

Sustainability Appraisal of the North West Regional Spatial Strategy Partial Review **SA Report**

Final Report for Submission
July 2009



Prepared for



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Final Sustainability Appraisal Report July 2009

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Acronyms

AA	Appropriate Assessment (also known as HRA)
AFS	Action For Sustainability
AGMA	Association of Greater Manchester Authorities
AMR	Annual Monitoring Report
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Areas
BERR	Department for Business, Enterprise and Regulation Reform
BME	Black and Minority Ethnic persons or groups
BMI	Body Mass Index
BREEAM	Building Research Establishment Environmental Assessment Method
CACI	Consolidated Analysis Center Incorporated
CEEQUAL	Civil Engineering Environmental Quality Assessment and Award Scheme
CHD	Coronary Heart Disease
CI	Confidence Interval
CLG	Department of Communities and Local Government
DDA	Disability Discrimination Act
DEFRA	Department of Environment, Food and Rural Affairs
DFT	Department for Transport
DH	Department of Health
DTI	Department of Trade and Industry
EA	Environment Agency
EEC	European Economic Community
EfW	Energy from Waste
EiP	Examination in Public
EqIA	Equalities Impact Assessment
EU	European Union
FAHAP	Food and Health Action Plan
FMC	Former Metropolitan County
FRS	Family Resources Survey
GONW	Government Office for the North West
GP	General Practitioner

GTAA	Gypsy and Traveller Accommodation Assessments
GVA	Gross Value Added
GWP	Global Warming Potential
HES	Hospital Episode Statistics
HIA	Health Impact Assessment
HLE	Healthy Life Expectancy
HRA	Habitats Regulations Assessment
HSSA	Housing Strategy Statistical Appendix
ICT	Information and Communication Technology
IMD	Index of Multiple Deprivation
LA	Local Authority
LGBT	Lesbian, Gay, Bisexual, and Transgender
LLSI	Limiting Long-Standing Illness
LPA	Local Planning Authority
LPI	Local Performance Indicator
LSOA	Lower-layer Super Output Area
MPA	Mineral Planning Authority
MPS	Minerals Policy Statement
NCOD	National Childhood Obesity Database
NHPAU	National Housing and Planning Advice Unit
NHS	National Health Service
NVQ	National Vocational Qualification
NWDA	North West Development Agency
NWEDLG	North West Equality and Diversity Leadership Group
NWPHO	North West Public Health Observatory
NWRA	North West Regional Assembly
ODPM	Office of the Deputy Prime Minister
ONS	Office for National Statistics
PFI	Private Finance Initiative
PPPSI	Policies / Plans / Programmes / Strategies / Initiatives
PPS	Planning Policy Statement
PSA	Public Service Agreement
RES	Regional Economic Strategy
RFF	Regional Forestry Framework
RFRA	Regional Flood Risk Appraisal

ROC	Renewable Obligation Certificate
RPB	Regional Planning Body
RPG	Regional Planning Guidance
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCP	Sustainable Consumption and Production
SEA	Strategic Environmental Assessment
SER	Sub-National Economic Review
SES	Single Equality Scheme
SFRA	Strategic Flood Risk Assessment
SIC	Standard Industrial Classification
SoS	Secretary of State
SR	Scoping Report
SSSI	Sites of Special Scientific Interest
UE	Unauthorised Encampments
UKCIP	United Kingdom Climate Change Impacts Programme
VAT	Value Added Tax
WwTWs	Waste Water Treatment Works



1 Introduction

1.1 Introduction

1.1.1 Scott Wilson was commissioned by 4NW (previously the North West Regional Assembly) to carry out the Sustainability Appraisal (SA) of the Partial Review of the North West Regional Spatial Strategy (the RSS). The process has also integrated a range of assessments including:

- Habitats Regulations Assessment (HRA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Rural Proofing.

1.1.2 It was considered unnecessary to include these in separate reports given the minimal impacts that the draft policies will have on international sites (in the case of the HRA) and the high degree of overlap with the SA assessment (in the case of HIA, EqIA and Rural Proofing).

1.1.3 In particular, a separate HRA report was not considered necessary due to the fact that, from Issues and Options stage in May 2008, it was clear that there were unlikely to be significant adverse effects upon international sites from the policies on Gypsies and Travellers, Travelling Showpeople and Car Parking Standards. Care was still taken to scrutinise the policies and associated supporting text at each redrafting, but only very minor comments were made and the impact on international sites was still minimal.

1.1.4 Natural England have been consulted upon the inclusion of HRA within this SA Report and have agreed in writing that it is an appropriate method of reporting the HRA in this instance.

The North West Plan

1.1.5 The NWRA prepared a Draft RSS – ‘the North West Plan’ - during 2004 – 06, setting out the scale, priorities and broad locations for future development across the region and providing a framework for where and how much development should take place. It covers a broad range of issues including housing, retail and the environment and includes a Regional Transport Strategy. The plan was published by the Secretary of State (SoS) in September 2008, it forms part of the statutory development plan and will have to be taken into account by Local Planning Authorities (LPAs) in deciding planning applications in the region.

- 1.1.6 During the preparation of the Submitted Draft Plan and in line with legislation a SA was undertaken – by Entec on behalf of NWRA - to appraise the Plan’s sustainability performance. The SA Report produced was submitted alongside the Plan prior to the Examination in Public (EiP).

The Partial Review

Box 1 - Partial Review Objectives

The Partial Review will update specific policy areas in response to recommendations of the RSS Examination in Public Panel report and recent developments in Government policy. In doing so, it will take account of the context provided by existing RSS, Government policy and other regional strategies.

- 1.1.7 At the time of the submission of the Draft RSS, the Assembly identified a number of policy topics which would need to be addressed in a future review of the RSS. The Panel Report¹ has endorsed this approach.
- 1.1.8 The Report of the Panel following the Examination in Public (EiP) of the RSS recommended that 4NW undertake an immediate Partial Review of the RSS to provide more detail on certain topics and creating policy on others. On inception, the Partial Review originally addressed six topics following recommendations made in the Report of the Panel:
1. Strategic Renewable locations;
 2. Location of Waste facilities;
 3. Housing allocation (including rural);
 4. Gypsies and Travellers;
 5. Travelling Showpeople; and
 6. Car parking standards.
- 1.1.9 There has been a change in the scope of the Partial Review primarily due to the Sub-national Review (and the Government’s response) and the subsequent draft legislation; Local Democracy, Economic Development and Construction Bill². Essentially these documents outline a new direction for regional planning which includes the production on a Regional Strategy (RS) which will replace the Regional Economic Strategy (RES) and the Regional Spatial Strategy (RSS). Additionally there have been changes in the mechanics of plan delivery with the change in emphasis of Regional Assemblies and the increased emphasis on sub-regional planning.

¹ North West Draft Regional Spatial Strategy: Examination in Public - Report of the Panel, March 2007. Available at:

http://www.gos.gov.uk/497468/docs/457370/2007_Panel_Report_Chapters.pdf

² <http://services.parliament.uk/bills/2008-09/localdemocracyeconomicdevelopmentandconstruction.html> (see Part 5). Another key related factor was the decision by the Regional Planning Body (RPB), 4NW to change the scope of the Partial Review of Regional Spatial Strategy (RSS) endorsed by the Regional Leaders Forum at their meeting on 15 September 2008.

- 1.1.10 In the North West of England, a pro-active approach has been taken by the North West Development Agency (NWD) and 4NW to progressing towards the RS³. The RS will be a new and clear strategic investment framework for the region. The strategy builds on the learning gained in the process of developing the **Regional Economic Strategy 2006**⁴ the **Regional Spatial Strategy** and **RSS Partial Review** and the **Regional Housing Strategy**. The Northwest Regional Development Agency and 4NW have agreed that they should quickly move to produce a Northwest Regional Strategy (RS2010) over the next 18-24 months. The process involved in developing the RS2010 will need to ensure it encompasses the relevant steps outlined in the emerging legislation and guidance.
- 1.1.11 As a result of the change in planning direction, the RPB has taken the view that topics 1-3 should be taken out of the Partial Review process and instead included in the RS2010 process⁵. The remaining topics (4-6) will follow the Partial Review process set out in the Project Plan.

Gypsies & Travellers and Travelling Showpeople

- 1.1.12 The Government has made clear that it views this issue as an integral part of the wider housing agenda to tackle affordability and homelessness issues. The Housing Act 2004 coupled with Planning Circulars 01/2006 and 04/2007, put in place a framework for identifying and providing sites to meet the accommodation needs of the Gypsy and Traveller and Travelling Showpeople communities. In light of this the Partial Review will set out separate figures for Gypsy & Travellers and Travelling Showpeople for each district, on the required provision (number of pitches/plots).

Update of Regional Parking Standards

- 1.1.13 An undertaking was given during the development of RPG13 to review regional parking standards. Based on research⁶ a new set of standards will be set out - intended to be a direct replacement for those in the current draft of the RSS.

This Report

- 1.1.14 This SA Report has been prepared to inform the formal public consultation and provide appraisal information on the three draft policies in the Review.

³ Further Information is available at the following website address: <http://www.nwregionalstrategy.com/>

⁴ Further Information is available at the following website address: <http://www.nwregionalstrategy.com/files/RES06v2.pdf>

⁵ See Item 4 of the Regional Leaders Forum on 15th Sept 2008

⁶ 4NW (2008) [Review of Regional Parking Standards](#) (research conducted by Mouchel)



2 SA and Evidence Base

2.1.1 This chapter sets out the background and process to SA and provides a summary of the Evidence Base as it relates to the policy topics.

2.2 Sustainability Appraisal

2.2.1 A Sustainability Appraisal (SA) – incorporating Strategic Environmental Assessment (SEA) – was carried out by Entec during the preparation of the Draft North West Plan and a SA Report was published alongside the Submitted Draft Plan in January 2006. In light of the Panel Report, the GONW undertook to revise the Plan. Scott Wilson carried out a SA of the Draft Proposed Changes in December 2007 – January 2008 and prepared the Consolidated SA Report to accompany the published RSS.

2.2.2 This SA process is continuing through the Partial Review and this report documents **Stage C** of the process. It should be borne in mind that this is one of three SA's that have been carried out consecutively on the RSS and provided supplemental information to that carried out by Entec in 2006 and Scott Wilson in 2007 - 2008.

2.2.3 Scott Wilson is following the Guidance for the assessment of RSSs as published by the department for Communities and Local Government (CLG)⁷. The SA process is set out in **Figure 2** below.

2.2.4 **Stage A** in the SA process involves developing the **framework** for undertaking the appraisal – generally a set of sustainable development objectives – as well as an **evidence base** to inform the appraisal. The framework and evidence base are presented in a **Scoping Report** for consultation with stakeholders including the statutory consultees (English Heritage, the Environment Agency and Natural England). In this case, the Scoping Report was prepared by Entec in February 2005, this has been subsequently amended through a Scoping Report Addendum prepared by Scott Wilson and Ben Cave Associates in Spring 2008.

2.2.5 **Stage B** in the SA process involves undertaking the **appraisal** itself. This involves identifying and evaluating the impacts of the different options open to the plan-makers as well as the preferred options / draft plan policies. This is carried out in two phases, a relative comparison during the options development stage to assess which option performs the best in sustainability terms and then in a more detailed assessment against the SA Framework when the preferred options or policies have been developed. This report documents both of these phases. Mitigation measures for alleviating adverse impacts are also proposed at this stage together with potential indicators for monitoring the plan's implementation.

⁷ See: <http://www.communities.gov.uk/publications/planningandbuilding/sustainabilityappraisal>

Figure 1: Stages required in SA



2.2.6 **Stage C** in the SA process involves documenting the appraisal and preparing the **SA Report** (this incorporates the material required for inclusion in the Environmental Report under the SEA Directive). The SA Report, guided by the Regulations will be published in for consultation alongside the Partial Review options.

2.2.7 **Stage D** in the SA process involves **consulting** on the Draft RSS (in this case the Partial Review) and the SA Report. In the case of the Partial Review, this consultation is taking place in Summer 2009.

2.2.8 **Stage E** in the SA process involves **monitoring** the adopted RSS including its sustainability impacts. In this case, NWRA will monitor the adopted North West Plan through its annual Regional Monitoring Reports.

2.2.9 The SA of the Partial Review will be undertaken in three stages:

- **Scoping Report Addendum** – providing and documenting the evidence base for the assessment;
- **Interim Sustainability Appraisal Report** – documenting the assessment of the options for the Partial Review; and

- **Sustainability Appraisal Report** – documenting the assessment of the preferred options or policies for submission to the Secretary of State.

2.2.10 In order to provide a clear signpost to the requirements of the SEA Directive, **Table 1** illustrates where the requirements have been met in the SA process.

Table 1: SEA Directive requirements and where they have been met.

Environmental Report requirements ⁸	Location
an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Scoping Report Scoping Addendum Section 1
the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report Scoping Addendum Section 1
the environmental characteristics of areas likely to be significantly affected;	Scoping Report Scoping Addendum Section 1
any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report Scoping Addendum Section 1
the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Scoping Report Scoping Addendum Section 1
the likely significant effects ⁹ on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 4 and Appendix1 Stage C SA Report
the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 4 and Appendix1 Stage C SA Report
an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 4 and Appendix1 Stage C SA Report
a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 4 Stage C SA Report
a non-technical summary of the information provided under the above headings.	Non-technical summary

⁸ As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment).

⁹ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

2.3 Evidence Base

2.3.1 Stage A provides the evidence base for the SA of the RSS Partial Review. The Addendum sets out additional information that has been published since the Scoping Report was finalised (7th February 2005) and includes:

7. Information supplied for the Examination in Public (EiP);
8. Studies undertaken by the statutory consultees; and
9. Updates to the Baseline and Context review as a result of more up-to-date data.

2.3.2 The following sections set out summaries of the information found in the Scoping Report Addendum. For the information in full, please see the Scoping Report and Scoping Report Addendum available from 4NW.

2.4 Context Review (A1)

2.4.1 The requirement to undertake a context review arises from the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations:

The SEA Directive requires:

“the relevant aspects of the current state of the environment and the likely evolution there of without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” to be included into the Environmental Report.

Annex 1(b) and (c) of the SEA Directive and Schedule 2 (2) & (3) of the Environmental Assessment of Plans and Programmes Regulations 2004

Also, the government guidance states that:

Baseline information “provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them.”

Para 2.2.7, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

2.4.2 The PPPSIs reviewed for the first SA Scoping Report are listed in Appendix 1 of the Scoping Report Addendum. The relevant key messages for the Partial Review are listed in Table 2:

Table 2: Key messages from context review update

Document	Key message
National	
Homes for the future: more affordable, more sustainable - Housing Green Paper (July 2007)	Significant increases in housing deliver required. Sub-regional housing allocations will provide additional spatial information to better predict sustainability effects
Planning White Paper	Given the Partial Review covers both Renewable delivery and housing it will be essential that trade-offs are clearly identified. Improved building performance will reduce the overall energy demand fro the region.
Securing the Future, delivering the UK Sustainable Development Strategy (2005)	Sustainable communities, amongst other things to be: Active inclusive and safe- fair, tolerant and cohesive with a strong local culture and other shared community activities Fair for everyone – including those in other communities, now and in the future
OPDM - PPS1: Delivering Sustainable Development (2005)	High quality inclusive design in the layout of new developments Requires development plans to contain clear, comprehensive and inclusive access policies. Community involvement is an essential element of delivering sustainable development and creating sustainable and safe communities
PPS 3 Housing – Equality Impact Assessment	PPS3 key goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live - to promote opportunities for home ownership & ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need, - to improve affordability across the housing market, including by increasing the supply of housing and to create sustainable, inclusive, mixed communities in all areas, both urban & rural. - PPS3 emphasises meeting the needs of disabled people, families with children, single parent families, homeless households, older people and students.
PPS9: Biodiversity and Geological Conservation (August 2005)	The spatial implications on sustainability will need to be considered in more depth than the previous SA due to increased information. In particular the effects of sites on European Sites should be addressed. Note that this will be addressed in detail through the ongoing Habitats Regulations Assessment.
Planning Policy Statement 25: Development and Flood Risk (December 2006)	The RPB should take flood risk into account in determining strategic planning considerations in the RSS for its region, including the criteria to be used for selecting and determining broad strategic locations for housing provision and transport infrastructure. Inclusion of an SA objective on flooding based on SFRA findings. The SA should incorporate or reflect the RPB's RFRA and the planning

	authority's SFRA.
Planning Policy Statement 10: Planning for Sustainable Waste Management	To encourage consultation with stakeholders on their waste strategies when identifying locations for waste management facilities. Consider location for waste management in terms of coordinating business with local authorities and third sector organisations Need to consider Energy from Waste when locating waste management facilities, and in conjunction with renewable energy generation facilities.
Future Water – The Government's water strategy for England	Climate change and water availability will be key challenges for the UK in the future. This may have effects on both human health and biodiversity. Housing provision in the sub-regions will need to take into consideration not only water availability but also, implications for water pollution and the increased risk of flooding
Planning for Gypsy and Traveller Caravan Sites. ODPM Circular 01/2006	Issues of sustainability for sites are important and so should be considered in the SA, including tranquillity, access to services and schools, provision of a settled base, locating sites away from floodplains.
Planning for Travelling Showpeople. CLG Circular 04/2007	Issues of sustainability for sites are important and so should be considered in the SA, including <i>"to recognise, protect and facilitate the traditional way of life of travelling showpeople, creating sustainable, respectful and inclusive communities where travelling showpeople have fair access to suitable accommodation and services"</i> .
Your health, your care, your say: a new direction for community service	Proposals to make NHS care in England more accessible by moving services from hospitals into the community. Reconfiguring healthcare services presents opportunities to increase sustainability and so should be considered in the SA.
Delivering Choosing Health: Making Healthier Choices Easier, Department of Health, (March 2005)	This delivery plan highlights how the DH and the NHS, within the framework of government policies, will help more people make more healthy choices and reduce health inequalities. Individual choice is a key Government driver: the SA will need to identify how the revisions can create a framework that enable people to live healthy lives and any trade-offs that may reduce these choices.
Delivering Housing For An Ageing Population, Housing & Older People Development Group, October 2005	Ensure the SA considers links with older people's strategies, transport, health and other strategies.
Regional	
NW Food and Health Action Plan, North West Food and Health Task Force, January 2007	Identify how the revisions can enable people to live healthy lives and any trade-offs that may reduce these choices.
NW Regional Housing Strategy (2005)	The regional housing strategy aims to contribute to economic growth and social inclusion, with a priority to provide affordable homes to maintain balanced communities. Tackling shortages of affordable housing in areas where demand is high, adversely affecting social inclusion and growth of local, sub-region and regional economies.

	Priority to meet the needs of the North West's diverse communities and individuals needing support, with an emphasis on specialist housing provision to meet community and individual needs at a local level
Northwest Equality and Diversity Strategy & Implementation Plan 2006-9	Identifies economic participation for all, promoting diversity as a regional asset and reducing hate crime and violence as the main equality and diversity objectives for the region. The NWRA is the lead agency for promoting diversity as a regional asset.
North West Regional Assembly 'Single Equality Scheme' (2008)	Its core objectives relate to increasing awareness of rights, increasing representation of under-represented groups in society, recognition of the benefits of diversity (closely relating to the NWRA's lead role on promoting diversity as a regional asset under the regional diversity and equality strategy) and promoting a more cohesive society.
The North West Gypsy & Traveller Accommodation Assessments, 2007	The assessment is a tool towards fulfilling the responsibilities of the regional body to co-ordinate provision of accommodation to meet the needs of gypsies and travellers in the region. Romany gypsies and Irish travellers in particular are protected under Race Equality legislation. The assessment looks towards ensuring all authorities identify gypsy and traveller accommodation needs and develop attractive accommodation options for meeting need, in conjunction with other service provision for gypsies and travellers.
Committed to Inclusion, Accepting the Challenge: The NW & Disability	This study informed a Disability Action Charter North West which encourages key players to address the issues affecting disabled people in the region. These include housing, education, employment and training, accessibility and public communications
A Northwest Framework - to achieve healthy weight for children and families (Feb 2008)	Consideration will need to be given to how the Plan supports Physical Activity and Healthy Eating for all ages and reduces the obesogenic environment.

2.5 Baseline (A2)

2.5.1 The requirement to consider the environmental and sustainability baseline arises from:

The SEA Directive requires:

“the relevant aspects of the current state of the environment and the likely evolution there of without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” to be included into the Environmental Report.

Annex 1(b) and (c) of the SEA Directive and Schedule 2 (2) & (3) of the Environmental Assessment of Plans and Programmes Regulations 2004

Also, the government guidance states that:

Baseline information “provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them.”

Para 2.2.7, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

2.5.2 The baseline provides not only a snapshot of current environmental / sustainability performance but should also describe the likely future of the baseline without implementation of the plan.

2.5.3 The update of the scoping report highlighted areas where the current performance in the North West is an issue. Note that by being an ‘issue’ it does not necessarily imply a negative performance, the issues may also be positive. **Table 3** summarises the relevant issues that have arisen and whether they were also considered in the original Scoping Report. A green fill indicates that the region is currently performing well; a red fill indicates that the region is currently performing poorly. A blue fill indicates that it is not possible to comment on performance at this stage. The arrows indicate what the likely performance of this indicator will be without the implementation of the Partial Review. An arrow pointing upwards means that the issue is likely to improve. A horizontal arrow indicates that there is likely to be no change and an arrow pointing downwards means that the performance of the issue is likely to deteriorate. If there is no arrow then it has not been possible to determine a trend (please see **Appendix 2** of the Scoping Report Addendum for full baseline table).

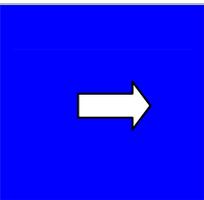
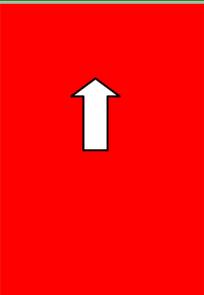
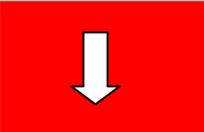
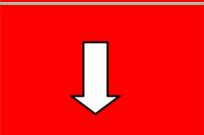
Table 3: Baseline issues summary

Indicator	Trend	Performance	Identified in original Scoping Report?
Economic			
GVA per capita in disadvantaged areas ¹ . (£ per head - current basic prices ¹⁰)	Since the 2002 figures, the North West has experienced a consistent rise in this indicator (approximately 14%). The NE has experienced a 18% increase, with Y&H (13%), EM (15%) and WM (13%).	↑	Yes
Claimants in most deprived areas - % resident working age population estimates.	Claimants in the NW have increased overall (2.2 – 2.6) with particular significance with only Manchester and Cumbria experiencing a decrease.	↓	Yes
Proportion of LSOAs in the bottom 20% deprived in England	Second worst performance of all Government Office Regions (only the North East fairs worse).	↓	No
No of VAT registrations in deprived areas (per 10,000 resident adults). (2006) ¹¹	Showing upward trend, 23, 23, 23, 26, 25, 25 from 2000 - 2005 ¹² . Data only available Region – by – Region.	↑	Yes
% employed	Employment rate may have leveled off. 72.9% of all people in the North West employed, up from 2003.	→	Yes
Environmental			
% of people in employment's usual method of travel to work - car.	Notable that the majority of regions have experienced a reduction whereas the North West has remained the same.	→	Yes
Bus 'availability': % households within 13 minutes walk of a bus stop with a service at least once an hour.	Increase from 2002/2003 figures by 2% although still not as high as 1998 figure.	↑	Yes
Petrol and diesel consumption of road vehicles (Thousand tones)	Personal – 2891 (of which 2170 is petrol cars) Freight – 1579. No trend identified, however, the NW is the second highest consumer in England after the SE.	↓	No

¹⁰ NUTS2.2

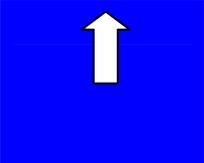
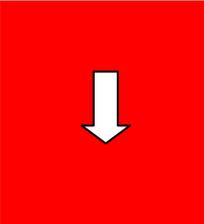
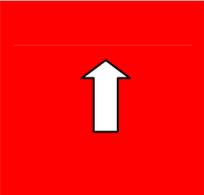
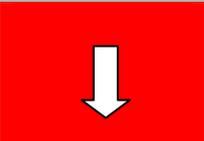
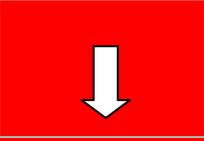
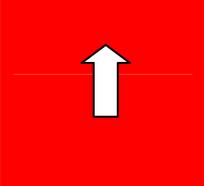
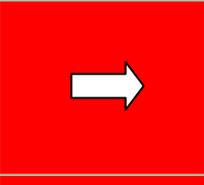
¹¹ See: <http://stats.berr.gov.uk/ed/vat/VATStatsPressReleaseNov2007.pdf>

¹² See: <http://stats.berr.gov.uk/ed/vat/20002005MostDeprivedAreas.xls>

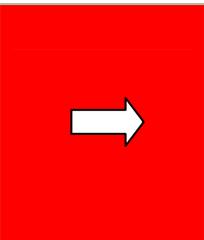
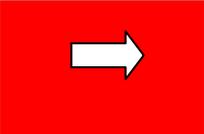
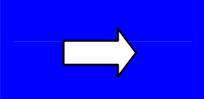
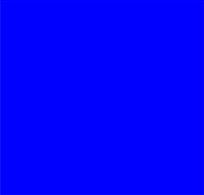
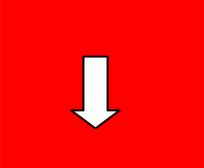
% of total area designated because of landscape quality - Areas of Outstanding Natural Beauty and National Parks	Same areas designated.		Yes
% of listed (grade I and II) buildings at risk of decay.	Continued reduction from 6.7 (1999), 6.1 (2005) and 5.4 in 2007). New entries on the register outweighed by 7 buildings removed from the register (2007)		Yes
Woodland bird population versus 1994 levels.	Continuing increase in woodland bird species.		Yes
Designated SSSIs in 'favourable' habitat condition / Designated SSSIs unfavourable recovering habitat condition. (condition of SSSIs that make up Natura 2000 sites)	85.61% meeting PSA target so NW some way short.		Yes
Proportion of total river length of 'good/fair' biological quality.	Consistent increase since 2000 (84.3%) although not reaching England levels.		Yes
Proportion of total river length of 'good/fair' chemical quality.	Consistent increase since 2000 (91.5%) although not reaching England levels.		Yes
Percent of moderate/higher pollutant days (by NW monitoring stations).	Number of days with exceedences have increased from 2004 – 2006 for both Rural and Urban sites. ¹³		Yes
CO ₂ emissions from all sources	Emissions predicted to significantly increase (13 - 15%) primarily through increases in traffic movements and traffic growth ¹⁴ .		No
Average electricity consumption per domestic consumer (Kwh).	Electricity consumption has been decreasing since 2005 (2004 if experimental results are considered)		No

¹³ See: <http://www.environment-agency.gov.uk/commondata/103196/606878?referrer=/regions/northwest/346910/588128/>

¹⁴ See: http://www.climatechangenorthwest.com/assets/files/documents/oct_07/cli_1191931499_nwra_1187602048_NWRA_Energy_and

Average electricity consumption per commercial and industrial consumer (Kwh).	Electricity consumption has been decreasing since 2005 (if experimental results are considered then there is a substantial increase)		No
Number of planning applications permitted contrary to the advice of the Environment Agency where the objection was made on flood defence grounds.	In 2007, 235 objections from the EA received, 7 of which were approved (3%) reinforcing the increased number of objections from the EA.		Yes
Social			
Male life Expectancy at Birth (years).	North West region still has the lowest life expectancy for males. However, life expectancy has increased from 2000-2002 (74.6) with Greater Manchester having the lowest of the sub-regions (74.8).		Yes
% homes unfit for use.	Still in decline and compares more favourably with the national figure of 2.5%		Yes
Equalities Impact Assessment			
Access to Affordable Housing			
% of households with incomes below the 'affordability' threshold	80% of households within the region have incomes below the 'affordability' threshold		Yes
Total additional affordable housing completions / acquisitions	Affordable Housing Completions declining. Affordable housing completions below average of 3067.1/ year and decreasing.		Yes
None available to show disabled people's access to affordable housing	Disabled people have considerably less choice about where they live than non-disabled people. Private housing stock in the region remains largely inaccessible to people with physical impairments.		No
None available to show BME people's access to affordable housing	Bangladeshi's and Black African people have the poorest housing conditions of any group. Large households and overcrowding is an issue, plus poor quality		No
Residential pitch needs for gypsy and travellers	Need for 315-326 residential pitches across NW 2006-2011		Yes

Transit pitch needs for gypsies and travellers	Need for 111-245 pitches on transit accommodation 2006-2011		Yes
Equal economic participation			
% of disabled people of working age in employment	349,000 (41%) are in employment		No
% of disabled people on state benefits and not in work	416,000 (49%) are on state benefits and not in work.		No
% BME people of working age unemployed but want to work.	20% of BME people are unemployed but want to work BME women are less likely to be in work, and are concentrated in fewer occupations than men		No
% of 18-24 year olds unemployed	11% of 18-24 year olds being unemployed		No
% of 16 year olds not in education, employment or training	One in seven 16 year olds is not in education, training or employment Younger people are disproportionately working in lower skilled occupations and in industries lower in the value chain.		No
Employment rate for 45-64 year olds and for 65-75 year olds	For 45-64 year olds the employment rate is 61% compared with 65.4% nationally and for 65-75 year olds it is 6.6%, compared with 8.4% nationally.		No
Average median gross weekly earnings for women compared with men	£450.00 for males and £351.60 for females (2005) In employment, women still earn 18% less than men on average and this double for part time workers.		No
Economic inclusion of LGBT people	No data on economic inclusion but reported experience of homophobia		No
Social Inclusion of Diverse Groups			
% of BME groups in most deprived districts and local authority areas	30% of BME people are in the 'Top 5' most deprived Districts in NW and 70% of BME communities are concentrated in the 88 most deprived Local Authority areas in the country - 21 in NW		No

Equal access to services for gypsies and travellers.	- Households on UE have inappropriate living conditions - Move into housing generally stimulated by education, ill-health and older age More precise indicators on access to services for gypsies and travelers not available		No
Racially aggravated offences	Racially aggravated offences fell between 2002 and 2003 in Greater Manchester but increased in other areas of the NW.		No
% of households in receipt of or family tax credit.	North West 2002-2003: 6%.		No
% of people who feel that their local area is a place where people from different backgrounds and communities can live together harmoniously.	Currently a data gap		Yes
Health			
Infant Mortality	The North West Region has the second highest infant mortality rate in England.		No
Percentage of total deaths that are alcohol-specific (2005)	For both males and females the North West region has the highest percentage of alcohol specific deaths in England		No
Rate of children aged 0-15 years killed or seriously injured in road traffic accidents per 100,000 population (2004)	Child road traffic injuries have declined in recent years and in 2004 was 43% below the baseline (1994-98 average). However children in the North West are significantly more likely to be injured or killed in a traffic accident in comparison to all other regions.		No

2.6 Key Issues (A3)

The 'Environmental Report' required under the SEA Directive should include:

"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive']"

(Annex 1(d) SEA Directive and Schedule 2 (4) of the Environmental Assessment of Plans and Programmes Regulations 2004)

Also, the government guidance states that:

"The identification of sustainability issues (including environmental problems as required by the SEA Directive) is an opportunity to define key issues for the RSS revision and to develop sustainable objectives and options."

Para 2.2.4, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

Flood Risk

2.6.1 The additional requirements of PPS25, in combination with the increased risk of flooding and the quantum of development outlined as part of the current RSS will place a much greater risk of flooding on the region than previously assessed. To address this information will be needed on:

- Number of dwellings and associated infrastructure at risk of flooding
- Future flood risk based on climate change scenarios.

Deprivation

2.6.2 As highlighted in the baseline summary, the North West is an area with particular pockets of deprivation. The areas of particular deprivation include Liverpool, Manchester, Knowsley, Blackpool, Preston, Blackburn and Burnley. These areas have been identified in **Figure 10** taken from the Indices of Multiple Deprivation 200715 (please see **Appendix 3** for other deprivation maps).

¹⁵ See: http://www.communities.gov.uk/documents/communities/pdf/733520?bcsi_scan_F6892CABA15785B4=0

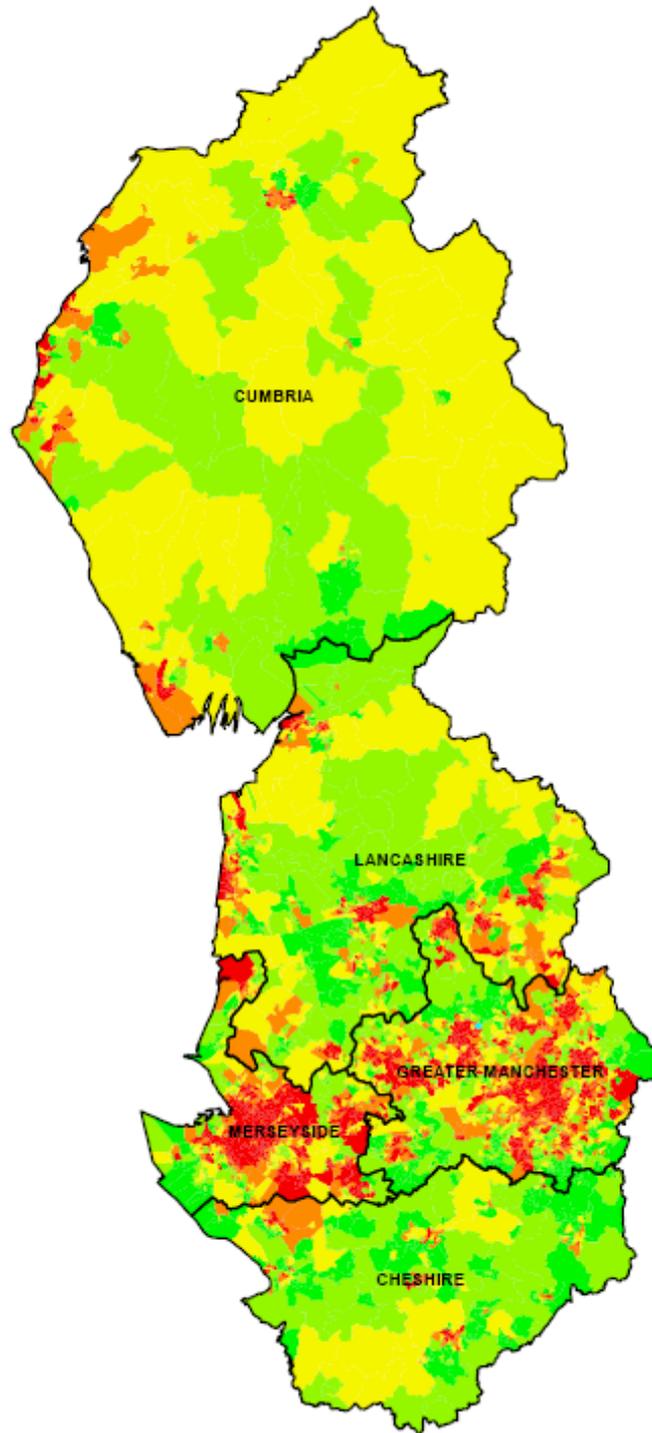


Figure 5: Index of Multiple Deprivation – North West

Health Improvement

- 2.6.3 Considerable investments have been made to address deprivation in the North West. The North West Region has significantly worse levels of adult binge drinking than the England average (APHO Health Profiles 2008) along with significantly lower than England average levels of healthy eating and physically active adults. Housing allocation and subsequent regeneration and economic development policies should not depend upon a night-time economy which prioritises alcohol and fast-food and which has a damaging effect on the health of people living and working in the north west.
- 2.6.4 Many elements of the NW RSS partial review provide opportunities for encouraging the healthier choice to be the choice people make.

Climate Change

- 2.6.5 The combination of increased requirements from the Government and EU on reducing energy demand, increasing energy efficiency and providing a greater proportion of energy from renewable sources should contribute towards a reduction the North West's potential climate change impacts. However, more effort will be needed to counter the predicted growth in emissions from vehicles, in order to not negate good work done elsewhere.
- 2.6.6 The new standards for sustainable buildings (the Code for Sustainable Homes) and for other developments (such as BREEAM and CEEQUAL) should contribute to overall energy savings.

Water resources

- 2.6.7 The demand for water will increase as new developments are built and completed. The growing population will also create a burden on existing water supplies. Added to this will be the pressure on current waste treatment and sewage facilities.

Habitats Regulations Assessment (Submission Draft RSS)

The HRA of the Submission Draft RSS identified that:

- Current abstraction levels are already adversely affecting at least eight European sites in the region.
- The Plan provides for 411,160 new homes and for increases in economic activity and community facilities; the final Regional Spatial Strategy may provide for still more. This growth will add to existing pressure on water resources.

- 2.6.8 However, it has been identified in the Habitats Regulations Assessment (HRA) for the Proposed Changes to the RSS that “the water companies are in the process of preparing their five-year plans, which will **inform and influence the RSS review** in terms of water resources and wastewater treatment.”

Vulnerable groups

2.6.9 Climate change, water scarcity and other environmental factors often impact upon the more vulnerable sections of society more seriously than the more affluent. As such, in the context of the sustainability effects identified, the need to reduce inequalities and ensuring that the population of the North West as a whole are considered is highlighted. The data on vulnerable people and any risk posed is scarce and it is recommended that the North West undertake a Vulnerability Mapping exercise to determine those most at risk.

Cumulative effects

2.6.10 The effects of increased population and shifting housing sizes will affect the North West's influence on the natural environment and infrastructure through cumulative impacts through increased consumption on a number of fronts. It has been calculated that dwellings of lower occupancies consume more natural resources per capita than those with higher occupancy levels. The projected growth in housing in the North West and the nature of its occupancy may create an exponential growth in the demand for natural resources and waste production. **Table 5** provides an illustration of the levels of consumption resulting from shifting household sizes.

2.6.11 If data can be obtained on predicted household composition and accurate per capita consumption and waste then it may be possible to quantify to some extent the pressures on the North West Region from the use of resources.

Table 5: per capita consumption of resources¹⁶

No. of People in household	Average Water Use per person per day (litres)	Waste generation (kg per person per day)	Estimated final energy demand per capita per day (kWh)
1	223	2.7	61
2	182	1.7	40
3	136	1.3	34
4	129	1	28
5+	85	0.86	21

Equality

2.6.12 Based on the context review and baseline, the key issues identify equalities issues of relevance for the RSS revision and to develop sustainability objectives in relation to equality and equality criteria for use in the assessment.

2.6.13 The key issues identified in relation to equalities in the region pertaining specifically to the issues subject to the partial review are:

¹⁶ Source: Levett-Therivel and Treweek Environmental Consultants – *Household resource consumption*

- Meeting the housing needs, including the need for increased affordable housing, of diverse groups in the region, including disabled people, BME people, and other vulnerable groups, including families with children, single parent families, homeless households and older people, recognising the existing poor housing conditions experienced by BME groups, limited housing choices of disabled people and the problems of affordability for disadvantaged and low income groups.
- Meeting the accommodation needs and equal access to other services of gypsies and travellers in the region, in particular for Roma gypsies and Irish travellers, to address severe shortages of accommodation needs.
- Promoting diversity as an asset in the region, including via equal economic participation for diverse groups in the region, including disabled people, BME people, young people and older people, recognising the changing profile of the regional population and differences in employment and unemployment rates for these groups compared with regional averages and include the promotion of social enterprise schemes and their associated benefits to equalities issues, growth points and housing provision.
- Promoting diversity as an asset in the region, including via narrowing the pay gap between women and men, tackling the pay gap for full time and part time women, particularly in the context of lower average earnings for both men and women compared with UK averages.
- Promoting diversity as an asset in the region, including the social and economic inclusion of different groups, including faith groups and LGBT people, addressing existing prejudice and discrimination and building on existing concentrations of specific groups in certain areas
- Promoting social inclusion for equality groups in NW, Including BME people, to address existing spatial and social concentrations of poverty and deprivation experienced by BME groups in the region
- Promoting improved access to public transport services and other local services, which particularly disadvantage low income groups and women.

Air Pollution

- 2.6.14 The level of air pollution in the North West – in terms of numbers of days exceeding air quality levels *and* number of Air Quality Management Areas (AQMA) designated – have both increased since 2005. The Environment Agency provide figures showing that traffic in the region increased by 15% from 1995-2005 causing air quality problems in major cities. This will be amplified through the predicted growth in traffic (see climate change indicators above). The Agency also provides information on industrial pollutants

in the North West. The EA indicate that the levels of 6 of the 8 key air pollutants are below those in 1998 (the two exceedances are carbon monoxide and nitrogen oxide).¹⁷

- 2.6.15 The Habitats Regulations Assessment (HRA) of the Proposed Changes to the RSS identified that “air pollution levels country-wide are expected to go down over the next ten years in response to improved vehicle technology and the closure of some power stations.”

Housing Affordability for Equality Groups

- 2.6.16 Access to affordable high quality housing is a key issue of concern in the region in general and in particular for BME groups, in particular Bangladeshis and Black Africans. Likewise, disabled people face less choice in their access to housing both in private housing and affordable housing. Requirements for Lifetime Homes standards in new housing and to meet DDA requirements are likely to contribute towards addressing this issue in new build housing.

Social Inclusion and Deprivation

- 2.6.17 A significant proportion of BME groups in the North West live in areas of deprivation. Given the high levels of deprivation in the region, this is a significant implication for the North West region, in terms of tackling inequality for BME groups.

Gypsy & Traveller and Travelling Showpeople Accommodation and access to services

- 2.6.18 The current shortfall in suitable accommodation provision for Gypsies & Travellers and for Travelling Showpeople is an equality concern. This particularly relates to the protection of Irish Travellers and Roma gypsies under Race Equality legislation, including for the promotion of good relations between different racial groups as part of sustainable communities. It also relates to the needs of children, older people, disabled people and women within the Gypsy & Traveller and Travelling Showpeople communities, including in relation to access to both accommodation and other services, such as health and education.

¹⁷ See: http://www.environment-agency.gov.uk/commondata/acrobat/nwenv_summary08_1473612.pdf

2.7 Sustainability Framework (A4)

2.7.1 The requirements for the development of a SA Framework are outlined in the Government's SA Guidance:

"The SA framework provides a way in which sustainability effects can be described, analysed and compared. It is central to the SA process."

"Sustainability objectives are distinct from the objectives of the plan, through they may in some cases overlap with them. They provide a way of checking whether RSS Revision objectives are the best possible ones for sustainability and can be seen as a methodological yardstick against which the social, environmental and economic effects of the RSS Revision can be tested."

Sections 2.2.15 and 2.2.17, SA of Regional Spatial Strategies and Local Development Documents, DCLG 2005

2.7.2 The SA Framework should be informed by the previous stages of the SA process (A1, A2 and A3) and should form a robust benchmark against which the sustainability of the plan can be assessed.

2.7.3 The Scoping Report (2005) proposed a framework of 26 Objectives with sub-criteria. This framework was used for the assessment of the Proposed Changes and it is proposed to use the same framework for the Partial Review, with a few additional recommended changes developed through the consultation process.

2.7.4 It is not proposed to change any of the overarching Objectives but rather to include additional sub- objectives on the following themes:

- Climate change;
- Microgeneration;
- Flooding;
- Water consumption;
- European sites (Natura 2000);
- Air pollution; and
- Deprivation.

2.7.5 **Table 6** sets out the sustainability framework used for the appraisal of the draft policies

Table 6: SA Framework

SA Objective	Decision making question
1. To reduce the disparities of sub-regional economic assemblies	1a. Will it provide job opportunities in areas with residents most at need 1b. Will it reduce economic disparities within the region and with other UK regions?
2. To exploit the growth potential of business sectors	2a. Will it increase employment opportunities within the region? 2b. Will it help to diversify the regions economy? 2c. Will it promote growth in key sectors of the regional economy? 2d. Will it help to develop the regions knowledge base? 2e. Will it increase the economic benefit derived from the regions natural environment?
3. To develop and market the region's image	3a. Will it support the preservation and/or enhancement 3b. Will it promote the area as a destination for short and long term visitors, for residents and investors.
4. To deliver urban renaissance	4a. Will it improve economic, social and environmental conditions in the most deprived areas and most deprived groups? 4b. Will it improve quality of the built and historic environment 4c. Will it improve the quality of public open space?
5. To deliver rural renaissance	5a. Will it support rural diversification? 5b. Will it support and encourage the growth of rural businesses? 5c. Will it retain and promote the economic growth of market towns? 5d. Will it retain and promote access to village services?
6. To secure economic inclusion	6a. Will it meet the employment needs of local people? 6b. Will it improve physical accessibility to jobs with the location of sites and/ or public transport links being closer to areas of high unemployment? 6c. Will it encourage business start-up especially from women and BME groups?

SA Objective	Decision making question
7. To develop and maintain a healthy labour market	7a. Will it address the skills gap and enable skills progression?
	7b. Will it increase the levels of participation and attainment in education?
	7c. Will it provide a broad range of jobs and employment opportunities?
8. To reduce social exclusion	8a. Will it reduce poverty and social exclusion in those areas and communities most affected? (particularly BME people, LGBT, Faith Groups and Rural Communities).
9. To reduce the need to travel improve choice of use and use of sustainable transport modes	9a. Will it reduce car and lorry traffic?
	9b. Will it encourage walking, cycling and equal access to and use of public transport?
	9c. Will it reduce freight movement?
	9d. Will it improve equal access to and encourage the use of ICT?
10. To improve health and mental health and reduce health inequalities	10a. Will it reduce deaths in key vulnerable groups?
	10b. Will it promote healthier lifestyles?
	10c. Will it reduce health inequalities among different groups in the community?
	10d. Will it reduce isolation for vulnerable people?
11. Improve access to good quality affordable and resource efficient housing	11a. Will it provide an appropriate mix of housing to meet all residents needs including affordable?
	11b. Will it reduce the number of unfit and empty homes?
	11c. Will it support the development and operation of resource efficient housing?
	11d. Will it meet the accommodation needs of gypsies and travellers, in line with Race Equalities requirements?
12. To reduce crime, disorder and the fear of crime inequalities	12a. Will it reduce actual levels of crime (including hate crime)?
	12b. Will it reduce the fear of crime?
	12c. Will it reduce prejudice (racial, homophobic, gender or age related)?
13. To enable groups and communities to contribute to decision making	13a. Will it identify and engage with hard to reach stakeholders?
	13b. Will it encourage wider community involvement in design, or the provision of services?

SA Objective	Decision making question
	13c. Will it enable the community to contribute to and have influence in decision-making and be involved in implementation?
14. To develop strong and positive relationships between people from different backgrounds and communities?	14a. Will it create a sense of belonging and well-being for all members of the community?
	14b. Will it support community development?
	14c. Will it improve relations between all groups and religions (including between gypsies and travellers and settled communities)?
	14d. (12c.) Will it reduce prejudice (racial or homophobic)? (moved)
15. To improve access to basic goods, services and amenities for all groups	15a. Will it improve equal access to cultural, sporting and leisure facilities including natural green spaces?
	15b. Will it improve equal access to essential services and facilities, including for gypsies and travellers?
	15c. Will it improve the range and quality of cultural, sporting and leisure facilities and equal access to them?
	15d. Will it improve equal access to basic goods, promoting the use of those that are locally sourced?
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.	16a. Will it protect and enhance the character and appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens and their settings?
	16b. Will it improve access to buildings of historic/cultural value?
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	17a. Will it protect and enhance the character and appearance of the regions townscape and countryside maintaining and strengthening local distinctiveness and sense of place?
	17b. Will it protect and enhance the biodiversity of the regions landscapes?
	17c. Will it protect and enhance the accessibility of the landscape across the region?
	17d. Will it protect and enhance the tranquillity of the region's landscapes?
18. To protect and improve local environmental quality	18a. Will it reduce light and noise pollution and graffiti?
	18b. Will it redress environmental inequalities within region's urban and/or rural areas?

SA Objective	Decision making question
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.	19a. Will it protect and enhance existing designated European, national and regional wildlife and geological sites and species populations?
	19b. Will it protect and enhance habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?
20. To protect and improve the quality of inland and coastal waters	20a. Will it reduce or manage flooding?
	20b. Will it maintain and enhance ground and surface water quality?
	20c. Will it improve the quality of coastal waters?
21. To protect and improve air quality	21a. Will it maintain and improve air quality?
	21b. Will it address the causal factors of poor air quality in AQMAs?
22. To restore and protect land and soil	22a. Will it reduce the amount of derelict, contaminated, degraded and vacant/ underused land?
	22b. Will it encourage the development of brownfield land in preference to Greenfield?
	22c. Will it reduce the loss of good soils to development?
	22d. Will it maintain and enhance soil quality?
23. To mitigate and adapt to climate change	23a. Will it reduce or minimise greenhouse gas emissions?
	23b. Will maintain water abstraction, run-off and recharge within carrying capacity?
	23c. Will it contribute to the ability to adapt to the impacts of climate change?
	23d. Will it expose the region to increased flood risk
	23e. Will it reduce the economic impact of the future effects of climate change?
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	24a. Will it alter the demand for raw materials and natural resources?
	24b. Will it support the repair and re-use of existing buildings?
	24c. Will it reduce minerals extracted and imported?
	24d. Will it promote the use of recycled and secondary materials?

SA Objective	Decision making question
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	25a. Will it minimise the need for energy?
	25b. Will it maximise the production and/ or use of renewable energy?
	25c. Will it increase energy efficiency in buildings, transport modes etc?
	25d. Will it minimise the use of fossil fuels?
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	26a. Will it minimise the production of waste?
	26b. Will it increase waste recycling and reuse?
	26c. Will it reduce the amount of residual waste to landfill?



3 Appraisal Methodology

3.1 The Assessments

3.1.1 The multiple assessment strands represent both statutory and non-statutory types of appraisal. In developing the methodology the requirements of the statutory assessments (SA and HRA) take precedence in terms of dictating the process and therefore the programme. Furthermore, the SA process has more onerous requirements for consultation and outputs than the other assessments plus it is more established in terms of guidance and what constitutes 'best practice'. Therefore the SA process forms the 'spine' of the process with the other assessments feeding in at the important points.

3.1.2 The important points - or decision making points - have been identified at three instances in the Partial Review process:

- Issues consideration and options development;
- Options assessment; and
- Policy Assessment.

3.1.3 At these points key information needs to be made available to 4NW in order to adequately inform the plan and decision makers and to meet regulatory obligations.

3.2 Method

3.2.1 The appraisal of the options consisted of a matrix approach derived from that used by Entec for the Draft Submission Plan and used by Scott Wilson for the assessment of the proposed changes (see **Table 7** and **8**). Traditionally, the assessment matrices are carried out to compare the relative sustainability merits of the options proposed to address the issues identified in the area, in this case the North West Region. These are filled in using expert judgement and consensus from not only the consultants point of view but also incorporating local knowledge from the planning authority. This has been the case in this assessment, the scoring system used is provided in **Appendix 1**.

Appraisal Group

3.2.2 This appraisal was supplemented through the use of an 'Appraisal Group'. The Appraisal Group was made up of key stakeholders in the development of the RSS. The aim of the group was to undertake, verify and supplement the appraisals findings at key stages in order to reach a consensus. The Appraisal Group met as an informal workshop with an open floor to enable discussion on a multitude of issues, the meeting was documented and outcomes made available as part of the consultation process.

3.2.3 The Appraisal Group was held on the 3rd July 2008, the full report is available from 4NW¹⁸.

3.2.4 The attendees included:

- Louise Maxwell – Environment Agency
- Sue Bradburne – Environment Agency
- Peter Wilson – North West Environment Link (pm only)
- Bruce Johnson – University of Central Lancashire
- Lillian Burns – North West Transport Roundtable
- Ken Burgess – Natural England (pm only)
- Michelle Young – Natural England (pm only)
- Janet Smith – Northern Network of Travelling People (am only)
- Alessandra Zucca – IMPACT
- Debra Holroyd – NWRA (now 4NW)
- Duncan McCorquodale – NWRA (now 4NW)
- Paul Iggulden – Ben Cave Associates
- Alex White – Scott Wilson Ltd.
- Mark Fessey – Scott Wilson Ltd.
- Liz Clarke – Scott Wilson Ltd.

3.2.5 The key messages that arose in this appraisal group are included in the options summary tables in the following section.

¹⁸ 4NW (June 2008) **Sustainability Appraisal Report – Issues and Options** (available from <http://www.northwestplanpartialreview.org.uk/>)

Table 7: Blank Matrix

Policy Description:									
Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
1. To reduce the disparities of sub-regional economic assemblies									
1a. Will it provide job opportunities in areas with residents most at need									
1b. Will it reduce economic disparities within the region and with other UK regions?									
2. To exploit the growth potential of business sectors									
2a. Will it increase employment opportunities within the region?									
2b. Will it help to diversify the regions economy?									
2c. Will it promote									

growth in key sectors of the regional economy?										
2d. Will it help to develop the regions knowledge base?										
2e. Will it increase the economic benefit derived from the regions natural environment ?										

Table 8: Assessment key

x	Objective not linked	++	Strongly positive effect	+	Positive effect	-	Negative effect	--	Strongly negative effect	?	Uncertain effect	0	Insignificant effect	✓	Occurs in this timescale
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4 Appraisal Findings

4.1 Issues and Options

4.1.1 The Issues and Options were developed during Spring 2008. The options were subject to a comparative SA in May 2008. The options assessed and brief descriptions are provided in **Table 1** below.

Table 9: Issues and Options

Issue	Options
Car parking standards	Option A) Adopt the revised standards
	Option B) Keep existing parking standards as detailed in RPG13 and Draft RSS
Gypsies and Travellers	Option A) Use the results from the Gypsy and Traveller Accommodation Assessment (GTAA) studies to distribute new provision
	Option B) Modify (A) to ensure a minimum level of pitch provision in every district
	Option C) Work to agree a more balanced share of meeting need across districts
Travelling Showpeople	Option A) Use the results from the Gypsy and Traveller Accommodation Assessment (GTAA) studies, which also incorporated assessments of the accommodation needs for Travelling Showpeople, to distribute new provision
	Option B) Modify (A) to ensure a minimum level of pitch provision in every district
	Option C) Work to agree a more balanced share of meeting need across districts

4.1.2 Summaries of the assessment findings are provided below, the full appraisal matrices can be found in **Appendix 1**.

Gypsies and Travellers

Summary

It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently, Gypsies and Travellers are not evenly spread throughout the region (although they are spread more evenly throughout the region than is the case for Travelling Showpeople). Option A will reinforce this unequal distribution, whilst Option C will distribute new pitches for Gypsies and Travellers throughout the region in a more 'balanced' fashion.

It is likely that there would be benefits for local communities to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Gypsy and Traveller pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). A high concentration of Gypsy and Traveller pitches could generate some negative sustainability effects that would impact upon the receiving environment, community or economy. A particularly significant effect is worsening social relations between the Gypsy and Traveller community and the settled community in the area, signified for example, in concerns about crime levels.

It is important to consider that many effects felt by the receiving environment and settled community in the vicinity of Gypsy and Traveller pitches may be insignificant or non-existent if pitches are authorised as it can be assumed that authorised pitches are sensitively located. Furthermore, any negative effects associated with new authorised sites have the potential to decrease over time, as it is more likely that there will be the potential for harmonious relationships and cultural understanding to develop between the settled and Gypsy and Traveller communities.

For these reasons, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. However, it is difficult to predict with any certainty whether this will occur as evidence does suggest a strong preference for permanent pitches, with a preference for authorised sites, a resort to privately owned unauthorised sites where an authorised pitch cannot be obtained and a final resort to unauthorised encampments. Gypsies and Travellers are currently more dispersed around the region than is the case for Travelling Showpeople, and so it might be suggested that promoting a *more* balanced dispersal would be something that Gypsies and Travellers find acceptable, although this suggestion needs to be confirmed with hard evidence. The potential for unauthorised pitches remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Gypsy and Traveller pitches, as opposed to a distribution of new pitches that mirrors the

current distribution, would directly result in increased access to services and opportunities. This is because the number of Gypsies and Travellers within a given area will always be relatively small in comparison to the settled community, even if the number of Gypsies and Travellers in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Gypsy and Traveller and settled communities. If Option C is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Gypsies and Travellers, namely access to services and opportunities.

Option C promotes working with the Gypsy and Traveller community to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Gypsy and Traveller families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Gypsies and Travellers to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Gypsies and Travellers could become isolated from the rest of the community. Option B could result in particular potential for effects to be felt by individual families.

In conclusion, Option C, developed and implemented, could achieve a more sustainable outcome for all, but developed and implemented badly, could have damaging effects on the Gypsy and Traveller community.

Recommendations

- 1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.
- 2) Requiring some Gypsies and Travellers to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Gypsy and Traveller community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Appraisal Group Comments

Key comments – Gypsies and Travellers

- Clarify differences between Gypsy and Traveller sub-groups
- Look at the sub-regional study – don't use the NWRA study
- Ethnic monitoring to identify culturally-suitable accommodation
- Better assistance for LAs
- Question assumptions about the importance of proximity to services and facilities.
- Option C is best but needs genuine engagement
 - Gives choice of location and therefore proximity to services (remember: patchiness a result of no choice)
- Not enough stopping places
- Problem: Site footprints bigger than house footprints

Travelling Showpeople

Summary

It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently Travelling Showpeople are not evenly spread throughout the region, but are concentrated around the Manchester area. Option A will therefore reinforce this unequal distribution. Option C will distribute new pitches for Travelling Showpeople throughout the region in a more 'balanced' fashion.

There is certainly potential for the Option C approach to impact upon the lives and, in particular the livelihoods, of Travelling Showpeople. It is highly likely that Travelling Showpeople have chosen to concentrate around the Manchester conurbation for logistical reasons, such as the need to have good access to the major road network and the pattern of fun fairs across the region throughout the year, as well as perhaps for reasons of being close to friends and family. If this is indeed the case then Option C will have the potential to jeopardise the viability of the business that is key to their economic well-being, as well as perhaps affect the strength of the Travelling Showpeople community.

It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Travelling Showpeople pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). However, it is not entirely clear what problems might be experienced within areas with a concentration of Travelling Showpeople. There could be localised environmental, community or economic impacts, including possibly a fear of crime, but there is no clear evidence to support this.

Furthermore, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches.

There is no evidence available currently on the prevalence or impacts associated with unauthorised Travelling Showpeople pitches. However, it is possible that Travelling Showpeople could reject the offer of authorised pitches spread around the region and choose unauthorised sites instead. This potential effect remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy and communities.

A benefit to Travelling Showpeople resulting from an Option C approach is the possible increased potential for identification of suitably large sites to accommodate Travelling Showpeople's vehicles and equipment and to address localised issues of access to sites for large numbers of heavy vehicles.

However, it is not clear that promoting an even distribution of Travelling Showpeople pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Travelling Showpeople within a given area will always be relatively small in comparison to the settled community, even if the number of Travelling Showpeople in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Travelling Showpeople and settled communities. If Option C is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Travelling Showpeople, namely access to services and opportunities.

Option C promotes working with the Showman's Guild to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Travelling Showpeople families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Travelling Showpeople to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Travelling Showpeople could become isolated from the rest of the community (many of whom would remain concentrated around Manchester. Option B could result in particular potential for effects to be felt by individual families, whilst Option C would be more likely to result in more insidious impacts on the regions Travelling show people community or communities.

<p>Recommendations</p>	<p>1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.</p> <p>2) Requiring some Travelling Showpeople to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Travelling Showpeople community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.</p>
<p>Appraisal Group Comments</p>	<p>Key comments – Travelling Showpeople</p> <ul style="list-style-type: none"> • Unauthorised sites are rare with travelling showpeople • Distinct from gypsies and travellers – needs to be recognised <ul style="list-style-type: none"> ○ Less deprived • Economic benefits brought to region need to be recognised

Car Parking Standards

<p>Summary</p>	<p>The proposed parking standards are very different from the existing ones in their holistic approach. As well as discouraging the use of the car at sites where there is good accessibility by alternative modes of transport, the proposed standards also encourage the use of other modes of transportation by emphasising the importance of providing bicycle and motorcycle parking; by underlining the need of employers to design travel plans; and by discouraging certain types of development in inaccessible areas (as opposed to promoting that they will require a great deal of car parking).</p> <p>The focus on public transportation and on curbing dependency on the car has two obvious benefits, one is environmental, and the other relates to more equitable accessibility. The proposed standards again take a more holistic approach in promoting equitable access not only by promoting public transportation (which is important for those without access to a private car) but also stipulating bicycle, motorcycle and disabled parking standards.</p> <p>Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of curb parking is associated with increased risk of injury for children¹⁹. In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased risk and occurrence of accidents²⁰. This will also apply to streets</p>
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¹⁹ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). *Journal of Public Health Medicine* 1998;20(4):463-6.

²⁰ Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

	<p>where people use the pavement for accommodating their vehicles. Well managed parking can provide <i>friction</i> and slow the flow of traffic thus giving greater priority to pedestrians²¹. The management of parking is of crucial importance.</p> <p>The Sustainability Appraisal has shown clearly that, in terms of a number of SA Objectives, the proposed parking standards perform better than the existing standards. The appraisal has not highlighted any sustainability trade-offs that must be considered, should the decision be taken to take the new standards forward as the preferred option.</p>
<p>Recommendations</p>	<p>1) The language used in the table related to discouraging certain types of development could possibly be toned down so that it is not so exclusionary. In particular, employment should not be discouraged in locations not accessible by public transportation if it can be demonstrated that parking spaces won't be needed since most employees reside nearby.</p> <p>2) The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW. In particular, the standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments.</p> <p>3) Whilst increasing the provision of public transport should encourage people to use alternatives to the car it is important that the cost of these services supports this approach. We recommend that where possible economic analysis is undertaken to ensure that alternatives to the car are financially competitive.</p>
<p>Appraisal Group Comments</p>	<p>Key comments – Car parking provision</p> <ul style="list-style-type: none"> • People know what they are buying in to • Reconsider recommendation 1 'language need to be toned down' • Careful with recommendation 3 – Park & Ride may be interpreted as the answer and P&R is not always the answer it alludes to be (see minutes) without correct provisos in place • Parking at railways needs consideration and therefore rural regeneration • Car parking standards are very important in the short to medium term as they are achievable, where as large scale transport improvements are not on the immediate horizon • Need stronger/firmer wording and constant dialogue with LAs • Consider housing developments and where parking is located • Consider difference between rural and urban situations, and if there is sufficient evidence to change current policy • Fuel costs is a background element that should be kept in mind

²¹ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

4.2 Habitats Regulations Assessment (HRA)

4.2.1 Habitats Regulations Assessment (HRA) aims to ensure that the integrity of sites of international nature conservation importance²² is not negatively affected by plans such as the North West RSS Partial Review.

4.2.2 A HRA for the Draft North West Plan was prepared in December 2007. The findings of the HRA of the Draft North West Plan informed the HRA of the Partial Review. In particular, the HRA of the Draft Plan identified a range of conditions needed to maintain the integrity of sites of international nature conservation importance. Understanding of these conditions facilitated assessment and direction of the emerging policies that formed part of the Partial Review of the North West Plan.

4.2.3 Initially, the Partial Review planned to address six topics (following recommendations made in the Report of the Panel):

- Strategic renewable locations;
- Location of waste facilities;
- Housing allocation (including rural);
- Gypsies and Travellers;
- Travelling Showpeople; and
- Car Parking Standards.

4.2.4 In this context, it was decided that a primary function of the HRA of the Partial Review would be proactively to suggest locations, and approaches to development, that could help to avoid adverse impacts. The HRA of the Partial Review therefore initially proposed:

- Exploring in more detail potential key impacts that the different forms of development (waste, renewable energy, housing etc.) could have on international sites;
- Making recommendations about how these impacts could be avoided in the selection of broad areas for development; and
- Once broad areas for development had been identified, defining (through maps) the international sites that might be affected by the development 'in combination' with other plans and projects and identifying any necessary avoidance and mitigation measures to ensure that development does not lead to such impacts.

²² Special Protection Areas, Special Areas for Conservation, Ramsar sites and European marine sites

- 4.2.5 These objectives were to be met through a combination of overlay mapping, workshops related to particular sub-regions, and workshops related to specific types of impacts.
- 4.2.6 Once topics 1-3 were excluded from the Partial Review process and instead included in the RS2010 process, much of the planned HRA work became no longer directly relevant to the Partial Review process. The HRA work undertaken up to that point was therefore summarised in a 'Handover Report' which presented the information in a suitable format to inform the (separately commissioned) HRA of the RS2010²³.
- 4.2.7 Meanwhile, the emerging policies associated with the remaining topics (4-6) were subject to HRA screening.
- 4.2.8 Comments were provided at the following stages:

Stage	Date	Summary of comments
Issues and Options	May 2008	<p>General HRA concerns and suggestions, to guide development of draft policies on original six issues, notably:</p> <p>Need for timely provision of adequate infrastructure (water supply, water treatment, green infrastructure etc) associated with new housing in order to avoid potential adverse impacts on international sites.</p> <p>Question on implications of regional-scale waste facilities versus sub-regional facilities.</p> <p>Concern over capacity of the waters around the NW to meet theoretical maximum offshore renewable energy generation targets due to the concentration of international sites, especially estuaries.</p>

²³ Scott Wilson - *Habitats Regulations Assessment of the North West Regional Spatial Strategy Partial Review: Closure Report*, prepared for 4NW, January 2009

Stage	Date	Summary of comments
		There were no comments made on the remaining three issues (Gypsy and Travellers, Travelling Showpeople and Car Parking Standards), as these are not likely to result in significant effects on international sites.
1 st Draft of pitch distribution for Gypsy and Traveller Pitch provision and Travelling Showpeople Pitch provision	November 2008	No HRA concerns or comments.
Interim draft policies (dated 2 January 2009)	January to February 2009	<p>No changes required.</p> <p>Minor comments:</p> <p>Policy RT2 reinforces potential positive air quality effects associated with sustainable transport – no need to emphasise further as adequately explored in previous HRA associated with development of RSS.</p> <p>Suggestion of possible inclusion of EM1 in the cross-referenced policies within Policies L6 and L7 in order to reinforce the need to protect and enhance biodiversity, including international sites.</p> <p>Minor rewording change to supporting text to Policies L6 and L7 for clarity.</p>
Submitted draft policies (dated 29 May 2009)	May to June 2009	No comments.

- 4.2.9 Although care was taken to scrutinise the policies and associated supporting text at each redrafting, only very minor comments were made. Effectively, from Issues and Options stage in May 2008, it was clear that there were unlikely to be significant adverse effects upon international sites from the policies on Gypsies and Travellers, Travelling Showpeople and Car Parking Standards.
- 4.2.10 Tables 7.2 (Scale and Distribution of Gypsy and Traveller Pitch Provision) and 7.3 (Scale and Distribution of Travelling Showpeople Plot Provision) in the draft policies show small numbers of plots per district. The higher numbers of pitches, and these are still relatively small compared with overall residential figures in the North West Plan, generally lie in districts with few or no international sites.
- 4.2.11 The scale of pitch provision and the flexibility associated with the provision of such small numbers of pitches enables us to conclude that significant effects upon international sites of nature conservation importance can be avoided.
- 4.2.12 Thus, no changes to Policies L6, L7 and RT2 were recommended as a consequence of Habitats Regulations Assessment.

4.3 Health Impact Assessment (HIA)

- 4.3.1 Potential effects on health and well being and on health inequalities were considered as part of the early stages of the NW RSS partial review. The assessments were informed by stakeholder workshops along with evidence reviews. Key findings from the assessment of health and well being have informed this report.
- 4.3.2 The workshop on health identified issues and recommendations in relation to car parking standards. Community cohesion is important for public health and for the long term sustainability and the workshop highlighted that attention must be paid to the governance of how decisions are made.
- 4.3.3 Furthermore, the workshops identified that social inequality is an important dimension to the placement of parking facilities and that the placement of facilities can be used to encourage walking for drivers by placing them near, rather than immediately next to, facilities.
- 4.3.4 A number of conclusions can be drawn from the appraisal of the options for the Gypsies and Travellers and the Travelling Showpeople policies. The options appraisal of SA objective 10 (to improve health and mental health and reduce health inequalities) identifies that in general, it is assumed that under any of the options, Gypsies and Travellers will be accommodated in good living environments. The appraisal notes that option B and option C could result in a higher number of unauthorised pitches. The

conclusions for the Travelling Showpeople policy options in relation to SA Objective 10 are the same as for the Gypsies and Travellers policy options.

- 4.3.5 Additionally, the appraisal of the car parking policies against SA Objective 10 identifies that the management of parking is of crucial importance in relation to health and well being.
- 4.3.6 The draft policies for Gypsies and Travellers (L6) and Travelling Showpeople (L7) have a positive effect on improving health and mental health and reducing health inequalities (SA objective 10) due to the locating criteria proposed identified in the background text for each policy. The positive effect should occur both within and outside of the plan period.
- 4.3.7 The draft Car Parking Standards policy also has a positive effect on SA objective 10, but to a lesser extent. It is likely to promote healthier lifestyles through encouraging cycling and other forms of active transport both within and outside of the plan period.

4.4 Equality Impact Assessment (EqIA)

- 4.4.1 Impacts on equality have been considered as part of the Sustainability Appraisal due to the fact that specific objectives within the SA framework are directly related to issues of equality. As such a separate EqIA is not necessary.
- 4.4.2 A number of conclusions can be drawn from the appraisal of the options for the Gypsies and Travellers and the Travelling Showpeople policy options. In relation to SA objective 8 (to reduce social exclusion), option C of the Gypsies and Travellers policy suggests that it can successfully lead to increased social cohesion through determining the distribution of Gypsy and Traveller pitches. The appraisal also highlights that it is important to consider the importance of cohesion within the Gypsy and Traveller community, as this will be a major factor in determining whether they suffer from the effects of exclusion from the wider community.
- 4.4.3 Within the options appraisal for the travelling Showpeople policy against SA Objective 8, Option C also suggests that it can successfully lead to increased social cohesion through determining the distribution of Travelling Showpeople pitches. The options appraisal identified that Option A could perpetuate or worsen any poor relationships between the two communities in the parts of the region where Travelling Showpeople are concentrated.
- 4.4.4 Furthermore, the appraisal of the car parking policy options against SA objective 8 highlights the need to locate employment in places well served by public transportation and stipulates the provision of bicycle parking which would benefit people who cannot afford private transportation.

- 4.4.5 The appraisal of the policy options against SA objective 11 (improve access to good quality affordable and resource efficient housing) highlights that all options promote the same number of Gypsy and Traveller and Travelling Showpeople pitches. However, both options appraisals note that it could be debated whether options B and C promote pitches in locations where they will be suitably accessible to Gypsies and Travellers and Travelling Showpeople.
- 4.4.6 The options appraisal for both the Gypsies and Travellers and the Travelling Showpeople policy options highlight that relative to Option A, Option C is certain to promote acceptance and understanding of Gypsies and Travellers by the settled community and this has the potential to reduce fear of crime amongst Gypsies and Travellers and Travelling Showpeople (SA objective 12).
- 4.4.7 SA objective 13 relates to enabling groups and communities to contribute to decision making. The appraisal highlights how option C for both the Gypsies and Travellers and the Travelling Showpeople policies promote consultation with the Gypsy and Traveller and Travelling Showpeople community but would not ensure that all would have a say in where pitches are located. Furthermore, option A for both policies is deemed to take account of the identified needs and wishes of the Gypsy and Traveller and Travelling Showpeople community in the decision as to how pitches should be distributed. Option B for both states nothing about involving gypsies and travellers or travelling showpeople in decisions about the exact redistribution of pitches.
- 4.4.8 In terms of SA Objective 14 (to develop strong and positive relationships between people from different backgrounds and communities) it is considered that Options B and C of both the Gypsies and Travellers and Travelling Showpeople policies have the potential to generate unauthorised pitches. Option C for both could be more likely to generate unauthorised pitches than Option B because it promotes a distribution of pitches that differs greatly from that promoted by a 'need where it arises' approach.
- 4.4.9 SA objective 15 (to improve access to basic goods, services and amenities for all groups) identifies that In general, it is assumed that under any of the options within both the Gypsies and Travellers and the Travelling Showpeople policies, Gypsies and Travellers and Travelling Showpeople will be accommodated at sites in close proximity to services and facilities and some will be provided on-site. However, Option B and Option C for both policies could result in more unauthorised pitches, which could lead to poor access to services and facilities. Additionally, the appraisal of the car parking policies against this SA objective identifies that both existing and proposed parking standards allow for more parking in less accessible areas. The new parking standards also stipulate parking provision for bicycles, motorcycles and disabled people, allowing for a more equal access to facilities.
- 4.4.10 The sustainability appraisal found that the Draft Policy L6 (Scale and Distribution of Gypsy and Traveller Pitch Provision) has a number of positive effects on a series of SA objectives relating to equality. The draft policy should have a positive impact on

reducing social exclusion (SA objective 8) and improving access to basic goods, services and amenities for all groups (SA objective 15) given the nature of the groups identified in, and benefiting from, this policy. In relation to improving access to good quality affordable and resource efficient housing, the policy makes provision for transit pitches and for the allocation of pitches beyond the review timescale.

- 4.4.11 Furthermore, in assessing Draft Policy L6 against SA objective 12 (to reduce crime, disorder and the fear of crime inequalities) and SA objective 14 (to develop strong and positive relationships between people from different backgrounds and communities), the appraisal recommends that an explicit mention of coexistence between communities should be made for all locations. The assessment of the policy against SA objective 13 (enabling groups and communities to contribute to decision making) recommends that further clarification on the need for engagement and communication with Gypsy and Traveller communities is required within the policy.
- 4.4.12 The sustainability appraisal found that the Draft Policy L7 (Scale and Distribution of Travelling Showpeople Plot Provision) also has a number of positive effects on a series of SA objectives relating to equality. The effects of the policy on the SA objectives are the same as those detailed above in relation to Draft Policy L6.
- 4.4.13 A final observation regarding equality impacts on Draft Policies L6 and L7 is the need to consider Gypsy & Traveller sites and Travelling Showpeople plots as a “normal” housing type that should be treated no different from any other residential allocation. In the past, such sites / plots were sometimes treated differently in local policy with unreasonable clauses placed on such allocations (over and above what would be asked of other housing types).
- 4.4.14 Draft Policies L6 and L7 are clear in their treatment of such sites / plots in that they should not be considered set apart from other housing types and should be treated the same, which is positive in an equality sense. This then relies on the policy being implemented correctly by local authorities so that they also treat such allocations the same as other housing types.

4.5 Assessment of the Draft Policies

- 4.5.1 The assessment of the Draft Policies took place in January / February 2009 and this was updated in June 2009 as the draft policies were amended. Again, the full matrices can be found in Appendix 1, summaries are provided below:

Gypsies and Travellers

- 4.5.2 The options assessment considered three alternative policy approaches to allocating Gypsy and Traveller pitches:
- Option A) Use the results from the Gypsy and Traveller Accommodation Assessment (GTAA) studies to distribute new provision
 - Option B) Modify option (A) to ensure a minimum level of pitch provision in every district
 - Option C) Work to agree a more balanced share of meeting need across districts
- 4.5.3 The assessment found that there were pros and cons to the different options, but that there was some suggestion that Option C – working to achieve a more balanced distribution across districts – would be most likely to achieve significant net benefits. Option C has been taken forward as the basis for developing the preferred policy.
- 4.5.4 The policy sets out a series of statements and requirements that should enable Gypsy and Traveller communities to benefit from increased access to a range of facilities, although in some cases this could be made more explicit. It also identifies the need for transit pitches and is flexible in identifying future provision.
- 4.5.5 While much of the impact of this policy will be determined through the precise location of sites, which will be determined at a local authority level, it is clear that the policy has a positive effect and sets clear guidance for local authorities in identifying sites. In addition, given the relatively small scale, size and number of sites being discussed, in the wider context of development in the region, any effect caused by such sites will be minimal, especially on the region as a whole. Any effects of such sites are generally felt at a local level, if at all, and collectively will have a minimal impact.
- 4.5.6 One issue that has the potential to cause negative effects on sustainability is the ability given to local authorities to allow exception sites for Gypsies & Travellers in the Green Belt. Given the types of locations many Gypsies & Travellers like their sites to be in and the controversy that can be caused by placing sites in urban areas, there may be pressure on local authorities to utilise this ability. Placing sites in the Green Belt (i.e. in more isolated areas) will reduce access to services for Gypsies & Travellers and mean that traffic to and from the sites will have to travel further. Such sites will not be sustainable.
- 4.5.7 It would seem nonetheless that there are adequate provisions in the policy to ensure that the sites are selected appropriately and sustainably. If the policy is implemented correctly by local authorities, the policy only allows exception sites where evidence has

been provided to demonstrate that there are no other suitable sites in the authority's area. Therefore, there should be very few exception sites allocated across the region.

- 4.5.8 The policy should, provided the needs assessment is accurate, provide a suitable level of provision during the lifetime of this plan and beyond. On some of the more qualitative SA objectives it is difficult to ascertain precisely what the impact will be, specifically objective 12 and 14, although the intention of the policy is clearly to have a positive effect on these objectives.
- 4.5.9 Whilst the policy sets out to promote co-existence this is not by any means guaranteed and the policy could make further attempts to encourage, if not require, action to promote coexistence and engage with communities. This ties in neatly with some of the problems identified in SA objective 13. The promotion of coexistence may be facilitated by a greater level of consultation and communication by LPAs in determining the location of the sites.

Travelling Showpeople

- 4.5.10 The options assessment considered three alternative policy approaches to allocating Travelling Showpeople plots:
- Option A) Use the results from the Gypsy and Traveller Accommodation Assessment (GTAA) studies, which also incorporated assessments of the accommodation needs for Travelling Showpeople, to distribute new provision
 - Option B) Modify option (A) to ensure a minimum level of pitch provision in every district
 - Option C) Work to agree a more balanced share of meeting need across districts
- 4.5.11 The assessment found that there were pros and cons to the different options, but that there was some suggestion that Option C – working to achieve a more balanced distribution across districts – would be most likely to achieve significant net benefits. Option C has been taken forward as the basis for developing the preferred policy.
- 4.5.12 The general performance of the policy is in line with that for the Gypsies and Travellers policy, including regarding issues relating to the Green Belt exception policy. However, there are some additional issues.
- 4.5.13 Firstly, the yards or plots of Travelling Showpeople sites are not only used for habitation but also for storage. As the policy points out this presents some planning problems. Essentially the sites will need to accommodate living areas that are suitable when in

close proximity to heavy goods vehicles (HGVs) and other mechanical plant. This provides some risk to the health of the occupants and thus any policy should ensure the safety and health of the occupants by having stringent design measures to separate these different uses.

- 4.5.14 Secondly, but again related to HGVs and plant, there is potential for these sites to cause disturbance in terms of noise, air pollution and visual impacts. There is a potential need for additional guidance on the locational criteria for these sites. Finally, this use of the sites may create a more difficult situation in regard to promoting co-existence in the area.

Car Parking Standards

- 4.5.15 The options assessment considered two alternative approaches to car parking standards. The assessment found clear evidence to suggest that Option A – adopting revised standards – would lead to significantly greater benefits in terms of a range of sustainability objectives than the alternative Option B, which was to keep with the existing standards. Option A has been taken forward as the basis for developing the preferred policy.
- 4.5.16 It is technically quite difficult at this level to provide a detailed assessment of the implications of the new standards as they are decided on a case-by-case basis. However, bearing this in mind, this policy generally performs better than the previous one, essentially due to the fact that there is more ‘granularity’ in the standards.
- 4.5.17 With more accuracy comes greater certainty for developers and assumes an overall reduction in car parking space provision. It could also be assumed that a greater accuracy in allocations could reduce the amount of car parking facilities actually needed and car usage itself (combined with improved public transport provision).
- 4.5.18 Finally, there is a good emphasis on provision for cyclists and other forms of active transport and an emphasis on access for the disabled. It should also be noted that these standards provide one aspect of a multifaceted policy and that it should be seen holistically rather than stand alone.

4.6 Mitigation and Recommendations

- 4.6.1 With regards to Policy L6 (Accommodation for Gypsies and Travellers), there are several recommendations:
- Explicit mention of coexistence should be made for all locations.

- Further clarification on the need for engagement and communication with Gypsy and Traveller communities is required within the policy or, at least, the supporting text.
- The explicit requirement of employment access to be considered when locating sites.

4.6.2 With regards Policy L7 (Accommodation for Travelling Showpeople), there are also several key recommendations:

- The need for further guidance on the locational criteria of Traveller and Showpeople sites should be explored, specifically those that will use HGVs, heavy plant or other noisy / polluting equipment
- Requirements for site design should be clearly set out to ensure health and wellbeing of permanent occupants.
- Explicit mention of coexistence should be made for all locations.
- Greater emphasis on community engagement and consultation.

4.6.3 No mitigation or recommendations are proposed for the car parking standards.

4.6.4 The table below lists further recommendations for the Partial Review in relation to Gypsies & Travellers and Travelling Showpeople:

Further Recommendations

To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home

- Some guidance for local authorities on the time period for which sites are granted planning permission may be required. There are benefits for the Gypsy and Traveller population from long term permissions, but local authorities may seek guarantees that sites can be subject to further development in the future.
- Local Authorities should consider not only CLG's Draft Guidance on the Design of Sites for Gypsies and Travellers: a consultation paper, (May 2007) when designing new sites but also follow the principles set out in other guidance on sustainable design and construction to allow for the highest standards to be met.

Travelling Showpeople sites must be subject to the same level of requirement in terms of good design and construction.

To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment

- As part of the design of sites water saving initiatives such as sustainable urban drainage systems and grey water recycling facilities should be installed especially in areas where there is a water deficit.
- In addition, given that sites allocated on Greenfield land often become permanent, site allocations should be 'future proofed' i.e. allocated based on an understanding of likely future changes in flood risk.

To improve the health and well-being of the population and reduce inequalities in health

- Existing sites should be improved to meet health and safety standards, size standards, facilities for the disabled, access to health care where they may require expansion to meet pitch requirements.
- Local authorities should be directed to consider ways of providing for the specific needs of Gypsies and Travellers and Travelling Showpeople as part of developing their strategic policies on health in partnership with PCTs and other health consultees.
- When promoting health measures such as healthy eating, exercise and other measures for good health Local Authorities should target communities suffering the worst conditions, such as the Gypsy and Traveller community.

To reduce poverty and social exclusion and close the gap between the most deprived areas in the North West and the rest of the region

- In partnership with social services and other relevant consultees and local authorities, there should be a proactive approach to improving the conditions for the Gypsy and Traveller community and the Travelling Showpeople community. Options that tackle the causes of social exclusion and poverty, such as barriers to education, health services and adequate site infrastructure should be addressed.

To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work

- When creating new sites Local Authorities should aim to include requirements for accessibility to educational facilities, including libraries and adult education facilities.

To reduce crime and the fear of crime

- Prior to the opening of new sites Local Authorities could be advised to undertake education and awareness workshops to improve relations between the settled and travelling communities and reduce the fear of crime.

To create and sustain vibrant communities

- When allocating, planning for and designing sites, recognition of the distinctions between the sub groups within different Gypsy, Traveller, and Travelling Showpeople communities (i.e. Romany, Irish and English) will assist in supporting vibrancy. This would also be in keeping with the principles set out in the Race Relations Act, and the Human Rights Act.
- This may include consideration of the size of pitches, improving buffering around existing pitches, and the provision of high quality communal facilities.
- Public sites should also be adequately buffered from the settled community with planting for example to allow for privacy for Gypsy, Traveller and Travelling Showpeople families.
- LPAs are likely to need place tailored initiatives to support the Gypsy, Traveller and Travelling Showpeople communities especially in areas already experiencing high levels of deprivation.

To improve accessibility to all services and facilities

- Policy could be supported by guidance to ensure sites are located in proximity to educational, health facilities, public transport, and other essential facilities in line with CLG guidance.
- Guidance for LPA's should also consider requirements for on-site facilities and infrastructure, including water supply, toilet and washing facilities, drainage and waste facilities and services.
- When developing options for the allocation of Gypsy and Traveller and Travelling Showpeople sites, Local Authorities should host meetings with health, education and other service providers to discuss what measures can be put in place to improve access to these essential facilities.
- In order to facilitate accessible services Local Authorities should be encouraged to carry out some additional research on specific barriers which inhibit the Gypsy, Traveller and Travelling Showpeople communities in order to overcome these. This could help to overcome such barriers.

- Gypsy, Traveller and Travelling Showpeople transit sites should be subject to the same level of facilities, infrastructure and accessibility as permanent sites.

To encourage increased engagement in cultural activity across all sections of the community in the North West

- Further research on Gypsy and Traveller cultures and sub-cultures and traditions by Local Authority cultural services may be beneficial.
- When developing policies on promoting engagement in culture Local Authorities should consider options on how they promote increased awareness and respect for the Gypsy, Traveller and Travelling Showpeople cultures and traditions, as well as improving access for Gypsies, Travellers and Travelling Showpeople to wider cultural activities in the North West.
- Measures to promote the positive cultural traditions of Gypsies and Travellers should be considered, which could lead to further requirements for the provision of facilities on sites.

To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance

- Although a sequential approach should be applied, policy should avoid limiting the search for Gypsy and Traveller and Travelling Showpeople sites to brownfield land. The planning process will determine at the local level the most appropriate and efficient use of land given the pressures for settled accommodation and the complex needs of the Gypsy, Traveller and Travelling Showpeople communities.

To conserve and enhance the region's biodiversity

- The allocation of sites should be in accordance with PPS9 and other national, regional, and local Biodiversity Action Plans.
- Ability to provide for appropriate grazing areas should be considered when allocating sites.

To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment

- It will be important that sites are allocated in accordance with PPG16 (Archaeology), PPS9 (Biodiversity and Geological Conservation), PPS7 (Sustainable Development in

Rural Areas) and other relevant guidance

- It is likely that one of the main concerns regarding Gypsy and Traveller and Travelling Showpeople sites will be their visual intrusion on the surrounding countryside. Measures such as natural screening and landscaping of sites could mitigate these concerns.

To reduce waste generation and disposal and achieve the sustainable management of waste

- When designing Gypsy and Traveller and Travelling Showpeople sites, Local Authorities should work in partnership with the local waste services to include the most appropriate waste recycling and composting facilities to assist in meeting local targets.
- Any local promotional campaigns to encourage recycling and composting should also be targeted towards the Gypsy, Traveller and Travelling Showpeople communities to increase the levels of recycling and composting.

To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region

- Local authorities, when developing education, training, skills, employment and other related policies, should work with education providers to help improve access to those least likely to access skills training, such as the Gypsy and Traveller community.

4.7 Monitoring

- 4.7.1 The SEA Directive includes a specific requirement for monitoring the significant environmental effects of plans and programmes and the Environmental Report on the assessment (incorporated within the SA Report) should include a description of the measures envisaged for monitoring the plan.
- 4.7.2 Government guidance on the development of Regional Spatial Strategies Planning Policy Statement (PPS) 11 states that “in order to help focus on the key actions that are necessary to deliver the strategy, policies should be quantified and output targets and indicators set” wherever practicable. The guidance also advises that it’s “important that progress against the output targets is monitored as a key element of the annual monitoring report”. Contextual indicators should also be monitored. As previously mentioned, as part of the wider SA, and as required by the SEA Directive, “the significant effects of the RSS on society and the economy, as well as on the

environment, need to be assessed and monitored”²⁴. Detailed guidance for RSS monitoring can also be found in *Regional Spatial Strategy Monitoring: A Good Practice Guide*²⁵.

4.7.3 The monitoring framework in the consolidated SA report of the North West RSS comprises four tiers of indicators to assess progress towards the RSS vision. It should be noted that the RSS is also subject to monitoring. Proposals for implementing and monitoring the sustainability effects of the North West Plan are set out in its Implementation and Monitoring framework.

4.7.4 The following indicators are drawn from the Monitoring Framework and are applicable to measuring the performance of the policies set out in the Partial Review:

Table 10: Relevant Monitoring Indicators from the North West RSS Sustainability Appraisal (Table 7: Monitoring Framework)

Indicator	Target	Source
Journey to work by mode	By 2010, increase bus use by 10%, rail by 50% (passenger kms), DFT Ten Year Transport Plan	Department for Transport
Percentage of people who agree that their local area is a place where people from different backgrounds get on well together	Increase	National Indicator 1 (NI1), CLG
Access to services and facilities by public transport, walking and cycling	Increase	National Indicator 175 (NI 175), CLG

4.7.5 In addition, the document “*Regional Spatial Strategy and Local Development Framework: Core Output Indicators – Update 2/2008*” (CLG) identifies a further indicator

²⁴ Office of the Deputy Prime Minister (2004) *Planning Policy Statement 11: Regional Spatial Strategies* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps11>

²⁵ Office of the Deputy Prime Minister (2005) *Regional Spatial Strategy Monitoring: A Good Practice Guide* [online] available at: <http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps11>

of great relevance to the Partial Review. This is simply the “**Net additional pitches (Gypsy and Traveller)**” count which can be sourced from CLG or Local Authorities. This indicator can be directly compared against the targets set in the Partial Review.

- 4.7.6 In addition to this 4NW still collect the recently removed Core Output Indicator 3a 'Percentage of new non residential development (minimum gross floorspace 1,000 sq.m) complying with regional car parking standards set out in the Regional Spatial Strategy'.

4.8 Conclusions

- 4.8.1 In the SA of the options for the Partial Review it was concluded that, in terms of Gypsies and Travellers and Travelling Showpeople, the issues are complex and there is a need to make tough decisions that will require substantial trade-offs between sustainability objectives. In terms of Car Parking Standards, it is very clear that a more sophisticated approach is supportive of wider efforts to reduce dependency on the car as well as bringing about a range of other social benefits.
- 4.8.2 The preferred options taken forward were all found to be generally sustainable, although specific issues regarding the policies for Gypsies and Travellers and Travelling Showpeople were raised. These can be rectified through the wording of policy or inclusion of guidance for Local Authorities on particular issues.
- 4.8.3 In relation to cumulative effects, no significant effects have been identified. The selection of Option C to inform the policies developed for both Gypsies and Travellers, and Travelling Showpeople mean that sites should be spread throughout the region, reducing the possibility of cumulative impact of several sites in one area. It also limits the likelihood of cumulative impacts with other uses, although the cumulative effect of how Local Authorities apply regional policy will need careful consideration to ensure that, in any given location, a cumulative effect is not created together with other uses.

5 Next Steps & Consultation

- 5.1.1 The Partial Review of the North West Regional Spatial Strategy (the RSS) will be submitted in July to the Secretary of State as a draft document for consultation. The next steps for the plan are, in summary:
- a 12 week formal public consultation in Summer 2009;
 - an Examination in Public (EiP) to debate the draft policies, expected to take place in March 2010; and
 - formal public consultation on any Secretary of State's Proposed Changes (which will be published after the publication of the Examination in Public Panel report).
- 5.1.2 Once all the stages noted above have concluded, the policies in the Partial Review will then be published as part of a revised Regional Spatial Strategy.
- 5.1.3 This SA Report will be consulted upon alongside the Partial Review document itself and made available for consultation with the public, stakeholders and statutory consultees.
- 5.1.4 The requirements for consultation arises from the guidance and the regulations:

"To meet the requirements of the SEA Directive, the RPB must seek the views of the three statutory environmental consultation bodies designated in the SEA Regulations (English Heritage, Natural England and the Environment Agency) on the scope and level of detail of the environmental information to be included in the SA Report. It is also desirable for other relevant bodies to be consulted as the RPB considers appropriate, with a balance between those concerned with social, environmental and economic issues."

Sections 2.2.20 SA of Regional Spatial Strategies and Local Development Documents, DCLG 2005

"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies" (Statutory Consultees)"

Article 12 (5) The Environmental Assessment of Plans and Programmes Regulations 2004

Where a consultation body wishes to respond to a consultation under para (5), it shall do so within the period of 5 weeks...)

Article 12 (6) The Environmental Assessment of Plans and Programmes Regulations 2004



Appendix 1: Appraisal Matrices

Key Assumptions

Screened out / in. Given that some of the more significant spatial elements of the plan, it is worth looking at the SA Framework to see which objectives can be screened out as not being linked to the policies being appraised.

x	Objective not linked	++	Strongly positive effect	+	Positive effect	-	Negative effect	--	Strongly negative effect	?	Uncertain effect	0	Insignificant effect	✓	Occurs in this timescale
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Gypsies and Travellers - Options

Gypsies and Travellers

The Government has made clear that it views this issue as an integral part of the wider housing agenda to tackle affordability and homelessness issues. The Partial Review will set out separate figures for Gypsies & Traveller for each district, on the required provision (number of pitches). The Partial Review of RSS will be informed by the results of a series of Gypsy and Traveller Accommodation Assessments (GTAA's) undertaken in the region. The North West GTAA identifies total additional residential need for each sub-region. In addition the GTAA identifies need for the development of a number of transit pitches in order to cater for the seasonal increases in travelling needs of the Gypsies and Traveller population.

However these figures should not be interpreted directly into the policy provision of pitches across the region. The methodology used in the GTAA's was based on CLG guidance and best practice. This has been done on a 'need where it is seen to arise' basis. Thus findings reflect the historical inequalities in pitch provision. Therefore, there is a tendency when the need for additional accommodation is assessed, for the needs assessment to further compound existing inequalities in site provision. For example, authorities which already provide Gypsy and Traveller accommodation (publicly or privately) are assessed as having greater need for additional pitch provision than authorities with little or no pitch provision.

SA Objective	Option A) Use the results from the studies to distribute new provision	Option B) Modify (a) to ensure a minimum level of pitch provision in every district	Option C) Work to agree a more balanced share of meeting need across districts	Comments
1. To reduce the disparities of sub-regional economic assemblies	0-	0+	0+	Effects are unlikely to be significant. However, if authorised Gypsies and Traveller sites are concentrated in a part of the region that already suffers from economic deprivation then this could potentially act, to a small degree, to perpetuate economic problems and hinder efforts to achieve economic regeneration.
2. To exploit the growth potential of business sectors	x	x	x	Gypsies and Travellers will have no effect on the growth potential of key economic sectors at the regional scale.
3. To develop and market the region's image	0-	0?	0+	If authorised Gypsies and Traveller sites are concentrated in one authority (Option A) then the image of that authority could suffer. However, it is unlikely that this effect would be significant at the regional scale. A balanced spread of sites (Option C) would certainly ensure that the image of the region or authorities does not suffer. Option B is an intermediary between A and C in terms



				<p>of the balance of Gypsies and Travellers in the region.</p> <p>Option B and Option C, could have the potential to increase the number of unauthorised pitches, and unauthorised pitches are more likely to impact upon local environmental quality. However, this effect is uncertain and would be localised.</p>
4. To deliver urban renaissance	0?	0?	0?	<p>These options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in an authority that has a trend of towns in need of urban renaissance could hinder such renaissance to a very minor degree. At the same time, however, Option B and Option C, could have the potential to increase the number of unauthorised pitches, and unauthorised pitches are more likely to impact upon local communities and economies.</p>
5. To deliver rural renaissance	0-	0+	0+	<p>These Options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in an authority that is characterised by rural villages and service centres in need of renaissance could have the effect of hindering renaissance to a very minor degree. In particular Gypsies and Travellers have the potential to put additional strain on services and facilities in small rural settlements.</p>
6. To secure economic inclusion	+?	-?	-?	<p>It must be assumed that in some instances Gypsies and Travellers will have chosen to live where they live for economic reasons. Options B and C promote distributing Gypsies and Travellers to parts of the region other than where they have chosen to live currently. This could, in theory, have negative effects on the economic fortunes of the Gypsy and Traveller community. In practice, however, Gypsies and Travellers may be less economically tied to a certain area than members of the settled population or indeed members of the Travelling Showpeople community.</p> <p>Redistributing Gypsies and Travellers across the region in a 'balanced' fashion, as promoted by Option C, could have a particularly significant effect. However, this could be mitigated by the fact that Option C promotes consultation with the Gypsy and Traveller community.</p>



<p>7. To develop and maintain a healthy labour market</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The distribution of Gypsy and Traveller pitches will have no significant effect on the labour market at the regional scale.</p> <p>In terms of the effects on participation and attainment in education amongst Gypsies and Travellers, this will depend, primarily, on the proportion of Gypsies and Travellers living in authorised sites. Authorised sites will tend to be located where there is adequate access to education. Furthermore, Gypsies and Travellers living on authorised sites will be more likely to settle in one place for a longer period of time.</p> <p>However, there are other complicating factors that determine whether Gypsy and Traveller children are likely to attend and perform well at school such as the degree to which they are bullied and accepted more generally. These factors will be related to the perception of Gypsies and Travellers amongst the local settled community. It is likely that Option C, and to a lesser extent Option B would be most likely to promote good relations between the two communities.</p> <p>The overall result is that none of the options are guaranteed to have a significant effect, and any effects are very uncertain.</p>
<p>8. To reduce social exclusion</p>	<p>?</p>	<p>?</p>	<p>?</p>	<p>Option C suggests that it can successfully lead to increased social cohesion through determining the distribution of Gypsy and Traveller pitches through “working with sub-regional partnerships and the Gypsy & Traveller Community [to] agree a more balanced share of meeting need across districts.”</p> <p>It is expected that the benefits described would primarily come as a result of improved chances for successful integration between the settled and Gypsy and Traveller communities. This is in contrast to Option A, which could perpetuate or worsen poor relationships between the two communities in the parts of the region where Gypsies and Travellers are concentrated.</p> <p>However, it is also important to consider the importance of cohesion within the Gypsy and Traveller community, as this will be a major factor in determining whether they suffer from the effects of exclusion from the wider community. It is possible that enforcing a ‘more balanced’ distribution across the region could result in social networks between Gypsy and Traveller families being stretched to breaking point, as families make the tough decision to move further away from one another in order to access a pitch on an authorised site. This effect would occur under</p>

				Option B and C.
9. To reduce the need to travel improve choice of use and use of sustainable transport modes	0+	0-	0-	A significant factor considered by Gypsies and Travellers when determining where they live is seasonal and more regular travel patterns. Promoting a distribution of Gypsies and Traveller pitches other than that which results from identified need could increase travel distances. However, it is important to remember that this effect will be felt by Gypsies and Travellers in terms of the distance they need to travel, but in terms of effects on total road travel (the concern of this SA Objective) effects will not be significant.
10. To improve health and mental health and reduce health inequalities	0+	0-	0-	The scale of health inequality between the Gypsy Traveller population and the UK general population is large, with reported health problems between two and five times more prevalent. Accommodation was the overriding factor, mentioned by every respondent, in the context of health effects. Issues include security of tenure, access to services and ability to register with a GP, support and security of being close to extended family, a non-hazardous environment and the notion of freedom for the children. In general, it is assumed that under any of the options Gypsies and Travellers will be accommodated in good living environments. If this is achieved and maintained it will contribute to health improvement: health practitioners cite a range of health issues experienced by Gypsies and Travellers "that are attributed partly to adverse environmental conditions: accidents, gastro-enteritis, upper respiratory infections and otitis media" ²⁶ . Poor access to health care services is a factor in poor health outcomes for Gypsies and Travellers. Travellers face discrimination in access to health care ²⁷ , this can arise as a result of NHS staff prejudice ²⁸ and is also associated with enforced mobility ²⁹ . However, Option B and Option C could result in a higher number of unauthorised pitches. Gypsies and Travellers living in unauthorised pitches are less likely to have good access to health

²⁶ Parry,G., Van Cleemput, P., Peters, J., Walters, S., Thomas, K., Cooper, C. Health status of Gypsies and Travellers in England. Journal of Epidemiology and Community Health 2007; **61**: 198-204

²⁷ Lynch, E. Travellers' Tales. Nursing Standard June 21 vol 20 no 41 2006

²⁸ Bowers, J. Travellers' Tales. Health Service Journal 16 December 2004

²⁹ Webster,L. A report for the Children's Society on the impact of the Criminal Justice and Public Order Act on the lives of Travellers and their children. 1995

				<p>and social care, education and other services and more likely to experience tension with the settled communities. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. This may be detrimental to good access to services, to the ability to live close to extended family and to relations with the settled community. It is possible that adverse effects could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C. This approach should be integral to each option and it requires long-term commitment of proper resources.</p>
<p>11. Improve access to good quality affordable and resource efficient housing</p>	<p>+</p>	<p>?</p>	<p>?</p>	<p>All options promote the same number of Gypsy and Traveller pitches. However, it could be debated whether Options B and C promote pitches in locations where they will be suitably accessible to Gypsies and Travellers. Option C promotes a distribution that is significantly different to that which would be delivered through a 'need where it arises' approach, and so could have significant effects on Gypsy and Traveller communities. However, this effect will be mitigated, to a degree, through working with the Gypsy and Traveller community to determine sub-regional allocations.</p>
<p>12. To reduce crime, disorder and the fear of crime inequalities</p>	<p>-</p>	<p>+</p>	<p>++</p>	<p>Gypsies and Travellers sites can, in many instances, generate a fear of crime amongst the local settled community. The degree of fear is likely to be correlated to the number of Gypsy and Traveller pitches and sites in the vicinity. It is unlikely to be strongly correlated to whether sites are authorised or unauthorised, although over time there is the potential for fear of crime to decrease if integration between the two communities leads to mutual understanding, which is more likely to occur with authorised sites. It is also important to consider that Gypsies and Travellers can be the victim of crime in areas where there is animosity towards them.</p> <p>Relative to Option A, Option C is certain to promote acceptance and understanding of Gypsies and Travellers by the settled community. This has the potential to reduce fear of crime amongst the settled and Gypsy and Traveller communities.</p> <p>There might be the potential for fear of crime (negative effects) associated with authorised sites to decrease over time.</p>

<p>13. To enable groups and communities to contribute to decision making</p>	?	-	?-	<p>Option C promotes consultation with the Gypsy and Traveller community, but at the same time it is not clear that this would be effective in terms of ensuring all Gypsies and Travellers have a voice and a say in where pitches are located. Furthermore, Option C starts from the premise that there will be a 'balanced' distribution throughout the region, and so it might be the case that any further decisions on sub-regional allocations are concerned with fine-tuning allocations only.</p> <p>Option A promotes a distribution determined by a 'need where it arises' approach, and so it is deemed that it takes accounts of the identified needs and wishes of the Gypsy and Traveller community in the decision as to how pitches should be distributed.</p> <p>Option B promotes a distribution of pitches other than that which would meet the needs of the Gypsy and Traveller community, and states nothing about involving them in decisions about the exact redistribution.</p>
<p>14. To develop strong and positive relationships between people from different backgrounds and communities?</p>	-?	?	+?	<p>It is likely that a more balanced distribution of Gypsies and Travellers would reduce the net animosity felt towards them by the settled community and so there would be greater potential for positive relationships to develop between the two communities.</p> <p>However, in terms of this SA Objective it is also important to consider that Options B and C have the potential to generate unauthorised pitches. A harmonious relationship between the two communities is much less likely where Gypsies and Travellers live in unauthorised pitches.</p> <p>Option C could be more likely to generate unauthorised pitches than Option B because it promotes a distribution of pitches that differs greatly from that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p>
<p>15. To improve access to basic goods, services and amenities for all groups</p>	0+	0-	0-	<p>In general, it is assumed that under any of the options Gypsies and Travellers will be accommodated at sites in close proximity to services and facilities and some services and facilities will be provided on-site.</p> <p>However, Option B and Option C could result in more unauthorised pitches. Gypsies and Travellers living in unauthorised pitches are more likely to suffer from poor access to</p>



				<p>services and facilities. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. This effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p>
<p>16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The concentration of Gypsies and Travellers in a particular area (Option A) could have a cumulative effect on the landscape character of that area, although the effect would be far less likely if Gypsies and Travellers are accommodated in authorised sites as opposed to unauthorised sites.</p> <p>Option B and Option C could result in more unauthorised pitches. Unauthorised pitches are more likely to impact upon local landscapes. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p> <p>It is impossible to say that authorised sites, even acting cumulatively, can impact upon a particular landscape. Furthermore, it is impossible to say that the number of unauthorised pitches that could be generated by Options B and C would be enough to have a significant effect on any particular landscape. Therefore effects are judged as insignificant and uncertain.</p>
<p>17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>The concentration of Gypsies and Travellers in a particular area (Option A) could have a cumulative effect on the landscape character and biodiversity of that area, although the effect would be far less likely if Gypsies and Travellers are accommodated in authorised sites as opposed to unauthorised sites. Authorised sites could have an impact on biodiversity if horses are kept by the Gypsies and Travellers, and grazed in inappropriate locations.</p> <p>Option B and Option C could result in more unauthorised pitches. Unauthorised pitches are more likely to impact upon local landscapes and biodiversity. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a</p>



				<p>'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p> <p>It is impossible to say that authorised sites, even acting cumulatively, can impact upon a particular landscape or biodiversity value at the regional scale. Furthermore, it is impossible to say that the number of unauthorised pitches that could be generated by Options B and C would be enough to have a significant effect on any particular landscape or biodiversity at the regional scale. Therefore effects are judged as insignificant and uncertain.</p>
<p>18. To protect and improve local environmental quality</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>Unauthorised sites can have significant negative effects on local environmental quality. Negative effects will be much less likely to result from authorised sites, and for the purposes of this assessment it is assumed that such effects would be negligible.</p> <p>Option B and Option C could result in more unauthorised pitches, which are more likely to impact upon local environmental quality. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.</p> <p>Effects will be localised and the magnitude of the effect means that effects will not be significant at the regional scale.</p>
<p>19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>Unauthorised sites have the potential to impact upon designated biodiversity. However, the effects of these options are unlikely to be significant as the majority of effects will be determined by decisions on the specific locations of sites.</p> <p>Option B and Option C could result in more unauthorised pitches, which are more likely to impact upon designated biodiversity. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach.</p> <p>However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C. The effects of any one of these options is unlikely to be</p>

				significant as the majority of effects will be determined by decisions on the specific locations of sites.
20. To protect and improve the quality of inland and coastal waters	*	*	*	No effect
21. To protect and improve air quality	*	*	*	Gypsies and Travellers are heavily reliant on transport by private car, but none of these options will have any effect on air quality.
22. To restore and protect land and soil	*	*	*	Unauthorised pitches have the potential to impact upon land and soil, but this effect is considered as part of the assessment against SA Objective 24.
23. To mitigate and adapt to climate change	0+	0-	0-	Options B and C could result in Gypsies and Travellers living in areas where they would not choose to otherwise live, with the effect that net distances travelled by private car could increase. However, effects in terms of climate change are not likely to be significant.
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	0+	0-	0?	Option B and Option C could result in more unauthorised pitches, which are more likely to make inefficient use of land. Option C could be more likely to generate unauthorised pitches than Option B because it promotes distribution of pitches that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Gypsy and Traveller community" promoted by Option C.
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	*	*	*	No effect
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste	*	*	*	Waste is less likely to be managed in a sustainable and efficient pattern at unauthorised sites, although these effects will have no significant effect in terms of this SA Objective.



production and increase re-use, recycling and recovery				
<p>Summary</p>	<p>It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating pitches throughout the region on a 'need where it arises' basis. Currently, Gypsies and Travellers are not evenly spread throughout the region (although they are spread more evenly throughout the region than is the case for Travelling Showpeople). Option A will reinforce this unequal distribution, whilst Option C will distribute new pitches for Gypsies and Travellers throughout the region in a more 'balanced' fashion.</p> <p>It is likely that there would be benefits for local communities to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Gypsy and Traveller pitches as these areas would avoid any further concentration of pitches (as is promoted by Option A). A high concentration of Gypsy and Traveller pitches could generate some negative sustainability effects that would impact upon the receiving environment, community or economy. A particularly significant effect is worsening social relations between the Gypsy and Traveller community and the settled community in the area, signified for example, in concerns about crime levels.</p> <p>It is important to consider that many effects felt by the receiving environment and settled community in the vicinity of Gypsy and Traveller pitches may be insignificant or non-existent if pitches are authorised as it can be assumed that authorised pitches are sensitively located. Furthermore, any negative effects associated with new authorised sites have the potential to decrease over time, as it is more likely that there will be the potential for harmonious relationships and cultural understanding to develop between the settled and Gypsy and Traveller communities.</p> <p>For these reasons, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised pitches. However, it is difficult to predict with any certainty whether this will occur as evidence does suggest a strong preference for permanent pitches, with a preference for authorised sites, a resort to privately owned unauthorised sites where an authorised pitch cannot be obtained and a final resort to unauthorised encampments. Gypsies and Travellers are currently more dispersed around the region than is the case for Travelling Showpeople, and so it might be suggested that promoting a <i>more</i> balanced dispersal would be something that Gypsies and Travellers find acceptable, although this suggestion needs to be confirmed with hard evidence. The potential for unauthorised pitches remains uncertain, but what is certain is that unauthorised pitches are much more likely to negatively impact upon the receiving environment, economy</p>			

and communities

It might also be argued that perpetuation of the current uneven balance may not be in the interests of the Gypsy and Traveller community in terms of their equal access to services and opportunities. Option C states that it:

“would see pitch provision distributed to meet the requirements for Gypsies and Travellers, so that they had the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community, and thus contribute towards community cohesion and sustainable communities.”

However, it is not clear that promoting an even distribution of Gypsy and Traveller pitches, as opposed to a distribution of new pitches that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Gypsies and Travellers within a given area will always be relatively small in comparison to the settled community, even if the number of Gypsies and Travellers in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new pitches must come forward quickly and in areas where there are acceptable relations between the Gypsy and Traveller and settled communities. If Option C is the Option most capable of delivering new pitches in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Gypsies and Travellers, namely access to services and opportunities.

Option C promotes working with the Gypsy and Traveller community to determine the exact regional allocation. However, it also promotes starting from the premise that pitches will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Gypsy and Traveller families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Gypsies and Travellers to live in parts of the region that are a long-way from where they would ideally choose to live, with the effect that some Gypsies and Travellers could become isolated from the rest of

	<p>the community. Option B could result in particular potential for effects to be felt by individual families.</p> <p>In conclusion, Option C, developed and implemented, could achieve a more sustainable outcome for all, but developed and implemented badly, could have damaging effects on the Gypsy and Traveller community.</p>
Recommendations	<ol style="list-style-type: none">1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.2) Requiring some Gypsies and Travellers to relocate to parts of the region that are a significant distance from where they would ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Gypsy and Traveller community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Gypsies and Travellers – Draft Policies

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
1. To reduce the disparities of sub-regional economic assemblies									
1a. Will it provide job opportunities in areas with residents most at need	x								
1b. Will it reduce economic disparities within the region and with other UK regions?	x								
2. To exploit the growth potential of business sectors									
2a. Will it increase employment opportunities within the region?	x								
2b. Will it help to diversify the regions economy?	x								
2c. Will it promote growth in key sectors	x								



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			Urban	Rural					
of the regional economy?									
2d. Will it help to develop the regions knowledge base?	x								
2e. Will it increase the economic benefit derived from the regions natural environment?	x								
3. To develop and market the region’s image									
3a. Will it support the preservation and/or enhancement of high quality built, natural and historic environments within the region?	x								
3b. Will it promote the area as a destination for short and long term visitors,	x								

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			Urban	Rural					
for residents and investors.									
4. To deliver urban renaissance									
4a. Will it improve economic, social and environmental conditions in the most deprived areas and most deprived groups?	✓		+	+	0	✓	✓	+	As recognised in the background text, there has been persistent issue in regard to the shortage of suitable accommodation for the Gypsy and Traveller community. The provision of additional pitches, with the requirement for better access to health, education and employment facilities should alleviate environmental conditions. The identification of the need for transient pitches and the subsequent additional allowance should allow for the more mobile and underrepresented groups within this community to be catered for.
4b. Will it improve quality of the built and historic environment	✓		?	?	0	✓	✓	+	It is difficult to determine the precise nature of this impact given the siting and design of sites will be at the LDD level. However, we believe it is fair to say that given the requirements of Circular 01/2006 and the

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			Urban	Rural					
									increased standards enforceable on authorised sites, there should be positive impacts.
4c. Will it improve the quality of public open space?	x								
5. To deliver rural renaissance									
5a. Will it support rural diversification?	x								
5b. Will it support and encourage the growth of rural businesses?	x								
5c. Will it retain and promote the economic growth of market towns?	x								
5d. Will it retain and promote access to village services?	x								
6. To secure economic inclusion									
6a. Will it meet the employment needs of local	✓		+	+	0	✓	✓	+	Given the specific mention of access to employment in the supporting text it could

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			Urban	Rural					
people?									be inferred that the policy will address this, although it is not obvious. Recommendation: The explicit requirement of employment access to be considered when locating sites.
6b. Will it improve physical accessibility to jobs with the location of sites and/ or public transport links being closer to areas of high unemployment ?	✓		+	+	0	✓	✓	+	Given the specific mention of access to employment in the supporting text it could be inferred that the policy will address this, although it is not obvious. Recommendation: The explicit requirement of employment access to be considered when locating sites.
6c. Will it encourage business start-up especially from women and BME groups?	✓		?	?	0	✓	✓	?	Unknown, particularly the effect amongst other groups. However, there is provision in para. 10 for the identification of sites suitable for mixed use development which may encourage business start-ups within the Gypsies & Travellers community.
7. To develop and maintain a healthy labour market									
7a. Will it address the	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating

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			Urban	Rural					
skills gap and enable skills progression?									criteria defined in background text.
7b. Will it increase the levels of participation and attainment in education?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
7c. Will it provide a broad range of jobs and employment opportunities?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
8. To reduce social exclusion									
8a. Will it reduce poverty and social exclusion in those areas and communities most affected? (particularly BME people, LGBT, Faith Groups and Rural Communities).	✓		+	+	0	✓	✓	+	Should have positive impacts given the nature of the groups identified in, and benefiting from, this policy.
9. To reduce the need to travel improve choice of use and use of sustainable transport modes									
9a. Will it reduce car and	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating

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			Urban	Rural					
lorry traffic?									criteria defined in background text.
9b. Will it encourage walking, cycling and equal access to and use of public transport?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
9c. Will it reduce freight movement?	✗								
9d. Will it improve equal access to and encourage the use of ICT?	✗								
10. To improve health and mental health and reduce health inequalities									
10a. Will it reduce deaths in key vulnerable groups?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
10b. Will it promote healthier lifestyles?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
10c. Will it reduce health inequalities among different	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.

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groups in the community?									
10d. Will it reduce isolation for vulnerable people?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
11. Improve access to good quality affordable and resource efficient housing									
11a. Will it provide an appropriate mix of housing to meet all residents needs including affordable?	x								
11b. Will it reduce the number of unfit and empty homes?	x								
11c. Will it support the development and operation of resource efficient housing?	x								
11d. Will it meet the accommodation needs of gypsies and	✓		++	++	0	✓	✓	++	This policy's aim is to provide for sites where Gypsies and Travellers have decent accommodation. It is noted

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			Urban	Rural					
travellers, in line with Race Equalities requirements?									that there is a need for 'rural exception sites' in the supporting text. It is also noted that the policy makes provision for transit pitches and for allocation of pitches beyond the review timescale. Table 7.2 sets out the spatial distribution of site allocations across the Districts of the North West. Provided this is in accordance with identified need and enables access to services and employment opportunities, this should be appropriate.
12. To reduce crime, disorder and the fear of crime inequalities									
12a. Will it reduce actual levels of crime (including hate crime)?	✓		?	?	0	✓	✓	?	As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to 'countryside locations' – and the policy itself refers to working with "settled communities" to achieve levels of provision. Recommendation: Explicit

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			Urban	Rural					
									mention of coexistence should be made for all locations.
12b. Will it reduce the fear of crime?	✓		?	?	0	✓	✓	?	<p>As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision.</p> <p>Recommendation: Explicit mention of coexistence should be made for all locations.</p>
12c. Will it reduce prejudice (racial, homophobic, gender or age related)?	✓		?	?	0	✓	✓	?	<p>As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision.</p> <p>Recommendation: Explicit mention of coexistence should be made for all</p>

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			Urban	Rural					
									locations.
13. To enable groups and communities to contribute to decision making									
13a. Will it identify and engage with hard to reach stakeholders?	✓		+	+	0	✓	✓	+	<p>The policy does refer to the need to “work with ... local Gypsies & Travellers and settled communities, to achieve levels of provision required by 2016”.</p> <p>However, the need to engage with hard to reach stakeholders could be stressed more specifically and made a requirement in identifying sites in the policy.</p> <p>Recommendation: Further clarification on the need for engagement and communication with Gypsy and Traveller communities is required within the policy</p>
13b. Will it encourage wider community involvement in design, or the provision of services?	✓		+	+	0	✓	✓	+	<p>The policy does refer to the need to “work with ... local Gypsies & Travellers and settled communities, to achieve levels of provision required by 2016”.</p> <p>However, the need to encourage involvement in design and provision of services could be stressed more specifically and made a requirement in identifying</p>

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									sites in the policy. Recommendation: Further clarification on the need for engagement and communication with Gypsy and Traveller communities
13c. Will it enable the community to contribute to and have influence in decision-making and be involved in implementation ?	✓		+	+	0	✓	✓	+	The policy does refer to the need to “work with ... local Gypsies & Travellers and settled communities, to achieve levels of provision required by 2016”. However, the need to engage with the community could be stressed more specifically and made a requirement in identifying sites in the policy. Recommendation: Further clarification on the need for engagement and communication with Gypsy and Traveller communities
14. To develop strong and positive relationships between people from different backgrounds and communities?									
14a. Will it create a sense of belonging and well-being for all members of the community?	✓		?	?	0	✓	✓	?	As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers

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									to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
14b. Will it support community development?	✓		?	?	0	✓	✓	?	As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
14c. Will it improve relations between all groups and religions (including between gypsies and travellers and settled	✓		?	?	0	✓	✓	?	As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve

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communities)?									levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
14d. Will it reduce prejudice (racial or homophobic)?	✓		?	?	0	✓	✓	?	As the actual siting of the pitches is down to LDDs this is difficult to determine. However, para 9 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
15. To improve access to basic goods, services and amenities for all groups									
15a. Will it improve equal access to cultural, sporting and leisure facilities including natural green spaces?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.

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			Urban	Rural					
15b. Will it improve equal access to essential services and facilities, including for gypsies and travellers?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
15c. Will it improve the range and quality of cultural, sporting and leisure facilities and equal access to them?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
15d. Will it improve equal access to basic goods, promoting the use of those that are locally sourced?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.									
16a. Will it protect and enhance the character and	x								



Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens and their settings?									
16b. Will it improve access to buildings of historic/ cultural value?	x								
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region									
17a. Will it protect and enhance the character and appearance of the regions townscape and countryside maintaining and strengthening local distinctiveness and sense of place?	x								
17b. Will it protect and enhance the biodiversity of	x								

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
the regions landscapes?									
17c. Will it protect and enhance the accessibility of the landscape across the region?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
17d. Will it protect and enhance the tranquillity of the region's landscapes?	✗								
18. To protect and improve local environmental quality									
18a. Will it reduce light and noise pollution and graffiti?	✗								
18b. Will it redress environmental inequalities within region's urban and/or rural areas?	✗								
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.									
19a. Will it protect and	✗								

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
enhance existing designated European, national and regional wildlife and geological sites and species populations?									
19b. Will it protect and enhance habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?	x								
20. To protect and improve the quality of inland and coastal waters									
20a. Will it reduce or manage flooding?	x								
20b. Will it maintain and enhance ground and surface water	x								

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
quality?									
20c. Will it improve the quality of costal waters?	x								
21. To protect and improve air quality									
21a. Will it maintain and improve air quality?	x								
21b. Will it address the causal factors of poor air quality in AQMAs?	x								
22. To restore and protect land and soil									
22a. Will it reduce the amount of derelict, contaminated, degraded and vacant/ underused land?	✓		?	?	0	✓	✓	?	Generally unknown, although it is feasible that areas where derelict, vacant or underused land is available could be utilised for sites. However, it seems unlikely that contaminated or degraded land would be suitable given the risks to health and the cost or remediation.

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
22b. Will it encourage the development of brownfield land in preference to Greenfield?	x								
22c. Will it reduce the loss of good soils to development?	x								
22d. Will it maintain and enhance soil quality?	x								
23. To mitigate and adapt to climate change									
23a. Will it reduce or minimise greenhouse gas emissions?	x								
23b. Will maintain water abstraction, run-off and recharge within carrying capacity?	x								
23c. Will it contribute to the ability to adapt to the impacts of	x								

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
climate change?									
23d. Will it expose the region to increased flood risk	x								
23e. Will it reduce the economic impact of the future effects of climate change?	x								
24. To ensure the prudent use of natural resources and the sustainable management of existing resources									
24a. Will it alter the demand for raw materials and natural resources?	x								
24b. Will it support the repair and re-use of existing buildings?	x								
24c. Will it reduce minerals extracted and imported?	x								
24d. Will it promote the	x								

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
use of recycled and secondary materials?									
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources									
25a. Will it minimise the need for energy?	x								
25b. Will it maximise the production and/ or use of renewable energy?	x								
25c. Will it increase energy efficiency in buildings, transport modes etc?	x								
25d. Will it minimise the use of fossil fuels?	x								
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery									
26a. Will it minimise the production of waste?	x								

Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in / out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
26b. Will it increase waste recycling and reuse?	x								
26c. Will it reduce the amount of residual waste to landfill?	x								
Summary	<p>The policy sets out a series of statements and requirements that should enable Gypsy and Traveller communities to benefit from increased access to a range of facilities although in some cases this could be made more explicit. It also identifies the need for transit pitches and is flexible in identifying future provision. However, it is difficult to pin down the exact nature of some impacts, particularly those relating to sites as these will be determined at a LDD level. It would seem nonetheless that there are adequate provisions in the policy to ensure that the sites are selected appropriately. The policy should, provided the needs assessment is accurate, provide a suitable level of provision during the lifetime of this plan and beyond. On some of the more qualitative objectives it is difficult to ascertain precisely what the impact will be, specifically objective 12 and 14. Whilst the policy sets out to promote coexistence this is not by any means guaranteed and the policy could make further attempts to encourage, if not require, action to promote coexistence and engage with communities. This ties in neatly with some of the problems identified in objective 13. The promotion of coexistence may be facilitated by a greater level of consultation and communication by LPAs in determining the location of the sites.</p> <p>Recommendations:</p> <p>Explicit mention of coexistence should be made for all locations.</p> <p>Further clarification on the need for engagement and communication with Gypsy and Traveller communities is required within the policy or, at least, the supporting text.</p> <p>The explicit requirement of employment access to be considered when locating sites.</p>								

Travelling Showpeople - Options

Travelling Showpeople

The Government has made clear that it views this issue as an integral part of the wider housing agenda to tackle affordability and homelessness issues. The Partial Review will set out separate figures for Travelling Showpeople for each district, on the required provision (number of plots). The Partial Review of RSS will be informed by the results of a series of Travelling Showpeople Accommodation Assessments (GTAA's) undertaken in the region (which include assessments for Travelling Showpeople accommodation needs). Results from the North West GTAA, identified the total additional residential need for Travelling Showpeople in each Sub-region of the North West.

However these figures should not be interpreted directly into the policy provision of pitches across the region. The methodology used in the GTAA's was based on CLG Guidance and best practice. This has been done on a 'need where it is seen to arise' basis. Findings reflect the historical inequalities in pitch provision and, therefore, there is a tendency for the needs assessment to further compound inequalities in site provision.

When developing new site provision for Travelling Showpeople it is important that RSS takes a strategic view of allocation of sites which accommodates logistical issues (i.e. travelling with large equipment) and the pattern of fun fairs across the area. To assist in this process 4NW has been working with the Showman's Guild to collate information on the working \ travelling patterns of Showman's Guild members in the region over a calendar year³⁰.

SA Objective	Option A) Use the results from the studies to distribute new provision	Option B) Modify (a) to ensure a minimum level of pitch provision in every district	Option C) Work to agree a more balanced share of meeting need across districts	Comments
1. To reduce the disparities of sub-regional economic assemblies	0-	0+	0+	Effects are unlikely to be significant. However, if authorised Travelling Showpeople sites are concentrated in a part of the region that already suffers from economic deprivation then this could potentially act, to a small degree, to perpetuate economic problems and hinder efforts to achieve economic regeneration.
2. To exploit the growth potential of business sectors	x	x	x	Travelling Showpeople will have no effect on the growth potential of key economic sectors at the regional scale.

³⁰ Such patterns will be heavily influenced by the location of Fairs within the region.

3. To develop and market the region's image	0-	0?	0+	<p>If authorised Travelling Showpeople sites are concentrated in one part of the region (Option A) then the image of that area could suffer. However, it is unlikely that this effect would be significant at the regional scale. A balanced spread of sites (Option C) would certainly ensure that the image of the region does not suffer. Option B is an intermediary between A and C in terms of the balance of Travelling Showpeople sites in the region.</p> <p>Option B and Option C, could have the potential to increase the number of unauthorised sites, and unauthorised sites are more likely to impact upon local environmental quality. However, this impact is uncertain, and it is acknowledged that Travelling Showpeople have no history of unauthorised sites, and would be localised.</p>
4. To deliver urban renaissance	0?	0?	0?	<p>These options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in one part of the region that has a trend of towns in need of urban renaissance could hinder such renaissance to a very minor degree. At the same time, however, Option B and Option C could have the potential to increase the number of unauthorised sites, and unauthorised sites are more likely to impact upon local communities and economies. However, it is acknowledged that Travelling Showpeople have no history of unauthorised sites</p>
5. To deliver rural renaissance	0-	0+	0+	<p>These Options do not determine exact locations and so it is unlikely that there will be any significant effects in terms of this SA Objective. However, concentrating authorised sites (Option A) in a part of the region that is characterised by rural villages and service centres in need of renaissance could perhaps have the effect of hindering renaissance. In particular Travelling Showpeople and their families have the potential to put additional strain on services and facilities in small rural communities.</p>
6. To secure economic inclusion	+?	-?	-?	<p>It must be assumed that in many instances Travelling Showpeople will have chosen to live where they live for economic reasons. Options B and C promote distributing Travelling Showpeople to areas of the region other than where they would choose to live given the choice. There is clear potential for this to have a negative effect on the economic fortunes of Travelling Showpeople.</p>



				<p>In terms of economic inclusion Travelling Showpeople are clearly reliant on a narrow range of economic activity, and so it is vital that their ability to continue with current economic activity is not overly hindered.</p> <p>Redistributing Travelling Showpeople across the region in a 'balanced' fashion, as promoted by Option C, could have a particularly significant effect. However, this could be mitigated by the fact that Option C promotes consultation with the Showman's Guild.</p>
7. To develop and maintain a healthy labour market	0?	0?	0?	<p>The distribution of Travelling Showpeople plots will have no significant effect on the labour market at the regional scale.</p> <p>In terms of effects on participation and attainment in education amongst Travelling Showpeople, this will depend, primarily, on the proportion of Travelling Showpeople living in authorised sites. Authorised sites will tend to be located in an area with adequate access to education. Furthermore, Travelling Showpeople living on authorised sites will be more likely to settle in one place for a longer period of time.</p> <p>However, there are other complicating factors that determine whether Travelling Showpeople children are likely to attend and perform well at school such as the degree to which they are bullied and accepted more generally. These factors will be related to the perception of Travelling Showpeople amongst the local settled community. It is likely that Option C, and to a lesser extent Option B would be most likely to promote good relations between the two communities.</p> <p>The overall result is that none of the options are guaranteed to have a significant effect, and any effects are very uncertain.</p>
8. To reduce social exclusion	?	?	?	<p>Option C suggests that it can successfully lead to increased social cohesion through determining the distribution of Travelling Showpeople plots through <i>"working with the Showman's Guild [to] agree a more balanced share of meeting need across districts."</i></p> <p>It is expected that the benefits described would primarily come as a result of improved chances for successful integration between the settled and Travelling Showpeople communities. This is in contrast to Option A, which could perpetuate or worsen any poor relationships between the two communities in the parts of the region where Travelling Showpeople are concentrated.</p>

				<p>However, it is also important to consider the importance of cohesion within the Travelling Showpeople community, as this will be a major factor in determining whether they suffer from the effects of exclusion from the wider community. It is possible that enforcing a 'more balanced' distribution across the region could result in social networks between Travelling Showpeople families being stretched to breaking point, as families make the tough decision to move further away from one another in order to access a plot on an authorised site. This effect would occur under Option B and C.</p>
9. To reduce the need to travel improve choice of use and use of sustainable transport modes	0+	0-	0-	<p>A significant factor considered by Travelling Showpeople when determining where they live is the pattern of fairs and shows across the region and access to the strategic road network. Promoting a distribution of Travelling Showpeople plots other than that which results from a 'need where it arises' approach could increase distances travelled. However, it is important to remember that, although this effect will be felt by Travelling Showpeople in terms of the distance they need to travel, the effect in terms of total road travel (the concern of this SA Objective) will not be significant.</p>
10. To improve health and mental health and reduce health inequalities	0+	0-	0-	<p>No information has been found on health and wellbeing issues for Travelling Showpeople. We have assumed that the pathways by which the health of Travelling Showpeople is affected are similar to those for the Gypsy Traveller population.</p> <p>As a result the conclusions for these policy options are the same as for the policy options for Gypsies and Travellers, although it is acknowledged that Travelling Showpeople have no history of unauthorised sites and so the specific health issues related to unauthorised sites may therefore not be relevant to Travelling Showpeople.</p>
11. Improve access to good quality affordable and resource efficient housing	+	?	?	<p>All options promote the same number of Travelling Showpeople plots. However, it could be debated whether Options B and C promote plots in locations where they will be suitably accessible to Travelling Showpeople. Option C promotes a distribution that is significantly different to that which would be delivered through a 'need where it arises' approach, and so could have significant effects on Travelling Showpeople communities and their ability to maintain a viable business. However, this effect will be mitigated, to a degree, through working with the Showman's Guild to determine</p>



				sub-regional allocations.
12. To reduce crime, disorder and the fear of crime inequalities	-?	+?	+?	<p>It is unclear whether Travelling Showpeople generate fear of crime amongst the local settled community. For the purposes of this assessment it will be assumed that there can be some degree of fear of crime felt by the settled community in the vicinity of Travelling Showpeople sites.</p> <p>The degree of fear is likely to be correlated to the number of Travelling Showpeople plots and sites in the vicinity. It is unlikely to be strongly correlated to whether sites are authorised or unauthorised, although over time there is the potential for fear of crime to decrease if integration between the two communities leads to mutual understanding, which is more likely to occur with authorised sites. It is also important to consider that Travelling Showpeople can be the victim of crime in areas where there is animosity towards them, or when sites do not include adequate space and facilities for them to store their equipment.</p> <p>Relative to Option A, Option C is certain to promote acceptance and understanding of Travelling Showpeople by the settled community. This has the potential to reduce fear of crime amongst the settled and Travelling Showpeople communities. Option B might also have a lesser positive effect.</p> <p>There might be the potential for fear of crime (negative effects) associated with authorised sites to decrease over time.</p>
13. To enable groups and communities to contribute to decision making	?	-	?-	<p>Option C promotes consultation with the Showman's Guild, but at the same time it is not clear that this would be effective in terms of ensuring all Travelling Showpeople have a voice and a say in where plots are located. Furthermore, Option C starts from the premise that there will be a 'balanced' distribution throughout the region, and so it might be the case that any further decisions on sub-regional allocations are concerned with fine-tuning allocations only.</p> <p>Option A promotes a distribution determined by a 'need where it arises' approach, and so it is deemed that it takes accounts of the identified needs and wishes of the Travelling Showpeople community in the decision as to how plots should be distributed.</p> <p>Option B promotes a distribution of plots other than that which would meet the needs of the Travelling Showpeople community, and states nothing about involving them in decisions about the exact redistribution.</p>

<p>14. To develop strong and positive relationships between people from different backgrounds and communities?</p>	?	-?	-?	<p>Where as for Gypsies and Travellers it is well known that there are often tensions between themselves and the settled community, the nature of the relationships that exist between Travelling Showpeople and local settled communities in the vicinity of their 'yards' is less well established. It is acknowledged that Travelling Showpeople have no history of unauthorised sites, and as a result, problems with themselves and the settled community are less widespread and well-known than is the case for Gypsies and Travellers.</p> <p>It is likely that a more balanced distribution of Travelling Showpeople would reduce the net animosity felt towards them by the settled community and so there would be greater potential for positive relationships to develop between the two communities.</p> <p>However, it is possible that a balanced distribution (Options B and C) could generate the possibility of a step-change in unauthorised Travelling Showpeople sites. A harmonious relationship between the two communities is much less likely where Travelling Showpeople live in unauthorised sites, although it has been noted previously that Travelling Showpeople have no history of unauthorised sites.</p> <p>Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of plots that differs greatly from that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C.</p>
<p>15. To improve access to basic goods, services and amenities for all groups</p>	?	?	?	<p>In general, it is assumed that under any of the options Travelling Showpeople will be accommodated at sites in close proximity to services and facilities and some services and facilities will be provided on-site. It is not entirely clear why Option C states that it could increase access to services and facilities amongst Travelling Showpeople, although it is accepted that widening the search will make it easier to find sites large enough to accommodate vehicles and machinery.</p> <p>However, Option B and Option C could result in more unauthorised plots although it is acknowledged that Travelling Showpeople have no history of unauthorised sites. Travelling Showpeople living in unauthorised plots are more likely to suffer from poor access to services and facilities. Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of</p>

				plots that differs greatly than that promoted by a 'need where it arises' approach. This effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C.
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.	0?	0?	0?	<p>The concentration of Travelling Showpeople, along with their machinery and vehicles, in a particular area (Option A) could have a cumulative effect on the landscape character of that area, although the effect would be far less likely if Travelling Showpeople are accommodated in authorised sites as opposed to unauthorised sites.</p> <p>Option B and Option C could result in more unauthorised plots although it is acknowledged that Travelling Showpeople have no history of unauthorised sites. Unauthorised plots are more likely to impact upon local landscapes. Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of plots that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Travelling Showpeople community" promoted by Option C.</p> <p>It is impossible to say that authorised plots, even acting cumulatively, can impact upon a particular landscape. Furthermore, it is impossible to say that the number of unauthorised plots that could be generated by Options B and C would be enough to have a significant effect on any particular landscape. Therefore effects are judged as insignificant and uncertain.</p>
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	0?	0?	0?	<p>The concentration of Travelling Showpeople in a particular area (Option A) could have a cumulative effect on the landscape character and biodiversity of that area, although the effect would be far less likely if Travelling Showpeople are accommodated in authorised sites as opposed to unauthorised sites. Authorised sites could have an impact on biodiversity or landscape if there is insufficient space and facilities on-site for equipment and vehicles.</p> <p>Option B and Option C could result in more unauthorised plots although it is acknowledged that Travelling Showpeople have no history of unauthorised sites. Unauthorised plots are more likely to impact upon local landscapes and biodiversity. Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of plots that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be</p>



				<p>mitigated by the approach of “working with the Showman’s Guild” promoted by Option C.</p> <p>It is impossible to say that authorised sites, even acting cumulatively, can impact upon a particular landscape or biodiversity at anything other than the local scale. Furthermore, it is impossible to say that the number of unauthorised plots that could be generated by Options B and C would be enough to have a significant effect on any particular landscape or biodiversity at anything other than the local scale. Therefore effects are judged as insignificant and uncertain.</p>
<p>18. To protect and improve local environmental quality</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>Unauthorised sites can have significant negative effects on local environmental quality. Negative effects will be much less likely to result from authorised sites of an adequate size and with adequate on-site storage facilities. For the purposes of this assessment it is assumed that such effects would be negligible.</p> <p>Option B and Option C could result in more unauthorised plots, although it is acknowledged that Travelling Showpeople have no history of unauthorised sites, which are more likely to impact upon local environmental quality. Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of plots that differs greatly than that promoted by a ‘need where it arises’ approach. However, this effect could be mitigated by the approach of “working with the Showman’s Guild” promoted by Option C.</p> <p>Effects will be localised and the frequency at which effects could potentially occur means that effects will not be significant at the regional scale.</p>
<p>19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.</p>	<p>0+</p>	<p>0-</p>	<p>0-</p>	<p>It is assumed that all three options would result in authorised sites of an adequate size and with adequate on-site storage facilities so that there would not be any direct effects on biodiversity bordering sites.</p> <p>Unauthorised sites have the potential to impact upon designated biodiversity. Option B and Option C could result in more unauthorised plots, although it is acknowledged that Travelling Showpeople have no history of unauthorised sites, which are more likely to impact upon designated biodiversity. Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of plots that differs greatly than that promoted</p>

				by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C. The effects of any one of these options is unlikely to be significant as the majority of effects will be determined by decisions on the specific locations of sites.
20. To protect and improve the quality of inland and coastal waters	x	x	x	No effect
21. To protect and improve air quality	x	x	x	Travelling Showpeople are heavily reliant on transport by private car, but none of these options will have any effect on air quality.
22. To restore and protect land and soil	x	x	x	It is assumed that all three options would result in authorised sites of an adequate size and with adequate on-site storage facilities so that there would not be any direct effects on land and soil bordering sites. Unauthorised plots have the potential to impact upon land and soil, but this effect is considered as part of the assessment against SA Objective 24.
23. To mitigate and adapt to climate change	0+	0-	0-	Options B and C could result in Travelling Showpeople living in areas where they would not choose to otherwise live, with the effect that net distances travelled by private transport, including by HGVs, could increase. However, effects in terms of climate change are not likely to be significant.
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	0+	0-	0?	Option B and Option C could result in more unauthorised plots, although it is acknowledged that Travelling Showpeople have no history of unauthorised sites, which are more likely to make inefficient use of land. Option C could be more likely to generate unauthorised plots than Option B because it promotes distribution of plots that differs greatly than that promoted by a 'need where it arises' approach. However, this effect could be mitigated by the approach of "working with the Showman's Guild" promoted by Option C.
25. To minimise the requirement for energy use, promote efficient use and	x	x	x	No effect

increase the use of energy from renewable resources				
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	*	*	*	Waste is less likely to be managed in a sustainable and efficient pattern at unauthorised sites, although these effects will have no significant effect in terms of this SA Objective.
Summary	<p>It is worth considering Options A and C only as, if the choice were between just these two options, there would be a number of important sustainability trade-offs to consider. Option A promotes allocating plots throughout the region on a 'need where it arises' basis. Currently Travelling Showpeople are not evenly spread throughout the region, but are concentrated around the Manchester area. Option A will therefore reinforce this unequal distribution. Option C will distribute new plots for Travelling Showpeople throughout the region in a more 'balanced' fashion.</p> <p>There is certainly potential for the Option C approach to impact upon the lives and, in particular the livelihoods, of Travelling Showpeople. It is highly likely that Travelling Showpeople have chosen to concentrate around the Manchester conurbation for logistical reasons, such as the need to have good access to the major road network and the pattern of fun fairs across the region throughout the year, as well as perhaps for reasons of being close to friends and family. If this is indeed the case then Option C will have the potential to jeopardise the viability of the business that is key to their economic well-being, as well as perhaps affect the strength of the Travelling Showpeople community.</p> <p>It is likely that there would be benefits to the approach promoted by Option C. In particular, benefits would be felt in those parts of the region that currently have a high concentration of Travelling Showpeople plots as these areas would avoid any further concentration of plots (as is promoted by Option A). However, it is not entirely clear what problems might be experienced within areas with a concentration of Travelling Showpeople. There could be localised environmental, community or economic impacts, including possibly a fear of crime, but there is no clear evidence to support this.</p> <p>Furthermore, it is difficult to predict with any certainty negative effects on the environment or non travelling economy / community associated with Option A (or benefits associated with Option C) because there might be the possibility that Option C could lead to an increase in the number of unauthorised plots, although it is acknowledged that Travelling Showpeople have no history of unauthorised sites. It is possible that Travelling</p>			

Showpeople could reject the offer of authorised plots spread around the region and choose unauthorised sites instead. This potential effect remains uncertain, but what is certain is that unauthorised plots are much more likely to negatively impact upon the receiving environment, economy and communities.

A benefit to Travelling Showpeople resulting from an Option C approach is the possible increased potential for identification of suitably large sites to accommodate Travelling Showpeople's vehicles and equipment and to address localised issues of access to sites for large numbers of heavy vehicles.

It is not clear that promoting an even distribution of Travelling Showpeople plots, as opposed to a distribution of new plots that mirrors the current distribution, would directly result in increased access to services and opportunities. This is because the number of Travelling Showpeople within a given area will always be relatively small in comparison to the settled community, even if the number of Travelling Showpeople in an area were to increase (Option A). However, the key point in terms of increasing access to services and opportunities is that new plots must come forward quickly and in areas where there are acceptable relations between the Travelling Showpeople and settled communities. If Option A is the Option most capable of delivering new plots in this fashion then its major benefit will be the fact that it will address one of the key sustainability issues related to Travelling Showpeople, namely access to services and opportunities.

Option C promotes working with the Showman's Guild to determine the exact regional allocation. However, it also promotes starting from the premise that plots will be distributed in a 'balanced' fashion, and so it is questionable whether any further decisions still to be made will represent anything other than fine-tuning of sub-regional allocations. Option C, to be successful, would need to be achieved via genuine engagement with individual Travelling Showpeople families, including hidden households, as well as via identification of sites that do provide access to services and facilities. This would require strong co-operation between sub-regional authorities and would need to proceed on the basis of an agreement of how to determine what is considered equitable access to services, facilities, social and economic opportunities. These measures would provide some safeguards against the risk of political negotiations between sub-regional authorities forming the real basis for site allocations under this option.

Option B is an intermediary option, and the sustainability effects predicted for Option B reflect this. It will still require some Travelling Showpeople to live in parts of the region that may be a long-way from where they would ideally choose to live, with the effect that some Travelling Showpeople could become isolated from the rest of the community, many of whom would remain concentrated around Manchester. Option B could result in particular potential for effects to be felt by individual families, whilst Option C may result in more insidious impacts on the regions Travelling Showpeople communities.

Recommendations

- 1) Develop the approach by which the statement in Option C would be achieved, in agreement with sub-regional authorities, as the approach, as things stand, could be disadvantageous. In doing so take account of the points raised in the summary of the options assessment.
- 2) Requiring some Travelling Showpeople to relocate to parts of the region that are a significant distance from where they may ideally choose to live would need to be done with a great deal of precaution to ensure that such families would not become isolated from the wider Travelling Showpeople community. If Option C is pursued it will be important that a robust strategy is developed for addressing the local political challenges involved in pursuing this approach.

Travelling Showpeople – Draft Policies

Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
1. To reduce the disparities of sub-regional economic assemblies									
1a. Will it provide job opportunities in areas with residents most at need	x								
1b. Will it reduce economic disparities within the region and with other UK regions?	x								
2. To exploit the growth potential of business sectors									
2a. Will it increase employment opportunities within the region?	x								
2b. Will it help to diversify the regions economy?	x								
2c. Will it promote growth	x								

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			Urban	Rural					
in key sectors of the regional economy?									
2d. Will it help to develop the regions knowledge base?	x								
2e. Will it increase the economic benefit derived from the regions natural environment?	x								
3. To develop and market the region's image									
3a. Will it support the preservation and/or enhancement of high quality built, natural and historic environments within the region?	x								
3b. Will it promote the area as a destination for short and long	x								

Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision									
Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
term visitors, for residents and investors.									
4. To deliver urban renaissance									
4a. Will it improve economic, social and environmental conditions in the most deprived areas and most deprived groups?	✓		+	+	0	✓	✓	+	As recognised in the background text, there has been persistent issue in regard to the shortage of suitable accommodation for Travelling Showpeople. The provision of additional plots, with the requirement for better access to health, education and employment facilities should alleviate these conditions.
4b. Will it improve quality of the built and historic environment	✓		?	?	0	✓	✓	+	It is difficult to determine the precise nature of this impact given the siting and design of sites will be at the LDD level. However, we believe it is fair to say that given the requirements of Circular 01/2007 and the increased standards enforceable on authorised sites, there should be positive impacts.

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Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
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			Urban	Rural					
4c. Will it improve the quality of public open space?	x								
5. To deliver rural renaissance									
5a. Will it support rural diversification?	x								
5b. Will it support and encourage the growth of rural businesses?	x								
5c. Will it retain and promote the economic growth of market towns?	x								
5d. Will it retain and promote access to village services?	x								
6. To secure economic inclusion									
6a. Will it meet the employment needs of local people?	✓		+	+	0	✓	✓	+	As Travelling Showpeople are often 'self-employed business people' the provision of a suitable number of plots can only serve to provide a positive impact for this group.

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			Urban	Rural					
6b. Will it improve physical accessibility to jobs with the location of sites and/ or public transport links being closer to areas of high unemployment ?	✓		+	+	0	✓	✓	+	<p>The key is to link the economic needs of Travelling Showpeople with locational needs. Para 3 links the use of 'yards' and 'plots' the economic vitality of this community.</p> <p>With this in mind, an adequate supply of yards / plots should serve to provide better access to economic drivers such as fair locations but will also allow greater flexibility in terms of storage and accommodation.</p>
6c. Will it encourage business start-up especially from women and BME groups?	✓		?	?	0	✓	✓	?	<p>Possibly. Greater availability of sites and in increased certainty of availability should enable the community to consolidate its economic base and expand, providing the possibility of business start-ups.</p> <p>However, it is uncertain whether this will reflect on the employment prospects for women.</p>

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			Urban	Rural					
7. To develop and maintain a healthy labour market									
7a. Will it address the skills gap and enable skills progression?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
7b. Will it increase the levels of participation and attainment in education?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
7c. Will it provide a broad range of jobs and employment opportunities?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
8. To reduce social exclusion									
8a. Will it reduce poverty and social exclusion in those areas and communities most affected? (particularly BME people, LGBT, Faith Groups and Rural Communities).	✓		+	+	0	✓	✓	+	Should have positive impacts given the nature of the groups identified in this policy.

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			Urban	Rural					
9. To reduce the need to travel improve choice of use and use of sustainable transport modes									
9a. Will it reduce car and lorry traffic?	✓		?	?	0	✓	✓	?	<p>Increased sites may well induce further activity, including vehicle movements from and to the site.</p> <p>Of particular concern is the movement of heavy vehicles, lorries, etc. moving fair equipment, which may have negative effects for air pollution (specifically particulates), noise and vibration.</p> <p>However, the proposed distribution of sites attempts to alleviate to current travelling patterns imposed on Travelling Showpeople due to where they currently reside.</p>
9b. Will it encourage walking, cycling and equal access to and use of public transport?	✓		?	?	0	✓	✓	?	Unlikely.
9c. Will it reduce freight movement?	✗								

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9d. Will it improve equal access to and encourage the use of ICT?	*								
10. To improve health and mental health and reduce health inequalities									
10a. Will it reduce deaths in key vulnerable groups?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
10b. Will it promote healthier lifestyles?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
10c. Will it reduce health inequalities among different groups in the community?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
10d. Will it reduce isolation for vulnerable people?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
11. Improve access to good quality affordable and resource efficient housing									
11a. Will it provide an appropriate mix of housing to meet all	*								

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			Urban	Rural					
residents needs including affordable?									
11b. Will it reduce the number of unfit and empty homes?	x								
11c. Will it support the development and operation of resource efficient housing?	x								
11d. Will it meet the accommodation needs of gypsies and travellers, in line with Race Equalities requirements?	✓		++	++	0	✓	✓	++	<p>This policy's aim is to provide for sites where Travelling Showpeople have an increased need for decent accommodation.</p> <p>It is also noted that the policy makes provision for allocation of plots beyond the review timescale.</p> <p>It should be noted that overall the spatial distribution of the site allocations remains roughly the same as the historic allocation.</p> <p>Provided this is in accordance with identified</p>

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			Urban	Rural					
									need, this should be appropriate.
12. To reduce crime, disorder and the fear of crime inequalities									
12a. Will it reduce actual levels of crime (including hate crime)?	✓		?	?	0	✓	✓	?	<p>As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision.</p> <p>This is of particular importance to Travelling Showpeople sites given the likelihood of HGVs and relatively high levels of vehicle activity.</p> <p>Recommendation: Explicit mention of coexistence should be made for all locations.</p>
12b. Will it reduce the fear of crime?	✓		?	?	0	✓	✓	?	<p>As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard</p>

Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision									
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			Urban	Rural					
									to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
12c. Will it reduce prejudice (racial, homophobic, gender or age related)?	✓		?	?	0	✓	✓	?	As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
13. To enable groups and communities to contribute to decision making									
13a. Will it identify and engage with hard to reach stakeholders?	✓		+	+	0	✓	✓	+	The policy does refer to the need to “work with ... local Travelling Showpeople and settled communities, to achieve

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			Urban	Rural					
									<p>levels of provision required by 2016".</p> <p>However, the need to engage with hard to reach stakeholders could be stressed more specifically and made a requirement in identifying sites in the policy.</p> <p>Recommendation: Further clarification on the need for engagement and communication with the Travelling Showpeople communities is required within the policy</p>
13b. Will it encourage wider community involvement in design, or the provision of services?	✓		+	+	0	✓	✓	+	<p>The policy does refer to the need to "work with ... local Travelling Showpeople and settled communities, to achieve levels of provision required by 2016".</p> <p>However, the need to encourage involvement in design and provision of services could be stressed more specifically and made a requirement in identifying sites in the policy.</p> <p>Recommendation: Further clarification on the need for engagement and</p>

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			Urban	Rural					
									communication with the Travelling Showpeople communities
13c. Will it enable the community to contribute to and have influence in decision-making and be involved in implementation ?	✓		+	+	0	✓	✓	+	<p>The policy does refer to the need to “work with ... local Travelling Showpeople and settled communities, to achieve levels of provision required by 2016”.</p> <p>However, the need to engage with the community could be stressed more specifically and made a requirement in identifying sites in the policy.</p> <p>Recommendation: Further clarification on the need for engagement and communication with the Travelling Showpeople communities</p>
14. To develop strong and positive relationships between people from different backgrounds and communities?									
14a. Will it create a sense of belonging and well-being for all members of the community?	✓		?	?	0	✓	✓	?	<p>As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself</p>

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			Urban	Rural					
									refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
14b. Will it support community development?	✓		?	?	0	✓	✓	?	As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
14c. Will it improve relations between all groups and religions (including between	✓		?	?	0	✓	✓	?	As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard to ‘countryside locations’

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Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
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			Urban	Rural					
gypsies and travellers and settled communities)?									– and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
14d. Will it reduce prejudice (racial or homophobic)?	✓		?	?	0	✓	✓	?	As the actual siting of the plots is down to LDDs this is difficult to determine. However, para 10 references the need for promoting coexistence – although this is in regard to ‘countryside locations’ – and the policy itself refers to working with “settled communities” to achieve levels of provision. Recommendation: Explicit mention of coexistence should be made for all locations.
15. To improve access to basic goods, services and amenities for all groups									
15a. Will it improve equal access to cultural, sporting and leisure facilities	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.

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Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
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			Urban	Rural					
including natural green spaces?									
15b. Will it improve equal access to essential services and facilities, including for gypsies and travellers?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
15c. Will it improve the range and quality of cultural, sporting and leisure facilities and equal access to them?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
15d. Will it improve equal access to basic goods, promoting the use of those that are locally sourced?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.

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			Urban	Rural					
16. To protect, enhance and manage the Region’s rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.									
16a. Will it protect and enhance the character and appearance of archaeological sites, historic buildings, townscape, landscape, parks and gardens and their settings?	x								
16b. Will it improve access to buildings of historic/ cultural value?	x								
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region									
17a. Will it protect and enhance the character and appearance of the regions townscape and countryside maintaining and strengthening local distinctiveness	x								

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			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
and sense of place?									
17b. Will it protect and enhance the biodiversity of the regions landscapes?	x								
17c. Will it protect and enhance the accessibility of the landscape across the region?	✓		+	+	0	✓	✓	+	Should have positive impacts due to the locating criteria defined in background text.
17d. Will it protect and enhance the tranquillity of the region's landscapes?	x								
18. To protect and improve local environmental quality									
18a. Will it reduce light and noise pollution and graffiti?	x								
18b. Will it redress environmental inequalities within region's	x								

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			Urban	Rural					
urban and/or rural areas?									
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.									
19a. Will it protect and enhance existing designated European, national and regional wildlife and geological sites and species populations?	x								
19b. Will it protect and enhance habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?	x								
20. To protect and improve the quality of inland and coastal waters									
20a. Will it reduce or	x								

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Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
manage flooding?									
20b. Will it maintain and enhance ground and surface water quality?	x								
20c. Will it improve the quality of costal waters?	x								
21. To protect and improve air quality	✓		-	-	0	✓	✓	-	There is potential for disturbance in terms of noise, air pollution and visual impacts due to the nature of Travelling showpeople sites. There is potential need for additional guidance on the locational aspects of these sites.
21a. Will it maintain and improve air quality?	x								
21b. Will it address the causal factors of poor air quality in	x								

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			Urban	Rural					
AQMAs?									
22. To restore and protect land and soil									
22a. Will it reduce the amount of derelict, contaminated, degraded and vacant/ underused land?	✓		?	?	0	✓	✓	?	Generally unknown, although it is feasible that areas where derelict, vacant or underused land is available could be utilised for sites. However, it seems unlikely that contaminated or degraded land would be suitable given the risks to health and the cost or remediation.
22b. Will it encourage the development of brownfield land in preference to Greenfield?	✗								
22c. Will it reduce the loss of good soils to development?	✗								
22d. Will it maintain and enhance soil quality?	✗								
23. To mitigate and adapt to climate change									
23a. Will it reduce or	✗								

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			Urban	Rural					
minimise greenhouse gas emissions?									
23b. Will it maintain water abstraction, run-off and recharge within carrying capacity?	x								
23c. Will it contribute to the ability to adapt to the impacts of climate change?	x								
23d. Will it expose the region to increased flood risk	x								
23e. Will it reduce the economic impact of the future effects of climate change?	x								
24. To ensure the prudent use of natural resources and the sustainable management of existing resources									
24a. Will it alter the demand for	x								

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			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
raw materials and natural resources?									
24b. Will it support the repair and re-use of existing buildings?	x								
24c. Will it reduce minerals extracted and imported?	x								
24d. Will it promote the use of recycled and secondary materials?	x								
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources									
25a. Will it minimise the need for energy?	x								
25b. Will it maximise the production and/ or use of renewable energy?	x								
25c. Will it increase energy efficiency in	x								

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			Urban	Rural					
buildings, transport modes etc?									
25d. Will it minimise the use of fossil fuels?	x								
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery									
26a. Will it minimise the production of waste?	x								
26b. Will it increase waste recycling and reuse?	x								
26c. Will it reduce the amount of residual waste to landfill?	x								
Summary	<p>The general performance of the policy is in line with that for the Gypsies and Travellers policy. However, there are some additional issues. Firstly, the yards or plots of Travelling Showpeople sites are not only used for habitation but also for storage. As the policy points out this presents some planning problems. Essentially the sites will need to accommodate living areas that are suitable when in close proximity to heavy goods vehicles (HGVs) and other mechanical plant. This provides some risk to the health of the occupants and thus any policy should ensure the safety and health of the occupants by having stringent design measures to separate these different uses.</p> <p>Secondly, but again related to HGVs and plant, there is potential for these sites to cause disturbance in terms of noise, air pollution. There is a potential need for additional guidance on the locational criteria of these sites.</p> <p>Finally, this use of the sites may create a more difficult situation in regard to promoting co-existence in the area.</p>								

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			Urban	Rural					
			<p>Recommendations</p> <p>The need for further guidance on the locational criteria of Traveller and Showpeople sites should be explored, specifically those that will use HGVs, heavy plant or other noisy / polluting equipment</p> <p>Requirements for site design should be clearly set out to ensure health and wellbeing of permanent occupants.</p> <p>Explicit mention of coexistence should be made for all locations.</p> <p>Greater emphasis on community engagement and consultation.</p>						

Car Parking Standards - Options

Car parking standards

The Regional Parking Standards, set out in the Regional Spatial Strategy, provide the framework for the identification at a local level of appropriate parking provision for new developments. The current parking standards have remained unchanged since the publication of RPG13 in 2003 and an undertaking was given to review them within 5 years. Consequently, 4NW, as part of the Partial Review of the Regional Spatial Strategy is proposing a revised set of standards. The proposed standards set out maximum parking standards and in addition set out an accessibility based tool through which parking requirements for individual sites will be assessed. The parking standards table has been significantly expanded from the existing table in RPG13 to take into account Use Classes Order, minimum parking standards for disabled drivers, bicycles, motorcycles, coaches as well as maximum standards for cars. The table also includes recommendations for residential developments.

SA Objective	Option A) Adopt the revised standards	Option B) Keep existing parking standards as detailed in RPG13 and Draft RSS (business as usual)	Comments
1. To reduce the disparities of sub-regional economic assemblies	+	0	The revised standards advise employers to provide travel plans which would have a disproportional positive impact on people who can not afford private transportation, thereby allowing them access to jobs. It also discourages industrial development in locations not accessible by a range of modes of transport which again will benefit people that do not own private transportation.
2. To exploit the growth potential of business sectors	✗	✗	
3. To develop and market the region's image	✗	✗	

4. To deliver urban renaissance	+?	0+	<p>Both existing and proposed parking standards differentiate between quantities of parking needed according to accessibility. Nevertheless the new parking standards include a much more thorough assessment of accessibility and so is more likely to ensure that there is not over provision of parking in places well served by public transportation. New parking standards also stipulate bicycle parking provision and recommend travel plan measures at a corporate level. All these measures help in reducing traffic, noise and emissions and allow pedestrians to enjoy public open spaces.</p> <p>The standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments.</p>
5. To deliver rural renaissance	? -	? +	<p>The proposed parking standards include comments on the need to resist locating offices, business parks, research and development, call centres and general industry in places not well served by public transportation, which will include many rural areas.</p> <p>Both existing and proposed parking standards intend to allow for more parking in rural areas (where accessibility is generally not as good) which will support rural diversification or the growth of rural businesses by, for example, making it easy for employees to drive to work where public transportation is not available.</p> <p>Therefore the proposed standards have the potential for negative effects in terms of this SA Objective.</p>
6. To secure economic inclusion	0+	0	<p>The proposed parking standards emphasise the need to locate employment in places well served by public transportation. They also stipulate the provision of bicycle parking which would benefit people who cannot afford private transportation. The proposed parking standards make allowance for the provision of disabled parking, encouraging equal participation in the jobs market by disabled people.</p>
7. To develop and maintain a healthy labour market	x	x	
8. To reduce social exclusion	0+	0	<p>The proposed parking standards emphasise the need to locate employment in places well served by public transportation. They also stipulate the provision of bicycle parking which would benefit people who cannot afford private transportation. The proposed parking standards make allowance for the provision of disabled parking, encouraging equal participation in society by disabled people.</p>

9. To reduce the need to travel improve choice of use and use of sustainable transport modes	++	+	It is expected that the existing parking standards will reduce car traffic, and encourage walking and cycling as alternatives. The proposed standards will do the same, but to a greater degree by: setting out a more thorough assessment of the level of accessibility; encouraging cycling; discouraging employment in places of low public transportation accessibility; and by encouraging the design of travel plans by employers.
10. To improve health and mental health and reduce health inequalities	?	?	<p>Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of kerb parking is associated with increased risk of injury for children³¹. In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased risk and occurrence of accidents³². This will also apply to streets where people use the pavement for accommodating their vehicles. Well managed parking can provide <i>friction</i> and slow the flow of traffic thus giving greater priority to pedestrians³³. The management of parking is of crucial importance.</p> <p>The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW.</p>
11. Improve access to good quality affordable and resource efficient housing	x	x	
12. To reduce crime, disorder and the fear of crime inequalities	x	x	
13. To enable groups and communities to contribute to decision making	x	x	

³¹ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). Journal of Public Health Medicine 1998;20(4):463-6.

³² Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

³³ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

14. To develop strong and positive relationships between people from different backgrounds and communities?	x	x	
15. To improve access to basic goods, services and amenities for all groups	+	0+	Both existing and proposed parking standards allow for more parking in less accessible areas. Nevertheless the proposed parking standards include a much more thorough assessment of the level of accessibility of a development, and are likely to discourage the use of private transportation, making public transportation infrastructure more viable. More public transportation is likely to allow for more equitable access to leisure, sports facilities and services. Unlike the existing parking standards, the new parking standards also stipulate parking provision for bicycles, motorcycles and disabled people, allowing for a more equal access to facilities.
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.	+	0+	Neither existing nor proposed parking standards are likely to have a direct impact, but both discourage the use of cars, thereby protecting and enhancing the character and appearance of archaeological sites, historic buildings, landscapes and townscapes, parks and gardens, through the curbing of emissions, reducing congestion, allowing for green space, and improving the general aesthetic of the space by putting cars out of sight.
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region	+	0+	Both existing and proposed parking standards are likely to discourage the use of cars, thereby protecting and enhancing the character and appearance of landscapes and biodiversity through the curbing of emissions, reducing congestion, lowering the amount of green space that would have to be dedicated to car parking, and improving the general aesthetic of the space by putting cars out of sight. The provision of bicycle and disabled parking and the encouragement of public transport use will improve accessibility to landscape and biodiversity resources across the region.
18. To protect and improve local environmental quality	+	0+	Both parking standards allow for more parking in less accessible areas. Nevertheless the proposed parking standards include a much more thorough assessment of the level of accessibility which will discourage the use of private transportation reducing noise pollution from private vehicles.
19. To protect and enhance the viability of endangered species,	x	x	

habitats and sites of geological importance/ to protect and enhance biodiversity.			
20. To protect and improve the quality of inland and coastal waters	x	x	
21. To protect and improve air quality	++	+	Both parking standards discourage the use of cars in places likely to be accessible by public transportation but the proposed parking standards include a much more thorough assessment of the level of accessibility of a development and therefore allow for more fine-tuned solutions. The proposed parking standards also stipulate the provision of bicycle parking, encourage walking and advise employers to implement travel plans. These measures should reduce the level of emissions and improve air quality. One of the causal factors of poor air quality in AQMAs is road traffic, which is targeted by these measures.
22. To restore and protect land and soil	x	x	
23. To mitigate and adapt to climate change	++	+	See assessment against SA Objective 9
24. To ensure the prudent use of natural resources and the sustainable management of existing resources	+	0+	See assessment against SA Objective 9.
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources	+	0+	See assessment against SA Objective 9. A further consequence of less car usage on this SA Objective is likely to be a decrease in consumption of fossil fuels.
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery	x	x	

Summary	<p>The proposed parking standards are very different from the existing ones in their holistic approach. As well as discouraging the use of the car at sites where there is good accessibility by alternative modes of transport, the proposed standards also encourage the use of other modes of transportation by emphasising the importance of providing bicycle and motorcycle parking; by underlining the need of employers to design travel plans; and by discouraging certain types of development in inaccessible areas (as opposed to promoting that they will require a great deal of car parking).</p> <p>The focus on public transportation and on curbing dependency on the car has two obvious benefits, one is environmental, and the other relates to more equitable accessibility. The proposed standards again take a more holistic approach in promoting equitable access not only by promoting public transportation (which is important for those without access to a private car) but also stipulating bicycle, motorcycle and disabled parking standards.</p> <p>Parking standards are important to the quality of the built environment and to health and wellbeing. Parked cars can obstruct vision and increase social severance making it less attractive to be a pedestrian. A high density of kerb parking is associated with increased risk of injury for children³⁴. In streets where the majority of gardens have been converted into parking bays the width of the road is effectively trebled leading to increased traffic speeds and increased risk and occurrence of accidents³⁵. This will also apply to streets where people use the pavement for accommodating their vehicles. Well managed parking can provide <i>friction</i> and slow the flow of traffic thus giving greater priority to pedestrians³⁶. The management of parking is of crucial importance.</p> <p>The Sustainability Appraisal has shown clearly that, in terms of a number of SA Objectives, the proposed parking standards perform better than the existing standards. The appraisal has not highlighted any sustainability trade-offs that must be considered, should the decision be taken to take the new standards forward as the preferred option.</p>
Recommendations	<p>1) The language used in the table related to discouraging certain types of development could possibly be toned down so that it is not so exclusionary. In particular, employment should not be discouraged in</p>

³⁴ Roberts I, Li L, Barker M. Trends in intentional injury deaths in children and teenagers (1980-1995). Journal of Public Health Medicine 1998;20(4):463-6.

³⁵ Greater London Authority. Crazy paving: the environmental importance of London's front gardens. 2005. London. Environment Committee. Available at www.london.gov.uk

³⁶ Smith, G. P. Movement and spaces; traffic management, safety, parking & loading, public space and mixed-use. The Annual South East Public Health Conference 2007 Joint Centre for Urban Design, Oxford Brookes University

locations not accessible by public transportation if it can be demonstrated that parking spaces won't be needed since most employees reside nearby.

2) The standards could give higher priority to cycling spaces to reflect the importance of active transport in the NW. In particular, the standards for spaces for bicycles could be more ambitious for A1-A4, B1-B8 developments.

3) Whilst increasing the provision of public transport should encourage people to use alternatives to the car it is important that the cost of these services supports this approach. We recommend that where possible economic analysis is undertaken to ensure that alternatives to the car are financially competitive.

Car Parking Standards – Draft Polices

Policy RT2 – Managing Travel Demand									
Sustainability Appraisal Objectives and sub-criteria	Screened in/out	Key Baseline Information	Geographical Scale			Timescale		Cumulative	Commentary
			Intra – regional		Inter - regional	Within plan	Outside plan		
			Urban	Rural					
1. To reduce the disparities of sub-regional economic assemblies									
1a. Will it provide job opportunities in areas with residents most at need	x								
1b. Will it reduce economic disparities within the region and with other UK regions?	x								
2. To exploit the growth potential of business sectors									
2a. Will it increase employment opportunities within the region?	x								
2b. Will it help to diversify the regions economy?	x								
2c. Will it promote growth in key sectors	x								



of the regional economy?									
2d. Will it help to develop the regions knowledge base?	x								
2e. Will it increase the economic benefit derived from the regions natural environment?	x								
3. To develop and market the region's image									
3a. Will it support the preservation and/or enhancement of high quality built, natural and historic environments within the region?	x								
3b. Will it promote the area as a destination for short and long term visitors, for residents and investors.	x								
4. To deliver urban renaissance									
4a. Will it improve economic,	x								

social and environmental conditions in the most deprived areas and most deprived groups?									
4b. Will it improve quality of the built and historic environment	x								
4c. Will it improve the quality of public open space?	x								
5. To deliver rural renaissance									
5a. Will it support rural diversification?	x								
5b. Will it support and encourage the growth of rural businesses?	x								
5c. Will it retain and promote the economic growth of market towns?	x								
5d. Will it retain and promote access to village services?	x								



6. To secure economic inclusion									
6a. Will it meet the employment needs of local people?	x								
6b. Will it improve physical accessibility to jobs with the location of sites and/ or public transport links being closer to areas of high unemployment ?	x								
6c. Will it encourage business start-up especially from women and BME groups?	x								
7. To develop and maintain a healthy labour market									
7a. Will it address the skills gap and enable skills progression?	x								
7b. Will it increase the levels of participation and attainment in education?	x								
7c. Will it provide a broad	x								

range of jobs and employment opportunities?									
8. To reduce social exclusion									
8a. Will it reduce poverty and social exclusion in those areas and communities most affected? (particularly BME people, LGBT, Faith Groups and Rural Communities).	*								
9. To reduce the need to travel improve choice of use and use of sustainable transport modes									
9a. Will it reduce car and lorry traffic?	✓		+	+	0	✓	✓	+	The new standards provide more detail in regard to the maximum provision of car parking spaces. Specifically standards should be more restrictive in areas of higher access to public transport and less where there is lower. As the policy indicates that each site should be assessed case-by-case it is difficult at this stage to be precise in predicting effects. What can be said is that the general <i>principle</i> of the standards should result in positive effects.



<p>9b. Will it encourage walking, cycling and equal access to and use of public transport?</p>	✓		+	+	0	✓	✓	+	<p>The policy explicitly provides to 'encourage cycling for the specific development but also within the wider area'. Furthermore the policy considers the length of stay in its allocation of spaces.</p>
<p>9c. Will it reduce freight movement?</p>	✗								
<p>9d. Will it improve equal access to and encourage the use of ICT?</p>	✗								
<p>10. To improve health and mental health and reduce health inequalities</p>									
<p>10a. Will it reduce deaths in key vulnerable groups?</p>	✗								
<p>10b. Will it promote healthier lifestyles?</p>	✓		+	+	0	✓	✓	+	<p>The encouragement of cycling and other forms of active transport should create positive health benefits.</p>
<p>10c. Will it reduce health inequalities among different groups in the community?</p>	✗								
<p>10d. Will it reduce isolation for vulnerable</p>	✓		?	?	0	✓	✓	?	<p>The provision of disabled spaces <i>above</i> government standards but on a case-by-case basis</p>

people?										should provide positive effects in terms of access for the disabled however it is not possible to state definitively at this stage.
11. Improve access to good quality affordable and resource efficient housing										
11a. Will it provide an appropriate mix of housing to meet all residents needs including affordable?	x									
11b. Will it reduce the number of unfit and empty homes?	x									
11c. Will it support the development and operation of resource efficient housing?	x									
11d. Will it meet the accommodation needs of gypsies and travellers, in line with Race Equalities requirements?	x									
12. To reduce crime, disorder and the fear of crime inequalities										
12a. Will it reduce actual	x									

levels of crime (including hate crime)?									
12b. Will it reduce the fear of crime?	x								
12c. Will it reduce prejudice (racial, homophobic, gender or age related)?	x								
13. To enable groups and communities to contribute to decision making									
13a. Will it identify and engage with hard to reach stakeholders?	x								
13b. Will it encourage wider community involvement in design, or the provision of services?	x								
13c. Will it enable the community to contribute to and have influence in decision-making and be involved in implementation ?	x								

14. To develop strong and positive relationships between people from different backgrounds and communities?									
14a. Will it create a sense of belonging and well-being for all members of the community?	x								
14b. Will it support community development?	x								
14c. Will it improve relations between all groups and religions (including between gypsies and travellers and settled communities)?	x								
14d. Will it reduce prejudice (racial or homophobic)?	x								
15. To improve access to basic goods, services and amenities for all groups									
15a. Will it improve equal access to cultural, sporting and leisure facilities including natural green	x								

spaces?									
15b. Will it improve equal access to essential services and facilities, including for gypsies and travellers?	x								
15c. Will it improve the range and quality of cultural, sporting and leisure facilities and equal access to them?	x								
15d. Will it improve equal access to basic goods, promoting the use of those that are locally sourced?	x								
16. To protect, enhance and manage the Region's rich diversity of cultural and built environmental and archaeological assets / To protect places, landscape and buildings of historic, cultural and archaeological value.									
16a. Will it protect and enhance the character and appearance of archaeological sites, historic buildings, townscape,	x								

landscape, parks and gardens and their settings?									
16b. Will it improve access to buildings of historic/ cultural value?	x								
17. To protect and enhance the biodiversity, local character and accessibility of the landscape across the region									
17a. Will it protect and enhance the character and appearance of the regions townscape and countryside maintaining and strengthening local distinctiveness and sense of place?	x								
17b. Will it protect and enhance the biodiversity of the regions landscapes?	x								
17c. Will it protect and enhance the accessibility of the landscape across the region?	x								

17d. Will it protect and enhance the tranquillity of the region's landscapes?	x								
18. To protect and improve local environmental quality									
18a. Will it reduce light and noise pollution and graffiti?	✓		+	+	0	✓	✓	+	Theoretically, if there is an overall reduction in car parking spaces there may also be a reduction in car parks with associated light and noise pollution and graffiti.
18b. Will it redress environmental inequalities within region's urban and/or rural areas?	x								
19. To protect and enhance the viability of endangered species, habitats and sites of geological importance/ to protect and enhance biodiversity.									
19a. Will it protect and enhance existing designated European, national and regional wildlife and geological sites and species populations?	x								
19b. Will it protect and enhance	x								



habitats and species, provide opportunities for new habitat creation and reverse the fragmentation of wildlife corridors?									
20. To protect and improve the quality of inland and coastal waters									
20a. Will it reduce or manage flooding?	x								
20b. Will it maintain and enhance ground and surface water quality?	x								
20c. Will it improve the quality of coastal waters?	x								
21. To protect and improve air quality									
21a. Will it maintain and improve air quality?	✓		+	+	0	✓	✓	+	Theoretically, if there is an overall reduction in car parking spaces there may also be a reduction in car usage with associated air pollution.
21b. Will it address the causal factors of poor air quality in AQMAs?	✓		+	+	0	✓	✓	+	Theoretically, if there is an overall reduction in car parking spaces there may also be a reduction in car usage with an associated reduction in air pollution.

22. To restore and protect land and soil									
22a. Will it reduce the amount of derelict, contaminated, degraded and vacant/ underused land?	x								
22b. Will it encourage the development of brownfield land in preference to Greenfield?	x								
22c. Will it reduce the loss of good soils to development?	x								
22d. Will it maintain and enhance soil quality?	x								
23. To mitigate and adapt to climate change									
23a. Will it reduce or minimise greenhouse gas emissions?	✓		+	+	0	✓	✓	+	Theoretically, if there is an overall reduction in car parking spaces there may also be a reduction in car usage with associated ghg emissions.
23b. Will maintain water abstraction, run-off and recharge within carrying	x								



capacity?									
23c. Will it contribute to the ability to adapt to the impacts of climate change?	x								
23d. Will it expose the region to increased flood risk	x								
23e. Will it reduce the economic impact of the future effects of climate change?	x								
24. To ensure the prudent use of natural resources and the sustainable management of existing resources									
24a. Will it alter the demand for raw materials and natural resources?	x								
24b. Will it support the repair and re-use of existing buildings?	x								
24c. Will it reduce minerals extracted and imported?	x								
24d. Will it promote the	x								



use of recycled and secondary materials?									
25. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources									
25a. Will it minimise the need for energy?	x								
25b. Will it maximise the production and/ or use of renewable energy?	x								
25c. Will it increase energy efficiency in buildings, transport modes etc?	x								
25d. Will it minimise the use of fossil fuels?	✓		+	+	0	✓	✓	+	Theoretically, if there is an overall reduction in car parking spaces there may also be a reduction in car usage with associated use of fossil fuels.
26. To manage waste sustainably, minimise waste, its production and increase reuse, recycling and recovery rates/ to minimise waste production and increase re-use, recycling and recovery									
26a. Will it minimise the production of waste?	x								
26b. Will it increase waste recycling and reuse?	x								



26c. Will it reduce the amount of residual waste to landfill?	*								
Summary	It is technically quite difficult at this level to provide a detailed assessment of the implications of the new standards as they are decided on a case-by-case basis. However, bearing this in mind, this policy generally performs better than the previous one, essentially due to the fact that there is more 'granularity' in the standards. With more accuracy comes greater certainty for developers and assumes an overall reduction in car park space provision. It could also be assumed that a greater accuracy in allocations could reduce the amount of car parking facilities actually needed and car usage itself (combined with improved public transport provision). Finally, there is a good emphasis on provision for cyclists and other forms of active transport and an emphasis on access for the disabled.								

