

4NW Regional Leaders  
Forum

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**SA and EqIA of  
Regional Housing  
Strategy**

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Combined Appraisal of  
Regional Housing  
Strategy Consultation  
Paper

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Paper

Final Report

February 2009

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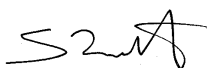
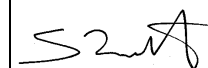

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# 1 Introduction

Arup was appointed by the 4NW Regional Leaders Forum in February 2008 to undertake the Sustainability Appraisal (SA) and Equality Impact Assessment (EqIA) of the North West's Regional Housing Strategy (RHS) and Regional Supported Housing Strategy (RSHS). The commission also involves undertaking a Health Impact Assessment (HIA) and Rural Proofing of both strategies.

This report presents the findings of the Combined Appraisal undertaken on the Consultation Paper for the RHS. The Consultation Paper represents the second stage in the development of the RHS and the final appraisal stage before the final strategy is developed. This report is an important tool in the policy making process, whereby the authors of the RHS will need to fully consider the issues and recommended mitigation measures raised and provide justifications where these are not taken forward in the preparation of the final strategy.

## 1.1 The Appraisals

This report sets out the findings of the appraisal of the RHS Consultation Paper. This follows an initial Combined Appraisal of the RHS and RSHS Discussion Papers earlier in 2008.

The initial Combined Appraisal was used to assess each Discussion Paper collectively to provide a holistic appraisal of their social, economic and environmental credentials as well as specific appraisals that focused on equality, health and rural issues. For the RHS, the first stage of the Combined Appraisal involved an initial assessment being undertaken by Arup, which was followed by an Appraisal Group Workshop on 23 May 2008 that involved a range of stakeholders. Following this a Combined Appraisal Report was completed and published on [www.4nw.org.uk](http://www.4nw.org.uk).

Below is a diagram demonstrating the basic stages of preparation for both the RHS and RSHS. We are now at the second stage of the preparation process (Appraisal 2). The outcomes of this stage will be used to inform the development of the final RHS. The appraisal of the RSHS Consultation Paper (Appraisal 3) is scheduled for early 2009.

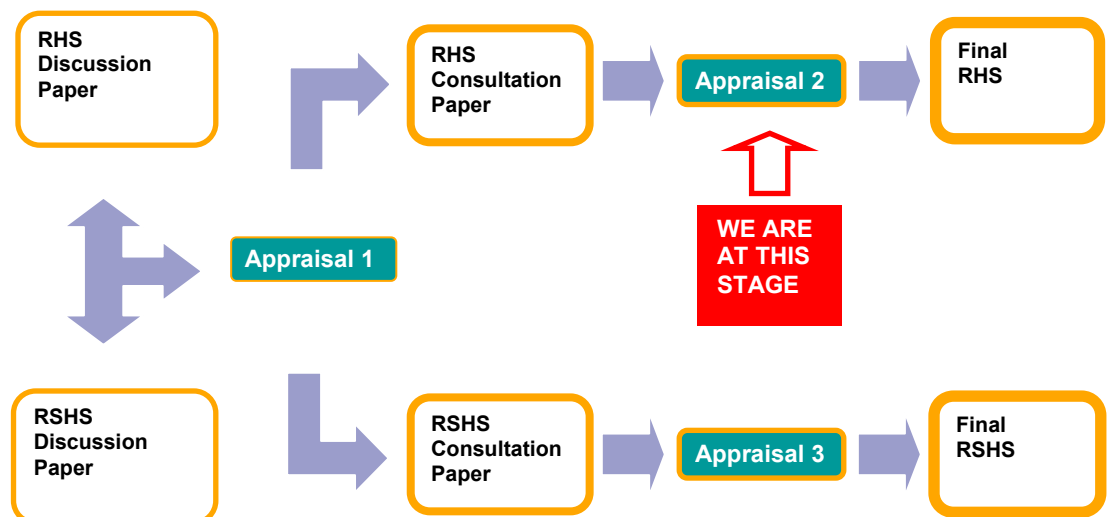


Figure 1: North West RHS and RSHS Appraisal and Preparation Process

## 1.2 Structure of the is Report

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In summary the structure of this report includes:

- **Section 1 Introduction:** This section provides background information on the need to review RHS, the emergence of a Regional Strategy and the need to develop an appraisal approach that will help produce more effective spatial strategies.
- **Section 2 Key Aims of the Regional Housing:** This section summarises the key issues identified in the RHS Consultation Paper.
- **Section 3 Summary of Combined Appraisal:** This section provides a brief overview of the results of the Appraisal.
- **Section 4 Key Issues:** This section provides a summary of the key issues and recommended mitigation measures to be considered by the RHS and RSHS Steering groups and authors.
- **Section 5 Emerging Issues regarding future development of the North West's IAT and Evidence Base:** This section sets out a range of additional issues that should be considered when developing the IAT furthering future.
- **Section 6 Next Steps:** Provides a summary of the next stage for the preparation of the RHS.

## 1.3 Background

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The RHS is a key document for the North West. It sits alongside the Regional Economic Strategy (RES) (which will be replaced by the emerging Regional Strategy) and Regional Spatial Strategy (RSS) to inform the sustainable development of the region. The region's first Regional Housing Strategy (RHS) was published in 2005 and provided analysis of the North West housing markets. The strategy identifies the strategic housing issues facing the region, setting out a framework for delivering the necessary changes. The RHS is also used to guide funding allocations from the Regional Housing Pot (RHP) to local authorities and to the Housing Corporation's Affordable Housing Programme.

The RHS primarily focuses on the existing housing stock with issues such as the amount and location of new housing ultimately being the responsibility of the Regional Spatial Strategy (RSS). However the RHS's influence over new housing is growing and it has a role to ensure that housing meets a range of needs effectively. An example of this is the preparation of the RSHS. This document will, together with the Regional Homelessness Strategy, be prepared to inform the RHS to ensure that the specific and specialist needs of communities and individuals are addressed.

Consideration of the Strategic Housing Investment Framework for the North West and publication of the Housing Green Paper in 2007 has identified that the RHS needs to reflect many new national policy changes in urban and rural areas, with a particular emphasis on the economy, delivery of affordable housing, climate change and mixed communities. It is therefore timely that the Regional Leaders Forum is undertaking a review of the North West RHS.

## 1.4 Developing a Combined Strategic Approach

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The Regional Leaders Forum, North West Development Agency (NWDA) and Government Office of the North West (GONW) have been working to ensure better alignment of regional strategies. This has included the commissioning and joint use of common evidence bases on a variety of topics, to inform policy development in the RES, RSS and other strategies. This has been successful in ensuring better policy alignment. The proposals under the Sub-National Economic Review (SNR) for a Single Regional Strategy build upon that approach.

Further consultation on this has been undertaken via the publication of 'Prosperous Places: Taking forward the Review of Sub National Economic Development and Regeneration' by

CLG and BERR in 31 March 2008. The Consultation Paper provides further detail on how the new regional strategy will be developed. For the housing element of the new strategy, it proposes that local authority (LA) assessments will need to be undertaken to identify housing opportunities and needs in each area, with LAs encouraged to work collaboratively within a sub regional framework. The LA assessments would then be used by Regional Development Agencies (RDA) and LAs to 'test' guidance produced (based on advice from the National Housing and Planning Advisory Unit (NHPAU)<sup>1</sup>) on housing provision required over a 15 to 20 year period. The delivery of housing focuses on the need for local authorities to have ownership of housing distribution as set out in the regional strategy. The role of leader forums is central as they are engaged in all aspects of the regional strategy's development and implementation.

In setting out the long-term vision for sustainable economic growth and housing supply the Prosperous Places Consultation Paper recognises the need for future development to contribute to a low carbon economy, deliver the objectives set out in the Climate Change and Energy Bills, and to be in line with planning policy on climate change. As well as undertaking the appraisal for the North West's Regional Housing Strategies, 4NW, as a Regional Planning Body, has also agreed to undertake a Partial Review of the RSS that will run concurrently with the review of RHS and this appraisal process. The Partial Review of the RSS will need to be adaptable to fit within the emerging procedures for the preparation of a Regional Strategy. The emergence of the Regional Strategy (RS) is driving towards an integrated appraisal approach. Therefore this has implications for the RHS and provides an opportunity for the final RHS to inform the Regional Strategy. Consequently the appraisals, together with the appraisals for the RSS Partial Review have been developed in a coordinated way.

#### **1.4.1 Developing a Combined Appraisal Approach**

Each type of appraisal/ assessment for the commission (EqIA, HIA and Rural Proofing) has been integrated to create a Combined Appraisal and is based on the North West's Integrated Appraisal Toolkit (IAT) (Please visit: [www.sdtoolkit-northwest.org.uk/toolkit/index.php](http://www.sdtoolkit-northwest.org.uk/toolkit/index.php)). The IAT has been developed to ensure that policies and projects developed in the North West integrate fully economic, social and environmental objectives. In addition to developing a Combined Appraisal, a key consideration for this commission has been to ensure that stakeholders are fully engaged in the process to access existing knowledge and skills. For full details on the methodology used, the IAT and how the Appraisal Groups have been developed and involved in the process please see Appendix A of this report.

#### **1.5 Need for a Sustainability Appraisal**

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Thorough consideration of sustainability from an economic, social and environmental perspective is a critical step necessary to secure the successful delivery of any strategy. The Regional Leaders Forum is committed to ensuring that policy and strategies are fully informed and appraised to secure the delivery of the best options possible for the region. Appendix B provides a full breakdown of the driving forces behind the content of this Appraisal which includes the following elements:

- Sustainability Appraisal (SA) (not including Strategic Environmental Assessment);
- Equality Impact Assessment (EqIA) taking into account:
  - Race Relations Action 1976 and Amendment Act 2000
  - Disability Discrimination Act 2005
  - Equality Act 2006
- Health Impact Assessment (HIA) and Rural Proofing.

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<sup>1</sup> See <http://www.communities.gov.uk/housing/nhpau/>

## 2 Key aims of the Regional Housing Strategy

### 2.1 Introduction

This section provides a short background to the RHS, what it aims to do and how it relates to other strategies being prepared for the region.

### 2.2 Key aims of the RHS

Prior to the publication of the RHS Consultation Paper, the RHS Discussion Paper identified 3 key themes that underpin the RHS. These are:

- Increasing the quantity of the stock through contextualised growth, supporting and enhancing the delivery of the housing numbers set out in RSS and Growth Points to achieve the mix and range of housing.
- Improving the quality and sustainability of the existing stock and supporting place shaping and quality of life activity.
- Better connecting people to the enhanced housing offer by improving access to affordable homes; raising housing opportunities, aspirations, choice and stability, and by linking housing and employment opportunities.

The 3 key themes build on a housing statement for the North West produced in 2007 ([www.nwpda.gov.uk](http://www.nwpda.gov.uk)). This statement was a starting point for the review of the RHS. It identified that the RHS:

- Will be more dynamic and proactive, making use of the region's expertise and skills to ensure better partnership working at sub-regional and local levels to address cross boundary issues.
- Will need to reflect and strengthen the strategic role of the North West's five sub-regions to ensure strategies reflect housing markets in urban and rural settings, bringing common delivery benefits through economies of scale.
- Will play a higher profile/ integral role in community strategies.
- Will provide strategic drivers via broader intervention measures for housing markets that are underperforming.
- Should place greater emphasis on the private rented sector in meeting housing need, and ensure that accommodation in this sector is high quality and is well-managed.
- Will continue to prioritise the need to improve the quality of housing through policies that address 'non-decent' homes in both the social and the private sectors, with particular emphasis on energy efficiency and the role of housing in adapting to climate change.

The Consultation Paper builds on the themes and previous objectives by setting out the purpose of the RHS. This includes the need:

- To set out a clear view of the strategic housing issues facing the North West informed by the relationship between housing, economy and social and environmental sustainability.
- To inform the forthcoming Regional Strategy – we will only succeed in achieving our objectives if the suite of regional strategies are more closely aligned and integrated. The RHS has both a supportive and a leading role in this and will look to the RS to capture the added value of this interdependence to ensure it is more effectively exploited.

- To establish a set of principles for the regional housing roles of the key agencies, sub-regions and districts.
- To provide a signal for all housing, planning and regeneration spend in the region to support the Regional Housing Board in making investment decisions and to identify where the Board and its partners can intervene to make a demonstrable positive difference in housing markets.
- Make the case to Government, supported through the Regional Funding Advice (RFA) process, to support real long term investment commitments to meet the regions housing priorities.

## **3 Summary of Combined Appraisal of the RHS Consultation Paper**

### **3.1 Introduction**

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This section provides a summary of the cumulative scores following the Combined Appraisal using the IAT and additional, supplementary questions developed to meet the requirements of the EqIA, HIA and Rural Proofing.

Stage 1 of the process involved an initial appraisal of the RHS and RSHS Discussion Papers. The findings of this initial stage were then issued to Appraisal Group members who reviewed the findings and provided comments at the workshop on the 23 May 2008 and/ or via email.

For further details on the methodology, the use of the IAT and how the Appraisal Groups were developed and contributed to the appraisal process please see Appendix A.

### **3.2 Summary of Cumulative Combined Appraisal Scores**

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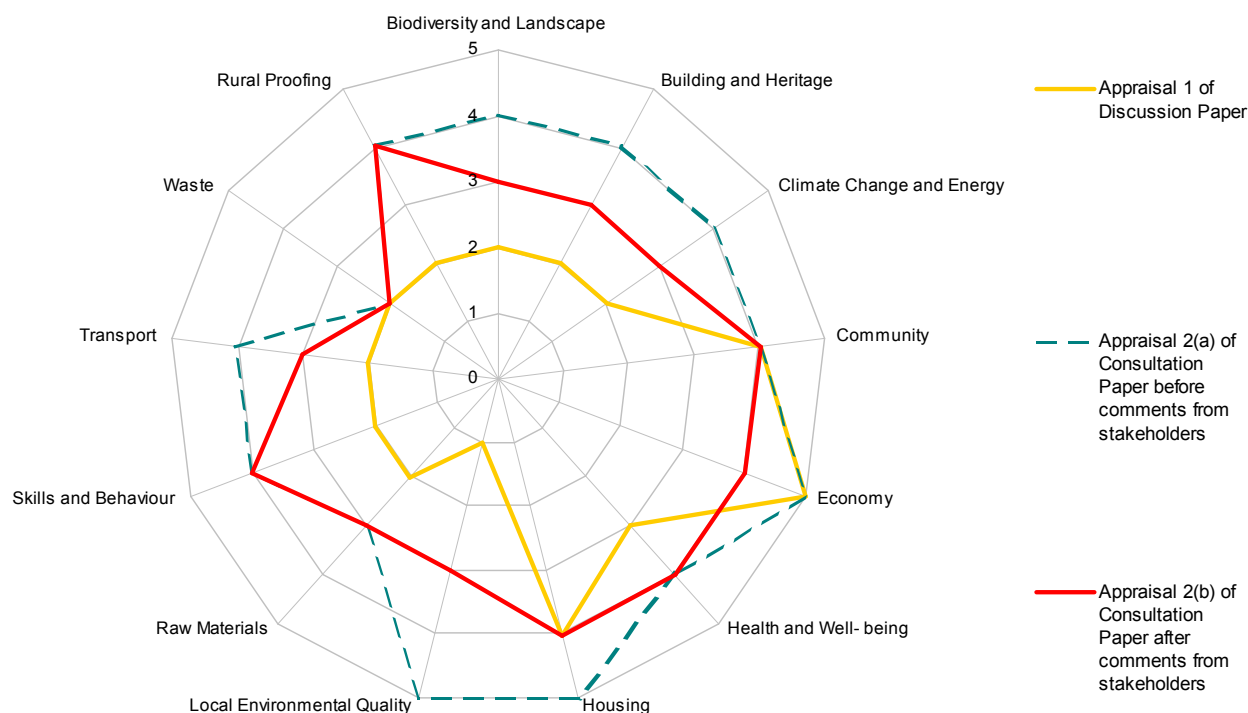
#### **3.2.1 Introduction**

This section presents the cumulative scores for each of the appraisal themes used for the Combined Appraisal of the RHS Consultation Paper. For a more comprehensive summary of the key issues identified following the appraisal of the RHS Consultation Paper please see Section 4. For the full details of the appraisal please see Appendix C.

It is important to note that the results of the appraisal are based on the status of the document as a Consultation Paper and not a Draft Strategy. The Consultation Paper builds on the issues and prompts contained in the Discussion Paper which represented the very first stage of policy development for both the RHS and RSHS (Appraisal 1) and which sought to explore a range of issues that they may need to consider. Because of the nature of the Consultation Paper (i.e. it is a document that seeks further discussion and debate of issues as well as setting out the beginnings of a policy framework structure rather than being a conventional 'draft' strategy) the overall appraisal results are slightly distorted as a number of issues in the Paper are 'open ended'.

Therefore, to help demonstrate the iterative process used for the appraisal of the RHS Discussion and Consultation Paper this section presents the scores at various stages of the process. It also presents the potential scores for the final RHS if the recommendations and policy consideration from the detailed appraisal (see Appendix C) are adopted.

**Figure 2: Summary of Appraisal Scores for the RHS Discussion Paper (Appraisal 1) and Consultation Paper (Appraisal 2 a and b)**



### 3.2.2 The iterative appraisal process

As can be seen in Figure 2, following the appraisal of the RHS Discussion Paper (Appraisal 1) an initial appraisal was undertaken of the RHS Consultation Paper (Appraisal 2a). Appraisal 2a identified that the RHS Consultation Paper is likely to have slightly positive impacts for Biodiversity and Landscape, Building and Heritage, Climate Change and Energy, Community, Skills and Behaviour, Transport, Waste and Rural Proofing. There were very positive impacts for Economy, Housing and Local Environmental Quality. Raw Materials were judged to have a mixed or neutral impact whilst Waste received a slight negative impact.

As set out in Figure 2, the appraisal of the Consultation Paper, prior to the appraisal workshop being undertaken was considered to have a more positive impact for a range of themes, when compared to the first appraisal of the RHS Discussion Paper. In particular, there was a significant improvement in how the RHS would impact on Local Environmental Quality. Other improvements also cover wider spatial considerations, usually related to the environment including improvements for Biodiversity and Landscape, Building and Heritage and Climate Change and Energy. In addition, there were equally significant improvements in relation to Skills and Behaviour, Transport and Rural issues. The Consultation Paper was seen to provide greater reference to how housing relates to Health and Well Being and greater clarity in how housing issues will be addressed.

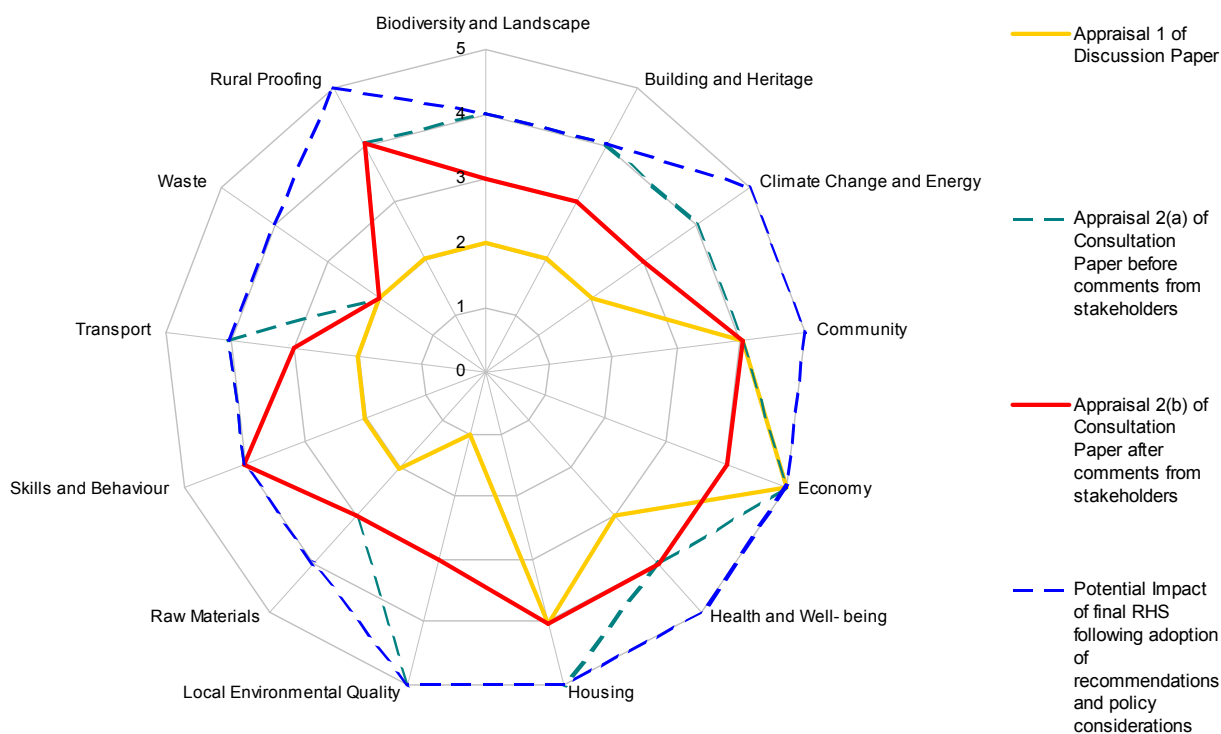
However following the appraisal workshop, stakeholders viewed that the initial/ draft appraisal (Appraisal 2a) was scored too positively for the majority of themes. It was stressed by stakeholders that in order to achieve more positive impacts the RHS will need to do more than signpost policies or consider issues in technical annexes or appendices. Instead, stakeholders strongly felt that the RHS should provide clear guidance to sub regional and local organisations in developing their housing strategies and how they should use the guidance and best practice to develop strategies, Multi Area Agreements (MAA) and Local Area Agreements (LAA). In taking stakeholder's views into account, Arup have

reviewed all the comments received at the workshop and via email and have subsequently amended the impact scores if we have agreed and /or have limited evidence to justify retaining the positive impacts identified in Appraisal 2 (a). In considering stakeholder comments there are a number of cases where we have revised an impact but not to the extent that the stakeholders considered necessary (i.e. a neutral/ mixed impact rather than a slightly negative impact) as it was considered that there was enough detail in the Consultation Paper to indicate that the final RHS would achieve benefits across the region.

As can be seen in Figure 2; following the comments from stakeholders (Appraisal 2b), a number of impacts have been revised. These amendments saw the IAT themes of Community, Health and Well Being and Rural Proofing maintain slightly positive impacts. However there were revisions to the Economy and Housing themes, where it was felt that the approaches and detail set out in the document would result in a slightly positive impact rather than a very positive impact. Local Environmental Quality was also revised from a very positive impact to a neutral or mixed impact. Climate Change, Transport and Skills and Behaviour were both amended from a slight positive impact to a neutral or mixed impact. Waste and Raw materials retain a slightly negative impact score and Biodiversity and Landscape fell from a slight positive score to a neutral or mixed impact.

It is important to note that the revised impact scores are not a direct reflection of the final RHS, and instead are an indication of the likely sustainability performance if it was taken forward without any of the recommendations set out in this report and Appendix C being taken forward. However, if these recommendations were taken forward there is potential for the RHS to have a significant number of positive impacts. Consequently, to help demonstrate this Figure 3 sets out the potential impacts of the final RHS if the recommendations and policy considerations were adopted.

**Figure 3: Summary of Appraisal Scores for the RHS Discussion Paper (Appraisal 1) and Consultation Paper (Appraisal 2 a + b) and potential scores upon adoption of recommendations and guidance set out in Appraisal 2.**



## 4 Key Issues

### 4.1 Introduction

This section sets out a brief analysis of the appraisal against the Consultation Paper and summarises the key issues and recommendations for mitigation that the RHS Steering Group and strategy authors will need to consider when developing the final RHS.

In considering the findings of the appraisal the Consultation Paper takes forward a number of recommendations from the first appraisal of the RHS Discussion Paper. However, it will be important to ensure that the issues and guidance provided in the Consultation Paper are consolidated in the final RHS to ensure that the key messages are clear, consistent and will ensure effective delivery and implementation.

To help clarify and further improve the final RHS, a number of key issues are identified in the rest of this section. To help structure the summary of responses we have categorised them into three main themes. The main categories include:

- **Areas for clarification**
- **Making connections and achieving balance**
- **Implementation of housing provision and service delivery**

Due to the comprehensive nature of the Combined Appraisal, it remains likely that a number of the issues raised will be beyond the scope and remit of the RHS. However, it is still appropriate to raise these issues as it provides a useful reference to the full range of social, economic and environmental issues facing the region. Where the RHS Steering Group and authors consider the issues and recommendations to be inappropriate for the RHS to respond to directly, it will be important that a justification is provided as to why this is the case to help provide clarification, transparency and certainty to the process. This understanding can then be used to inform other strategies such as the RSS and emerging Regional Strategy and how these relate to the RHS and help to 'future proof' the region's strategies.

### 4.2 Areas for clarification

- There are opportunities to clarify the inter-relationships between the RHS and the RS in particular as well as the RSS. It is recognised that the synergy of the RHS and the emerging Regional Strategy in particular is already outlined in the Consultation Paper and takes account of the transitional nature of the Regional Strategy (i.e. Regional Strategy will not be recognised as a statutory document until legislation is formally introduced). The Consultation Paper already clearly sets out its purpose; however there would be benefits in setting this in the context of the remits of other key strategies.
- Overall it is felt that the final RHS will receive more positive impacts on the majority of IAT appraisal themes by articulating how it intends to address sustainability, equality and health issues in more detail in the main strategy document. It was considered that if the final strategy was taken forward in its current format there is a risk that the current structure will not provide a sufficient framework for effective delivery at sub regional and local levels. It was considered that too much emphasis is placed on the Technical Annexes and Appendices and the majority of this information should be placed in the main body of the strategy. Alternatively, the Technical Annexes/ Appendices could be retained, however there will need to be clearer guidance in the main body of the strategy on the topics covered in the Technical Annexes/ Appendices and how they should be used.
- It was also considered that whilst signposting to other strategies and guidance is useful, the RHS should expand on this and provide guidance on how the information could be interpreted at sub regional and local levels. It was also felt that

gaps remain in the guidance provided, particularly for equality, health and rural issues.

- A critical issue that was considered key to the RHS was the need to address a range of appraisal themes and clearly define what 'quality' means in terms of improving new and existing homes and the wider environment. It is recommended that 'quality' should be defined in terms of what this meant for new housing development, retrofitting and improvement of existing stock and the wider environment. In addition, when defining quality there would also be an opportunity to clearly set out how this relates to accommodation, the wider environment, health and well being, social networking and the sustainability of the environment and urban fabric.

### **4.3 Making the connections and achieving balance**

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- It was a continued view (from the Appraisal of the RHS Discussion Paper) that the RHS still has too much focus on the economy and not enough consideration of social and environmental issues. It was stressed that there needs to be full recognition to the resilience of accommodation, communities and the wider environment to issues such as climate change and that this is critical to sustainable economic growth being achieved.
- Generally it was felt that good progress has been made on sustainability, equality, health and rural issues leading to some improved scores. However there are instances where improvements have been made but not to the extent that scoring will be improved significantly. The recognition of issues such as climate change, wider environmental quality and design standards was commended, however it was agreed that the RHS will need to expand on a number of issues by providing specific advice and guidance on climate change adaptation and biodiversity. Many of the sustainability issues raised in the appraisal are likely to be addressed by the RSS or the emerging Regional Strategy; however it would be beneficial to build on the purpose and principles set out in Section 2 of the Paper.
- There are opportunities to strengthen the links and recognise the interrelationships between some of the IAT themes. For example in recognising that the region's existing housing stock can be reused rather than being demolished, the relationship between this and the wider benefits of reducing waste, use of raw materials and reduction in carbon emissions should be reflected in other themes such as Waste, Raw Materials and Climate Change.
- The RHS will need to have full regard to the implications of an aging population as this is not a marginal issue. An aging population was considered to be a key sustainability issue and one of the main challenges facing the region and not just an issue of equality. In addition, it was also stressed that the implications for the wider population in terms of the availability of housing and the economic balance in the region should be considered. One example provided was in rural areas where there are a high proportions of elderly people (that are economically inactive) combined with the migration of younger people seeking work, resulting economic 'deserts' in these areas.
- The RHS will need to have full regard to disability. The RHS should enshrine disability in the main body of the strategy and in doing so refer to it as independent living.
- The Consultation Paper makes reference to the relationship between the economy and housing markets; however there seems to be insufficient consideration of housing policy as an approach to addressing diverse social needs and helping to overcome tensions between them i.e. the needs of families and children, young people, older people, single people, BME groups and Gypsies and Travellers.

Without emphasising this as a key area of policy development, equality issues could become a 'side issue'.

- The Paper recognises the need for wider environmental improvements as well as improvements to the immediate housing stock and provides clear guidance on design issues. However, opportunities remain to expand on this and clearly set out how this can provide wider benefits to health and well being, safety, the sustainability of dwellings and their wider locations in terms of reducing forms of pollution.
- The Consultation Paper recognises climate change is a key issue facing the region and recognises that matters such as sustainable travel to work patterns and the location of housing and employment are significant issues. However opportunities remain to build on this, with climate change adaptation being central. Therefore the RHS should look to address this issue together with the RSS and emerging Regional Strategy.
- The Paper gives strong indications that 4NW's regional housing policies will positively address equality issues. However one area that requires specific consideration is that the proposed RHS framework does not anchor the importance of housing to supporting 'quality of life' for all members of society.
- It was recommended that the RHS places greater emphasis on sub regional and local organisations to use the RSS, Local Transport Plans, Workspace/ Employment Land Studies, Design and Access Statements and Green Infrastructure Plans to ensure that accommodation and the wider environment are developed to the highest design and sustainability standards.

#### **4.4 Implementation of housing provision and service delivery**

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- It was recommended that further clarification of the role of Housing Market Areas (HMA) in developing sustainable growth and transport patterns is considered. To plan for sustainable growth it will be necessary to recognise and understand changing HMAs rather than basing strategic planning on existing market areas, as this would merely maintain the status quo.
- The Consultation Paper provides a comprehensive overview of the roles and responsibilities of national, regional and local organisations and how they should work in partnership to provide improvements to housing provision, service delivery and wider spatial considerations. There are further opportunities to improve this area of guidance by signposting the policies, strategies, plans and programmes referred to in both the appraisal and the Consultation Paper in one section rather than being dispersed throughout the document. This will then provide a clear framework for the authors of sub regional and local housing strategies and help develop a clearer understanding of the wider spatial issues when developing these strategies.
- The Paper recognises that there are specific issues in rural and coastal areas and that these should be addressed at a local level. However there is an opportunity to help 'frontload' sub regional and local strategy authors. Consequently the RHS could expand on this and identify what the issues are likely to be such as increased costs and difficulties with service delivery in remote areas.
- The RHS should go beyond ensuring community groups are consulted and advocate the full involvement of different groups to ensure that all housing provision and service delivery is organisation led, but community driven.

## 5 Emerging Issues regarding future development of the North West's IAT and Evidence Base

### 5.1 Introduction

This section sets out a range of additional issues that were raised at the Appraisal Group workshops for the RHS and RSHS Discussion Papers and RHS Consultation Paper. Where appropriate these issues will be considered for:

- the future review and development of the IAT;
- the development of the North West's Regional Evidence Base; and
- wider consideration of issues such as the emerging Regional Strategy.

### 5.2 Issues that will be considered for future appraisals

This section provides a summary of the issues raised with IAT with regards to the appraisal process for of the RHS and RSHS Discussion papers and RHS Consultation Paper. The key issues are set out below.

- It was noted that children's education is not covered by the IAT.
- The Appraisal Group members disagreed with some of the IAT questions that where screened out. This included environmental quality questions relating to litter and fly tipping, hazardous waste and an economic question relating to innovation and research and development.

The issues raised by stakeholders where considered for the appraisal of the RHS Consultation Paper, however it was felt that such issues could still be considered without adding additional questions/ supplementary questions to the IAT. However these issues should be considered in the future development of the IAT by the NWDA.

### 5.3 Future Development of the IAT

This section sets out a range of issues that should be considered in the future development of the IAT.

#### Further development of the IAT appraisal framework

There should be focus on expanding the appraisal framework to have an increased emphasis on equality and health and how accommodation and the wider environment relate to this. The suggestions included:

- Ensuring there is greater emphasis on age proofing, as an aging population is regarded as one of the main sustainability issues facing the region.
- The question of high quality design should promote best practice design of homes and accommodation to support accessible homes and sustainability.
- The question on enhancing the lives of ALL communities in the Community section of the IAT needs more detail and in addressing supported housing client groups the term "vulnerable groups" should be avoided.
- The question on improving health and/or improve access to health care: in the Health and Well Being theme could be expanded to include a wide range of issues including:
  - accessible design of accommodation in the public and private sectors;
  - the accessibility of the environment and transport, as well as to local facilities including chemists, shops and post offices;
  - issues relating to clean air policies; and
  - provision of adequate waste disposal and recycling procedures (some of which

are currently impossible for disabled people to comply with without assistance), designing for security, ensuring the provision of open spaces and facilities for children and young people etc.

- Providing access to good quality, affordable and resource efficient housing should include better standards than the “decent homes standard”. This was recently recognised in the CLG proposals in promoting Lifetime Homes and other standards. Currently BS 8300 is under review and is in a consultation phase. This may also affect and improve current accessibility standards.
- It was considered that future approaches to appraisal should fully integrate Rural Proofing into all aspects of the IAT, particularly in the EqlA element of the appraisal process to ensure it is not a ‘bolt on’ assessment. The approach should view rural residents/ communities as a population group with particular needs that may be impacted upon to a different degree than urban residents by policies, strategies and service delivery arrangements. The object of the exercise is to consider those differential impacts and any variation in policy or delivery that may be needed to mitigate them.

#### **Further technical development of the IAT**

The future development of the IAT should consider a range of technical improvements in terms of systems and software development. These include:

- Development of IAT questions to be weighted and linked to each other to ensure that the impacts of supplementary questions automatically effect on the main, ‘parent’ question for each IAT theme. The links and weighting could also be applied across different themes. For example, if the RHS Consultation Paper identifies the objective of using existing housing stock rather than demolition; this is likely to have positive impacts on reducing waste; the need for raw materials and in turn reducing CO2 emissions.
- The software needs to be developed to ensure there is a more robust approach to auditing the contributions of appraisers. At present there is too much scope for appraiser’s comments to be deleted in the text boxes and therefore for the purposes of the appraisal of the RHS and RSHS Arup have resorted to more traditional forms of consultation.
- In addition, the IAT should include areas in the toolkit that clearly present the results of previous appraisals and provide opportunities for the authors of the plans, programmes and strategies etc being appraised to respond to the comments made and provide justifications and responses where necessary. This would improve the opportunities for a transparent and robust appraisal and clearly demonstrate an iterative process.
- There are opportunities to improve the final outputs of the IAT by providing a range of presentational options for the user to present the results of the appraisal. This could include the symbol approach currently used along with a range of graphic options including bar charts and radar diagrams (as used for the appraisal the RHS Consultation Paper)

## **5.4 Future Evidence Base Considerations**

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This section presents a number of issues raised at the Appraisal Group workshop and through comments received via email from the Appraisal Group members relating to the future development of the North West Evidence Base.

### **5.4.1 Accessible Accommodation**

The Appraisal Group members raised concerns regarding the lack of information on the availability and management of accessible housing, especially in the private sector and in housing trusts. It was felt that there is a need for a regional strategy to support mixed schemes, choice and availability of housing relating to employment opportunities. A key issue discussed at the RHS Consultation Paper appraisal included the role of Housing Market Areas (HMA) in providing a framework for ensuring existing and future employment and housing areas are fully integrated with each other. However to achieve this, it was felt that currently HMAs do not accurately reflect and/or are flexible enough to adapt to future housing and employment development and would only serve to maintain current travel to work patterns. Therefore it was recommended that amendments to HMAs are considered to better reflect changes regarding the potential impact of significant housing or employment development such as Growth Points.

Accessible housing standards will be appropriate for older people requiring additional support, for larger families, for people receiving NHS medical support at home instead of in hospital and for disabled people. It was noted that baseline information on the availability and quality of accessible accommodation for disabled people is not available anywhere in the North West and this should be a priority.

### **5.4.2 Use of Indices of Multiple Deprivation (IMD)**

The Appraisal Group members raised a number of issues with regards to the accuracy of data to inform the North West Evidence Base. One recommendation from an Appraisal Group member was that the future development of the region's evidence base takes into account sources such as OCSI [www.ocsi.co.uk](http://www.ocsi.co.uk). This uses the same data, however interprets it at an Output Area levels with smaller populations (i.e. populations of around 300). It was considered that this allows for a much better understanding of the way in which small numbers of deprived people cluster in rural areas. OCSI also looks at the 'rural share' of deprivation by comparing the number of people affected by deprivation in rural areas against their urban counterparts. This can transform understanding about the targeting of activity because it translates a relatively low percentage of deprivation in rural areas into numerically significant populations.

### **5.4.3 Community-level Evidence:**

The Appraisal Group emphasised the need for using community consultation as part of the North West Evidence Base. It was emphasised that in responding to the Government's community engagement and empowerment agenda; policies and strategies should be built from the bottom up i.e. community / parish plans informing community strategies and Local Development Frameworks, in turn informing regional policy/strategy. There was concern at the workshop that there was a limited connection between the RHS/ RSHS and 'grass roots' sources of evidence and subsequently strategies often fail to address the real needs of some communities in the region.

### **5.4.4 Monitoring of the Planning System:**

At the Appraisal Group workshop it was suggested that more evidence on the way that planning authorities are operating was needed. This included decision making, including consultations, best practice in relation to access standards for disabled people, open and green spaces and the relationship to employment.

## **5.5 Future Consultation Considerations**

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This section presents a number of issues raised at the Appraisal Group workshop and through comments received via email from the Appraisal Group members relating to future approaches to consultation in the region.

### **5.5.1 Developing a consistent, regional approach to consultation**

Issues were raised regarding the need to develop specific guidelines and procedures for consultation and community engagement to include not only local residents but also groups that operate city wide and regionally. This would often ensure that consideration to issues such as accessibility in housing, transport and the environment that would meet the needs of all members of the community.

It was recommended that the development of guidelines and procedures should be part of an overall consultation strategy common throughout the North West and in keeping with various government strategies.

One example provided by the Appraisal Group members included the potential for a strategy for communicating the knowledge underpinning best practice design to ensure that developers, architects, planners and building control officers and planning inspectors are aware of the reasons behind best practice design (i.e. the needs of different client groups) which is often to the detriment of many developments.

## **5.6 Considerations for the RSS Partial Review**

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This section sets out a number of issues raised at the Appraisal Group workshop and comments received from Appraisal Group members via email with regards to the planning system that could be considered as part of the RSS Partial Review. Since the inception of this commission there have been significant changes in the scope of the RSS Partial Review that have resulted in housing numbers being omitted. Therefore the degree to which the appraisal of the RHS can be used to influence the Partial Review is limited to issues regarding Gypsies and Travellers only.

### **5.6.1 Potential Barriers in the Planning System**

The Appraisal Group raised a number of issues with regards to housing provision in general, in particular potential and perceived barriers in the planning system for affordable and supported housing provision. It was considered that these tensions are well illustrated in the latest RSS where there are policies that are supportive of meeting rural needs (e.g. DP8, RDF2) however; experience has shown that such policies are often interpreted literally and inflexibly by Local Planning Authorities.

For example DP1, 2 and 5 all require development to be genuinely accessible by public transport. However, this is a requirement that simply cannot be met by numerous smaller and more remote Cumbrian communities, including some that are Local Service Centres.

In addition, further examples included provision of housing being constrained because of strict design policies, particularly in rural areas where there are landscape characteristic sensitivities.

One recommendation from the Arup team was that in ensuring the right balance of housing provision is met to meet different community and client group needs an annual EqlA of Planning Permissions should be considered.

## 6 Next Steps

### 6.1 Taking the Appraisal findings of the RHS Consultation Paper forward

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Following completion of this Appraisal it will be issued to the RHS Steering Group and authors and used to inform and guide the final RHS. Upon completion of the RHS, the Appraisal Report will be published alongside the final strategy.

Following this, a further appraisal (Appraisal 3) will be undertaken on the emerging RSHS. This is anticipated in early 2009. This appraisal will follow an identical process as the approach for the RHS; however the work will also include a final analysis and recommendations of how the IAT should be developed.

The RHS Consultation Paper is a different type of document than a typical Draft Strategy. Therefore this has had implications for undertaking the appraisal in terms of appraising and establishing the existing and future content and structure of the final strategy.

Consequently, Arup recommend that a further appraisal should be undertaken on the draft RHS before the final RHS is prepared and published. In considering this recommendation, Arup recognises the resource and timescale implications this would have on the preparation of the final RHS. Therefore we consider that an alternative approach could be undertaken which focuses on undertaking a further appraisal workshop event with stakeholders on a final draft version of the RHS. Although not ideal, this alternative approach would be in the spirit of an iterative appraisal process as advocated by Sustainability Appraisal and SEA<sup>2</sup>. This would provide an opportunity for stakeholders to be involved in the final preparation stage of the report. We recognise that at the time of writing this report 4NW have undertaken further consultation with the appraisal group members on specific elements of the final RHS.

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<sup>2</sup> A statutory SA and SEA were identified as not being required for this commission by 4NW