
RSS Interim Working Draft – Sustainability Appraisal

1.1 Introduction

Entec, in conjunction with Ben Cave Associates (BCA) and Levett-Therivel have been appointed by the North West Regional Assembly (NWRA) to undertake a sustainability appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA) of the emerging revision to the Regional Spatial Strategy (RSS).

The SA is an iterative process which began with the collection of baseline data and publication of a Scoping Report in February 2005. This report outline the methodology to be undertaken during the SA and included a list of sustainability objectives and associated questions that would be used to appraise the various options and policies of the RSS as they were developed. These sustainability objectives are designed to cover a range of sustainability issues and they are considered to cover the five guiding principles of the UK Sustainable Development Strategy (2005). The objectives have been consulted upon and changes made accordingly.

As part of the consideration of the RSS Interim Working Draft Policies two sustainability workshops were held on 8 and 23 November respectfully. These workshops were held to provide an opportunity for a wide group of stakeholders to consider the sustainability issues that present themselves in the region and the extent to which the Interim Working Draft RSS policies contribute towards this. The two workshops considered the following topics:

8 November:	Overall Spatial Development Framework, (Policies CS1/CS2) Spatial Development Framework (Policies SDF1-SDF18) Regional Transport Strategy (Policies RT1 – RT8) Regional Priorities for housing (Policies L2 – L5)
23 November:	Spatial Development Framework (Policies SDF19 – 21) Health and Education (Policy L1) Working in the North West (Policies W1 – W6) Enjoying and Managing the North West (Policies EM1 – 13)

In advance of the workshops Entec appraised each of the policies against the SA Objectives. This was been undertaken using a matrix against which the performance of each policy can be considered against each sustainability objective. In total there are 26 objectives and these are included in Appendix 1.

It was not the intention of the workshops to go through each matrix for each policy given the time allowed. Therefore, Entec and the wider consultant team, sought to identify the key issues that they identified as arising from the policy appraisal. In addition to these key issues the intention was to identify particular strengths and challenges arising from the appraisal. The

purpose of this paper therefore is to present the findings from these appraisals but as reviewed, commented and amended by the workshop participants.

The two workshops were attended by the following participants:

8 November:	Matthew Wilkinson – NWRA
	Neil Wilton – NWDA
	Dave Dunlop – Lancs, Manchester and N Merseyside Wildlife Trust
	Andrea Titterington – CABE
	Brenda Fullard – GONW Dept of Health
	Peter Greifenberg– Consultant for Waste Policies
	Heidi Curran – Environment Agency
	David Kenyon – Entec
	Phillip Minas – Entec
	John Hall – Entec
23 November:	Matthew Wilkinson – NWRA
	Duncan McCorquodale – NWDA
	John Berry – CPRE
	Heidi Curran – Environment Agency
	Brenda Fullard – GONW Dept of Health
	Andrea Titterington – CABE
	Stephen Glynn – Sustainability North West
	Robert Johnstone – Equality and Diversity
	Francis McGuire - RSPB
	David Kenyon – Entec
	Clive Harridge - Entec

It is the intention of Entec, and the NWRA, that a series of meetings be held with policy authors on 9 December at which the findings of the workshops, including measures for mitigation and enhancement can be reported and discussed.

A final SA Report will be published to accompany the final Draft RSS. This will report on the whole appraisal process and include for a further appraisal of RSS policies should they change significantly from the Interim Working Draft.

The next section of this paper seeks to identify some of the key overarching messages identified by the consultant team and workshop participants. The sections that follow it provide a short commentary on the policies appraised, their strengths and challenges.

1.2 SA Appraisal – Emerging findings and Key Messages

The overall approach to the RSS is set out within the Spatial Development Framework (SDF) and continued within the individual RSS policies. The appraisal review to date has identified the following strengths:

- A focus on a strong economy seeking through spatial means, a reduction in the economic disparity that the region faces;
- Linkages with complementary regional strategies including the emerging RES and Northern Way;
- An emphasis on regeneration, particularly within the deprived urban parts of the region;
- Support for urban renaissance and the continued development of sustainable communities;
- Recognition of the need to reduce and adapt to climate change within Core Development Principles;
- Recognition of reducing the need to travel although this does not appear to be taken through into the transport policies explicitly.

It is suggested that key challenges for the RSS remain:

A concentration on the urban parts of the region and a lack of explicit consideration of rural areas, and rural renaissance particularly within many of the SDF policies;

An emphasis upon economic growth and regeneration within key regional centres but a lack of attention to lower order settlements particularly within the SDF policies. The term ‘Growth’ is not used within the UK SD Framework and may not deliver the benefits needed;

A lack of emphasis throughout the document on reducing environmental impacts (and the protection and enhancement of the environment) – environmental protection policies are included but the importance of the environment appears to be less recognised within the SDF policies, including the overall Spatial Development Framework;

A need for better co-ordination between policies with some SDF policies recognising the importance of a high quality environment (including a historic one) and others ignoring it as an example.

Policy references to improving connectivity could encourage greater movement within and between regions thereby increasing greenhouse gas emissions and impacts on environmental quality.

Not convinced that recognition of the need to reduce and adapt to climate change within Core Development Principles is carried through in all policies.

Continued use of the word 'sustainable' without defining what it means in different circumstances.

Lack of health and healthy living as a core development principle (although requirement for HIA is noted). There is a tension between reducing inequalities in health and the focus on economic growth.

No reference to importance of green space, and access to it within Core Framework and Principles.

Little reference to needs of younger and older members of the community together with information on the demographic changes facing the region and how we meet the increasingly diverse needs of the population. There is also little reference to the threats and opportunities of globalisation.

No reference to air quality, and the impacts of poor air quality.

Little reference to agriculture, soil and the need for high quality design.

Inequality is little mentioned, awareness of needs and support for those with disabilities, within a spatial planning context should be an overarching principle of the RES. Recognition of the BME communities is important also. With regard to the former there is a particular need to recognise the need for flexibility to accommodate those with disability. It is recommended that a technical paper could focus upon how spatial planning could support this and maintain and improve quality of life.

Issues of personal care, and the ability to support those living and working from home should be recognised.

A key message from both workshops was the recognition of the need to read the document as a whole, rather than individual policies but the difficulties and inconsistencies that were experienced. Recognition was made of the reluctance to constantly refer to cross referencing within documents but it was felt that the provision of a policy matrix that identified the RSS policies within a tabular framework would be useful.

The following sub-sections provide particular comments on individual, policies or policy groupings and are based upon the findings of the individual SA appraisals undertaken by Entec and the results of the two workshops.

1.3 Specific Policy Conclusions and Recommendation

Core Spatial Framework and Development Principles

Overall the framework and principles included and recognised many of the objectives identified as necessary in moving the region towards sustainable development. A number of the issues emerging from the appraisals of these two policies have been captured within the key messages listed above. Specific implications and recommendations are provided within the table overleaf.

Key Sustainability Implications and Recommendations

Policy CS1: Overall Spatial Development Framework

When this policy is considered in isolation it appears to be exclusively focussed on maximising growth through supporting and securing development. Whilst this will have significant positive effects on the economy, it would benefit from a broader emphasis that it will operate within a sustainable development framework (as defined in more detail under Policy CS2 – Core Development Principles). As noted above economic growth may also create negative effects and the workshop questioned how the maximisation of growth would sit with climate change. A lack of any strong reference to environmental protection and enhancement was noted and as was the impact that improved connectivity may have of encouraging, rather than reducing travel. The inclusion of maintaining urban sprawl and discouraging urban sprawl is welcomed.

Recommendations:

1. To make reference to sustainable development and improving the overall quality of life for people in the region as an overarching priority of this policy.
2. Consider removing reference to 'maximising the growth opportunities of the city regions', with 'creating a strong, stable and sustainable economy realising the economic potential of the city regions'.
3. Development is secured within the key service centres "at a scale and nature appropriate to fulfil the needs of local communities for housing, employment and services". However, the 'needs of local communities' extends beyond that of housing, employment and services to clean air, safe streets, access to open green spaces etc. Furthermore, the RSS should seek to 'manage these needs', and not just respond to them.
4. Replace connectivity with accessibility when referencing transport networks and include environmental protection and enhancement as a key priority.
5. Add reference to enhancing the quality of urban life (as well as rural) life.
6. Policy should seek to prevent rather than discourage urban sprawl.
7. A healthy region should also be a priority as well as one which is well designed with a high quality public realm.

Policy CS2 – Core Development Principles

The Core Principles are clear, meaningful and broadly beneficial for sustainability. The reference to 'where possible' development not lead to the loss of key benefits and services was felt to be weak.

Recommendations:

1. Could health/quality of life be included as a Core Principle which could include for improvements in air quality, open space, healthy food and walking and cycling. Reference was made to the Public Health White Paper which references the need for the provision of choice to lead a healthy life?
2. Would the term settlements be preferable to urban areas?
2. The focus seems to be on new development; is there anything that can be done to improve the quality of existing development e.g. through refurbishment, redevelopment, restoration etc?
3. Should proposals that take into account local implications of climate change also take into account vulnerable/sensitive populations (and not just locations), for example the elderly?

Manchester City-Region

Five policies combine to provide the spatial framework for the Manchester City Region. They include for overall priorities, and also provide individual policies for the individual sub-areas within the City Region. The overall priorities for the City region (Policy SDF1) seek greater accessibility and connectivity between the different parts of the sub-region and particularly focus upon reducing disparities by linking economically prosperous areas with those that suffer from deprivation. The RSS provides a shift away from an attempt to direct economic

development to areas of poor economic performance and instead seek to build upon strengths and improve accessibility to them.

The priorities have an economic and economic regeneration focus and there is no reference to quality of life or environmental protection and enhancement. Manchester suffers from some of the poorest environmental conditions in the region (air quality, noise pollution, failing SSSIs, high CO2 emission, serious racial inequality) yet none of these are recognised within the priorities. 88% of Manchester's waste is sent to Yorkshire!

Recognition of the importance of the environment is only found within Policy SDF3 (linked to housing), there is no other reference within the other policies all of which have a strong economic focus, there is a need for consistency through the policies, and protection of the environment should be common with all policies. The suite of policies has been appraised against the SA objectives, findings under the four key headings are provided in the table overleaf.

Key Sustainability Implications and Recommendations

Manchester City Region

Economy

The focus upon Manchester as the regional centre is appropriate within the RSS and will prove attractive to inward investment. The identification of opportunities in terms of growth sectors and development locations is also positive. In terms of their sustainability, the challenge will be to ensure that a workforce to meet the needs of these growth sectors is resident nearby or further away with good accessibility. Without this being done, economic development will be compromised and an increase in car based commuting from elsewhere in the city's hinterland will occur. The supply of brownfield land within the inner area should allow this to be achieved and so aid regeneration objectives.

The relationship between Manchester and other towns (the development hierarchy) is clear and appropriate although the performance of the implicit dependence of the northern towns upon the regional centre will require a robust public transport network.

Consider inclusion of reference to the importance of the universities to Manchester.

Social

The jobs created through development may not be accessed by those living in the socially deprived areas of the region; indeed the concentration of jobs in the urban areas could increase commuting. The policies are helpful but appear to presume that development will reduce social exclusion, yet a significant amount of the population is not engaged by the region's economy. Probably the key challenge for the RSS is to recognise and demonstrate either directly, or through the generic policies, how unemployment rates can be improved.

Housing is a key issue within the context of the city region with both large areas of poor market demand and also areas where affordable housing needs to be provided. An appropriate mix should be easier to achieve within the broadly doubled housing numbers for the city region. In terms of building sustainable communities, access to facilities (with the exception of local leisure) is supported, although policies and mechanisms to secure local engagement in decision making are weak.

Environmental

The protection of the environment of the city region is not strongly supported. The urban concentration of development could increase inequality creating pressure on environmental assets and introducing negative impacts (congestion, air quality, pollution) to the existing and planned population. The broad support of policy EM1 (and for the Region in general) should more properly be addressed at core strategy and city region level.

It was felt that SDF3 had a presumption that housing could be provided in alignment with transport, environment, flood defence etc but that the capacity of existing infrastructure, and carrying capacity of the environment may not be sufficient, and may not be able to expand to accommodate the increase in housing numbers. Waste should be included also.

Use of Resources

Urban development can reduce the need to travel but it can also increase movement and does not necessarily lead to it. Policies support of accessibility and co-location of development are positive but are subordinate to investment in economically and socially excluded populations. Generic policies could be more actively supported by environmental management concerns at city region level. This management should include approaches to reduce resource use through greater efficiency, improvements to infrastructure, re-use and recycling.

Recommendations:

1. *Include reference to reducing the impact of transport on the environment.*
 2. *Include references to the protection and enhancement of the environment within the Priorities, recognise the importance of the historic environment.*
 3. *Include reference to sustainable communities, that are healthy, low in crime and with a range of local facilities and services.*
 4. *Include reference to climate change and reducing emissions (although this is recognised within the overarching principals there is a need for cross-referencing).*
 5. *Recognise that linkages between areas in need of employment, and those with successful economies will not come about through physical improvements to access only. Wider infrastructure of skill and education and supporting social infrastructure is required some of which will be delivered by other partners but which may have their own infrastructure requirements.*
 6. *Concern over the wording of key growth accelerators, definition and the lack of any reference in policy SDF4 to environmental capacity.*
 7. *Importance of improving public transport links across and between communities rather than into the regional Centre.*
 8. *Reference environmental protection within SDF4.*
 9. *Reference Parks and open space and the importance of sport to the City Region.*
 10. *Recognise the trade-offs required to support Manchester Airport.*
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Liverpool City Region

Three policies combine to provide the spatial framework for the Liverpool City Region. Here priorities differ from Manchester and economic potential in conjunction with urban renaissance and social inclusion are promoted as priorities. Reference to maintaining high environmental quality (where it exists?) is also made and this is again lacking in the Manchester policies. Whilst there is a strong economic focus to this City Region it does appear to have more balance than Manchester with references to social and environmental revival (SDF7) and enhancing overall quality of life (SDF8). Comments arising from the sustainability appraisal are provided in the table below.

Key Sustainability Implications and Recommendations

Liverpool City Region

Economy

The position of the city region within the RSS is appropriate and its development potential should prove attractive to inward investment. The identification and policy support for key economic drivers, growth clusters and sectors is also positive. In terms of their sustainability, the challenge will be to ensure that a workforce to meet the needs of these growth sectors is resident nearby or further away with good accessibility. The focus of development upon gateway (i.e. peripheral) sites is risky; development is likely to be accompanied by commuting through the urban area, around the city and from the east. In the longer term, economic inclusion and sustainable travel patterns will only be achieved through complementary investment in the population to ensure access to the skills, training and support for greater educational achievement (in partnership with other agencies). The support for improved physical accessibility between regenerated

communities and employment locations is welcome and vital. Reference the importance of universities to Liverpool. Consider reference to other clusters such as pharmaceuticals cars, gaming, glass etc.

Lack of consideration to rural areas, West Lancs is one of the biggest food producers in the UK.

Social

The jobs created through development may not be accessed by those living in the socially deprived areas of the city region; indeed the concentration of jobs within, and on the periphery of, urban areas could increase commuting. The policies are positive but appear to presume that development will reduce social exclusion and utilise the population not engaged by the regions economy. Probably the key challenge is for the RSS is to recognise and demonstrate either directly, or through the generic policies, how unemployment rates can be reduced. Improved public access form areas of need to opportunity are important but must be supported by other infrastructure, including education.

Housing is a key issue for the city region with large areas of poor market demand. The ability to meet this challenge and secure regeneration is assisted by the promulgated increase in housing numbers. This should bring environmental benefits, e.g. the re-use of brownfield land and, in time, assist in addressing economic and social conditions. In terms of building sustainable communities, access to facilities (with the exception of local leisure) is supported, although policies and mechanisms to secure local engagement in decision making are weak.

Environmental

Recognition of a high quality environment and good accessibility, quality of life within the city region, which is positive. However, concentration of development could increase inequality creating pressure on certain environmental assets and introducing negative impacts (congestion, air quality, pollution) to the existing and planned population. There is a need for a generic policy to maintain and where possible enhance the value of environmental assets at core strategy and possibly at city region level. In addition to the Waterfront Park, it should be noted that Liverpool has more parks than any city outside of London, also has a very high level of listed buildings, these assets should be recognised, protected and enhanced also.

Use of Resources

Urban development can reduce the need to travel but it can also increase movement. Policies support of accessibility and co-location of development are positive but are subordinate to investment in economically and socially excluded populations. Generic policies could be more actively supported by environmental management concerns at city region level. This management should include approaches to reduce resource use through greater efficiency, improvements to infrastructure, re-use and recycling.

Recommendations:

1. *Recognise importance of inter-working with other agencies within supporting text.*
2. *Recognise economic clusters within the city region*
3. *Recognise importance of mitigating for environmental impacts of economic drivers, as well as access into Liverpool*
4. *Recognise importance of Regional Parks and other parks (green infrastructure) within Merseyside.*
5. *Include reference to climate change and reducing emissions (although this is recognised within the overarching principals there is a need for cross-referencing).*
6. *Consider policy reference for the rural areas within the region.*

Warrington Strategic Framework

Policy SDF9 provides the spatial framework for Warrington. The policy seeks to focus development within the existing urban area and seeks to promote regeneration and restructuring in older areas.

Key Sustainability Implications and Recommendations

Policy SDF9

Policy does not reference improving the environment, nor the inadequacies of public transport. There is no sense within the policy that authorities should seek to improve the existing environment of Warrington.

Recommendations:

1. Confirm definition of 'older areas' as areas appropriate for restructuring.
2. Ensure sufficient housing is provided to accommodate economic development, thereby ensuring close proximity between jobs and homes.
3. Include for protection and enhancement of existing environment as a key element within the aims of regeneration.

Central Lancashire City Region

Policy SDF10, 11 and 12 provide the spatial framework for the Lancashire City Region. In common with the Manchester City Region, priorities (SDF10) are focussed upon economic growth with no recognition of the environmental and social impacts that this may have. Recognition is provided within policy SDF11 to the enhancement of urban quality and 'natural setting'. The workshop commented that the former Central Lancs new town had grown without tackling the requirement for infrastructure and that this should be addressed by policy

Blackpool is one of the authorities with the poorest health in the region, improvements to health particularly here should be reflected within the regional priorities. This City region does include for a significant rural area although no over-arching spatial direction is provided.

Key Sustainability Implications and Recommendations

Central Lancashire City region

Economy

The designation of the city region within the RSS is appropriate in view of its polycentric nature (i.e. a need to share economic benefits) and the presence of the adjoining two main city regions. The focus upon the Preston regional centre/gateway should prove attractive to investors and there should be associated affects/synergies in the areas along the main road infrastructure (M6/M65). Support for key growth sectors of advanced manufacturing, aerospace and other knowledge based industries is appropriate given the continued importance of a declining manufacturing sector. There is a particular risk that skills to meet these needs will be provided through unsustainable travel patterns (an inherent weakness of a polycentric structure) or through inward migration, especially along the motorway network and from a significant rural hinterland. Policies to improve access are positive but the achievement of results will be challenging.

In the longer term, economic inclusion and sustainable travel patterns will only be achieved through complementary investment in the population to ensure access to the skills, training and support for greater educational achievement. The support for improved physical accessibility between regenerated communities and employment locations is welcome and vital.

Social

Concentrating development in the four main centres and in other specific locations will help to bring job opportunities closest to areas with greatest need. However this will not achieve economic inclusion without complementary provision of skills training and support for greater educational achievement. Investment in the population is needed in combination with investment in employment. The policies are positive but appear to presume that development will reduce social exclusion and utilise the population not engaged by the regions economy. Probably the key challenge for the RSS is to recognise and demonstrate either directly, or through the generic policies, how unemployment rates can be improved.

Housing is a key regeneration issue for the city region with large areas of poor market demand (particularly in East

Lancashire). The ability to meet this challenge is supported within the context of the ELEVATE housing renewal programme and the promulgated 43% increase in housing numbers. This should bring environmental benefits, e.g. the re-use of brownfield land and, in time, assist in addressing economic and social conditions. In terms of building sustainable communities, access to facilities (with the exception of local leisure) is supported, although policies and mechanisms to secure local engagement in decision making are weak.

Environmental

Intention to seek a high quality environment and good accessibility within the city region is positive. However, concentration of development could increase inequality creating pressure on environmental assets and introducing negative impacts (congestion, air quality, pollution) to the existing and planned population. There is a need for a generic policy to maintain and where possible enhance the value of environmental assets at core strategy and possibly at city region level.

Use of Resources

Development can reduce the need to travel but it can also increase movement and does not necessarily lead to it. Policies support of accessibility and co-location of development are positive but are subordinate to investment in economically and socially excluded populations. Generic policies could be more actively supported by environmental management concerns at city region level. This management should include approaches to reduce resource use through greater efficiency, improvements to infrastructure, re-use and recycling.

Recommendations:

1. *Consider including reference to improving access to airports and ports in the most sustainable way.*
2. *Relevant social and environmental impacts should be considered in developing strategies and plans.*
3. *Greater recognition within priorities to environmental protection and enhancement (including the historic environment), social equality and health rather than economic performance alone (although this should have indirect benefits on social and health).*
4. *Reference the importance of rural areas within the sub-region*

Spatial Policies for Cumbria

The overall policy begins with a requirement that plans enhance the quality of life which is a departure from previous policies seeking economic growth. Following this requirement the priorities are therefore more holistic than previous City Regions (with the possible exception of Liverpool). Guidance on how proposals and scheme should support a flourishing, diverse and well paid economy should be provided. Major improvements to the sub-regional highway network would have local environmental impacts and encourage travel, increase emissions.

It was felt that SDF13 was written negatively and should celebrate Cumbria. Many issues facing the county were not considered to be covered including opportunities for homeworking and ICT, second homes, and the threat from SIPs tourism versus continuing changes to the agricultural sector.

Key Sustainability Implications and Recommendations

SDF13/14 Cumbria

Economy

The position of Cumbria within the RSS is remote but appropriate development is provided in view of the need to balance targeted regeneration and economic health against its rural nature and nationally important environment. Policy support to diversify the economy in those areas of the greatest opportunity or need is positive although growth sectors are not identified. The accessibility of the M6 corridor should prove attractive, in particular the significant development of Carlisle. The targeting of the western towns is important in social terms and development should be associated with benefits /synergies in the older areas. However, boosting their market attraction will be challenging and sustainable development will depend upon skills being available locally. Unless this is delivered, there is significant risk that employers will not be able to obtain a suitable local labour supply. The potential for lengthy inward migration/commuting that by-passes the local population is considerable. In addition, the adequacy of the RSS to address the needs of rural areas is queried given the need to safeguard the environment. Policies to improve access are positive but the achievement of results will be challenging.

In the longer term, economic inclusion and sustainable travel patterns will only be achieved through complementary investment in the population to ensure access to the skills, training and support for greater educational achievement. The support for improved physical accessibility between regenerated communities and employment locations and between the western towns and the rest of the region is welcome and vital. The achievement of results will be challenging.

Social

Concentrating development in the main towns will help to bring job opportunities closest to areas with greatest need. However this will not achieve economic inclusion without complementary provision of skills training and support for greater educational achievement. Investment in the population is needed in combination with investment in employment. The policies are positive but appear to presume that development will reduce social exclusion and utilise the population not engaged by the regions economy. Probably the key challenge for the RSS is to recognise and demonstrate either directly, or through the generic policies, how unemployment rates can be improved.

Housing is a key regeneration issue for the county with both large areas of poor market demand and also areas where affordable housing needs to be provided. An appropriate mix should be easier to achieve within the promulgated 60% increase in housing numbers. In terms of building sustainable communities and supporting the rural areas, access to facilities (with the exception of local leisure) is supported, although policies and mechanisms to secure local engagement in decision making are weak. Policy reference for affordable housing is referred to in SDF15 only.

Environmental

The positive intention to protect the environment of the Cumbria is welcome and vital. However, concentration of development in towns could increase inequality creating pressure on environmental assets and introducing negative impacts (congestion, air quality, pollution) to the existing and planned population. In addition, development in the rural areas will need to be handled extremely sensitively, especially within the National Park. There is a need for a generic policy to maintain and where possible enhance the value of environmental assets at core strategy level. No recognition of nuclear decommissioning.

Use of Resources

Development can reduce the need to travel but it can also increase movement and does not necessarily lead to it. Policies support of accessibility and co-location of development are positive but are subordinate to investment in economically and socially excluded populations. Generic policies could be more actively supported by environmental management concerns at sub-region level. This management should include approaches to reduce resource use through greater efficiency, improvements to infrastructure, re-use and recycling. Improvements to road network could increase traffic

Recommendations:

1. Improved connectivity through improvements to highways network should be taken forward only within as suite of demand management measures and individual environmental impacts will have to be assessed.
2. Greater recognition of the high quality environment and its contribution to the economy of the county.
3. Recognition of the challenges and implications over the changes from nuclear fuel processing to decommissioning at Sellafield.

Lake District

Policy SDF15 provides the spatial framework for the Lake District. The overall approach is to support development on a scale sufficient to support local needs. Reference to sustainable modes of transport including cycling and walking is made for the first time in the framework. The policy should refer to tourism, recognising its importance to the Park but also the need to protect certain parts of the park from it, to recognise and relieve pressures where appropriate.

Key Sustainability Implications and Recommendations

Overall Spatial Policy for the Lake District

Economy

The Lake District is a major tourism resource within the region but development must be appropriate to its environment and meet the needs of the existing population and those of visitors. The need to diversify the economy and hence, increase incomes is a significant challenge and the opportunities to boost its economic health against its rural nature and nationally important environment will need to be thoroughly assessed. Potential growth sectors are not identified (nor are they at county level). Boosting the environmental attraction of the Park is probably not necessary although the sustainability of its market attraction will depend upon skills being available locally. Unless this is delivered, there is significant risk that employers will not be able to obtain a suitable local labour supply. The potential for lengthy inward migration/commuting that by-passes the local population is considerable. In addition, the adequacy of the RSS to address the needs of rural areas is queried given the need to safeguard the environment. Policies to improve access are positive but the achievement of results will be challenging.

In the longer term, economic inclusion and sustainable travel patterns will only be achieved through complementary investment in the population to ensure access to the skills, training and support for greater educational achievement. The support for improved physical accessibility between key service centres, nearby towns and the rural is welcome and vital. The achievement of results will be challenging.

Social

Concentrating development in the key service centres will help to bring job opportunities closest to areas with greatest need. However this will not achieve economic inclusion without complementary provision of skills training and support for greater educational achievement. Investment in the population is needed in combination with investment in employment. The policies are positive but appear to presume that development will reduce social exclusion and utilise the population not engaged by the Park's economy. Probably the key challenge for the RSS is to recognise and demonstrate either directly, or through the generic policies, how unemployment rates can be improved.

Affordable housing is a key issue for the Park. The policy framework should be strengthened to ensure that the rural exception provision in PPG3 is used to its best advantage. In terms of supporting the rural community, access to facilities is supported, although areas of the Park will inevitably remain severely disadvantaged. Policies and mechanisms to secure local engagement in decision making are weak.

Environmental

Although the Lake District is acknowledged as a significant asset to the Region and the quality of its environment is clearly integral to this, positive concern for the environment is not a major feature of the policies. However, concentration of development in particular locations could increase the need to travel and pressure on environmental assets so introducing negative impacts (congestion, air quality, pollution). The need to ensure that skills and employment are matched and that the proposed transport measures are in place to ameliorate the ever present traffic in the Park. Development in the rural areas will need to be handled extremely sensitively, and there is a need for a generic policy to maintain and where possible enhance the value of environmental assets at core strategy level.

Use of Resources

Development can reduce the need to travel but it can also increase movement and does not necessarily lead to it. Policy support for accessibility and co-location of development are positive but are subordinate to investment in economically and socially excluded populations. Generic policies could be more actively supported by environmental management concerns at Park level. This management should include approaches to reduce resource use through greater efficiency, improvements to infrastructure, re-use and recycling.

Recommendation

1. *Include for explicit support for the environment and recognition of its importance as a major factor in the economy of the area.*

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2. *Recognise the importance of the visitor economy but environmental impacts of pressure from visitors in the Lake District.*
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Overall Spatial Policy for North Lancashire

Policy SDF16 provides the overall policy framework. Explicit reference is made to the need for new development that complements the historic centre. This is the first reference to the importance of the historic environment within the spatial framework policies.

Key Sustainability Implications and Recommendations

Policy SDF16

Economy

Assumed that regeneration of Morecambe includes for economic regeneration. Focus of new development on Lancaster may indirectly support development at the University. New development that enhances the historic environment of the City should raise its image and thereby indirectly contribute to economic development.

Social

Regeneration is assumed as including social. Improvements to Morecambe are assumed to improve health and crime through the redevelopment of certain areas following the requirements of other RSS policies. Provision of affordable housing should bring benefits for the local rural communities providing that the houses are focussed on their local needs rather than being open market 'affordable' housing. Support for economic development in rural areas could raise income levels thereby making other houses affordable.

Environmental

His policy includes for recognition that new development could have detrimental effects on historic areas and therefore specifically identifies the need to ensure that it is undertaken sensitively. This is welcomed. There is no similar recognition of the need to protect existing environmental resources such as open space, habitats and water bodies that also lie within the City. There is no specific recognition of the need for environmental enhancement in Morecambe, unlike that for south Cheshire Policy SDF18. A concentration of new development in Lancaster may have a detrimental impact on local air quality. Reference Red Rose Forest

Use of Resources

The policy makes no reference to resource use therefore any benefits will be indirect coming through other RSS policies.

Recommendations

1. *Be explicit in the definition of regeneration, does it include social?*
 2. *Recognise that regeneration should extend to other communities including rural*
 3. *Recognise the need for affordable housing in urban areas also*
 4. *Remind that new development is required to take into account many things in addition to the historic environment, including accessibility.*
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Overall Spatial Policy for West Cheshire

Policy SDF17 provides for the spatial framework of West Cheshire, recognising its links with Wales. The focus of development is around Chester and Ellesmere Port. A key concern is the attention given to improving linkages along road corridors, whilst this can improve accessibility to job opportunities it can also encourage additional commuting, especially in an area that is experience problems of migration from other parts of the region. Greater travel will increase emissions. Recognition of the daily commute along the M53 to Liverpool would be appropriate. Further consideration is provided in the table overleaf.

Key Sustainability Implications and Recommendations

Policy SDF 17 West Cheshire

Economy

The policy is strongly focussed in recognising and the strong economic performance of Chester and Ellesmere Port and the opportunities to increase this further. Both centres include accommodate key growth sectors and their continued development should be promoted by this policy and complementary policies concerning the distribution of housing for example. An equal emphasis on regeneration and improving linkages to areas of need and opportunity should help to address economic exclusion.

Social

Regeneration is focussed upon communities within West Chester and the policy does not consider wider regeneration needs of Ellesmere Port, or indeed pockets of deprivation within some of the rural communities. The supporting text references problems of migration and affordability of housing but does not actually state whether this is considered a problem and if so does not identify means to address them.

Environmental

Although Chester is recognised as an important tourist and visitor destination, and that this is as a result of its cultural heritage to a greater extent, the policy does not consider how the 'sustainable economic growth and regeneration' can protect and improve this resource. This is in contradiction to the policy for north Lancashire which recognises the importance of Lancaster's built heritage. Greater co-ordination of policies would be appropriate.

Use of resources

Economic growth would lead to an increase in resource use, it is assumed that other RSS policies would seek to reduce this. However the policy specifically refers to an improvement in linkages and these appear to be along transport corridors. Greater definition of what is meant by enhancing links would be appropriate as an encouragement to travel would increase resource use and generate carbon emissions. Access to services between the urban and local rural areas would be appropriate.

Recommendations

1. Acknowledge the importance of Chester's cultural and built heritage and the pressures that it may face from new development;
2. Consider wider regeneration extending outside of west Chester and including rural areas.
3. Recognise the environmental implications of promoting enhanced links particularly along the M56/M53 and A55.

Overall Spatial Policy for South Cheshire

This is the final policy (SDF18) that forms the spatial development framework for the region. The policy focuses upon Crewe. The policy does not provide a significant amount of detailed guidance and seek to confirm Crewe's regional role as a gateway to the region. Recognition of the need for environmental and economic regeneration is made. Gaps within the policy were considered to relate to the importance of the agricultural economy, tourism and salt, particularly the problems associated with its historical extraction.

Key Sustainability Implications and Recommendations

Policy SDF18

Economy

Policy should support economic regeneration of Crewe and it seeks to promote the town as a key regional town enhancing its role as a transport interchange and gateway to the region. The Policy makes no mention of the hinterland to the town, or to Nantwich which include for local areas of economic deprivation. There is no reference to the rural area supporting Crewe. Unclear as to how the town's role will be 'promoted'.

Social

Selective regeneration of the economy and environment may support communities within Crewe, although there is no reference to other towns and settlements. No specific reference to affordability, unlike other sub-regional policies and this is an issue in some of the towns surrounding Crewe. Reference to improved environment could indirectly improve health.

Environment

Reference is made to the selective regeneration of the environment. Use of the term 'selective' is requires further definition. Whilst the majority of development, identified within other policies, is likely to be on previously developed land (60%) this leaves a significant proportion that may come forward on Greenfield.

Recommendations

1. Consider a requirement for the rural hinterland to be reflected in plans and strategies
2. Confirm what is meant by selective regeneration

The final three policies within the SDF section consider generic geographical areas.

Key Sustainability Implications and Recommendations

Policy SDF 19 Rural Areas

The policy is considered to support economic objectives in that it requires plans and strategies to give priority to developing resources in areas suffering from rural deprivation. The accompanying text makes reference to the North West Rural Delivery Framework. At the same time it seeks to strengthen key services centres for the rural area through a concentration of development. Whilst concentration of development within key centres is welcomed it is considered that the policy should reference the appropriateness of development for local needs within settlements lower in the hierarchy, particularly larger villages.

Policy is also considered supportive of social objectives in that it outlines a role for key service centres as the spearhead for economic regeneration and settlements where an integrated approach to social inclusion would be appropriate. Improving and enhancing public transport links from these centres to surrounding areas should support improved accessibility to services and facilities within the wider rural area. The policy does also reference the need for a more equitable access to housing and it refers to 'innovative and flexible' solutions. Appraisal questions what the RSS understands by this term which could include for financial and/or design solutions also

When appraised against the environment protection objectives the policy is considered to be marginally positive. There is no direct reference to the importance of protecting and/or enhancing the rural environment although a focus of development within Key centres should reduce pressure on certain resources. Policy only makes reference to environmental impact when considering traffic management, whilst this is recognised it is felt that these safeguards could be broadened o refer to the whole policy which is considered to be vague on the environment in general. Reference could also be made to the impacts of climate change which are given less prominence when compared to social and economic impacts.

A concentration of development within key centres and the prioritising of public transport mean that the policy is appraised positively against the objectives of improving air quality and climate change.

Recommendations:

1. Whilst recognising concentration of development in key centres, policy should outline types of development appropriate within the lower order of settlements.
 2. Environmental protection objectives referred to in the policy could be widened to cover all development rather than just transportation.
 3. No reference to rural diversification and impacts that climate change may have on the agricultural industry of the region.
-

North West Coastal Zone

Policy SDF20 provides the spatial framework for the regions coast. It has been appraised with reference to Policy EM5 although comments have also been provided on this later policy separately.

Key Sustainability Implications and Recommendations

Policy SDF20 Integrated Planning and Management of the North West Coastal Zone

The policy is considered to be positive when considered against the economic objectives in that in conjunction with Policy EM5 it would support economic development within the regions port communities, many of which are suffering from economic deprivation. SDF20 does not in itself reference economic development in that it seeks to promote an integrated approach to coastal management per se.

The policy is important in that it recognises the need for integration with other planning regimes, particularly marine spatial planning. In this way it should ensure that the implication of marine development, particularly related to the requirements for port infrastructure, and energy generation are recognised by the land based planning system, particularly LDFs. A joined up approach should ensure that impacts upon the environment are considered and where possible avoided. Question whether there is anything emerging from the Marine Spatial Plan for the Irish Sea that should be reflected within this policy.

The supporting text to the policy references the issue of climate change and is recognises the importance of the coast in cultural, landscape and environmental terms. It is therefore assumed that these elements will be key to the development of the integrated planning and management of this zone. Whether in this policy or EM5, reference could be made to the CABE document 'Shifting Sands', which calls for better design quality in coastal communities. Additional reference could be made to the EA Shoreline Management Plan.

Recommendation

1. *Reference to Shoreline Management Plans and 'Shifting Sands' in the supporting text to either this policy or EM5.*
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The Green Belts

Policy SDF21 provides the overall policy framework for the region's Green Belts policies. The policy states that there will be no need for any strategic review of Green Belt within Cheshire, Greater Manchester, Lancashire or Merseyside before 2011 and within Warrington before 2021.

It was recognised that Manchester Airport falls within the Green belt and that any development boundary changes would be considered by RSS to be 'local'. It was suggested that the RSS should take a strong view with regard to the compensation that would be required for Green belt revision providing the checks and balances for local release.

Key Sustainability Implications and Recommendations

Policy SDF21 – The Green Belts

Against the economic objectives the policy is considered favourable in that it includes for reference to local adjustments which may facilitate a degree of flexibility to support the accommodation of business. Furthermore the policy should support urban renaissance by focussing development within urban locations and preventing urban sprawl. The policy should also support economic and social inclusion for the same reason. Suggest reference to the importance of density in housing development where a higher density can reduce pressure for Green belt release.

When appraised against environmental objectives the policy is considered to be favourable. By restricting development to existing urban boundaries it should indirectly support the retention of agricultural land, habitats and landscapes.

The policy indirectly supports the re-use of brownfield land and redevelopment within urban areas, it will therefore indirectly contribute towards the objectives of maximising resources, reducing waste (land) and controlling emissions. It was felt that the policy should provide direction to where local relaxations of Green belt may be permissible. Reference to compensation for loss should also be considered.

Recommendations

- 1 Policy should provide the checks and balances required before local Green belt release would be assessed.

1.3.1 Transport

Objectives

The seven RTS objectives in para 6.4 are cross-cutting and address the need to reduce travel by car, to maximise regeneration and to reduce the wider environmental, social and health impacts of road transport. (*Could these objectives be included in a policy to raise their profile?*). Transport is a key emitter of carbon dioxide, an RTS objective should include for the reduction in CO2 emissions. It was considered that the objectives should also make specific reference to walking and cycling. The objectives should begin with one that seeks to reduce the need to travel.

Policies

The transport policies will encourage economic development and regeneration. However, 'linking areas of employment with areas of need' will only be successful in encouraging regeneration within a raft of other social policies. As noted in a UK Government Strategy:

"Our social capital consists of the skills and knowledge, health, self-esteem and social networks of people and communities in the UK. The failure of urban renovation schemes of the recent past, which concentrated on physical investment alone... demonstrate the importance of building social capital as well as bricks and mortar... To build sustainable communities, institutions and policies are needed which can take a cross-cutting approach to sustainable development objectives. Public involvement is also essential".

Liverpool is an example of a city that is relatively under-performing economically but relatively connected by road transport.

Furthermore, the Standing Advisory Committee for Trunk Road Assessment (SACTRA) noted that "*the 'two-way road' argument reminds us that improved accessibility between two countries (and, similarly, between cities, areas or regions) may sometimes benefit one of them to the*

disbenefit of the other. Transport links can suck development out of an area as well as bringing it in”.

A key overarching theme for the RSS should be (and is within some policies) accessibility. It is suggested that the RSS consider requiring LPAs to undertake accessibility audits (see case Study within PPG13) to identify the most accessible parts of their settlements as a basis for identifying site allocations. The first recommendation is that an additional policy requiring the provision of accessibility audits be provided.

Linked to the concept of accessibility the workshop considered the merits of a transport hierarchy which could be provided either within the objectives or as an overarching transportation policy. The aim of this hierarchical policy would be to reduce the need to travel by locating development in locations which:

- avoid / obviate the need to travel (mixed use communities, homeworking and ICT)
- walk, cycle
- bus, rail (light / heavy) – maximise load factors, e.g. by concentrating journeys (compact multi-functional town centres)
- car – maximise load factors, e.g. by multi-occupant vehicle lanes, preferential parking
- air

Key Sustainability Implications and Recommendations

Policy RT1: A Regional Public Transport Framework

This policy is generally supportive of encouraging economic growth and regeneration and reducing social exclusion. By promoting more sustainable forms of transport and by helping to integrate transport modes it should also benefit the environment – although there are opportunities to make this more apparent in the policy. Existing freight lines could be promoted for use by passenger trains e.g. Bootle Branch Line.

Recommendations:

1. Include reference to reducing the impact of transport on the environment.
2. Should light trams and rail solutions be sought even when they are not considered to be the ‘best value for money’ – but when they are considered to offer a much more socially and environmentally beneficial option?

Policy RT2: Management, Maintenance and Improvement of the Regional Highway Network

Considering all practical solutions before making major road improvements is welcomed. We also welcome the inclusion of reallocating road space in favour of public transport as an integrated approach to demand management. Nevertheless, road improvements which encourage greater road use will cause significant damage to the natural and built environment and have serious effects on human health and climate change.

Recommendations:

1. Do ‘other fiscal measures’ mean congestion charging and road tolls – could these be specifically mentioned?
2. Plans and strategies for managing travel demand should focus on reducing the proportion and numbers of all car-borne journeys during peak hours.
3. Should the importance of road safety feature in this policy?
4. Para 6.9 Las should seek to reduce, rather than manage the school run.

Policy RT3: Airports, Policy RT4: Ports

Airports and ports both provide a high number of jobs within the region and the economic benefit that they bring is generally considered significant (although this may be questioned by some commentators).

However, it is widely recognised that an increase in aviation is environmentally unsustainable and particularly damaging in terms of air pollution and generation of greenhouse gases. Improving public transport access to airports helps but is far out-weighted by the negative impact of air transport. Other significant impacts include increased levels of noise (generated by aircraft and airport related road traffic).

Both ports and airports need additional land for expansion and this may have negative effects on the local environment and local communities. As written the policy acknowledges the green belt but does not acknowledge any wider environmental impacts.

Improvements to air capacity follows a similar pattern to the SACTRA notes quoted above with regard to new highways. This means that improved capacity for people to come into the region also provides capacity for people to leave. Research into the types of journeys and companies entering and leaving would be useful.

Recommendations:

1. Consider including reference to improving access to airports and ports in the most sustainable way.
2. Consider the environmental impacts of aircraft on the ground – e.g., noise and air quality. (White Paper recognises that more people will be impacted by noise pollution if airport is to expand)
3. Relevant social and environmental impacts should be considered in developing strategies and plans.
4. Recognise the forces of globalisation within supporting text

Policy RT5: Sustainable Freight Transport

Road freight and air freight have also increased at the expense of rail and water-borne freight over a number of years. Concern over moves towards 'predict and provide', rather than a requirement for Has to consider origin, destination and purposes of journeys.

Policy RT5 aims to increase the movement of freight by rail. Moving goods by rail is (in most circumstances) more environmentally beneficial than moving goods entirely by road. However the opening paragraph is concerned with road travel. Suggest references to the regional rail network, ports and water borne freight as well.

If this policy were successful it would also be beneficial for the communities in which large lorries now pass through. However, at the road/rail interchanges there is likely to be more local traffic generated and environmental impacts will occur.

Reference to a 'sustainable' freight policy is questioned when none of the other transport policy use this term. A definition should be provided for this term. Notwithstanding the major element of the policy relates to the transfer of freight from road to rail/water which is welcomed. The proportion of freight that will follow this route however will likely be substantially less than that which uses roads alone.

Recommendations:

1. Is road safety (e.g. lorries going through town centres) a concern that can be addressed by this policy?
2. Consider a requirement for LDFs to consider sub-regional and local freight and delivery networks including for local distribution centres from which local needs can be served and the linkages between improved distribution facilities and increases in food miles.

Policy RT6: Parking Policy and Provision

The inclusion of this policy is welcomed as a way of managing demand. It is considered to be broadly beneficial to the environment since it encourages users to find alternatives to the private car. The exceptions for disabled are appropriate. The supporting text to this policy reiterates the importance of a co-ordinated approach to parking and is welcomed. Question whether RSS can require that all car parking provided with new commercial development (e.g. retail stores/offices) to have a charging regime.

The parking standards identified within the annex are tighter than those national standards provided within PPG13, for example over 500sqm non food retail to be at 1 space per 20 to 22, as opposed to 1 per 20 in PPG13. The threshold is also reduced to 500sqm or above, as opposed to 1000sqm.

Question whether reference to strategic Park and Ride outside of cities and towns can be included, also the more local

impacts of major entertainment venues (such as football stadia) have on local environment.

Recommendations:

- 1 Consider guidance for strategic Park and Ride sites and Football Match Parking Zones.
- 2 Require that development with the potential for highest traffic generation be located in most accessible locations (by means other than by car)
- 3 Recognise the environmental impacts of parking, for example surface water run-off.

Policy T7 Regional Networks for Walking and Cycling

This policy is important since many pedestrians and cyclists are frightened from travelling as a consequence of the rise in motor vehicle use, the increasing weight of road freight and numbers of people are being killed injured on the roads every year, of which pedestrians and cyclists make up a disproportionate percentage of the total. This policy is beneficial for the environment and people's health.

Policy should also consider reference to the importance of an attractive and safe public realm to encourage walking and cycling together with the maintenance, management and enhancement of the regions foot and cycle path network.

Recommendations:

1. *Make an explicit link between this policy and the location of new development throughout the region. All development should be accessible by cycle.*
2. *Require new development, over certain thresholds, to provide facilities for cyclist, including cycle stores and changing rooms*
3. *Include here, or elsewhere support for homeworking as an alternative to travel to work*
4. *Can more emphasis be placed on linking key destinations (e.g. residential areas, employment centres, town centres, schools and colleges and linking smaller settlements and district centres to main town centres)?.*

Policy T8 Regional Priority for Transport Investment and Management

This policy provides a hierarchy of priorities for transport investment. A list of major investment projects to be taken forward has still to be produced and this policy will therefore require a more detailed assessment when it is provided.

The overall approach to investment and management is welcomed as it seeks to focus priorities upon the maintenance of the existing network and making best use of them

Recommendations:

- 1 *The soft measures are usually the easy-wins and the cheapest options for managing demand – can these be given a higher priority? Thresholds should be suggested for developments to provide these soft measures.*
2. *Is funding for public transport the same priority as funding for road transport?*

1.3.2 Access to health and Education Services

Policy L1 provides for the regional policy for health and education. The workshop questioned why health and education had been grouped together, there was a view that whilst access to education is predictable, health is not. It was stated that health provision is not a purely geographical issue and that there is a need for community involvement and consultation in the placing of facilities also. This reference to community includes for the community of users (i.e. those with chronic conditions). The workshop felt that the policy should be amended to refer to particular attention being given to improving access in areas where need is greatest, rather than those which are poorly served.

Key Sustainability Implications and Recommendations

Policy L1 Access to Health and Education Services

This policy is considered to be marginally supportive when appraised against the economic objectives in that it seeks to support and to facilitate the development of the health and education infrastructure of the region. Health and education are two key sectors of the regional economy. The policy is considered to be particularly supportive of the SA objective to support the development of a healthy workforce in that it seeks to support the appropriate planning of a full range of education, training and skills provision, including work-related training.

A key reference within the policy is that particular attention should be given to improving access in areas in which communities or the demands of the local economy are poorly served. This references a key issue within the region, that of differing accessibility and a recommendation is again made, in support of this policy, that all local authorities undertake an accessibility audit of their area as a basis for the proper provision and planning of services, facilities and development.

The policy is appraised as being marginally positive against the SA Objective to reduce the need to use the car because of its reference to improving access, as referred to above. However the type of access is not made clear and it is suggested that this should be prioritised with access by public transport as the most important.

The policy is very supportive against the objective of improving health in that it seeks to support the proper planning of the full range of health facilities. Reference in the supporting text to HIAs is recognised, as is the policy requirement under Policy CS2.

As with all RSS policies there is no reference to community involvement in the planning of service provision, engagement with communities is missing from all policies within the RSS, as is a particular recognition of the particular requirements of BMEs.

The policy is considered to have little impact upon the environmental and resource efficiency objectives.

Recommendations

- 1 Make explicit reference to access prioritised towards sustainable travel modes;
- 2 Require within this policy or with the transport policies, LPAs to undertake accessibility audits of their areas.
- 3 Reference the importance of working with local communities in the planning of services and the particular requirements of BMEs.
- 4 Focus upon areas in greatest need rather than poorly served.

1.3.3 Housing

Policies L2 to L5 outline the regional priorities for housing. These policies were appraised together. They consider the regional distribution of housing, the provision of affordable housing and housing renewal and regeneration. The RSS does not specify the densities at which housing should be developed, high densities would minimise land take and maximise infrastructure and it is recommended density figures are provided for the sub-regions, urban and rural areas. Densities should reflect traditional patterns of settlement, medium to high densities can support businesses and services through an increase in catchment populations. Cross referencing should also be made to design quality, including architectural and urban design.

No policy reference is made to the location of housing although supporting text states that this is a requirement for LDFs. It does state that it should be firstly in existing urban areas using previously developed land and accessible by choice of transport. Regional distribution states that a significant percentage of housing in certain LPA areas will be on greenfield land, a requirement that this also be released only in accessible locations should be included.

The RSS policies promote a significant increase in housing numbers, over existing RPG figures. A strong policy framework will be necessary to mitigate against environmental impacts.

Key Sustainability Implications and Recommendations

Polices L2-5

Commentary

Economic

Provision of a supply of housing throughout the region, with a significant proportion in the sub-regions including south Lakeland should enable these regions to maintain populations and thereby support economic development. Improvements to the regional portfolio of housing, particularly the renewal and regeneration of failing areas should address problems of image. Significant new housing should seek to support urban renaissance. Opportunities for the regional companies to take advantage of new methods of construction should be sought.

Social

New housing should support social inclusion providing levels of affordability are met. The provision of energy efficient housing (through B Regs.) should ensure that occupiers of these new dwellings have lower energy bills and the policy therefore indirectly contributes to reducing fuel poverty. The location of dwellings, and the requirement for accessible locations is required within supporting text, this should be transferred into a policy context. Reductions in number of vacant dwellings and mixes of tenure should also seek to improve community mix and increase densities. Policies and strategies should be informed by an understanding of demographic change including single parent families and BMEs. Workshop suggests that health is referred to in Policy L3, second paragraph. Policy L5 should seek to encourage mixed tenure rather than single tenure for affordable housing. The Workshop felt that the second paragraph was superfluous, affordability is region wide.

Environmental

Policy L4 proposed a substantial increase in housing numbers for the region of approximately 402,000 dwellings. With a build rate of 22,000 per annum, which is above RPG and actual build rates. This will have significant impacts upon the environment and resource use. It is accepted that new dwellings are likely to be more energy efficient, thereby reducing emissions. Policy does not make explicit reference to need to protect environmental capacity of an area and this is very important given the substantial housing numbers that are identified for cities such as Manchester, together with more rural areas including S Lakeland (which has an allocation as high as many metropolitan authorities). The rural areas are likely to require a greater proportion of greenfield land. A strong policy framework for release will be required and the release of the dwellings should be undertaken in conjunction with complementary economic development to prevent out-commuting from such areas.

Resource Efficiency

Significant development particularly in urban locations such as Manchester may further impact upon already poor air quality. Housing programme is likely to require use of new resources and the policy should be cross referenced with those which seek to reduce waste and promote recycling particularly of aggregates. Policies elsewhere in RSS, or reference within housing policies should include for the encouragement of sustainable construction principals. Workshop participants identified key concerns with regard to the capacity of existing infrastructure to accommodate housing figures, particularly around sewage treatment and resultant water quality. It is understood that water supply may be able to cope with the increase in housing, but only if all new homes are water efficient.

Recommendations

1. Policies should be cross referenced to those that seek to reduce waste and encourage recycling especially during construction.
2. Policies should refer to sustainable construction methods, high energy efficiency and ability to accommodate segregated waste streams. Energy efficiency is particularly important within affordable dwellings as a means of reducing fuel poverty. 'Build for Life' is an important concept, particularly for affordable housing.
3. Policies must ensure a phased approach to development in conjunction with development of supporting infrastructure, including green infrastructure but also water treatment capacity.
4. Policies must require greater water efficiency in new dwellings as the only way of maintaining water supply.
5. Distribution of housing allocations should include for estimate of number that are likely to be cleared to provide a better picture as to the balance of new development.
6. New housing must be provided as a co-ordinated package of development together with the necessary

economic, social and environmental infrastructure, relevant policy linkages should be made.

7. Clearance replacement must include for consultation with the local community and respect their needs. Acknowledgement of the historic importance of certain traditional housing areas should be recognised.
 8. Recognise that local needs and affordable needs may be different and that affordability alone may not improve housing choice for the local community but be occupied by incomers.
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1.3.4 Overall Regional Policies for Achieving a Sustainable Economy

The RSS contains six policies relating the region's economy. These concern regionally significant development, the supply of employment land and particular sectors of the economy including retail and tourism. Policy W4 Retail Development, was felt to be too focussed upon a predict and provide approach to retail development and the floorspace requirements identified were considered to place possible pressures on other uses within town centres. It was felt that a more balanced approach to retail growth would come through a town centre, rather than retail focussed policy. Policy W6 identifies Blackpool as the priority location for a regional casino.

Key Sustainability Implications and Recommendations

Policy W1 – W5

The appraisal question whether the 'broad locations' for Regional Investment Sites will be in close proximity to needy communities? Previous poor take up in NW appears to have prompted a revised spatial distribution based on current market attraction rather than relationship to population. – Implications for economic inclusion / urban renaissance.

Clearly a concern to 'share' RIS sites within the city regions. Does this political priority take precedence over the generic sustainability of locations?

The knowledge nuclei sites relate to existing opportunities, a high proportion of which are likely to be in central locations and could be expected to be developed soon. Questionable benefits to local needs where social / skills issues need to be addressed over long term and the policy should reference the need for other agencies to support skills training.

Prioritisation of inter-modal freight for transfers to rail and water is welcomed.

Reference to the opportunities to re-use buildings and sites could be provided.

Co-occurrence of opportunities / location and skills is a major issue for the RSS in general. Sustainability of employment policies depends upon other measures.

Rural employment inconsistently supported. Defence of rural sites helpful but not supported at Sub-Regional level. Support for agriculture required in W2 as at present it is confined to the supporting text. There is also a need for policy support for the re-use of buildings – IT infrastructure / diversification.

Despite emphasis upon B1 away from B2 and B8(?) will probably increase traffic movements due to.

- Accessible locations in response to current market requirements – only broad locations specified. Suggests distance from areas of need. Poor access?
- Reflecting of TTWA suggests that educational and training support in local areas is not a high priority.
- Potential for homeworking / IT networking not addressed in RSS
- Continued support for agriculture and traditional industries to be included in W2 text.

Protection of environment is not strong although natural heritage is well addressed. The lack of the RPG13 sequential test in RSS and the retention of the Warrington allocations suggest that the use of brownfield land is not as high a priority although W2 does seek to minimise take-up of additional Greenfield land for development and concentrates office development in towns and cities. Suggest opportunity for RSS to require LPAs to review existing Greenfield allocations if more appropriate brownfield sites are available. W2 should also refer to maximise brownfield, rather than minimise Greenfield.

Policy W2 refers to best quality sites, in terms of market attractiveness and sustainability being safeguarded, a definition of sustainability in this context would be welcomed and it is suggested that the definition of sustainable economic development within the UK SD framework – Securing the Future.

Policy W4 retail development places strong emphasis upon existing centres as preferred locations for development. The rejection of new out-of-town and large scale extensions to existing facilities is welcomed as this should support new development within existing towns, often the most accessible locations for all section of the community. Definition of 'unsustainable shopping patterns' would be appreciated. Policy does appear to focus upon larger 'high street' retailers, recognition of the importance of local products, healthy eating and the concept of food miles would be welcomed.

Policy text states that 'convenience shopping' is not a regional issue. Convenience (food) shopping and access to it is very important for local communities, especially those that do not have the means to access larger 'edge of town' supermarkets. Convenience shopping is a regional issue.

Table 8.3 identifies indicative town centre floorspace requirements which in most sub-regions forecast significant growth through the RSS time period (over 2 million msq). This may have significant impacts upon the environment of town centres and could lead to pressures on existing, historic areas because of the increasingly larger floorspace requirement preferred by individual retail companies. Pressure for retail could also force out other uses. Suggest reference within RSS to PPS6 and reference to alternative formats. Appraisal questions appropriateness of growth within a retail market that is increasingly pressured by factors such as the internet. As drafted the policy appears to follow a predict and provide approach to retail growth.

Policy W5 seeks to focus tourism growth within urban areas which would support economic development and channel visitors to locations which are most easily accessible by sustainable means of transport. Reference to the wider rural areas of the region are confined to the Lake District and AONB where the importance of environmental protection and management is identified and this should support environmental protection objectives. It is recommended that similar consideration be given to other AONBs within the Region as well as the Peak District National Park (although it is recognised that for RSS purposes it falls within the region).

It was felt that the requirements for tourism in the Lake District and AONBs to protect and manage the environment should be common to all tourism development, together with reference to the protection and enhancement of historic buildings and areas. Reference was also made to the strength of sport as a visitor attraction in the region and it was considered that this should be referred to also. Recognition should also be made of the need to diversify the tourism base, to move people away from vulnerable areas, this may be behind the last sentence within the third paragraph. Reference to eco-tourism would be welcomed.

Recommendations

- 1 *Suggest locational criteria for identification of employment sites focussing upon re-use of land and accessibility by sustainable transport modes.*
 - 2 *Recognise importance of links to other strategies particularly those concerned with skills training.*
 3. *Consider importance of convenience shopping, particularly ease of access for all communities.*
 4. *Consider changing W4 to a 'Town centre' policy.*
 5. *Is an additional 2 million msq of floorspace within the north west sustainable? How can this be accommodated within the wider RSS approach for housing and development of other uses within urban areas and town centres.*
 6. *Protection and management of the environment should be common throughout the whole policy.*
 7. *reference to the importance of sport to the visitor economy, and encouragement for eco-tourism.*
-

Policy W6 Regional Casinos

This policy seeks to guide the location of the region's Regional Casino. A background paper identifying some of the wider social impacts of casinos has been provided by Ben Cave Associates. The findings are that Casinos may have impacts upon health, crime and deprivation. Blackpool is the chosen location for the regional casino. This has severe inequalities in health which are likely to be widened. Economic benefits may also accrue from the casino and it will be necessary for authorities to carefully consider the strengths and

weaknesses of any proposal on social, economic and environmental matters. If the Casino is to come forward it will be necessary to consider mitigation measures such as:

- the ability to walk and cycle to the casino, and its ability to improve the public realm;
- the quality of the building which should be of good architectural design;
- a smoke free casino;
- the provision of healthy food;
- addictive prevention measures; and
- the complementary development of alternative attractions.

Key Sustainability Implications and Recommendations

Policy W6 – Regional Casinos

When appraised against the SA objectives concerned with economic performance the policy is considered to be marginally positive. By identifying one specific location for a casino, ahead of Manchester and Liverpool it is considered unlikely that the proposed casino would bring major economic benefits to the region as a whole. However it is understood that studies show that it should support the economic development of Blackpool. The policy has been appraised against the objective of supporting urban renaissance however. Whilst economic issues are a key element in renaissance, it also extends to social and environmental issues also. The policy is considered to perform less favourably against some of these objectives.

The proposed regional casino is considered to move significantly away from sustainable development when considered against the social objectives. It is understood that Casino's can encourage gambling and addiction and it is recognised that this in turn can create significant health problems. Blackpool already suffers from some of the poorest health rates in the region and it is considered that the development of a regional casino will exacerbate these existing trends. The policy also performs poorly against objectives concerned with crime reduction and the fear of crime.

The policy is considered to have little impact upon the objectives concerned with the environment and use of resources.

Further information on the potential impact of casinos is provided within the paper produced by Ben Cave Assocs.

Recommendations:

1 see above

1.3.5 Enjoying and Managing the North West – Living within Environmental Limits

This set of policies focuses upon environmental concerns in the North West, as identified by the RSS policy authors and includes for the protection and enhancement of environmental assets, water, minerals, waste and energy. The following tables summarise the findings of the appraisals. Waste policies were considered within a separate policy workshop

It was felt that the title of the policy section was misleading in that the region is not living within environmental limits at the moment, and it is not likely to during the lifetime of the RSS. Policies EM1 and 2 were not considered strong enough to deliver the title especially when

considered with the SDF policies. Question was asked as to whether an Environmental capacity Study had been undertaken.

Overall policies are considered supportive, although there is some concern over the imbalance between minerals forecasts and the RSS housing targets and 'go for growth' approach within some of the SDF policies.. The RSS would also benefit from a specific policy or reference within a policy to the 'future proofing' of buildings and /or support for sustainable construction and resource efficiency (as opposed to just energy efficiency). The emerging RES does include activities to support the delivery of future proofed buildings, this can only be widely adopted through planning policy and it would be appropriate for the RSS to reflect the intentions and objectives of complementary strategies such as the RES.

Key Sustainability Implications and Recommendations

Policy EM1 and EM2 (Sound Environmental Management and Green Infrastructure.

When appraised against those objectives with an economic focus the policies are considered to be broadly neutral. Nevertheless the policies are considered to provide significant support to the objective of raising the image of the region and, in isolation they should support the SA Objective of promoting urban renaissance. The appraisal does however raise a question over the extent to which these policies, particularly EM1 will be able to make the 'step change' increase in environmental resources within particular urban areas of the region, especially those that are to be the subject of considerable growth. Greater integration and recognition with certain spatial policies would be appropriate.

Greater access to open space via a green infrastructure network should improve access to informal recreational activities for local communities. This will also indirectly support opportunities for healthy living. A well maintained and managed environment should encourage greater use and indirectly reduced opportunities for crime. To support maintenance it will be important to encourage 'ownership' by local communities, there is no reference within either policy to engagement with community organisations.

Both policies should significantly support SA objectives to protect and enhance areas and building of cultural heritage, biodiversity, water quality and landscapes. Overall a question is again raised as to the extent that these policies will achieve their aim set against a spatial framework that is emphasised towards growth in many parts of the region.

Environmental management issues are likely to evolve as the impacts of climate change are increasingly felt. Policy EM1 should recognise climate change. Reference could also be made to the use of woodlands as biofuel crops and a definition of 'sustainable' remediation would be welcomed.

It was considered that the RSS could make reference to ecological services which can be costed, for example the design and provision of flood management can alleviate the environmental cost to business of flood damage. It was felt that it was important to recognise the economic benefits of a strong and healthy environment.

There is no reference to noise, air quality and soils either within this policy or elsewhere within the section.

Recommendations:

- 1. To make specific recognition either within EM1, or within the Spatial Framework policies, of the need to recognise environmental capacity, and seek to increase the resource, when balanced against policies that seek a 'step change' in development.*
- 2. Make reference to importance of local communities in managing the environment.*
- 3. To make specific recognition of the impacts of climate change and the challenges for environmental management. .*
- 4. To provide a definition of sustainable remediation and/or clarify the North West remediation hierarchy.*

Need policy reference to soil protection, air quality and noise.

Policy EM3 Regional Parks

Regional Parks are considered to complement green infrastructure concept. The policy is considered to have similar economic impacts to EM1 and 2, with positive support for the Region's image and urban/rural renaissance. The RSS does not provide any indication of a timetable for identification and delivery, these Parks will need to be established early

in the life-time of the RSS and in conjunction with the delivery of the spatial development policies.

Regional Parks should provide greater access to recreational facilities thereby contributing towards healthy living. Well managed environments should be more crime free. Opportunities to involve local communities within Regional Parks is not referenced.

Parks should support objectives for environmental protection and enhancement. When considered against the objective of protecting soils it is assumed that development within Parks would be directed to brownfield sites. Suggest reference to development only within developed areas, as referred to in EM5. Also recommend that recognition is made of the contributions that regional parks can make to mitigating the impacts of climate change and clarification as to whether they are appropriate locations for renewable energy development. Policy linkage with W5 – Tourism and the Visitor Economy would be appropriate.

Recommendations:

1. *A timetable for the delivery of the parks is provided to ensure that they are developed before, or in conjunction with delivery of other spatial framework policies.*
 2. *Reference importance of community consultation and involvement in Regional Parks.*
 3. *Reference opportunities that Parks provide to mitigate climate change and clarification as to whether they are appropriate location for renewable energy generation.*
 4. *Suggest that development be within developed areas only.*
-

Policy EM4 Integrated Water Management

Policy is considered to have only marginal impacts upon economic objectives. Policy which seeks to protect development from flooding will support a positive image of the region. It is understood that many of the areas identified for major housing growth lie within the floodplain, implication of this policy and its requirements for phasing against the spatial framework policies needs to be clarified.

River Basin Management Plans should seek to protect water supply and thereby support regions agricultural sector.

Policy is also unlikely to have significant social effects although protection of new development from flooding should improve the health of vulnerable communities, during flood events. It is understood that the development and adoption of SUDs can be hindered by difficulties over adoption, local communities through the establishment of trusts or management companies may be one way of resolving this, reference to communities could be included either within policy or supporting text. Discussion was held on the wording in the third bullet point to 'where possible' and it was eventually concluded that the second part of this sentence be deleted.

Policy will promote environmental protection and enhancement, improving water quality for example should support habitats and species and maintain landscapes.

Policy would make a significant impact upon mitigation and adaptation to climate change as it makes specific reference to this (one of the few policies that do) and it seeks to improve supply, attenuate run-off and manage flooding.

Recommendations:

1. *Recognition of difficulties surrounding SUDs adoption, and opportunities to involve local communities.*
2. *Reference to water recycling and minimisation) either within this policy or elsewhere. At present there is no policy reference within RSS. – need to co-ordinate with RES activities to promote future proofing and green buildings.*
3. *Remove 'and where possible, set above predicted flood levels' as superfluous.*

EM 5 Coastal Development

This policy seeks to support the diversification of the maritime economy and to support investment within the coastal communities of the region. It is therefore considered to support the objective of reducing economic disparities. Furthermore the policy recognises the importance of tourism to the coastal economy, this also has a major influence upon the image of the region. Policy also recognises the socio-economic difficulties facing some coastal communities.

Appraised against objectives to reduce the need to travel and improve access to facilities the policy is considered to be marginally supportive through the reference to supporting development only within existing developed areas. It is assumed that these areas will have an appropriate range of facilities and services, this could be referenced also.

The policy makes references to the improvement to the environment of the coast. One of the aims is to improve its attractiveness for recreation and tourism. Increased recreational activities should support healthy living.

When appraised against environmental objectives the policy is considered supportive with references to the historic and cultural environment, and conservation and enhancement of natural assets. The policy is also one of few that recognise and seek to take account of climate change in the context of coastal management and/or defence. Policy reference is given to prudent and sustainable use of natural resources and further clarification on what is meant by this would be useful.

Coastal policy could include for consideration of coastal infrastructure required to support delivery of other regional strategies such as renewable energy generation and oil and gas exploration. This is indirectly referred to within SDF19.

Overall this was considered to be a good policy in that it references many issues surrounding environmental protection and enhancement. This is in contrast to many RSS policies where these issues are supposed to be covered by overarching policies. It was felt that this results in an inconsistent message through the RSS.

Recommendations:

1. *Make reference to 'developed areas' with accessible services and facilities.*
 2. *Explain the type of natural resources, it is wind, wave, aggregates or open space.*
 3. *Recognise requirement for integration with other regional strategies and development pressures, for example the on-shore infrastructure requirements of oil and gas exploration.*
-

Aggregates and minerals

These policies seek to provide a framework for the extraction of minerals and aggregates within the region, they recognise that the region possess some naturally important reserves and seeks to protect these from imprudent use. Furthermore the policies seek to apportion sub-regional amounts of materials up to 2016 and to encourage greater recycling of aggregates looking towards a 20% and ultimately a 25% target. The key concern with these policies relate to the amount of apportionment which reflects that provided within MPG6. This apportionment does not work to the same time frame as the RSS. Furthermore apportionments identified are less than past trends and recycling targets are not considered to be sufficiently aspirational to fill the gap between supply and demand. There is therefore a concern that there will be insufficient resource to support the growth programme outlined within the spatial framework. This may have two implications:

- 1 That local authorities will allocate insufficient sites for extraction (based upon apportionments) to support the overall RSS spatial framework. The extraction industry will therefore have to seek permission for sites as departures to development plans (LDFs) which may slow the process and ultimately the extraction of materials and construction of properties with a consequential brake upon the development targets (particularly housing) for the region.
- 2 That with high demand for aggregates as a result of the RSS targets, and with a lack of allocated sites in the region, greater emphasis to be placed upon imports with the consequential increase in transportation and associated environmental effects.
- 3 It should be noted that a reduction in the apportionment, on its own would reduce the amount of land affected by mineral extraction compared to past trends. This may lead to environmental benefits.

Key Sustainability Implications and Recommendations

Policy EM6, 7 and 8

Due to the perceived imbalance between RSS economic and renaissance policies and the amount of aggregates identified the policy is considered to have the potential for a negative effect upon many of the economic objectives.

EM6 prioritises the use of rail, water and pipelines for transportation of minerals that are more sustainable than the use of road freight. The policy has been assessed as moving away from sustainability when considered against the SA Objective of providing accessible and resource efficient housing due to the perceived imbalance between housing targets and minerals allocations preventing the delivery. However it should be noted that increasing targets for the use of recycled materials in construction should support resource efficiency.

Aggregate and mineral extraction can have significant local impacts on communities, recognition of this would be appropriate. EM6 calls for LDFs to develop criteria based policies for the allocation of sites, it is suggested that topics for criteria are referenced, this would then be consistent with Policy EM13 Renewable Energy. Assumption has been made that these criteria will include for the protection of designated buildings, areas, habitats, species and landscapes. Notwithstanding paragraph 9.18 references peat and it was considered that there was little or no justification for continued peat extraction in the region and that in the drafting of forthcoming MPSs that the region make a submission on this basis.

Recommendations:

1. Clarify use of MPG6 apportionments versus RSS targets for housing and 'maximisation of growth' in certain sub-regions and explain or address potential imbalances.
2. Consider a more aspirational target for recycling in order to support apportionments – it is understood that 20% is already achieved.
3. Consider specifying criteria for allocation of sites in a similar manner to that outlined within EM13.
4. Consider how peat extraction in the region can be halted, possibly through representations to ODPM on forthcoming MPSs.

Sustainable Waste Management

The RSS contains two policies providing a regional approach to waste management and direction on how new development should support improved waste management. A specialised appraisal workshop was held on the 16th Nov 2005 to focus specifically on the Waste Management policies in the RSS interim draft. A summary of the main points that emerged from this exercise is provided below.

Key Sustainability Implications and Recommendations

Policy EM9 & 10

Employment

Increased employment is predicted. The waste strategy for increased recycling and waste treatment is projected to double waste industry revenue turnover (currently approximately £800m) within the next 10 years. Major capital investment in infrastructure (approx £10b for municipal waste) is also required. Increase diversity and opportunities for business start-up. There is potential for North West to be centre of excellence on waste technologies.

New jobs will require both basic manual skill levels together with a strong demand for skilled and expert managers and professionals. Where there is this range of levels of skills required, there are opportunities for movement between and progression through skills levels.

Transport

Diversification in management of waste, including increasing recycling and composting, will result in an overall increased journeys for transport of different materials for treatment, reprocessing and disposal.

Contaminated and brownfield development

Reduction in landfill, which renders land contaminated with limited use options, will result in less land -take.

Production of compost can assist in the remediation of contaminated, degraded and derelict land. Compost from waste can soil enhancement soils and offset soil loss or degradation.

New waste processing and treatment facilities would preferentially be constructed on brownfield land.

Greenhouse gas emissions

Reduction in greenhouse gases is the primary objective behind the reduction in the landfill of biodegradable waste

Raw materials and natural resources

Increased recycling and recovery of energy will reduce the demand for raw materials and supports the use of recycled and secondary materials. Recycling of demolition waste and use of recycled aggregates reduces the quantities of minerals extracted and imported.

The need for Energy

Although increasing recycling and treatment waste will increase the amount of energy required for transport, energy recovery from waste will replace fossil fuels (potential for replacement of 500,000 tonnes of fossil fuels p.a. from residual municipal waste)

Waste growth, recycling reuse and reduce residual waste to landfill

Growth in waste reduced to zero by 2014.

Recycling and/or composting of waste increased to 55% of household waste by 2020

Landfilling MSW reduced from 84% to 22% of total waste arisings and

C&I waste reduced from 75% to 40% of total waste arisings

Some concerns were raised over the no overall growth in commercial and industrial waste on the basis that this could limit economic growth. However, breaking the link between economic growth and waste growth is a key target for European and national policy on sustainable waste management. Concern within waste policies that no explicit reference to construction and demolition waste.

Recommendations:

- 1 Policy EM10 should reference construction and demolition waste and the opportunities to reduce amounts through recycling and re-use during the construction process within the supporting text. Reference could be made to MMC.*

Regional Energy Policy

Contains three policies concerned with energy use and efficiency, renewable energy and an overall framework for sustainable production.

Key Sustainability Implications and Recommendations

Policy EM 11, 12, 13

Sustained and a growing economy within the region will rely upon a constant and flexible energy supply which is recognised by the policies. Support for renewable energy as a means of diversifying supply is seen as supportive of the regions economy although it should be stated that renewable energy does cost more than traditional fossil fuel production and this may have indirect costs for business. Increased decommissioning of nuclear station, including Heysham, may also lead to increases in prices and greater reliance upon imported fuel sources with attendant environmental impacts.

Promotion of renewable energy technology and energy efficiency will support the environmental sector of the economy. Emphasis on renewable energy production has been appraised as positive for rural regeneration such that opportunities exist for biofuel production and detrimental impacts of generating activities such as wind farms on the visitor and tourist industry appear inconclusive.

Policy EM12 promotes energy efficiency in new development and this should prevent new occupiers suffering from fuel poverty as less energy will be required to heat and power new homes. Extent to which energy efficiency measures can be retro-fitted is questioned. Em12 suggests that one way to reduce energy consumption is through the promotion of sustainable travel means including walking and cycling and this is considered to be significantly positive when appraised

against the appropriate SA Objective.

Policy EM13 considers the appropriateness of new renewable energy generation and provides for a number of criteria or considerations that should be taken into account by local authorities when considering allocations or planning applications. These include for the protection of environmental resources such as historic buildings and areas, habitats and landscapes. As such the energy policies are considered to support SA Objectives concerned with environmental protection and enhancement. Because renewable energy does not generate greenhouse gases the policies are considered to support mitigation climate change and air quality SA Objectives. Particularly important is the reference to the 2010 target of 10% renewable energy generation as not being a ceiling. Policies are significantly supportive of all objectives concerned with the use of natural resources.

Recommendations:

5. Consider recognition of decommissioning of the regions conventional and nuclear power stations and the implications that this may have for the environment.
6. Consider whether policy criteria for development of new power stations other than renewable should be included.

1.4 Conclusion

This Technical Note reports on the sustainability appraisal into the RSS Interim Working Draft Policies. It has been informed by the appraisal of policies against agreed sustainability objectives together with discussion with a range of stakeholders within two workshops. It is understood that the policies will be amended as a result of the consultation into the RSS Interim Working Draft. Revised policies will again be appraised and reported within the SA Report. This report will identify policy changes as a result of this interim appraisal.

Authors:

.....John Hall/Phillip Minas.....

Reviewer:

David Kenyon

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Appendix 1

SA Objectives

1 Pages

RSS Sustainability Objectives

1. To reduce the disparities of sub-regional and regional economic performance
2. To exploit the growth potential of business sectors
3. To develop and market the region's image
4. To deliver urban renaissance
5. To deliver rural renaissance
6. To secure economic inclusion
7. To develop and maintain a healthy labour market
8. To reduce social exclusion
9. To reduce the need to travel, improve choice and use of sustainable transport modes
10. To improve physical health and mental health and reduce health inequalities
11. To improve access to good quality affordable and resource efficient housing
12. To reduce crime, disorder and the fear of crime
13. To enable groups and communities to contribute to decision making
14. To develop strong and positive relationships between people from different backgrounds and communities
15. To improve access to and use of basic goods, services and amenities for all groups
16. To protect enhance and manage the Region's rich diversity of cultural and built environment and archaeological assets
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region?
18. To protect and improve local environmental quality
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance
20. To protect and improve the quality of inland and coastal waters
21. To protect and improve air quality
22. To restore and protect land and soil
23. To mitigate and adapt to climate change
24. To ensure the prudent use of natural resources and the sustainable management of existing resources
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources
26. To manage waste sustainability, minimise waste, its production, and increase re-use, recycling and recovery rates