		

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		<p>knowledge on physical and social cultural infrastructure, particularly theatres, if the plans are revoked.</p> <p>The Woodland Trust commented that the Strategic Environmental Assessment implies that the National Planning Policy Framework and planning reform in general will lead to less development, particularly in the absence 'top down targets', but felt this is contradictory to every other message emanating from the Government, as the stated purpose of the current planning reforms is to encourage economic growth. Paragraph 1.6 of the Strategic Environmental Assessment document states that the National Planning Policy Framework sits within the broader context of national policy and legislation such as the National Environment White Paper. The draft National Planning Policy Framework did not however reflect the Natural Environment White Paper.</p> <p>The North West Wildlife Trusts stated that the regional strategy contained very strong policies for environmental protection which</p>		

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		<p>would be lost on revocation. These policies would not be replaced by other, equally strong environmental policies, if the consultation draft National Planning Policy Framework is adopted, as the replacement policies in the National Planning Policy Framework 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 plan and in the face of other pressures; and • that adequate protections for the natural environment actually exist at a national level. 		

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		<p>They stated that these assumptions have been taken as self-evident in the initial Environmental Report and have not been tested. In their opinion both assumptions were questionable, which undermined the credibility of the initial Environmental Report. They also considered that the initial 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>Campaign to Protect Rural England North West stated that the initial 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</p>		

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		strategy and that national protections in the emerging National Planning Policy Framework were adequate. This assumption had not been tested in the initial Environmental Report. For example, without a clear definition in the National Planning Policy Framework 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 initial 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 effects rather than the likely effects.		
20	Assessment - Policy Gap	Natural England noted that the revocation of the regional strategies would require local planning authorities to incorporate relevant environmental policies, previously	Natural England, Environment Agency,	The National Planning Policy Framework, published in March 2012, sets out the Government's planning policies for England.

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		<p>included in the regional strategy, into their local plans or to rely on National Planning Policy Framework 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 initial 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 National Planning Policy Framework would need to ensure that any potential policy gaps were filled.</p>	<p>Royal Society for the Protection of Birds, Wildlife and Countryside Link, Theatres Trust, RenewableUK, Friends of the Earth, English Heritage, North West Wildlife Trusts, North West Woodlands Trust, North West Campaign to Protect Rural England, Lancashire</p>	<p>The National Planning Policy Framework emphasises the need for local planning authorities to plan strategically. 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 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> <p>The National Planning Policy Framework also makes clear that, where it would be appropriate and assist the process of preparing or amending local plans, regional</p>

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		<p>The Royal Society for the Protection of Birds 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 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 National Planning Policy Framework 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 Royal Society for the Protection of Birds and the Wildlife and Countryside Link considered that revocation would remove a raft of policies on issues, such as those on</p>	County Council, Cumbria County Council	<p>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 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 National Planning Policy Framework expects should underpin both plan-making and decision-taking. Local Planning Authorities are expected to adopt proactive strategies to mitigate climate change and cooperate to deliver strategic outcomes which include climate change. They should plan 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</p>

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		<p>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 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 plan is revoked.</p>		<p>expected (paragraph 94) 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 Framework has underlined (paragraph 93) that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.</p>

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		<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>Friends of the Earth were concerned that the Strategic Environmental Assessments of the revocation of the Regional Spatial 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</p>		

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		<p>local authority's areas consumption and indirect impacts. They were of the view that the footprint approach at a regional level specifically aimed to counter 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 National Planning Policy Framework 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 Department of Communities and Local Government should maintain the regional evidence bases for local authorities to draw upon for local plans and cross boundary cooperation.</p> <p>English Heritage considered that the initial Environmental Report should have had</p>		

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		<p>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 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</p>		

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		<p>emerging National Planning Policy Framework 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 National Planning Policy Framework.</p> <p>The North West 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>North West Campaign to Protect Rural England believes that the revocation of the North West regional strategy without a</p>		

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		<p>robust National Planning Policy Framework is 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 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 National Planning Policy Framework 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>		

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		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.		
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 planning. However, both organisations commented that the initial 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	Natural England Environment Agency, English Heritage , Royal Society for the Protection of Birds, RenewableUK, Town and Country	<p>The Government recognises the importance of strategic planning. The National Planning Policy Framework, published in March 2012, makes clear that strategic 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</p>

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		<p>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 down stream. They suggested that this is recognised so that the duty to co-operate could fully support</p>	<p>Planning Association, Friends of the Earth , Clyde and Co LLP, Professor Alan Townsend, Campaign to Protect Rural England, Lancashire County Council, North West Coastal Forum, North West Environmental Link, Cumbria County Council</p>	<p>planning for waste facilities or flood prevention, cooperation will be necessary with authorities well beyond an authority's own border.</p> <p>Many councils are already working collaboratively to produce sound plans. The duty to co-operate formalises those arrangements by creating a statutory requirement to cooperate to ensure that local plans are effective and deliverable on cross-boundary matters. The duty requires authorities to work together constructively, actively 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</p>

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		<p>strategic planning at a local level.</p> <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 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</p>		<p>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 local planning authorities have failed to cooperate 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</p>

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		<p>danger that the wider perspective gained through strategic planning would be lost. The forthcoming National Planning Policy Framework 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 Royal Society for the Protection of Birds welcomed the strengthening of the duty to co-operate during its Parliamentary passage, they remained sceptical that the duty would deliver 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</p>		<p>the duty to co-operate.</p> <p>In recognition of the breath 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 making. The bodies, which are listed in local plan regulations, are:</p> <ul style="list-style-type: none"> (a) the Environment Agency; (b) the Historic Buildings and Monuments Commission for England; (c) Natural England; (d) the Mayor of London; (e) the Civil Aviation Authority; (f) the Homes and Communities Agency; (g) Primary Care Trusts; (h) Marine Management Organisation (i) Office for Rail Regulation (j) the Highways Agency; (k) Transport for London; (l) Integrated Transport Authorities; and (m) Highway authorities <p>The National Planning Policy Framework makes clear that local planning authorities</p>

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		<p>cumulative impacts of development.</p> <p>RenewableUK also expressed the view that the duty to co-operate provisions in the Localism Act seem weak, with no clear means of ensuring that local authorities would cooperate 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 with a tighter remit and much less</p>		<p>should work collaboratively with private sector bodies, utility and infrastructure providers.</p> <p>As stated above 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: 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>

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		<p>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>Friends of the Earth 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 e.g. 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</p>		

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		<p>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 unsound as a result.</p> <p>Clyde and Co LLP considered that the expectation that local authorities would co-operate was not good enough. It was therefore inappropriate for the assessment of likely effects, as encapsulated within the initial 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, climate change, river flooding, Areas of Outstanding</p>		

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		<p>Natural Beauty, reducing unnecessary travel, congestion and emissions, reducing deprivation and retailing. Hives Planning Ltd commented that the Localism Act did not set out any sanctions if local authorities did not cooperate.</p> <p>Lancashire County Council believe that with the abolition of the North West's regional strategy and the introduction of the National Planning Policy Framework 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 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</p>		

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		<p>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 National Planning Policy Framework. 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 initial Environmental Report places too much reliance on the National Planning Policy Framework to fill any policy vacuum which may result from the revocation of the North West regional strategy and any</p>		

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		<p>negative environmental impacts which may emerge. While some regional strategy and Saved Structure Plan policies share similarities with guidance contained in current Planning Policy Statements, Planning Policy Guidances and future National Planning Policy Framework, however these documents may fail to adequately reflect the unique character of Cumbria and in particular the strategically important sustainability, 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</p>		

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		appropriate replacements is likely to give rise to significant detrimental outcomes.		
22	Individual Topics - Access to data	Referring to the comment in the initial 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 National Planning Policy Framework, 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 National Planning Policy Framework (paragraphs 158-177) also sets out in detail the evidence base that is required to underpin the development of local plans and planning decisions.
23	Individual Topics -Green Belt	JC Consultants considered that the initial 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	JC Consultants, Hives Planning Ltd, Campaign to Protect Rural England, Campaign to Protect Rural	The National Planning Policy Framework, 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

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		<p>preventing urban sprawl.”</p> <p>Hives Planning Ltd suggested that the comment that there would be less pressure to review Green Belt boundaries in order to accommodate necessary growth, resulting in lower environmental impacts, was misleading. They added that Green Belt boundaries were established many years ago and it was clearly recognised in policy documents in the last decade that Green Belt boundaries must be reviewed in order to accommodate the inevitable need for housing.</p> <p>Campaign to Protect Rural England commented on the statement in the initial 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 National Planning Policy</p>	<p>England North West, Transport Activists’ Roundtable North West</p>	<p>openness and their permanence. Green Belt serves five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>The National Planning Policy Framework 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</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>Framework 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 National Planning Policy Framework, clause 109).</p> <p>Transport Activists’ Roundtable North West made 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>Campaign to Protect Rural England North</p>		<p>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 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 Framework. 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 policy goes on to say 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,</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		West 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 National Planning Policy Framework could undermine the integrity of the Green Belt.		<p>so that they should be capable of enduring beyond the plan period. 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 National Planning Policy Framework 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 planning authorities should ensure that substantial weight is given to any harm to the Green Belt.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>'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 National Planning Policy Framework 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 National Planning Policy Framework, 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 National Planning Policy Framework also includes specific policy on renewable energy projects and Community Forests in the Green Belt.</p> <p>The housing policies in the National Planning Policy Framework clearly state that when local planning authorities are ensuring their</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, this is as far as consistent with the policies set out in the Framework, which would include 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 Framework that indicate development should be restricted.</p>
24	Individual Topics - Gypsies and Travellers	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 initial 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	The Garden Court Chambers Gypsy & Traveller Team, Community Law Partnership, Friends, Families and Travellers ,	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 2012 makes it clear that its overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>retaining those regional policies relating to the provision of sites for Gypsies and Travellers. Community Law Partnership supported 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 initial 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</p>	National Federation of Gypsy Liaison Groups	<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 to ten and, where possible, for years 11-15;</p> <p>(iii) considering the production of joint</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>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 environment, for example if they were not suitably located there could be local impacts on the landscape.</p>		<p>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 abolition of 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 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.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
25	Individual Topics – Housing Supply	<p>The Town and Country Planning Association referred to the statement in the initial Environmental Report that under the regional strategies the overall direction was expected to be a widening gap between housing provision in the plan 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. This is a key issue in this region, the most economically buoyant in the country outside London.</p> <p>Campaign to Protect Rural England 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</p>	Town and Country Planning Association, Campaign to Protect Rural England, Persimmon Homes, Hives Planning Ltd	<p>The National Planning Policy Framework, published in March 2012, and the duty to co-operate address this issue. The National Planning Policy Framework 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 National Planning Policy Framework 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 capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework. 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>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>allocation of more green-field sites.</p> <p>Hives Planning Ltd on behalf of Arnold White Estates Ltd suggested that the assessment should have considered the socio-economic impacts of removing the regional planning framework on the provision of jobs and houses. They saw advantages of dealing with this regionally and the finding that “the pattern of development which the Regional Spatial Strategies seeks to encourage should make the region’s environment, and quality of life for its residents, much better than would be case without it” had not been addressed in the initial Environmental Reports. They also considered that the assessment should have looked at the impact of revocation on the delivery of housing, employment and infrastructure against wider identified needs through objective study, rather than needs identified by local authorities who may be more resistant to growth. They commented that Regional Assemblies were mainly composed of local authority representatives who were able to take a strategic planning</p>		<p>Local planning authorities will be expected to demonstrate evidence of having effectively cooperated 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 National Planning Policy Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such 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</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		overview above the tier and interests of the individual local authority.		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.
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 would welcome clarity on whether the Government was suggesting wider than county waste 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 National Planning Policy Framework had stated that waste would be considered</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 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.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		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.		
27	Individual Topics - Biodiversity	<p>On the basis of the content of the consultation draft of the National Planning Policy Framework, Natural England disagreed with the statement in Section 1.2 of the initial Environmental Reports that the National Planning Policy Framework “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</p>	Natural England, Woodland Trust, Scottish Natural Heritage and the Environment Agency, North West Wildlife Trusts	<p>The National Planning Policy Framework was published in March 2012. The finalised version of the National Planning Policy Framework 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 National Planning Policy Framework also states that local plans contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>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. Scottish Natural Heritage suggested that the initial Environmental Report should address the protection and enhancement of networks to allow species dispersal throughout Britain. They considered that value could be added to the initial 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 and Nature Improvement Areas should be</p>		<p>The National Planning Policy Framework also states 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 National Planning Policy Framework also states that local planning authorities should work with Local Nature Partnerships to assess existing and potential components of ecological networks.</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>highlighted. They pointed out that the overall purpose of Local Nature Partnerships 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, Local Nature Partnerships and Nature Improvement Areas 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 action within the region. The initial 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 National Planning Policy Framework where it doesn't appear to weaken national</p>		

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		environmental protection policies.		
28	Individual Topics - Renewable Energy	<p>RenewableUK were concerned that the Strategic Environmental Assessment 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 National Planning Policy Framework, 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 toencourage the use of renewable resources (for example, by the development of renewable energy). The National Planning Policy Framework 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 National Planning Policy Framework contains a number of policies aimed at encouraging the development of renewable energy development including that local planning authorities should: have a positive strategy to promote energy from renewable</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>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, National Planning Policy Framework policies on strategic planning for infrastructure need include the need to plan for energy infrastructure including heat.</p>
29	Individual Topics - Transport	Friends of the Earth considered that the removal of the regional strategies would in some cases have a negative environmental effect as their transport policies were	Friends of the Earth	The National Planning Policy Framework, published in March 2012, includes a number of core planning principles. These include the need to actively manage patterns of growth to

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		stronger than those presented in the draft National Planning Policy Framework.		<p>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 National Planning Policy Framework 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.</p> <p>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 which, where reasonable to do so, facilitates the use of sustainable modes of transport. The National Planning Policy Framework also states that local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
				<p>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 National Planning Policy Framework 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 lengths for employment, shopping, leisure, education and other activities.</p>
30	Individual Topics Brownfield	Campaign to Protect Rural England's position was that revocation, combined with the Government's wider reforms to the planning system, had seen the	Campaign to Protect Rural England,	The National Planning Policy Framework was published in March 2012. One of the 12 planning principles set out in the National Planning Policy Framework is that planning

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		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 Campaign to Protect Rural England 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.		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 National Planning Policy Framework 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	Welcome the recognition that local authorities should continue to work together on issues that cross local authority boundaries, alongside the Lead Local Flood Authorities' 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	EA, North West Coastal Forum, Countryside Council for Wales	In March 2012 the Government published the National Planning Policy Framework which contains policies to manage the risk of flooding through the planning system, together with technical guidance on flooding. The National Planning Policy Framework also states that Local planning authorities should set out the strategic priorities for the area in the local plan. This should include strategic

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>coastal erosion risk, to complement the National Planning Policy Framework would support Lead Local Flood Authorities and help achieve the duty to co-operate.</p> <p>The North West Coastal Forum believes 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>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</p>		<p>policies to deliver the provision of infrastructure for flood risk and coastal change management.</p> <p>The National Planning Policy Framework published in March 2012. 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 National Planning Policy Framework also asks that local planning authorities should set the strategic priorities for the area in the local plan, and that this should include strategic policies to deliver the provision of infrastructure for coastal change management.</p> <p>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 the local authority and land/sea boundaries, ensuring integration of terrestrial and marine planning regimes. Local planning authorities should reduce risk from coastal change by</p>

No	General	Detailed comments on the initial Environmental Report	Raised by	Response
		<p>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>avoiding inappropriate development in 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 restoration conditions.</p> <p>Further the National Planning Policy Framework 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>

ANNEX B

Consultation and Partner Engagement – Updated Environmental Report

Public consultation on the updated Environmental Report on the revocation of the North West Regional Strategy ran from 17 December 2012 to 18 February 2013.

The updated Environmental Report indicated that the Government welcomed, in particular, views on:

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

In total 19 written responses were received summarised by interest group

- 7 Strategic Environmental Assessment consultation bodies (Environment Agency, Natural England, English Heritage, Countryside Council for Wales, Historic Scotland, Scottish Natural Heritage and Scottish Environment Protection Agency);
- 4 Local planning authorities (Cumbria County Council, Cheshire East Council, Cheshire West and Chester Council and Lancashire County Council);
- 1 Parish Council (Tattenhall & District Parish Council (with the Tattenhall & District Parish Council's Parish Neighbourhood Planning Steering Group)).
- 3 Non Government Organisations and local pressure groups (Campaign to Protect Rural England North West (with the Ramblers North West), Transport Activists' Roundtable North West and the Town and Country Planning Association);

- 2 Industry representatives (RenewableUK and EDF Energy);
- 2 elected members (Councillor David Brickhill (Cheshire East Council) and Councillor Jill Houlbrook (Cheshire West and Chester Council)).

The following table summarised the points made and the Government's response.

Table B1 Responses to the consultation on the updated Environmental Report (published in December 2012)

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
1.	The overall approach taken to Strategic Environmental Assessment	<p>Natural England welcomes the updated Environmental Report and believe that it is a significant improvement over the previous iteration.</p> <p>Environment Agency agrees with the overall approach and welcomes the environmental report as much more detailed and clearer document than the original one.</p> <p>Environment Agency is also pleased to note that most of their previous comments on earlier versions of the report have been reflected in Appendix F.</p> <p>English Heritage have no specific comments to make with regard to the overall approach to the Strategic Environment Assessment.</p> <p>Scottish Natural Heritage, the Scottish Environment Protection Agency and Historic Scotland did not anticipate any significant environmental effects from the revocation of the plan on the Scottish environment and had no further comments to make on the updated environmental report.</p> <p>Cheshire West and Chester Council agrees with the conclusions and findings set out in the Environmental Report.</p> <p>Cumbria County Council raises a number of detailed</p>	<p>The Government welcomes the fact that the three English Strategic Environmental Assessment consultation bodies, English Heritage, Natural England and the Environment Agency consider the updated Environmental Report on the proposed revocation of the North West Regional Strategy improves on the initial Environmental Report published in October 2011.</p> <p>The Government welcomes the comments from the three Scottish Strategic Environmental Assessment consultation bodies, Scottish Natural Heritage, the Scottish Environment Protection Agency and Historic Scotland who do not anticipate any significant environmental effects from the revocation of the North West Regional Strategy on the Scottish environment.</p> <p>The Government acknowledges that the updated Environmental Report has been thought robust by a range of interested parties, including local planning authorities Chester, Cheshire West and Lancashire County Council, the Town and Country Planning Association,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>points upon the assessment of policies although it makes no specific comment with regard to the overall approach. Lancashire County Council considers that the Strategic Environmental Assessment has been undertaken in line with legislative requirements.</p> <p>Tattenhall & District Parish Council and Cllr Brickhill do not make any comments specific to the overall approach to Strategic Environmental Assessment call for the Regional Spatial Strategy to be revoked given that it was prepared in a time of economic prosperity and consider to be now out of date.</p> <p>EDF Energy supports the Strategic Environmental Assessment approach that the Department of Communities and Local Government has taken to assess the potential impacts of retaining or revoking the North West of England Regional Strategy.</p> <p>Campaign to Protect Rural England North West believe the Strategic Environmental Assessment is flawed because it:</p> <ul style="list-style-type: none"> – relies on an overly optimistic view of the delivery of environmental protection and sustainable 	<p>which is a nationally recognised Non Government Organisation.</p> <p>Disagree.</p> <p>The assessment does not rely only on the delivery of environmental protection in local plans and the National Planning Policy Framework but refers to hierarchy of measures that will apply in the absence of the regional</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>development in the National Planning Policy Framework and subsequently in local plans</p> <ul style="list-style-type: none"> – relies on untested processes for co-operation between local authorities – fails to address how the current arrangements might be improved to ensure an approach to strategic planning which is rigorous and engages all sectors – fails to address how the Government should tackle the acknowledged intra- and inter-regional disparities which it envisages emerging. <p>The Town and Country Planning Association welcomes the fact that the Strategic Environmental Assessment process has been repeated with a methodology more closely aligned to the requirements of Directive 2001/42/EC as transposed through the UK Regulations, as suggested in the Association's consultation response (20 January 2012) to the first Environmental Reports. Concerns do remain about the way that the method has been applied. It is in the Town and Country Planning Association's view risky to put so much reliance as a mitigation factor on the assumption that local authorities will continue to work together on</p>	<p>strategy. These include:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) • existing planning policy (such as the National Planning Policy Framework and Planning Policy Statement 10) • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning. <p>Regarding the comments by Campaign to Protect Rural England and the Town and Country Planning Association, in many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the National Planning Policy Framework have been referenced in the individual policy assessments in the updated</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		cross boundary strategic issues, and to assume that references in the National Planning Policy Framework and the duty to co-operate are effective substitutes for a regionally specific policy on key environmental topics.	<p>Environmental Report to provide a substantial alternative source of planning policy relevant to the local plan. For a number of regional strategy policies it has also been considered relevant to reference the duty to cooperate. Where this is the case, specific local examples of current cooperation are also cited where available. Examples where authorities have cooperated analogous to the duty to cooperate include: the authorities of Greater Manchester which have combined to develop a statutory authority which will co-ordinate economic, regeneration and transport functions; and the City of Preston and authorities of South Ribble and Chorley which operate a Joint Core Strategy and are working on other development plans, guidance and the community infrastructure levy.</p> <p>The Government recognises that the duty to co-operate needs to be sufficiently robust to secure effective planning on cross-boundary issues. The duty requires councils to demonstrate how they have complied with the duty as part of the independent examination of local plans. Failure to demonstrate compliance may mean that local authorities plans may not pass the examination process. This is a</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Cheshire East Council does not agree with the overall approach to the assessment. It considers that the approach is flawed in size areas which can be summarised as:</p> <ol style="list-style-type: none"> 1. Failure to identify environmental issues for Cheshire East and impacts of revocation, and propose mitigation measures; 2. A fundamental flaw in the logic assessing the impact of revocation and the reasonable alternatives in absolute terms, rather than relative to retention; 3. Reliance on implausible and unevidenced assumptions 4. Reliance on some out of date evidence. 5. Inadequate appraisal framework. 6. Done too late to influence the decision. <p>The Countryside Council for Wales supports the efforts made in undertaking this second version of the Revocation Strategic Environmental Assessment.</p>	<p>powerful sanction. Where 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 it may be found unsound.</p> <p>Disagree.</p> <p>The Government's view (supported by the range of statutory and non statutory consultees listed above) is that the updated Environmental Report contains a comprehensive assessment, compliant with the requirements of the Strategic Environmental Assessment Directive, providing an assessment of likely significant effects of the Plan to Revoke and reasonable alternatives to it. The points raised by Cheshire East and Countryside Council for Wales are considered in the appropriate sections within this table.</p> <p>The Government disagrees with the comments made by Cheshire East Council regarding the overall approach to the assessment. Detailed comments on the points raised by Cheshire East and the Countryside Council for Wales are set out in this table, in particular at rows 2, 3, 4,</p>

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		Cheshire East Council and The Countryside Council for Wales made comments on aspects of the assessment which are set out and responded to elsewhere in this table, in particular at rows 2, 3, 4, 8, 9, 10, 11, 12, 14 and 21 below.	8, 9, 10, 11, 12, 14 and 21 below.
2.	The overall approach taken to Strategic Environmental Assessment – reasonable alternatives	<p>The Environment Agency agrees with the overall approach that has been taken to appraise the options, including the wider range of alternatives.</p> <p>Cheshire East consider that the alternatives as selected present the revocation option falsely as appearing to have substantially positive impacts. The Council considers that the appraisal matrices compare the main alternatives of revocation and retention not with each other but with an implicit, but undefined, further alternative of absence of relevant planning policy. In their view this makes the revocation option falsely appear to have substantially positive impacts, compared to an option of not revoking the Regional Spatial Strategy. In the opinion of the Council, revocation would have few positive, and mostly negative, impacts (of varying strength and certainty). They do not agree with the conclusions of the Strategic Environmental Assessment.</p>	<p>Comments noted.</p> <p>Disagree.</p> <p>Appendix D of the updated Environmental Report presents the assessment against all the Strategic Environmental Assessment topics of retention and revocation of all the Regional Strategy policies. The assessment is of the absolute effects of each alternative and is presented in a matrix format that juxtaposes the assessment of revocation and retention to enable ease of comparison. The commentary in the main report presents the assessment of effects of each alternative (including the other alternatives of partial revocation) and comments on both absolute and relative</p>

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		<p>Lancashire Council considers that the options that the updated Environmental Assessment identifies and tests are reasonable.</p> <p>Natural England supports the identified outcomes of the assessment and understands the justification for using the policies found in the Strategic Environmental</p>	<p>effects. This approach enabled AMEC both to comment that there will be benefits from housing provision (in meeting community needs for housing) i.e. an absolute effect; however, that under revocation these benefits will be reduced and delayed due the effects arising from uncertainty until all the Local Planning Authorities in the region have up to date planning policies in place i.e. a relative effect when compared to retention. The Cheshire East submission appears to focus on the assessment of the relative effects. Such an approach would provide Government (and consultees) with only a partial understanding of the effects and could itself be challenged in failing to identify, characterise and assess all the likely significant effects of revocation.</p> <p>Comments noted.</p> <p>Section 3 of the updated Environmental Report sets out the Strategic Environmental Assessment methodology used in the assessment. This includes the steps in the</p>

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		<p>Assessment of the North West Regional Strategy as objectives, as this allows for a simpler comparison of data and objectives. It queries whether this allows for full discussion of the assessment of alternatives on the Strategic Environmental Assessment topic areas that Natural England leads on (namely biodiversity, landscape and access and recreation). Natural England query whether “environment” is taken to include the Strategic Environmental Assessment topics (biodiversity, landscapes, etc.) and suggest that it is difficult to aggregate up the impact on the policies, to the impact on the Strategic Environmental Assessment topics. Natural England suggest that a further summary that draws together the main findings from the assessment on the policies, to an assessment on the effects on the Strategic Environmental Assessment topics (as has been done for cumulative effects in section 4) would be beneficial.</p>	<p>Strategic Environmental Assessment process, when it was undertaken and by whom (Section 3.1), the scope of the assessment and the topics considered (Section 3.2), the baseline and contextual information used (Section 3.3) and the approach taken to completing the assessment (Section 3.4). Technical difficulties encountered during the assessment are also summarised (Section 3.5).</p> <p>Section 3.4 of the updated Environmental Report sets out the two stage nature of the assessment:</p> <ul style="list-style-type: none"> - A high level (or screening) assessment of the effects of the proposals for each regional strategy policy against all Strategic Environmental Assessment topics to identify those where there could be a likely significant effect; and - A detailed assessment of the likely significant effects (both positive and negative) identified through the high level assessment of each regional strategy policy, presented under each Strategic Environmental Assessment topic.

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>The high level assessment is presented in Appendix D in an assessment matrix covering the effects of retention and revocation of each regional strategy policy against all Strategic Environmental Assessment topics in the short, medium and long term and includes of consideration of permanent and temporary and positive and negative effects. The commentary outlines the likely significant effects, justification for the scores given, any mitigation measures, assumptions and uncertainties.</p> <p>The detailed assessment is presented in Appendix E at the end of each topic chapter. The topic chapters contain information required by Annex I (b) to (g) of the Strategic Environmental Assessment Directive and are considered germane to the assessment.</p> <p>The Strategic Environmental Assessment topics used were taken from those set out within the Strategic Environmental Assessment Directive, Annex I. The scope of these topics is detailed within Annex E to the updated Environmental Report with a separate chapter for each topic. Each chapter begins with a definition of the topic as used within the assessment and provides contextual</p>

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			<p>information (from the analysis of plans and programmes and baseline data) to inform the assessment. Each topic chapter also provides definitions of what constitutes positive, negative, minor and significant effects before then presenting those regional strategy policies assessed as having a significant effect on that topic (see Table 1.3, 2.4 3.2, 4.7 of Appendix E to the updated Environmental Report as examples). Landscape is covered within the Landscape and Townscape topic (chapter 10), biodiversity within the Biodiversity topic (chapter 1). Recreation, and in particular recreational pressure, is referenced predominantly within Biodiversity (sections 1.3.2, 1.4, 1.5 etc) but also under the Landscape topic (section 10.4.2). Environment, in its widest sense is taken to include all of the Strategic Environmental Assessment topics although specific references may however be made to the natural environment, water environment etc.</p> <p>Secondary, cumulative and synergistic effects are also specifically considered in section 4.5 of the updated Environmental Report and summarised in table NTS3.</p>

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		<p>Campaign to Protect Rural England consider that the National Planning Policy Framework places greater weight on housing and economic growth than on environmental protection and that Local Planning Authorities will in many cases not be able to make decisions that protect the environment, citing an example from Trafford where a locally-determined decision to return land to Green Belt was reversed. Campaign to Protect Rural England consider that it is therefore not reasonable to assume, as AMEC does, that revocation of the North West Regional Spatial Strategy will have positive environmental impacts, or that the impacts will be broadly similar to retention. Campaign to Protect Rural England comment that when considering alternative</p>	<p>All information is summarised in Section 4, and 5 of the updated Environmental Report and then further summarised in the NTS. Therefore the scorings and assessments do inform the conclusions set out in the Environmental Report, although the justification for them is set out in Appendix D and E rather than in Section 4 and the subsequent conclusions.</p> <p>The Government does not agree that a further summary is necessary.</p> <p>The Government notes the comments made by Campaign to Protect Rural England and has provided a response to the findings of the Strategic Environmental Assessment (Table 3.2 of this Post Adoption Statement) which included the finding concerning issues such as renewable energy generation or waste recycling which typically benefit from being planned at a wider geographical scale may not have their full potential realised as a result of revocation particularly as regional targets are set at a level which is higher than the corresponding national target.</p> <p>Campaign to Protect Rural England raise</p>

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		options the assessment does not appear to consider modifications to the new planning regime or institutions to ensure account is taken of strategic planning in the round.	<p>concern that Local Planning Authorities will not be able to make decisions that protect the environment and it is not therefore reasonable to assume that revocation will have positive environmental impacts, or that the impacts will be broadly similar to retention. However, Local Planning Authorities will make decisions in accordance with their development plan and the National Planning Policy Framework will be a significant material consideration.</p> <p>Development Plans throughout the region do have a significant body of policy that seeks to protect the environment. This will continue post-revocation. For example the Central Lancashire Core Strategy adopted July 2012 (and subsequent to the publication of the National Planning Policy Framework) contains Policies 20, and 21 which seek to ensure development is in character with the landscape and to conserve, protect and seek opportunities to enhance biological and ecological assets respectively. The aims and objectives of these policies do not depart substantially from similar policies contained within the Regional Spatial Strategy such as Policy EMA1 which requires plans and schemes to identify, protect, maintain and enhance features that contribute</p>

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			<p>to the character of the landscape or Policy EM1 B which seeks to protect, enhance expanding and link areas for wildlife. Indeed Central Lancashire Core Strategy Policy 21 contains supporting text which references explicitly the importance of ecological networks, a key tenet of the Regional Spatial Strategy Policy. When local planning policy is combined with material consideration such as the Core planning principles set out within the National Planning Policy framework (particularly in this case the seventh principle which requires plan and decision-makers to contribute to conserving and enhancing the natural environment) it is considered reasonable to assume that positive environmental effects will continue post revocation.</p> <p>However, Nature Improvement Areas and Local Nature Partnerships already provide opportunities for cross-boundary working with partners working together to improve biodiversity through projects which can be expected also to contribute significantly to landscape conservation.</p> <p>Revocation of the North West Regional Strategy does not signal an end to strategic</p>

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			<p>planning, but a shift towards a locally-led approach to planning for cross-boundary matters in local plans. The duty to co-operate requires local authorities and other public bodies (such as Natural England and the Environment Agency) to work together constructively, actively and on an ongoing basis in relation to planning for strategic, cross-boundary matters in local and marine plans. Utilities, particularly water companies also do this. Examples of cross-authority working in the North West region are outlined in section 2.2.5 of the updated Environmental Report.</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</p>

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			<p>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 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 the local plan 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>The National Planning Policy Framework makes it clear that local planning authorities should work collaboratively with private sector bodies, which would include Local Enterprise Partnerships which have a contribution to make</p>

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			<p>to the strategic planning function along with bodies like utility and infrastructure providers.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a recommendation that the duty to co-operate should be one of the priority areas on which the Government should consider providing guidance. The conclusions of the Review Group have been generally welcomed by Government and were published on 21 December for an 8 week consultation. The Government will consider the consultation responses before responding to the Group's recommendations.</p>
3.	<p>Additional information that should be contained with the baseline or review of plans and programmes.</p>	<p>Countryside Council for Wales notes with concern that the summary of the state of the environment in the North West includes no reference to International Sites shared in 'common' with Wales. It considers that reference should be made to those water supplies for the North West which are derived from sources in Wales. Reference to water quality issues in 'shared' water bodies including the Dee Estuary and River Dee should also be made.</p>	<p>Table NTS 1, summary of the state of the environment in the North West provides a brief and necessary high level summary of the environment within two pages for all Strategic Environmental Assessment topics considered in the assessment. The summary notes that there is 6,458 km of river in the North West and 866 surface water bodies covered by River Basin Management Plans within the North</p>

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		<p>The Environment Agency welcomes recognition of the Water Framework Directive.</p> <p>Renewables UK provides additional detail with regard to</p>	<p>West. Within the context of a summary, it would not be appropriate to reference individual water courses or estuaries, whether shared or wholly within the region. Reference to the wider water resource context is made in the water topic section in Appendix E to the updated Environmental Report. Appendix G to the updated Environmental Report considered European and Internationally Designated sites which included the River Dee and Bala Lake.</p> <p>Any abstraction from the river Dee will be managed through the issuing of abstraction licences managed by the Natural Resources Wales, working closely with Environment Agency and the water companies serving the North West (who work with local planning authorities in preparing Water Resource Management Plans). Abstraction licences are also subject to the requirements of the Habitat Regulations.</p> <p>Comment noted</p> <p>The Government notes the additional detail referred to by Renewables UK with regard to</p>

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		<p>climate change and renewable energy in context although it does not state that it considers the Strategic Environmental Assessment baseline to be deficient.</p> <p>Cheshire East Council considers that important aspects of the baseline are out of date. Reference is made to certain aspects of the baseline set out under the 'Population' heading. These include economic development and housing. The Council believes that more up to date information is available and should have been used to profile the existing environmental conditions of the region. The Council considers that reliance on baseline information from 2006 reflects a situation before the recession and consequently one which is not now of relevance. With regard to housing, the Council states that the trends identified of declining completions provides no justification for assuming that lower housing completions in the early years of the Regional Spatial Strategy period will be made up for by higher completions later. It considers that it would be more reasonable to extrapolate the current (lower) trend through the rest of the Regional Spatial Strategy period. The Council believes that this recommended approach could have been done if more up to date figures were projected forward.</p>	<p>climate change and renewable energy in context although it does not consider the baseline in the updated environmental report to be deficient.</p> <p>Disagree.</p> <p>The Cheshire East submission acknowledges that most of the baseline evidence in the updated environmental report is thorough and contemporary. Appendix E, page 36 onwards sets out the baseline relative to housing. It uses a mix of information sources with dates ranging from 2008-2010/11. The older information (2008) is taken from the evidence base compiled by the former Regional Leaders Board for the North West (4NW) in support of the then proposed changes to the Regional Spatial Strategy. This set out the patterns of change in the housing market (build rates, prices). In the case of housing, the baseline shows house build rates slowing and house prices stabilising, a view acknowledged and shared by Cheshire East.</p> <p>The Cheshire East submission suggests that, based on the baseline conditions, it is unreasonable for the assessment to assume</p>

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			<p>that Regional Strategy housing targets will be met and that instead the assessment should be based on an extrapolation of current completion rates. Section 3.4.5 (assumptions used in the Assessment) of the updated Environmental Report states:</p> <p>‘It is evident that since adoption of the regional strategies, actual housing completions per annum are below the levels expected in each strategy.... however, we have assumed that over the lifetime of the regional strategy that the housing policy will still be delivered. It is appreciated that whilst this appears to be reasonable assumption, it could be affected by the health of the economy or market changes. However, determining alternative credible views on the likely future outcome of regional strategies and their expectations for new development risks adding an extra layer of subjectivity to a process that is already relying heavily on judgements about future impacts in an uncertain world.’</p> <p>In consequence, to avoid a further set of potentially contentious and questionable assumptions, the assumption that the Regional Strategy housing targets would (eventually) be</p>

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			<p>delivered over the lifetime of the plan remained. This also enabled the assessment to draw on the findings of the Sustainability Appraisal of the North West Plan as the assumptions were then consistent.</p> <p>Utilising this housing information, a key finding of the updated Environmental Report has been that for revocation there will be a potential delay on housing delivery in the short and medium term with greater uncertainty about the nature and scale of positive and negative impacts on the Strategic Environmental Assessment topics due to the transition period for those local planning authorities that need to establish Local Plan policies that reflect the objectively assessed and up to date needs of their respective local communities. A view that has been echoed by Cheshire East.</p> <p>With regard to the point made by Cheshire East concerning out-dated data on economic development, a similar conclusion is reached. Again data is taken from the evidence base compiled by the former Regional Leaders Board for the North West (4NW) in support of the then proposed changes to the Regional Strategy. This provides a profile of the</p>

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			<p>changing economic structure within the region and how this compared to the national picture. The overall conclusion, set out at Appendix E, that the region's economic structure is changing by moving from an economy dominated by manufacturing to one based around service industries, is considered to be valid.</p> <p>The Government does not therefore agree with the comments made by Cheshire East.</p>
4.	<p>Whether the likely significant effects have been identified, described and assessed.</p> <p>Inadequate appraisal framework.</p>	<p>Cheshire East consider the Strategic Environmental Assessment to be very unusual in that it does not test alternatives against explicit appraisal objectives, instead relying on in their view a vague and undefined list of environmental topics in the Strategic Environmental Assessment Directive. The Council recognises that objectives are not formally required, but they content are used almost universally to provide enough clarity, explicitness and detail. The Council provide a list of suggested objectives.</p>	<p>Comment noted.</p> <p>The use of assessment objectives is not a requirement of the Strategic Environmental Assessment Directive or regulations. The approach to the assessment was agreed during the scoping stage, undertaken in May 2011 and subject to the views of the Strategic Environmental Assessment statutory consultees. This has been summarised in section 1.5.2 of the updated Environmental Report – no comments were made on the absence of the objectives. In recognition that the Strategic Environmental Assessment topics listed in the Directive are 'vague', the environmental topics included in the</p>

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			assessment are all defined in Appendix E, with appropriate contextual information provided. The assessment also used definitions of significance for each of the assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. These definitions were provided for every environmental topic considered. Within Appendix E of the updated Environmental Report each topic chapter contained a table which set out the approach to determining significant effects. Therefore for biodiversity for example, Table 1.3 set out the guidance the assessor used to consider the level of predicted effect ranging from significantly negative through to significantly positive. Setting out the guidance used by the assessor provides transparency to the assessment and it enabled a consistent approach to be taken for all regional assessments.
5.	Whether the likely significant effects have been identified,	Natural England comments upon Section 4.5 which is headed “Secondary, Cumulative and Synergistic effects”. It references Table 4.5 which provides scoring and a commentary on the potential cumulative effects of revocation. Within the table the commentary describes	Comment noted. The effects on the biodiversity topic of the Plan to Revoke the Regional Strategy are summarised in Table 4.1, 4.2, 4.3 4.4 and 4.5 of the updated Environmental Report. For

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	<p>described and assessed.</p> <p>Environment (Biodiversity, soils and landscape).</p>	<p>the effects of the impact on water levels on biodiversity and changes that levels of house building may have on these (due to the removal of Regional Strategy housing quotas). In Natural England's view these are 'direct' effects of the policy change, and have been discussed in other revocation Strategic Environmental Assessment assessments as such. It suggests that the impacts on biodiversity could be summarised early on when reaching the scoring assessment for the Strategic Environmental Assessment topics, this should not be left to the scoring of "cumulative effects".</p>	<p>example the direct effect of housebuilding upon biodiversity resulting from potential changes in water levels is recorded as negative upon the water and biodiversity receptors within Table 4.1 (for Policy L4/L5). This is a direct result arising from the revocation of policy.</p> <p>These tables are supported by commentary which notes the effects on biodiversity, whether positive:</p> <p>'The assessment has concluded that revocation of Regional Spatial Strategy Policy DP7 would lead to positive effects across many of the Strategic Environmental Assessment topics but with those positive effects being significant in relation to biodiversity/flora/fauna, population/health, water, cultural heritage and landscape. This is because the National Planning Policy Framework provides a framework of guidance and policy that encourages balanced consideration against all three dimensions of sustainability.' (page 58 of the updated Environmental Report).'</p> <p>or uncertain:</p> <p>'For the protection and enhancement of environmental resources more generally, the</p>

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			<p>cumulative effects of the absence of regional policy frameworks and associated resources is harder to determine over the longer term. Whether regional strategies specifically relating to biodiversity and landscape resources, for example, can adequately realise their potential in the absence of a unifying policy framework is uncertain whilst a similar conclusion is also reached for soils in the absence of a requirement for brownfield targets.' (page 111 of the updated Environmental Report).'</p> <p>More detailed information is presented in Appendix D and Appendix E which includes ncludes of consideration of temporary, permanent, direct and indirect, short , medium and long term positive and negative effects. The commentary outlines the likely significant effects, any mitigation measures, assumptions and uncertainties.</p> <p>Secondary, cumulative and synergistic effects are also specifically considered in section 4.5 and summarised in table NTS3.</p> <p>All information is summarised in Section 4, and 5 of this report and then further summarised in the NTS.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Natural England also provides commentary with regard to Soils and Landscape. It references the Report that there will be a minor negative effect on soils from the revocation of the Regional Strategy, mostly due to the loss of the Brownfield first policy. Natural England notes that assessment does not indicate the weight that has been given to the protection of Best and Most Versatile Land in the National Planning Policy Framework and it is not clear if the negative assessment is due to greater land take of soils, or the loss of Best and Most Versatile land. Further clarification and an indication of the importance given to Best and Most Versatile Land soils would be welcomed.</p> <p>Transport Activists Roundtable North West do not agree with the key conclusion of the consultation document that there would be more positive effects to revoking the North West Regional Spatial Strategy than there would be negative effects. As an example it cites that fact that local authorities are not setting for</p>	<p>Comment noted.</p> <p>The minor negative effect upon soils which has been recorded resulting from the revocation of regional policy containing brownfield targets considers soils as a whole, rather than a sub-division between Best and Most Versatile Land land and the rest. Soils which are not Best and Most Versatile Land can be as important, or indeed can often be more important, environmentally than Best and Most Versatile Land soils. Indeed National Planning Policy Framework paragraph 112 references the 'economic and other benefits' of Best and Most Versatile Land. The percentage of Best and Most Versatile Land in the region is set out within Appendix E (chapter 4) of the updated Environmental Report.</p> <p>Disagree.</p> <p>The key findings of the updated Environmental Report were:</p> <ul style="list-style-type: none"> • That there were significant positive effects for both retention and revocation;

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		<p>themselves high brownfield building targets (which the Regional Spatial Strategies did) and that the National Planning Policy Framework does not require them to do so. The negative effects of revocation are already being experienced in their opinion.</p>	<ul style="list-style-type: none"> • That for the majority of policies, it is difficult to identify clear differences between the effects of retention and revocation; • Where it occurs, differences between retention and revocation are most clear in respect of employment, housing, transport and certain sub-regional policies. In the case of revocation, there is some uncertainty about whether the benefits will be realised in the short to medium term for those local authorities that need to establish Local Plan policies for housing and economic development that reflect the objectively assessed and up to date needs of their respective local communities. <p>In the case of brownfield rates the Environmental Report does not conclude that local authorities are setting lower brownfield rates than those set out within the Regional Strategy. It recognises the potential for fewer sites to come forward but also acknowledges the targets that are being adopted by Councils and the positive measures put in place to support development on brownfield land. Section 4.2.1 Living in the North West states that:</p>

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

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		<p>With regard to landscape, Natural England recognises that Appendix E includes an assessment of the effects of the loss of the policy on green infrastructure (EM3), which is judged to be a significant benefit in the medium and long term. This, they argue, is not reconciled with the statement in the Strategic Environmental Assessment (page xii) which records that many of the benefits of retention relate to spatial planning issues that cross local authority boundaries (e.g. green infrastructure) and require direction and co-operation from a number of stakeholders including local authorities to be realised. In</p>	<p>brownfield development opportunities in areas of need.</p> <p>It is therefore concluded that the issue raised by the Report is more one of uncertainty with regard to the continuation of high brownfield targets. This is reflected within assessment for the revocation of Policy L4 against the Soil Strategic Environmental Assessment topic. It records 'uncertainty' in the short to medium term followed by minor negative long-term. This contrasts with the retention option which concludes minor negative for short, medium and long-term.</p> <p>Comment noted.</p> <p>The National Planning Policy Framework expects the planning system to protect and enhance valued landscapes. It states that planning should protect and enhance valued landscapes, minimise impacts on biodiversity and provide net gains in biodiversity where possible. It makes clear that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and</p>

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		<p>the case of revocation, the report concludes that there may be more uncertainty about benefits coming forward in the short to medium term where local authorities need to establish arrangements under the duty to co-operate to deliver such strategic policies and then reflect them in their adopted Local Plans. Given the concern about the level of uncertainty for the resources and co-operation required for the implementation of green infrastructure, the assessment for this topic (at least in the medium term) cannot be a significant benefit in the view of Natural England.</p>	<p>green infrastructure, and that to minimise impacts on biodiversity, planning policies should plan for biodiversity at a landscape-scale across local authority boundaries.</p> <p>Nature Improvement Areas provide cross boundary projects where partners' work to improve biodiversity and can be expected also to contribute significantly to landscape conservation. The 12 initial Nature Improvement Areas include Dark Park, Meres and Mosses and Morecambe Bay Limestones and Wetlands, which are wholly or partly in the Region. Across the twelve areas locally-led projects have a share of £7.5 million to restore habitat (which has attracted over £40million of additional resources, from cash contributions, gifts in kind, and voluntary support).</p> <p>The benefits of green infrastructure can accrue wholly within a local authority boundary, or across boundaries. The latter in particular will require co-operation with other stakeholders and other local authorities. Although Local Nature Partnerships are not a prescribed body under the duty to co-operate, the Localism Act provides an enabling power requiring the bodies that are subject to the duty to have</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>regard to the activities of other bodies when they are preparing their local plans and related activities (Local Enterprise Partnerships and Local Nature Partnerships have been prescribed in the 2012 Regulations for this purpose).</p> <p>The scoring therefore recognises that the benefits arising from green infrastructure to the landscape will take time to come forward, policies may need to be put in place, projects identified and implemented. It therefore concludes that significant effects (double plus) will only occur in the long-term with minor positive effects (single plus) in the medium term.</p>
6.	Whether the likely significant effects have been identified, described and assessed.	<p>Countryside Council for Wales notes the reference to significant adverse effects on material assets arising from policies for housing and employment provision however, Countryside Council for Wales states that it is unclear as to what is meant by 'material assets' in this context. Clarification would be welcomed as to whether water resources were included within the definition of 'material assets'.</p>	<p>The Government notes comments made by Countryside Council for Wales.</p> <p>Table 3.2 of the updated Environmental Report shows how the Strategic Environmental Assessment Regulations⁵ relate to the categories used in the Assessment of revoking the North West Regional Strategy. This table identified the 'material assets' category in</p>

⁵ See para 6(j) of Schedule 2 to the Environmental Assessment of Plans and Programmes Regulations 2004 (SI2004/1633)

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	Transboundary (Wales).	<p>Countryside Council for Wales notes with concern that the 'safeguards' proposed in respect of potential adverse effects resulting from the revocation of the Regional Strategy rely on 'deferring down' the responsibility for consideration of Habitats Regulations issues (including Habitats Regulation Assessment) to the local level (local planning authorities). It assumes that 'local' in this context means competent authorities in the North West area.</p> <p>Countryside Council for Wales suggests that likely adverse effects resulting from the North West Regional Strategy and its' Revocation may relate to the Dee Estuary Special Area of Conservation/Special Protection Area/Ramsar which is a shared 'European' site with Wales. Countryside Council for Wales is of the opinion that it is unlikely that the potential for these adverse effects in Wales could be or will be addressed to any</p>	<p>Strategic Environmental Assessment Regulations as Waste Management and Minerals. It also identified the 'Water Quality' category in Strategic Environmental Assessment Regulations as Water Quality and Resources (including inland surface freshwater and groundwater resources, and inland surface freshwater, groundwater, estuarine, coastal and marine water quality).</p> <p>Comments noted.</p> <p>The Government believes that the legislative and policy protections for European Habitat sites in both England and Wales are sufficient to allow the conclusion that the revocation of North West Regional Strategy is unlikely to result in a significant effect on a European site. Responsibility for Habitats Regulation issues for plan making and planning applications lie with the relevant local authority. In addition, water resource management plans, drawn up by Water companies, are also subject to strategic environmental assessment and Habitats Regulation Assessment.</p> <p>With regard to the Dee Estuary, and River Dee</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>satisfactory degree, by individual competent authorities in the North West.</p> <p>Countryside Council for Wales also consider that reference should be made to those water resources for the North West which are derived from sources in Wales.</p>	<p>and Bala Lake, the key environmental sensitivities have been identified in Appendix G of the updated Environmental Report.</p> <p>The updated Environmental Report notes that paragraph 162 of the National Planning Policy Framework states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for water supply and waste water treatment, and its ability to meet forecast demands. This latter requirement will require cross-boundary working with water companies in adjoining regions or countries such as Wales and Scotland due to the trans-boundary impacts that can occur as a result of water demand within the North West and the potential for secondary impacts upon features such as shared Special Protection Areas in some of these locations. Any abstraction from the river Dee will be managed through the issuing of abstraction licences managed by the Natural Resources Wales, working closely with Environment Agency and the water companies serving the North West (which works with local planning authorities in preparing Water Resource Management Plans). Abstraction</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>licences are also subject to the requirements of the Habitat Regulations.</p> <p>Water companies and their respective Water Resource Management Plans which set out how future demand for water resources will be met. Similarly, River Basin Management Plans for the region identify the pressures that the water environment faces and include action plans requiring cross boundary co-operation and input from a range of organisations. The duty to co-operate came into force on 15 November 2011. This statutory duty, set out in the Planning and Compulsory Purchase Act 2004 inserted by the Localism Act, requires local planning authorities and other public bodies to work together constructively, actively and on an ongoing basis when planning for strategic cross boundary matters.</p> <p>Other statutory and policy measures are in place to address the consequential effects on biodiversity, landscape and water resources), such as:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Floods and Water Management Act 2010)</p> <ul style="list-style-type: none"> existing planning policy (such as the National Planning Policy Framework, in this context particularly sections 10 & 11, and Planning Policy Statement 10) other government policy (such as that articulated in the Natural Environment White Paper) actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning. <p>River Basin Management Plans identify measures that will achieve Water Framework Directive requirements for water bodies. The Water Environment (Water Framework Directive)(England & Wales) Regulations 2003 places a duty on each public body including local planning authorities to have regard to River Basin Management Plans.</p> <p>The National Planning Policy Framework requires that local plans include strategic</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>The Countryside Council for Wales considers policies that form the framework for development and determine options for spatial distribution and magnitude of development should be considered in the context of required environmental goods and services and environmental effects and not by administrative boundaries.</p>	<p>policies to deliver water supply and wastewater infrastructure, and expects local planning authorities to work with other authorities and providers (such as water and sewerage companies) to assess the quality and capacity of infrastructure and its ability to meet forecast demands.</p> <p>Disagree.</p> <p>Since the North West regional strategy is being revoked, the administrative boundaries must be regarded, since it is the policies within the North West administrative boundaries that are being considered for revocation. Secondary, cumulative and synergistic effects including those that may arise outside the North West region are specifically considered in section 4.5.</p>
7.	Whether the likely significant effects have been identified,	<p>Scottish Natural Heritage, Scottish Environment Protection Agency and Historic Scotland In respect of their interests, do not anticipate any significant environmental effects from the revocation of the plan on the Scottish environment and therefore have no further comments to make on the Environmental Report.</p>	<p>Comments noted. The Government welcomes the comments from the three Scottish Strategic Environmental Assessment consultation bodies, Scottish Natural Heritage, the Scottish Environment Protection Agency and Historic Scotland who do not anticipated any significant</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	described and assessed. Transboundary (Scotland).		environmental effects from the revocation of the plan on the Scotland's environment.
8.	Individual topics: Habitats Regulation Assessment.	<p>The undertaking of Strategic Environmental Assessment for the plan to revoke the North West Regional Strategy enables the consideration of the potential effects on the wider environment at a strategic level and, in principle, allows the best opportunity to consider 'strategic' effects including cumulative, synergistic, direct and indirect effects. Given that the likely effects of the implementation of the North West Regional Strategy include, in many cases strategic 'in combination' effects and that the precautionary principle is embedded within the Habitats Directive and Habitats Regulation Assessment processes, Countryside Council for Wales consider that a Strategic Environmental Assessment should be undertaken together with a similar revocation Habitats Regulation Assessment also being undertaken. Without a revocation Habitats Regulation Assessment being undertaken, Countryside Council for Wales question the Government's view that 'revocation of the Regional Strategies will...have no effects requiring assessment under the Habitats Directive'.</p> <p>Natural England recommended that the criteria used in</p>	<p>Comment noted</p> <p>Section 1.4 of the updated Environmental Report addresses the requirements of the Habitats Directive (92/43/EEC) and concludes that 'the Government's view is that the revocation of the regional strategies will have no effects requiring assessment under the Habitats Directive'. This conclusion was reached on the basis of a screening exercise: each Regional Strategy policy (in this case the adopted North West of England Plan) was reviewed to identify those that referred to the protection of European sites and those which are locationally specific – i.e. they direct development to a particular parcel of land. Policies that were more pervasive in nature or provided a more general requirement for a local planning authority to make provision for a certain type or amount of development, were screened out at that stage, as it is for each</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>the screening process should be included in the Post Adoption Statement for the Strategic Environmental Assessment, in order to demonstrate that European protected habitats have been considered and are an important part of the evaluation process.</p>	<p>local planning authority to decide on a response to the pervasive policies and determine the most suitable locations for the development – taking account, where necessary, of the finding of their own Habitats Regulations Assessment.</p> <p>This exercise identified 14 policies which sought to avoid effects on European sites. These policies sought to mitigate for development that the Strategy itself encouraged. They were therefore considered further in order to determine whether it could be concluded that the revocation would not have adverse effects on such sites. Consideration was given, among other things, to the fact that: (i) the ‘development policies’ in the Regional Strategy they seek to mitigate would cease to apply were the Strategy to be revoked; and (ii) that the Conservation of Habitats and Species Regulations 2010 require that a competent authority, such as a local planning authority, in exercising any of their functions must have regard to the requirements of the Habitats Directive.</p> <p>This exercise did not identify any likely</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>significant effects on European sites.</p> <p>This conclusion was supported by the findings of the Strategic Environmental Assessment. The Strategic Environmental Assessment assessed the likely effects of the revocation of the strategy, and the likely effects of retaining the strategy (and a number of reasonable alternatives involving partial revocation). This assessment was carried out for each policy in the Regional Strategy and for each of the topics set out in Appendix I of the Strategic Environmental Assessment Directive (which include biodiversity, fauna and flora). These were detailed in table 3.2 of the updated Environmental Report. The assessment uses definitions of significance for each of the 10 assessment topics to aid transparency and consistency in the assessment and minimise the likelihood of any subjectivity. The guidance on a significant effect for biodiversity includes reference to negative and sustained effects on European or national designated sites and/or protected species. No significant negative effects on biodiversity were found, nor were any significant negative effects found from reasonable alternatives. Monitoring measures</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>have been proposed for the effects on biodiversity, including for Wales, (as well as the other topics) to help review the effects of the decision.</p> <p>The Secretary of State is therefore proceeding on the basis that the implementation of the plan as adopted (the Plan to Revoke the Regional Strategy) will not have a significant effect on a European site.</p>
9.	<p>Whether the likely significant effects have been identified, described and assessed: the weight applied to the National Planning Policy Framework.</p>	<p>Countryside Council for Wales commented that consideration has not been given to 'partnership' working across the boundaries of devolved administrations and that the policies proposed in the National Planning Policy Framework do not apply in Wales. It considers it to be unclear as to how the application of the National Planning Policy Framework could 'mitigate' for adverse effects on the environment in Wales. Even if the principles of the National Planning Policy Framework were applied in Wales, the presumption in favour of 'sustainable development' contained in the National Planning Policy Framework does not apply in respect of European protected sites such as the Dee Estuary Special Areas of Conservation/Special Protection Areas/Ramsar.</p>	<p>Comment Noted.</p> <p>The National Planning Policy Framework applies to English authorities and requires authorities to produce local plans and make planning decisions in line with the requirements of the National Planning Policy Framework. The policies in the Framework set the framework for sustainable development in England. In Wales land use planning policy guidance is set out in two core documents, "Planning Policy Wales" and "Minerals Planning Policy Wales". These documents are supported by topic based Technical Advice Notes (Wales). Circulars and Circular letters provide advice and guidance on specific topics.</p>

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			<p>Since the assessment process is aimed at assessing the implications of revoking policies that only apply in England, it is reasonable to consider the policy and legislative framework that will remain in place, at national and local level in England, should the regional strategy be revoked. The application of policy and legislation, for instance on water resource management, can mitigate impacts in Wales if the impact is transboundary. In the case of water supply, separate legislation and policy in place which sits outside the planning system (see line 6 of this Table).</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004/1633) require local authorities and other public bodies to assess the potential environmental effects of their plans in compliance with the Strategic Environmental Assessment Directive (2001/42/EC). The Regulations impose duties to consult certain bodies during the process, including the devolved administrations and their nature conservation agencies (the Countryside Council for Wales, in relation to such part of a plan as relates to Wales). Government</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>guidance emphasises the need to consult the consultation bodies and the public in any part of the UK significantly affected by a plan or programme in another part of the UK (A Practical Guide to the Strategic Environmental Assessment Directive (Office of the Deputy Prime Minister, September 2005), para 3.2).</p> <p>The Conservation of Habitats and Species Regulations 2010 (S.I. 2010/490), commonly referred to as the Habitats Regulations, impose further duties on local authorities to protect 'European sites' designated under the Wild Birds and Habitats Directives (79/409/EEC, now codified in 2009/147/EC, and 92/43/EEC). For example, under regulation 102 of the Habitats Regulations, plan-making authorities including local planning authorities are required to carry out an 'appropriate assessment' where a land use plan is likely to have a significant effect on a European site and is not directly connected with or necessary to the management of the site. For the purposes of this assessment the 'appropriate nature conservation body' must be consulted (Natural England in relation to England and the Countryside Council for Wales in relation to</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>Wales). Authorities are therefore required to consider the impacts of their plans on affected neighbouring authorities both in England and Wales as necessary.</p> <p>The duty to co-operate requires English authorities to co-operate in the drawing up of plans. Local plans are subject to the test of soundness required under section 20 of the 2004 Act and Paragraph 182 of the National Planning Policy Framework. Where 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 it may be found unsound.</p> <p>The National Planning Policy Framework and the duty to co-operate only apply to English local authorities; however this is not an obstacle to any English authority working with its Welsh counterparts. There is a tradition of collaborative planning between English and Welsh local planning authorities. The Planning and Compulsory Purchase Act 2004 (Section 64(5)(a) which applies to Wales only) states that the purpose of an independent examination is to determine whether a Local</p>

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			<p>Development Plan is sound. Guidance in the form of the Local Development Plans Wales 2005 sets out a number of tests of soundness, to be tested at examination by an independent Inspector. Specifically Test C1 encourages a collaborative approach to local plan making between local authorities by stating if a plan is to found sound, "C1: it is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas". This duty on Welsh local planning authorities extends beyond their Welsh neighbouring authorities to include English authorities where they share a boundary. In North East Wales, Wrexham and Flintshire have worked with Cheshire West and Chester on a number of strategic planning issues of common interest, for example water abstraction from the River Dee, management of the River Dee Estuary, housing growth and the phasing of development and improving access to Wrexham Industrial Estate a major employment centre in the North East Wales and West Cheshire sub region.</p> <p>The Welsh Government also plays a strategic planning role by participating in Local</p>

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			<p>Development Plan examinations and where they identify cross boundary issues they raise them and also alert Welsh local authorities to cross boundary planning issues at an early stage of plan preparation. Beyond the English and Welsh statutory planning system, for example River Basin Management Plans, because they are based on river basin water sheds cross local authority boundaries including the boundaries of England and Wales, provide a vehicle for joint strategic planning of the management of water resources by English and Welsh authorities.</p> <p>Local plans are subject to strategic environmental assessment which requires local authorities to assess the potential environmental effects of their plans. Certain planning decisions are also subject to the requirements of the Environmental Impact Assessment Directive. Local plans and planning decisions are subject to the requirements of the Habitats Directive. As part of this process English local authorities are required to consult statutory consultees on the potential impacts of their plans through the Strategic Environmental Assessment, and</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Campaign to Protect Rural England considers that the National Planning Policy Framework does not provide a sufficiently strong steer to ensure the delivery of genuinely sustainable development. It considers that the impact of its growth-focused policies is that Local Plans are compelled to compromise on policies that would protect the environment or deliver balanced sustainable development.</p>	<p>Habitats Regulation Assessment process including bodies in Wales as appropriate.</p> <p>The Government disagrees with the Campaign for Protection of Rural England's assertion that the protection afforded by the presumption in favour of sustainable development will reduce protection for the environment. The presumption in favour of sustainable development is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Campaign to Protect Rural England acknowledges that the final National Planning Policy Framework has now been published, and that this reduces some of the uncertainty referred to in its earlier response. However, it considers that the decisions made by both Local Authorities and the Secretary of State since the publication of the National Planning Policy Framework demonstrate clearly that the level of protection it affords to the natural environment is far lower than that assumed by AMEC. The brief definition of sustainable development contained in the National Planning Policy Framework, or even the National Planning Policy Framework taken as a whole, are no substitute for the detailed policies contained in the North West Regional Spatial Strategy, in particular in policies DP1-9 in the opinion of Campaign to Protect Rural England.</p> <p>Campaign to Protect Rural England also consider that the National Planning Policy Framework's emphasis on a simplistic concept of economic growth and short term viability will lead to poor local decision making, which gives undue weight to development interests in plan making (this seems to be already heavily influenced by the Planning Inspectorate response to messages in the National Planning Policy Framework).</p> <p>Campaign to Protect Rural England conclude that</p>	<p>taking. This sets out that there are three dimensions to sustainable development: economic, social and environmental and that these should not be undertaken in isolation, because they are mutually dependent.</p> <p>Planning decisions should be in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration in all planning applications. The presumption in favour of sustainable development provides for protection of the environment – permission should not be granted where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the National Planning Policy Framework as a whole or specific policies in the Framework which indicate that development should be restricted (see para 14 of the National Planning Policy Framework and footnote 9). Furthermore, in drawing up and reviewing their development plans LPAs should have regard to policies in the National Planning Policy Framework and plans should be consistent with the principles and policies of the National</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>AMEC's reliance on the National Planning Policy Framework's statements with regard to sustainable development render the conclusions of the report flawed and unreliable. The revocation of the Plan will significantly reduce protection for the environment and will therefore be likely to have significantly adverse environmental effects, in particular in terms of biodiversity, landscape, tranquillity, air pollution and carbon emissions, the quality of urban environments and the undesignated countryside.</p>	<p>Planning Policy Framework. Local Authorities should set policies and targets for development based upon local needs. The purpose of revoking the Regional Spatial Strategy is to allow Council's to assess and plan for their own needs rather than be compelled to meet targets set at a regional level.</p> <p>The assessment at Appendix D of the updated Environmental Report noted that for policies DP1-9 (Spatial Principles) the effects of revocation were similar to those for retention. However for policies DP4, DP5 and DP6 the assessment recognises that some positive effects of retention would not be realised in the short term if the Regional Strategy is revoked. Some of the benefits which arise from resource savings under DP4 do not therefore arise unless a strategic approach is put in place by authorities (or groups of authorities using the duty to co-operate) which is unlikely to be delivered until the medium term. For Policy DP7 the assessment recognises that some positive effects will be less strong in the case of revocation in the medium term.</p> <p>The assessment does not rely only on the</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>delivery of environmental protection in local plans and the National Planning Policy Framework but refers to hierarchy of measures that will apply in the absence of the Regional Strategy. These include:</p> <ul style="list-style-type: none"> • existing legislation concerning environmental protection (such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010) • existing planning policy (such as the National Planning Policy Framework and Planning Policy Statement10) • other government policy (such as that articulated in the Natural Environment White Paper) • actions by other organisations subject to statutory requirements such as water companies and requirements under the Water Industry Act 1991, as amended by the Water Act 2003 concerning water resource management planning. <p>In many instances, particularly for policies of a pervasive and non-spatially specific nature, the specific paragraphs of the National Planning Policy Framework have been referenced in the</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Cheshire East considers that the Strategic Environmental Assessment relies upon implausible and unevidenced assumptions. In particular it casts doubt on the ability of the National Planning Policy Framework to ensure a comparable level of environmental protection to the far more detailed and prescriptive Planning Policy Statements and other planning guidance which it replaced.</p> <p>The Town and Country Planning Association considered that the potential benefits of retaining key regional policies were not recognised. It concludes that this is partly because even a small mention of any topic within the National Planning Policy Framework is assumed to be sufficient to ensure compliance. The Town and Country Planning Association's suggest that a policy reference in the National Planning Policy Framework and the duty to co-operate cannot be</p>	<p>individual policy assessments to provide a substantial alternative source of planning policy relevant to the Local Plan. For a number of Regional Strategy policies it has also been considered relevant to reference the duty to co-operate. Where this is the case, specific local examples of current cooperation are also cited where available.</p> <p>The Government disagree with Cheshire East and the Town and Country Planning Association that reliance upon the National Planning Policy Framework is implausible and unevidenced. The National Planning Policy Framework is adopted by Government as national planning policy. In our opinion it is completely plausible that council, applicants, inspectors and the secretary of state will make decisions and prepare Local Plans in compliance with the National Planning Policy Framework. This is already the case.</p> <p>As noted above, environmental protection is not secured by the National Planning Policy Framework alone but by a comprehensive, integrated hierarchy of legislation and policy, to be implemented by local authorities and other</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>considered as a complete substitute for regionally specific policies, the evolution and testing of which contributed to awareness raising. Examples would be the regionally specific approach to maximum parking standards as an element of managing travel demand (Policy RT2), and the areas of search identified for new regional parks as one way of increasing green infrastructure (Policy EM4).</p>	<p>organisations with a statutory interest in resource management and protection.</p> <p>In response to concerns from respondents about the weight applied to the duty to co-operate and National Planning Policy Framework the Government recognises the importance of strategic planning and the National Planning Policy Framework, makes it clear that strategic priorities across local boundaries should be properly co-ordinated and clearly reflected in individual local plans.</p> <p>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. Existing legislation concerning environmental protection</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>(such as the Habitats Directive, Water Framework Directive, the Floods and Water Management Act 2010 – which includes a duty to co-operate) is part of the hierarchy of measures that will apply in the short to long term in the absence of the North West Regional Strategy. 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 and on an ongoing basis in relation to strategic cross-boundary issues in local plans. Nature Improvement Areas and Local Nature Partnerships already provide opportunities for cross- boundary working with partners' working together to improve biodiversity through projects which can be expected also to contribute significantly to landscape.</p> <p>The Government will provide a response to the findings of the Strategic Environmental Assessment (to be included as Table 3.2 of this Post Adoption Statement), including the finding</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>The Environment Agency agrees that the National Planning Policy Framework and other existing policy frameworks, legislative regimes, and partnerships can help enable the protection and enhancement of the environment and ensure development is sustainable. However, it believes that achieving environmental outcomes may be more challenging during the transitional period (short and medium term), after the Regional Strategy is revoked until up-to-date Local Plans are in place. The Agency welcome recognition of this within the updated Environmental Report.</p>	<p>that the effects arising from the revocation of policies will be uncertain until all participating local authorities define and agree areas of co-operation and implement the duty to co-operate reflect them in their adopted plans.</p> <p>Comments noted.</p>
10.	Whether the likely significant effects have been identified, described and assessed: the	<p>Countryside Council for Wales notes the premise that the duty to co-operate will become an integral part of plan preparation 'over time'. It is suggested that significant and irreversible damage may be done to the environment over this 'time' and would welcome clarification as to what safeguards are in place to ensure that environmental damage will not occur during this period.</p>	<p>Comments noted.</p> <p>The Government notes the comments from Countryside Council for Wales, Campaign to Protect Rural England, the Environment Agency and Town and Country Planning Association. The Government welcomes the Environment Agency's support for the duty to co-operate and Town and Country Planning</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	weight applied to the duty to co-operate.	<p>Campaign to Protect Rural England do not consider that the duty to co-operate, applied in the context of the National Planning Policy Framework, will result in better co-operation between councils. It may, in some cases, even be used to by neighbouring councils to undermine adjoining local plans. It is not convinced that there will be sufficient and consistent strategic monitoring and assessment to ensure application of the duty is rigorous. Campaign to Protect Rural England has concerns that the Duty will result in undue weight being given to the views of unaccountable Local Enterprise Partnerships. All interests, including crucial environmental interests, should be heard in respect of strategic planning issues.</p> <p>The Environment Agency supports the new Duty to Co-operate and, as a 'named party', will provide evidence that helps Local Authorities to consider cross-boundary issues such as adapting to climate change, reducing the impacts of flood risk, waste management, using water resources wisely and achieving Water Framework Directive objectives. The application of the duty to co-operate should allow the strategic environmental and infrastructure capacity issues to be addressed. However, the recognition in the Environmental Report that short to medium term environmental issues do arise post revocation is welcome. It will take time for local authorities</p>	<p>Association's recognition of the more thorough methodology in the updated Environmental Report.</p> <p>In response to the Town and Country Planning Association comment concerning the duty to co-operate as a mitigating factor, it should be noted that the assessment of effects arising from revocation considers the likelihood for significant effects based upon the extant policy and legislative framework currently in place – this includes for the duty to co-operate. Mitigation in the assessment process is defined as additional measures that would be recommended to address any identified significant effects (for example for the Yorkshire and Humber region the Government has retained policy protecting the Green Belt around the City of York).</p> <p>The statutory duty to co-operate underpinned by the National Planning Policy Framework enables local planning authorities along with other bodies to strategically plan to address the types of environmental issues such as climate change, flood risk, waste management and water use. In recognition of the breadth of bodies involved in effective strategic planning,</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>to establish arrangements under the duty to co-operate and deliver the necessary strategic policies. This will be particularly true where wastewater and water supply issues involve water companies in adjoining regions or Wales. The Agency notes that the NTS recognises that the outcome of revocation will be dependent on how the duty to co-operate is implemented and that it identifies circumstances such as renewable energy or waste recycling which typically benefit from being planned at a wider geographical scale and which may not therefore have their full potential realised, particularly where regional targets that are set at a level which is higher than the corresponding national target, are revoked.</p> <p>The Town and Country Planning Association welcomes the fact that the methodology used is more thorough than in the first Environmental Report, particularly in describing the environmental characteristics of North West, in its inclusion of alternatives, in acknowledging the interrelationship with the Regional Economic Strategy which was particularly strong in this region, and its attempt to take account of the local plan status in each local authority area. It considers that the tabulated assessment scorings show little difference in environmental effects between the retention and revocation alternatives, and this appears to be due to the reliance on a crucial assumption about the effectiveness</p>	<p>the duty to co-operate applies to local planning authorities county councils and public bodies that are prescribed in Local Planning Regulations 2012. These bodies are:</p> <ul style="list-style-type: none"> • the Environment Agency; • the Historic Buildings and Monuments Commission for England (English Heritage); • Natural England; • the Mayor of London; • the Civil Aviation Authority; • the Homes and Communities Agency; • Primary Care Trusts; • the Marine Mangement Organisation; • the Office of Rail Regulation; • the Highways Agency; • Transport for London; and • Highway Authorities <p>Local Enterprise Partnerships are not a prescribed body, however the Localism Act provides an enabling power requiring the bodies that are subject to the duty to have</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>of the duty to co-operate. By using this assumption as a mitigation factor, it has the result of neutralising what could be seen by others as significant environmental effects from revocation.</p>	<p>regard to the activities of other bodies when they are preparing their local plans and related activities (Local Enterprise Partnerships and Local Nature Partnerships have been prescribed in the 2012 Regulations for this purpose).</p> <p>The Government recognises that the duty to co-operate 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 plans may not pass the examination process. This is a powerful sanction. Where local planning authorities have failed to co-operate</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>on cross boundary matters it is also likely that their Local Plan will not be deliverable and as such it may be found unsound. Local Authorities are also required to report on their performance against the duty to co-operate in their monitoring reports.</p> <p>The Government will provide a response to the findings of the Strategic Environmental Assessment (to be included as Table 3.2 of Post Adoption Statement), including the finding that the effects arising from the revocation of policies which provide strategic direction and whose requirements extend beyond the boundaries of a single authority will be uncertain until all participating local authorities define and agree areas of co-operation and implement the duty to co-operate reflect them in their adopted plans.</p> <p>Delivery of local plans is increasing: across the North West region 40% of councils have a plan adopted post-2004 (nine in the 22 months since May 2011, compared to seven in the previous five years).</p>
11.	Whether the	Cheshire East considers that the Environmental Report has not identified environmental issues for Cheshire East	Disagree.

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	likely significant effects have been identified, described and assessed: Cheshire East.	and impacts of revocation, in particular the revocation of Policy MCR4 (South Cheshire) and has not identified appropriate mitigation measures.	<p>Appendix D of the updated Environmental Report contains an assessment of the environmental effects of revocation and retention of policies MCR4 South Cheshire and other policies such as L2 Local Housing Market Assessment topics as per the methodology set out in chapter 3 of the updated Environmental Report. The assessment of the revocation of MCR4 shows negative effects in the medium and long term against water, air and material assets and uncertain effects against soil and climate change. The assessment also records a delay in positive benefits on the population and human health topics when compared to retention. This is also summarised in chapter 4 (including Table 4.1 and 4.2) with some commentary provided on page 68.</p> <p>A further response to those comments raised by Cheshire East, including the potential retention of certain policies, are set out in this table, in particular at rows 2, 3, 4, 8, 13 and 20.</p>
12.	Monitoring.	Natural England recommends that the monitoring section should be extended to address the loss of Best and Most Versatile Land. To monitor this impact it	<p>Comments noted.</p> <p>The Government agrees with Natural England</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>suggests the use of soil assessments based around land classifications and best and most versatile land, which should be used in conjunction with Land Use registry figures suggested.</p> <p>For the identified landscape monitoring, Natural England states that the National Landscape Character Area assessment for the North West would provide an improved baseline for monitoring to supplement the assessment of Area of Outstanding Natural Beauty character and should replace the proposed monitoring of the “area” of Area of Outstanding Natural Beauty protected – which will not reflect the outputs of either the retention or revocation of the Regional Strategy.</p> <p>Countryside Council for Wales makes reference to proposed monitoring indicators and programmes, seeking clarification as to whether any monitoring will be undertaken on areas ‘shared’ across the England/Wales border e.g. the Dee Estuary and or whether consideration has been given to monitoring the effects of the Revocation on environments and environmental assets outwith the North West but which are affected by development in the North West of England.</p> <p>English Heritage welcomes the inclusion of heritage at risk figures as a monitoring indicator. In addition it suggests that monitoring could also include a measure of</p>	<p>that monitoring should be extended to assess the changes in amount of Best and Most Versatile Land.</p> <p>With regard to the monitoring of landscape impacts the Government agreed that Natural England’s National Character Areas can provide a useful addition to the sources of information to be drawn on for monitoring change in Areas of Outstanding Natural Beauty. The Government has added Natural England to the sources of information for monitoring which is set out at Annex C of this Post Adoption Statement.</p> <p>The Government notes the comments from the Countryside Council for Wales and has set out further details on working with Wales in Chapter 6 of this Post Adoption Statement. The arrangements for biodiversity, flora and fauna, water, air and landscape have been extended to cover both England and Wales. This includes the Water Resource Plans from Welsh Water, and using data published by the Welsh Government. If, as a result of monitoring it becomes apparent that implementation had led to significant negative environmental effects on</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>engagement with the historic environment issues within any joint strategic planning arrangements to ensure that broader characterisation work is available to assist understanding at a local level. This is a particular concern with the loss of saved structure plan policies and countywide Supplementary Planning Guidance relating to Historic Landscape Characterisation. For future reference it would be helpful to know how the monitoring requirement of Strategic Environmental Assessment is to be met and reported.</p> <p>The Environment Agency welcomes the monitoring recommendations that are included within the Environmental Report, and those already in place to understand compliance with the duty to co-operate. It strongly recommends closer monitoring of highly complex, cumulative effects on issues such as climate change, water quality and water resources.</p> <p>The Town and Country Planning Association welcomes the identification of proposed monitoring indicators. It is however unclear how this monitoring process will be undertaken except for a statement that CLG will make "periodic reference" to such metrics using certain data sources. Given the government's decision to discontinue publication of regional statistics, it is unclear at what spatial scale this monitoring will take place. The</p>	<p>sites covered by the Habitats Directive in Wales caused by activities in England, the Government will consider measures to address or mitigate those effects.</p> <p>Further, the National Planning Policy Framework (paragraphs 126 – 141) illustrates the key role which local planning authorities have through the development management decisions they take and local plans they prepare in conserving and enhancing the historic environment. Naturally local planning authorities will wish to monitor the impact of the planning system upon the conservation and enhancement of the historic environment in their localities. As illustrated local planning authorities must report on their performance against the duty to co-operate in their annual monitoring report. The Government notes that English Heritage welcomes the provisions which have been made on monitoring in the updated Environmental Report about the use of the Heritage at Risk register.</p> <p>The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan to revoke the North</p>

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		<p>Town and Country Planning Association strongly recommends that a clearer statement is given as to how this information will be brought together, and where it will be published.</p> <p>Renewables UK welcomes the provisions on monitoring in the report, especially those for the monitoring of greenhouse gases. However, in its view renewable energy generation needs to be monitored as well, in order to be able to understand the connection between these elements and other related ones which will be monitored (e.g. air quality, human health, biodiversity). This should be reflected in the recommended monitoring measures.</p>	<p>West Regional Strategy will be contained in the Post Adoption Statement in Annex C.</p> <p>This monitoring programme will use existing regulatory regimes and data collection processes to provide information for these potential environmental impacts, including the Department for Communities and Local Government's commitments regarding the local plan making progress by authorities and on compliance with the duty to co-operate. If, as a result of monitoring it becomes apparent that implementation had led to significant negative environmental effects, the Government will consider measures to address or mitigate those effects.</p> <p>Local planning authorities have to produce an annual monitoring report on the implementation of their local plan, this data can be used to flag up the need to review policies within their local plan. If local planning authorities working collaboratively wish to pool their resources to produce joint local plan monitoring and annual reporting mechanisms they can do so.</p> <p>All local planning authorities in Wales are</p>

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			<p>required under section 76 of the Planning and Compulsory Purchase Act 2004 to make an Annual Monitoring Report to the Welsh Assembly on the the extent to which objectives in the local plan have been achieved</p> <p>The monitoring should identify the impacts of policies, targets have been met, the basic strategy remains 'sound' and where progress has been made. This also includes achieving the objectives of the strategy and/or sustainable development objectives. As environmental issues will have a bearing on the strategy it is expected that key indicators are monitored to ensure that the objectives of sustainable development, as set out in Planning Policy Wales are achieved. This could include cross boundary issues, if appropriate.</p> <p>The Government notes that RenewableUK welcomes the provisions which have been made on monitoring in the update Environmental Report and their request for provision of monitoring of renewable energy infrastructure.</p>
13.	Individual Topics	Cllr Brickhill considers the North West strategy should be revoked at once and rewritten based on sensible local	Comments noted. The Localism Act 2011 removed the legal framework for the adoption

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
	Housing (support Plan to Revoke).	targets set locally. Tattenhall & District Parish Council and the Tattenhall Parish Neighbourhood Planning Steering Group recognise that the Regional Spatial Strategy was written during a time of prosperity and when different planning rules and regulations were in place. In the face of very different financial circumstances and many new Acts and policies it considers that the Strategy is now old-fashioned and out of date and many of its policies unrealistic and unachievable. It therefore requests that it be revoked at the earliest possible date.	of new Regional Strategies. .
14.	Individual Topics Housing (including Partial retention of the North West Regional Strategy).	Campaign to Protect Rural England recognises that the North West Regional Spatial Strategy directs that development should be focused on the main conurbations and major towns and, in order to ensure the regeneration of towns and cities was given priority over green-field development, it requires very high levels of building on previously developed land. Campaign to Protect Rural England considers this was an appropriate approach in the region because the North West has more brownfield land, more derelict land, and more empty homes than any other region. It suggests that this 'crucial focus' on regeneration is going to be lost and it will become easier to build on greenfield development as Local Authorities preparing plans are concerned that they will not	Disagree. Campaign to Protect Rural England's comments represent a fundamental difference of opinion with Government over the aims, objectives and deliverability of the National Planning Policy Framework. Local authorities when preparing local plans, and considering planning applications, will be required to take into account the Government's planning policies for England as set out within the National Planning Policy Framework. Furthermore, planning policies and decisions must reflect relevant EU obligations and statutory requirements. This is mentioned

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		<p>conform with policies in the National Planning Policy Framework.</p> <p>The result of this policy failure, in Campaign to Protect Rural England's view, will be sprawl into the countryside and more unsustainable movements of people and goods, with detrimental impacts on landscape, biodiversity, air quality, climate change and health. Campaign to Protect Rural England cites this as one specific example of the negative environmental impacts of the revocation of the North West Regional Spatial Strategy. It recognises that the Report records potential inter- and intra-regional imbalances but finds no clear recommendations in the report on how the Government should address these. Consequently one of the Campaign to Protect Rural England recommendations is that the Government should amend the National Planning Policy Framework or save North West Regional Spatial Strategy policies on a regional basis.</p>	<p>explicitly within the Introduction to the National Planning Policy Framework. Paragraph 8 states that the role of the planning system is to play an active role in guiding development to sustainable solutions, core planning principles include for protection of the green belt, recognition of the intrinsic character and beauty of the countryside and providing support for thriving rural communities. These principles are intended to facilitate development within a framework that encourages regeneration and protects the environment. High levels of brownfield development will continue to be delivered within the region's towns and cities. Authorities such as the City of Manchester and the Central Lancashire Authorities have recently set brownfield targets at the same levels as those provided by the Regional Spatial Strategy, major development proposals such as the proposed new Exhibition and Conference Centre Liverpool continue to come forward on brownfield sites and regeneration funding delivered through European and UK funding sources continues to be made available.</p> <p>Reference by Campaign to Protect Rural England to sprawl into the countryside does not fit with the National Planning Policy Framework</p>

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		<p>core planning principle which requires the management of patterns of growth that make the fullest possible use of public transport, walking and cycling that focus significant development in locations that can be or are sustainable. Paragraph 52 recognises implicitly that sustainable locations may sometimes be formed from larger scale developments such as new settlements or extensions to existing villages and town; these should follow the principles of Garden Cities.</p> <p>Campaign to Protect Rural England recognises a conclusion reached within the Environmental Report of potential inter and intra-regional imbalances. The Government [will] provide a response to the findings of the Strategic Environmental Assessment (to be included as Table 3.2 of Post Adoption Statement), including the finding that</p> <p>Transport Activists Round Table North West considers that whilst the report places a positive spin on the “<i>likely</i>” minimisation of negative effects through the application of the National Planning Policy Framework and Department</p>	<p>The Government is of the opinion that the National Planning Policy Framework, supported by international obligations, statutory requirements and policy provides the</p>

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		<p>for Environment, Food and Rural Area's National Waste Policy Review, that government pressures to build, aligned to the requirement for local authorities to have a five year housing supply plus a 5% buffer, is leading to a growing raft of planning permissions being granted around the country which will place a high demand on construction aggregates. Many of these developments are in unsustainable locations. Local authorities that do not have Local Plans in place are rushing to produce them and are aspiring to high levels of development in an attempt to assuage government pressure and, as Regional Spatial Strategies fall way, they will not have that all-encompassing framework to ensure their plans retain a realistic balance. Planning inspectors, under instruction from government, are rejecting Local Plans that do not meet the government's pre-determined levels of growth. This prompts the obvious question - where is the 'localism' in this approach?</p> <p>The Town and Country Planning Association notes that the North West Plan contained very clear spatial guidance on priorities for new development (Policy RDF1). It considers that the Strategic Environmental Assessment appears to underestimate the effect that revocation will have in losing this clear hierarchy, particularly the emphasis that was given in the second priority category to focusing new housing development in</p>	<p>all encompassing framework to ensure that plan maintain a realistic balance (in other words, sustainable development). The Government recognises that local authorities are making substantial headway in producing their local plans and this is to be welcomed. The National Planning Policy Framework 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 capacity or because to do so would cause significant harm to the principles and policies of the National Planning Policy Framework, including clear policies protecting National Parks. 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>Revocation of the Regional Strategy will mean that it will be for local authorities to determine the priorities and location for growth and regeneration, working with other local authorities, business partners and their communities. The National Planning Policy Framework was published in March 2012. One</p>

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		<p>the inner city areas around the two regional centres where selective demolition is most needed.</p> <p>The Town and Country Planning Association considers that likely differences in the location of development have been underestimated. Removing the clear spatial priorities in the North West Regional Strategy spatial strategy as well as the indicative brownfield land and buildings targets for groups of local authorities could lead to greater dispersal of new development. This uncertainty is not however translated into the comparative assessment scorings.</p> <p>The Town and Country Planning Association considers that the potential short to medium term effects on delaying development have been underestimated, particularly as six local authorities in this region have no housing provision figures in their last local plan. The Strategic Environmental Assessment suggests that such uncertainties will be offset by the National Planning Policy Framework presumption in favour of sustainable development in the absence of up-to-date local plans. It notes that it identifies the effects of the recent government reforms in giving more emphasis to growth and development but considers this ignores the fact that growth aspirations have always underlain regional policy in the North West and that the limitations on delivery have</p>	<p>of the 12 planning principles set out in the National Planning Policy Framework 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 National Planning Policy Framework 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).</p> <p>The National Planning Policy Framework is also clear that developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised' and that local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport'.</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</p>

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		<p>been from low demand rather than constraints within the planning system.</p> <p>The Town and Country Planning Association can find no justification for the assertion that a locally led approach could more effectively mitigate the negative effects of new housing and employment development. The possibility of more diverse and locally-specific spatial distributions taking account of local environmental capacity, will in its opinion, equate with more dispersal, thereby giving uncertainty over effects on soil and landscape, and on air quality and greenhouse gas emissions through the greater need to travel.</p>	<p>role is to assess whether the plan has been prepared in accordance with the statutory duty to co-operate, legal and procedural requirements, and whether it is sound.</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in respect of decision-taking. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking.</p> <p>Delivery of local plans is increasing: across the North West region 40% of councils have a plan adopted post-2004 (nine in the 22 months since May 2011, compared to seven in the</p>

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		<p>Cheshire East suggest that their concerns (listed in row 1 of this table) could largely be answered by partial revocation, leaving Regional Strategy policies relating to housing development and regeneration in Cheshire East in force until the Cheshire East Core Strategy is adopted.</p>	<p>previous five years).and overall 67% of councils now have a published plan.</p> <p>Since March 2013 in considering all decisions for planning permission, due weight will be given to relevant policies in all existing plans according to the degree of consistency with the policies in the National Planning Policy Framework. The closer policies are to policies in the National Planning Policy Framework the greater the weight that may be given.</p> <p>The Government does not consider it necessary to leave the policies requested in place until the Cheshire East Core Strategy is adopted.</p> <p>The updated Environmental Report did not identify any areas where revocation of those policies which make up the Core Spatial Strategy (DP1-9) would have any negative effects – either minor or significant. It did note that “The National Planning Policy Framework does not provide a direct replacement for Policy DP6 ‘Marrying Opportunity and Need’. This states that priority should be given, in locational choices and investment decisions, to</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>linking areas of economic opportunity with areas in greatest need of economic, social and physical restructuring and regeneration. It is however considered reasonable to assume that local authorities will seek to maximise the opportunities for development in their areas, and where an area is identified as needing regeneration, seek the best opportunities to achieve this. The duty to co-operate provides authorities with clear encouragement to work with other authorities to the same end, yet, because the goal in DP6 is not explicitly contained within paragraph 156 of the National Planning Policy Framework, the benefits of this approach are slightly less than under DP6, although still positive”.</p> <p>The updated Environmental Report also notes that for revocation of policies that provide the spatial strategy for the region, because the National Planning Policy Framework lacks any specific locational guidance with local authorities encouraged to plan for the local needs of their area, this could result indirectly, in a change in the distribution of development within the region.</p>

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			<p>The updated Environmental Report also notes that the removal of a specific brownfield target and its replacement within the National Planning Policy Framework by a general encouragement to re-use brownfield, subject to its environmental value, may result in fewer often inner urban sites coming forward for development, and that the short term following revocation the impact for those local authorities that do not have a plan that was either in conformity with the regional strategy or which post-dates it is likely to be uncertain.</p> <p>In assessing the cumulative impacts of the Plan to Revoke the updated Environmental Report identifies that In respect of setting local housing targets, over the medium and longer term, reliance on locally-generated housing figures could yield an increasing differentiation between local authorities and clusters of local authorities. In the North West, this could maintain or create disparities which the North West of England Plan sought to reconcile where areas with traditionally attractive housing markets are able to maximise the opportunities presented by developer interest potentially at the expense of traditionally less attractive</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>areas, often in need of regeneration.</p> <p>One of the 12 planning principles set out in the National Planning Policy Framework 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.</p> <p>The National Planning Policy Framework states that it is 'highly desirable that local planning authorities should have an up-to-date plan in place'. Where plans are absent, silent or out of date, the National Planning Policy Framework's presumption in favour of sustainable development will apply in respect of decision-taking. In particular, where a local authority cannot deliver a five year supply of deliverable sites, the relevant local policies for the supply of housing should not be considered up to date. In such cases, the decision taker will apply the presumption in favour of sustainable development, taking into account all relevant planning considerations. The presumption is clearly set out at paragraph 14 of the National Planning Policy Framework in respect of both plan-making and decision taking.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>The National Planning Policy Framework also makes it 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 homes and jobs needed in the area.</p> <p>Regarding housing issues, the National Planning Policy Framework states that local planning authorities may make an allowance for windfall sites in their five-year supply if they are compelling evidence that such 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 land 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</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>consistent with the principles of sustainable development.</p> <p>The Government notes the Councils concern that “if Policy MCR4 is revoked, there is a serious risk that in the gap before the Core Strategy is adopted, developers will be able to secure permission for a scale of housing development around Sandbach which will permanently and irreversibly frustrate the wishes of the local communities as revealed in the neighbourhood planning exercises”. In addition to the findings of the updated Environmental Report, and the approach set out in the National Planning Policy Framework, set out above, the Government notes that the Town Strategy for Sandbach (August 2012), which forms a contribution from the Neighbourhood Planning exercise to development of the Core Strategy, seeks to deliver in the order of 500 homes on new sites by 2030, and identified development areas. The Government also notes that, more recently, the Strategic Housing Land Availability Assessment for Cheshire East, which was approved by the Council in February 2013, has identified land supply for the years 2013 to 2018 and will be an important</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
			<p>component of the evidence base to support the development of their Local Plan. Crewe is prioritised by the Cheshire and Warrington Local Enterprise Partnership as a spatial focus for business and housing. The Business Plan for the Local Enterprise Partnership sets out that a dedicated economic development team has been established for Crewe, as well as for other locations with the best prospects for economic growth (Chester; Crewe; Ellesmere Port; Macclesfield; Warrington; Weaver Valley; and the 'rural areas'. Key opportunities identified in the Business Plan include the development of Basford East and Basford West sites, improvements to Crewe Station, other elements of the Crewe Gateway University Quadrant, redevelopment of the town centre and the regeneration of the West End.</p> <p>The Government does not therefore agree that there is a need to retain policies relating to housing development and regeneration in Cheshire East until the Cheshire East Core Strategy is adopted.</p>
15.	Individual Topics Cumbria.	Cumbria County Council state that the preparation of Local Plans can take time and it considered important that, as far as possible, unintended consequences	The updated Environmental Report identified other alternatives to the Plan to Revoke, and considered reasonable alternatives to the Plan

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>created by the removal policy should be avoided. Where there are to be negative consequences, it is suggested that there would be benefit in saving those policies until suitable local alternatives are in place.</p> <p>The Council provides comment on the importance of a number of Regional Spatial Strategy policies to the County. These are:</p> <p>Policies DP1, DP2, DP3, DP5, and DP8 Spatial Principles</p> <p>Policy W1 Strengthening the 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>The Council considers that these policies have an important role in emphasising important sectoral and spatial aspirations for the region as well as providing clear policy with respect to how proposals for the release of employment land should be considered. The Council consider that there is a danger that with the removal of these policies, authorities may not be able to give sufficient weight to important strategic considerations during the assessment of schemes and priorities.</p>	<p>to Revoke.</p> <p>For half of the Regional Strategy policies referred to by Cumbria County Council no difference in effect between revocation and retention was identified in the updated Environmental Report (DP1, DP2, DP3, DP8 – spatial principles; W1 – regional economy; L1 – Health, sport, recreation, culture and education; EM3 – green infrastructure; EM11 – waste management; EM14 – radioactive waste). For other policies the difference between revocation and retention was generally that, for revocation, there would be more uncertainty (in particular for policies: W3 and W4 – employment land, with more uncertainty in particular in the short term; EM10, EM13 – waste management with more uncertainty in particular in the longer term; and EM13 – waste management facilities), some less positive impacts on some SEA topics (in particular for policies: L2 and L3 – housing markets and existing stock; EM15 – energy, for climatic factors in the long term; EM12 – location principles, in the medium to long term; EM7, EM8, EM9 – minerals and W2 – locations for regionally significant development, with positive</p>

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		<p>Policy L1 Health, sport, recreation, culture and education service provision - retaining this policy until suitable replacements can emerge would have benefit</p> <p>Policy L3 Existing housing stock and housing renewal - This policy has value in directing policy, resources and investment in/to areas requiring housing market renewal. Therefore, its removal, could prove damaging to this important process.</p> <p>Policy L4 Regional housing provision - It is considered that removal of this policy could undermine the delivery of housing, creating challenges for those local planning authorities without up to date development plans. In this context, it is suggested that there would be benefit in retaining this policy in those localities where there is no up to date development plan.</p> <p>Policy EM1 Integrated enhancement and protection of the region's environmental assets- it is considered that its removal may hinder many parts of the region that do not have a recent development plan or a plan that reflects the principles set out within this policy. Recommended that it be retained.</p> <p>Policy EM3 Green Infrastructure - national guidance would offer some assistance in this regard, such guidance fails to carry the weight of this policy.</p> <p>Policy EM7 Minerals Extraction – policy revocation should not cause a vacuum given adopted Cumbria Waste and Minerals Development Framework.</p>	<p>rather than significant positive effects on human health).</p> <p>However, the updated Environmental Report did not identify any significant negative effects for revocation that were not identified retention of the Regional Strategy for those policies on which Cumbria County Council provides commentary.</p> <p>The assessment of remaining Structure Plan policies found that all for saved structure plan policies either national policy is in place, the policy has been superseded by local plan policy, or the policy is considered generic.</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 during either the initial, or subsequent consultation.</p> <p>Three of the seven authorities has adopted core strategies with one additional authority submitted for examination. The local authorities</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>Policy EM8 – Land won aggregates – The National Planning Policy Framework’s move away from a top-down system to a requirement for an annual Local Aggregates Assessment partly overcomes the problem.</p> <p>Policy EM9 – Secondary and Recycled aggregates – The current CWMDF provides for a target of 29%.</p> <p>Policy EM10 – A regional approach to waste management - removal of this policy will not create a policy gap within Cumbria given presence of national targets.</p> <p>Policy EM11 Waste management principles – covered by national guidance.</p> <p>Policy EM 12 – Locational Principles - covered by the CWMDF</p> <p>Policy EM13 Provision of nationally, regionally and sub-regionally waste management facilities – Policy continues to have an important role until alternatives arrangements are in place.</p> <p>Policy EM14 Radioactive Waste – covered predominantly by the CMWDF.</p> <p>Policy EM15 A framework for sustainable energy in the North West - To cover the requirements of Policy EM15 it is considered that local policy will need to be developed. In advance of such local policy, it is considered important in facilitating the decision making process.</p> <p>Policies CNL1 and CNL2 Cumbria. Removal of these</p>	<p>are:</p> <ol style="list-style-type: none"> 1. Allerdale Borough Council 2. Barrow in Furness Borough Council 3. Carlisle City Council 4. Copeland Borough Council 5. Eden District Council 6. Lake District National Park 7. South Lakeland District Council <p>The authorities either have, or are working towards up to date plan coverage for their areas. The current situation is as follows:</p> <p>Allerdale Borough Council – Consulted on the Core Strategy Preferred Options in 2012 and is currently working towards the publication of its submission documentation.</p> <p>Barrow in Furness Borough Council – The Council’s Local Development Scheme 2013 identifies publication of the Local Plan in 2014 with submission in 2015.</p> <p>Carlisle City Council – Preferred options consultation on the Council’s Local Plan is proposed for Spring 2013.</p> <p>Copeland Borough Council – on 31st October</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>policies ahead of adequate replacements may to this end, lessen the weight that can be given to certain strategically important matters.</p> <p>The Council also comments on the applicability of the North West Regional Strategy to Cumbria:</p> <p>Policy ST4 Major Development Proposals - the removal of this policy may bring about poorer quality planning decisions and thus outcomes.</p> <p>Policy ST5 New development and key service centres outside the Lake District National Park - this policy continues to have much value in decision making. Its removal may therefore bring about unintended consequences.</p> <p>Policy EM13 Employment land provision - the policy provides a recognised means to delivering economic development in Cumbria and has an important role to play until appropriate local policy can emerge to replace it.</p> <p>Policy EM14 Development of employment land for other purposes - It is considered that this policy has an important role in ensuring the ongoing and sustainable development of Cumbria and continues to bring benefit by being retained until superseded by appropriate local policy.</p> <p>Policy EM16 Tourism - until replaced by new local plan</p>	<p>2012 the Council submitted its Core Strategy and Development Management Policies document for examination.</p> <p>Eden District Council - The Core Strategy was adopted in 2010</p> <p>Lake District National Park – The Core Strategy was adopted in October 2010 and is due to be reviewed in 2013.</p> <p>South Lakeland District Council – The Core Strategy was adopted in October 2010.</p>

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>policy, it is considered that removal of this policy could result in poorer quality development management decisions.</p> <p>Policy H19 Affordable housing outside the Lake District National Park - Removal of this policy in advance of new local plan development; is likely to weaken the ability of those Local Planning Authorities without an up to date development plan to seek appropriate affordable housing contributions.</p> <p>Policy HM20 Housing in the Lake District National Park– replaced by Lake District Core Strategy</p> <p>Policies HM21 and 22 – the Council confirms that these are covered by the Lake District NP Core Strategy</p> <p>Policy T29 Safeguarding future transport schemes & Policy T30 Transport assessment & Policy T31 Travel plans - the Policy of the Cumbria Local Transport Plan, together with other national policy and guidance sufficiently replicate the policy considerations.</p> <p>Policy T33 Telecommunications - its removal weakens the established and robust policy context through which proposals are considered, especially where there is not an up to date development plan in place.</p> <p>Policy E35 Areas and features of nature conservation interests other than of national and international importance – The removal of this policy could create</p>	

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>policy gaps in those areas without an up to date plan.</p> <p>Policy E37 Landscape character - merit in retention</p> <p>Policy E38 Historic environment – merit in retention</p> <p>Policy R44 Renewable energy outside the Lake District National Park</p> <p>Policy R45 Renewable energy in the Lake District National Park and Areas of Outstanding Natural Beauty.</p> <p>If the Structure Plan policies are lost, the only guidance on renewable energy and low carbon energy schemes will lie within the National Planning Policy Framework and Local Planning Authorities' current Development Plans. It should be recognised that a number of Local Planning Authorities in Cumbria do not have an up to date development plan. In these cases, Structure Plan policies R44 and R45 provide policy for the district authorities during consideration of renewable energy schemes. The removal of this policy, which was created in a Cumbrian context with our unique environment in mind, can be expected to weaken the policy framework in which proposals are considered.</p> <p>The County Council confirms that the following policies are covered by either the MWDF, or in the case of the Lake District, relevant Core Strategy policies.</p> <p>Policy R46 – Safeguarding mineral resources</p> <p>Policy R47 – Mineral extraction outside the Lake District</p>	

No	Issue	Summary of consultation responses to the updated Environmental Report	Response
		<p>National Park and AONBs</p> <p>Policy R48 - Mineral Extraction in the Lake District</p> <p>National Park and AONBs</p> <p>Policy R49 – Waste recovery facilities</p> <p>Policy R50 – Thermal treatment and energy recovery from waste plants</p> <p>Policy R51 – Residual waste and landfill.</p>	
16.	<p>Individual Topics</p> <p>Renewable Energy (including Partial retention of the North West Regional Strategy).</p>	<p>Renewables UK is of the opinion that the loss of the North West Plan will not be helpful in securing more renewable energy deployment and keeping energy prices under control. It considers that there will be a resulting lack of clear policy guidance on renewable energy deployment and associated enabling mechanisms for the translation of national objectives into local deliverables risking a slow down in renewable energy development and a corresponding impact on energy prices. It also considers that there remains significant value in much of the supporting evidence base that was collected in the development of the renewable energy policies contained within the Regional Spatial Strategies and recommends that these policies and supporting evidence are saved for the benefit of Local Authorities and the development of Local Plans. It considers that these provisions have not been replaced and some have no current equivalent in the National Planning Policy Framework and Local Plans.</p> <p>The Town and Country Planning Association</p>	<p>Comments noted.</p> <p>The National Planning Policy Framework 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 National Planning Policy Framework 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 National Planning Policy Framework also contains a number of policies aimed at</p>

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		<p>recognises that The North West Plan contained several forward-thinking policies to support its overall framework for sustainable energy. The loss of incentive provided by this focused guidance, is likely, in the opinion of the Town and Country Planning Association, to reduce the amount of new generation capacity installed.</p>	<p>encouraging the development of renewable energy installations 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.” In addition, National Planning Policy Framework policies on strategic planning for infrastructure include the need to plan for energy infrastructure including heat.</p> <p>Other measures that local authorities will need to respond to include the nationally legally-binding target to ensure 15% of energy comes</p>

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			<p>from renewable sources by 2020 (in accordance with the Renewables Energy Directive (2009/28/EC)), the requirements of the Climate Change Act 2008, the Flood and Water Management Act 2010, the UK Renewable Energy Strategy 2009, the UK National Renewable Action Plan 2010, the Green Deal and responses to the UK Climate Change Risk Assessment 2012.</p> <p>Collectively the legislation and planning policy provides the framework for Government, agencies and local authorities to act in concert to respond to the challenge of climate change.</p> <p>The Government has also provided a response to the findings of the Strategic Environmental Assessment in which included the finding concerning issues, such as, renewable energy, biodiversity enhancement and landscape conservation, which typically benefit from being planned at a wider geographical scale, may not have their full potential realised.</p> <p>A report submitted by Lord Matthew Taylor of Goss Moor to the Government in December 2012 (the External Review of Government Planning Practice Guidance) includes a</p>

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			recommendation that the renewable energy should be one of the priority areas on which the Government should consider providing guidance. The conclusions of the Review Group have been generally welcomed by Government and was published on 21 December for an 8 week consultation. The Government will consider the consultation responses before responding to the Group's recommendations.
17.	Individual Topics Renewable Energy (support Plan to Revoke).	<p>EDF Energy recognises that the National Planning Policy Framework identifies a number of ways to achieve a low carbon future. The National Planning Policy Framework puts forward policy approaches to help increase the use and supply of renewable and low carbon energy and the Strategic Environmental Assessment has shown that positive benefits on climate change would be maintained along with other benefits for population / health and water by revoking the North West of England Regional Strategy and with the application of the National Planning Policy Framework. EDF Energy also recognise and support the key role that planning can play in helping to secure reductions in greenhouse gas emissions.</p> <p>Smaller scale energy infrastructure has an important role to play in meeting the Government's statutory energy and climate change objectives. EDF Energy welcomes the</p>	Comments noted.

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		integration and consolidation of policies that help to promote the objectives of the National Planning Policy Framework.	
18.	Individual Topics The role of Local Enterprise Partnerships.	<p>Campaign to Protect Rural England states that recent government announcements make it clear that it expects Local Enterprise Partnerships to take the lead on strategic planning “for growth”, which will necessarily include aspects of housing, transport, employment land and retail development. It is Campaign to Protect Rural England’s opinion that the clear focus of Local Enterprise Partnerships on driving growth and not on delivering balanced sustainable development or on environmental protection and improvement, will lead to significant negative environmental impacts. In consequence Campaign to Protect Rural England consider that the Environmental Report’s conclusions relating to the future of strategic planning are inaccurate.</p> <p>Commenting upon Section 2.2 of the report Campaign to Protect Rural England notes that it details how strategic planning will be delivered in future, relying upon the duty to co-operate, on Local Development Orders, which will give developers more certainty of development, and on the influence of Local Enterprise Partnerships. Campaign to Protect Rural England considers it unclear how this will operate in practice noting also that while Local Nature</p>	<p>Comments noted.</p> <p>The National Planning Policy Framework makes it clear that local planning authorities should work collaboratively with private sector bodies, which would include Local Enterprise Partnerships which have a contribution to make to the strategic planning function along with bodies like utility and infrastructure providers.</p> <p>Strategic planning matters such as the provision of employment land, housing, infrastructure and transport connections are vital to attract inward investment into an area and to promote growth. However, for strategic planning to work on the ground, local planning authorities need to work together and with a range of bodies, including Local Enterprise Partnerships, Local Nature Partnerships, environmental and other bodies.</p> <p>There are five Local Enterprise Partnerships in the North West of England region: the Cumbria, Lancashire, Greater Manchester, Liverpool City</p>

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		<p>Partnerships are mentioned as examples of partnership working they are not considered to be in any way as central to future strategic planning as Local Enterprise Partnerships. In Campaign to Protect Rural England's opinion this indicates a fundamental unbalance between economic and environmental interests and a clear indication that significant negative environmental impacts will result.</p>	<p>Region and Cheshire and Warrington Local Enterprise Partnerships. Their remit is to drive growth across their area making the most of its inherent strengths.</p> <p>The statutory duty to co-operate underpinned by the National Planning Policy Framework enables local planning authorities along with other bodies to strategically plan to address the types of environmental issues such as climate change, flood risk, waste management and water use. In recognition of the breadth of bodies involved in effective strategic planning, the duty to co-operate applies to local planning authorities county councils and public bodies that are prescribed in Local Planning Regulations 2012. These bodies are:</p> <ul style="list-style-type: none"> • the Environment Agency; • the Historic Buildings and Monuments Commission for England (English Heritage); • Natural England; • the Mayor of London; • the Civil Aviation Authority; • the Homes and Communities Agency;

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			<ul style="list-style-type: none"> • Primary Care Trusts; • the Marine Mangement Organisation; • the Office of Rail Regulation; • the Highways Agency; • Transport for London; and • Highway Authorities <p>The Localism Act provides an enabling power requiring the bodies that are subject to the duty to have regard to the activities of other bodies when they are preparing their local plans and related activities (Local Enterprise Partnerships and Local Nature Partnerships have been prescribed in the 2012 Regulations for this purpose).</p> <p>Revocation of the Regional Strategy will mean that it will be for local authorities to determine the priorities and location for growth and regeneration, working with other local authorities, business partners and their communities. The National Planning Policy Framework makes clear that Planning policies and decisions should be based on up-to date information about the natural environment and</p>

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			other characteristics of the area including drawing, for example, from River Basin Management Plans, and that working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks.
19.	Individual Topics Development pressure.	Campaign to Protect Rural England comments that the North West Regional Spatial Strategy directs that development should be focused on the main conurbations and major towns and, in order to ensure the regeneration of towns and cities was given priority over green-field development, it requires very high levels of building on previously developed land. It quotes the commentary provided within Pages 110-11 of the Environmental report on this matter. Campaign to Protect Rural England shares the general view expressed within the Environmental Report and is concerned that increasing development pressure in areas already under strain, such as south Manchester and north Cheshire, especially given other related Government policies such as the withdrawal of funding for Pathfinder Housing projects, changes in affordable housing rules and reduced brownfield development support, partly related to the	Comments noted. Campaign to Protect Rural England recognises a conclusion drawn from the assessment of revocation particularly with regard to potential to maintain or create disparities between parts of the region. This has the potential to occur when areas with traditionally attractive housing markets are able to maximise the opportunities presented by developer interest at the expense of traditionally less attractive areas, often in need of regeneration. The Government disagrees with Campaign to Protect Rural England that measures to improve the effectiveness of transport networks, such as the programmed electrification of much of the regional rail network, the introduction of trams

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		demise of Regional Development Agencies. Campaign to Protect Rural England remains unconvinced about the extent to which infrastructure projects and Local Enterprise Partnerships can address this issue in the absence of a wider level of policy and funding support for urban regeneration.	to Oldham, Rochdale and Ashton, the opportunities provided by the Regional Growth Fund and the work being undertaken by organisations such as the Liverpool City Region Local Enterprise Partnership to co-ordinate economic development will not be important tools to address this issue by connecting areas in need with areas of opportunity. It is the Government's view that they will be.
20.	Individual Topics Sustainable development.	Transport Activists Round Table North West recommends that the government promote the benefits of 'Smart Growth' and require local authorities to demonstrate they are making efficient use of land, which is a finite resource. If the Regional Spatial Strategies are removed, the government needs to come forward with amendments to the National Planning Policy Framework and/or to the Growth and Infrastructure Bill which require development to be primarily concentrated in compact urban areas that are laid out to enable good public transport and encourage walking and cycling. This reduces the need for new infrastructure necessitated by sprawl. The policies that will be left if the Regional Spatial Strategies are removed are no longer adequate to ensure that genuine sustainable development will be	Comments noted. The National Planning Policy Framework sets out policy to reduce emissions and congestion caused by transport. It requires local planning authorities, where reasonable to do so, to plan for patterns of development that support sustainable transport solutions. It is clear that developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. It also requires that plans should protect and exploit opportunities for the use of sustainable transport modes, giving priority to

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		achieved.	<p>pedestrian and cycle movements and high quality public transport for example.</p> <p>Revocation of the Regional Strategy will mean that it will be for local authorities to determine the priorities and location for growth and regeneration, working with other local authorities, business partners and their communities. The National Planning Policy Framework was published in March 2012. One of the 12 planning principles set out in the National Planning Policy Framework 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 National Planning Policy Framework 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).</p>
21.	Individual Topics Assessment undertaken too late in the	Cheshire East considers that the Strategic Environmental Assessment has been undertaken too late in the process to influence the decision which, it suggests, has already been made as a result of government's specific commitment to change plans or planning. In view of government pronouncements,	Disagree. It is noted that the intention (to revoke the Regional Strategies) has been subject to extended consultation (through the Strategic Environmental Assessment) and been assessed against the requirements of the Strategic Environmental Assessment Directive

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	process.	<p>Cheshire East considers it to be intrinsically hard to show that the Strategic Environmental Assessment has been taken account in any meaningful way if the commitment is implemented as originally stated. It continues that the problem does not arise if the Strategic Environmental Assessment can be shown to have made a significant difference to the way the commitment was eventually implemented, for example by leading to non-trivial changes to the contents of a plan which politicians committed to introducing or changing.</p> <p>Similarly, it concludes that the problem does not matter if the subsequent Strategic Environmental Assessment confirms that the commitment as originally stated is not significantly worse than any reasonable alternative and does not have significant negative effects that need mitigation. Whilst this is what the council considers the Strategic Environmental Assessment purports to show it believes that it has identified methodological failings which make the conclusion set out within the Environmental Report unreliable or misleading. In conclusion it considers that pressing ahead with total revocation regardless and with no attempt at mitigation would give strong evidence that the Strategic Environmental Assessment had not been taken into account. In considers however, that this situation could be avoided by changes to the revocation to mitigate for</p>	<p>twice (a process which has taken more than two years). Although the Government has presented its preferred option (as is standard in a Strategic Environmental Assessment) it has not been inflexible in its approach and has maintained an open mind. This is evidenced by: the extensive and detailed environmental reports (including the assessment of the revocation and retention of each policy in the Regional Strategy and the assessment of reasonable alternatives) and the extensive consultation and consideration of consultation responses. The Government has also demonstrated that it is open to considering changes to the plan to revoke, for instance through the retention of policies where the assessment concludes that revocation could lead to significant environmental effects e.g. retention of York Green Belt from the Yorkshire and Humber Regional Strategy and the retention of the NRM6 concerning Thames Basin's Heath in the South East Regional Strategy. In addition, if as a result of monitoring of the effects it became apparent that implementation had led to significant negative environmental effects, it would be expected that the Government would consider</p>

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		identified negative impacts, as was done, for example, with the retention of policy in the case of the Yorkshire and Humber Regional Spatial Strategy Revocation.	measures to address or mitigate those effects. Furthermore, and for the reasons set out earlier within this table, it is not accepted that there are methodological failings leading to unreliable or misleading conclusions within the Strategic Environmental Assessment process, as reported within the Environmental Report.

ANNEX C

Monitoring Indicators

Table C1 Strategic Environmental Assessment topics, monitoring indicators and sources of information

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
Biodiversity, Flora and Fauna	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Condition of designated sites • Threatened habitats and species • Populations of countryside birds • Surface water biological indicators 	<p>Joint Nature Conservation Committee report under Article 17 of the Habitats Directive (completed every 6 years) on the conservation status of protected habitats</p> <p>Joint Nature Conservation Committee http://www.jncc.gov.uk/page-4241 http://jncc.defra.gov.uk/page-4239 http://jncc.defra.gov.uk/page-4238 http://jncc.defra.gov.uk/page-4235 http://www.sssi.naturalengland.org.uk/Special/sssi/report.cfm?category=R,RF</p> <p>Department for Environment, Food and Rural Affairs (Defra) http://www.defra.gov.uk/statistics/environment/inland-water/</p> <p>The Environment Agency and Natural Resources Wales are responsible for monitoring water quality under the Water Framework Directive</p> <p>Welsh Government Sustainable Development Indicators http://wales.gov.uk/docs/statistics/2012/120829susdev12en.pdf</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
		(Indicators 3a and 3b) and State of the Environment Report in Wales http://wales.gov.uk/docs/statistics/2012/120725stateofenvironment12en.pdf (Indicators 19 and 21)
Population	Annual (where information allows) trends in: <ul style="list-style-type: none"> • Employment Information • Population • Housing and additional net dwellings • Local plan making progress and the duty to co-operate 	Office of National Statistics reports, specifically Regional Trends and Regional Gross Value Added Department for Communities and Local Government statistics: Annual net additional dwellings, Housebuilding: permanent dwellings completed by tenure and region The Department for Communities and Local Government Business Plan monitoring
Human Health	Annual (where information allows) trends in: <ul style="list-style-type: none"> • National Statistics – Long term illness, etc. • Crime • Deprivation • Access to and quality of the local environment 	Office for National Statistics on health Home Office, Crime Survey for England and Wales Department for Communities and Local Government statistics: Indices of Deprivation Office for National Statistics (proposed measures of wellbeing)

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
Soil and Geology	Annual (where information n allows) trends in: <ul style="list-style-type: none"> • Land use • Best Most Versatile Land 	Department for Communities and Local Government statistics. Department for Environment, Food and Rural Affairs http://magic.defra.gov.uk/
Water	Annual (where information allows) trends in: <ul style="list-style-type: none"> • % of catchments with good ecological status • Water resource availability • Per capita water consumption • Number of water resource zones in deficit 	Environment Agency and Department for Environment, Food and Rural Affairs http://www.defra.gov.uk/statistics/environment/inland-water/ Water Resource Plans (available every 5 years) from Dee Valley Water, United Utilities and Welsh Water For Wales Water Resource Plans (available every 5 years) from Welsh Water, Severn Trent Water and Dee Valley Water Welsh Government Sustainable Development Indicators http://wales.gov.uk/docs/statistics/2012/120829susdev12en.pdf (Indicator 15) and State of the Environment Report in Wales http://wales.gov.uk/docs/statistics/2012/120725stateofenvironment12en.pdf

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
		(Indicators 13b, 35c and 36c)
Air	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Number of Air Quality Management Areas • Number of Air Quality Management Areas where exceedances occurred. 	<p>Department for Environment, Food and Rural Affairs.</p> <p>Department for Environment, Food and Rural Affairs.</p> <p>Welsh Government http://wales.gov.uk/?lang=en</p> <p>State of the Environment Report in Wales http://wales.gov.uk/docs/statistics/2012/120725stateofenvironment12en.pdf (Indicators 33a, 33c and 33j)</p> <p>Welsh Government Sustainable Development Indicators http://wales.gov.uk/docs/statistics/2012/120829susdev12en.pdf (Indicators 11 and 12)</p>
Climatic factors	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> • Emission of greenhouse gases • Installed capacity of sites generating electricity from renewable sources (MW) 	<p>Department for Energy and Climate Change Statistical Release: Local and regional CO2 emissions</p> <p>Department for Energy and Climate Change Regional Renewable Statistics (from the RSTATS (Renewable Energy Statistics))</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<ul style="list-style-type: none"> Number of properties at risk of flooding 	<p>database and REPD (the Renewable Energy Planning) database, https://restats.decc.gov.uk/cms/welcome-to-the-restats-web-site/</p> <p>Environment Agency</p>
Material Assets	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> Volume of construction waste and proportions recycled Volume of hazardous waste Volume of controlled wastes and proportions recycled Volume of minerals extracted 	<p>Environment Agency</p> <p>Environment Agency</p> <p>Environment Agency</p> <p>North West Mineral Planning Authorities'</p>
Cultural heritage, including architectural and archaeological heritage	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> % of heritage assets of different types that are at risk 	<p>English Heritage 'Heritage at risk report'</p>
Landscape and Townscape	<p>Annual (where information allows) trends in:</p> <ul style="list-style-type: none"> Change in Areas of Outstanding Natural Beauty (area, 	<p>National Association of Areas of Outstanding Natural Beauty, and English National Park Authorities Association</p>

Strategic Environmental Assessment Topics	Monitoring Indicators	Source(s) of Information
	<p>threats and quality)</p> <ul style="list-style-type: none"> • Changes in Conservation Areas • Percentage who are very or fairly satisfied with local area • Trend in number of vacant dwellings 	<p>English Heritage (if 2003 survey repeated)</p> <p>Office of National Statistics (proposed measures of wellbeing)</p> <p>Department for Communities and Local Government</p> <p>http://www.communities.gov.uk/documents/housing/xls/1815794.xls</p> <p>Natural England</p> <p>Countryside Council for Wales (Natural Resource Wales)</p> <p>http://landmap.ccw.gov.uk/.</p>