

Panel Question (i)

Should separate policies be used in this chapter to cover the individual aspects of (a) integrated land management incorporating woodland/forestry, (b) biodiversity and (c) landscape and heritage (culture)?” Are the policy tests sufficiently explicit?

1.1 The Assembly considers that Policy EM1 promotes the concept of integrated land management by fostering a joined-up approach that addresses all aspects of the environment. Earlier drafts of the environment policies attracted criticism, from GONW in particular¹ with suggestions that they lacked spatial interpretation and repeated national planning policy guidance. The approach in draft RSS combines environment-related themes, gives specific guidance on particular regionally or sub-regionally specific aspects and provides further spatial interpretation where appropriate. When planning for an environment that is multi-functional in its nature (offering many assets that can be promoted and enhanced for environmental, economic and social gains), a joined-up, integrated approach to delivery has to be fostered. This is reflected in the presentation of the policy, combined as a whole rather than split into separate sections. Inherent linkages exist between Policies EM1, EM3 and EM4.

1.2 Policy EM1 avoids repeating national policy either directly verbatim or essentially reproducing it with different wording, resorting to platitudes or addressing planning issues that are more appropriately addressed at local level, as required by PPS11². New national planning policies contained in guidance such as PPS9 Biodiversity and Geological Conservation³ offers a clear policy framework for Local Development Frameworks to follow. For example, the Key Principles relating to biodiversity and geological issues cover about every eventuality in how to consider the biodiversity matters of a site. It also outlines guidance in relation to International Sites, SSSIs, Regional and Local sites, Ancient Woodland and other Important Natural Habitats, and Networks or Linked Habitats. Therefore there is no need to duplicate this in RSS.

1.3 The Assembly contend that the role of RSS in relation to aspects of the environment addressed in EM1 is to provide a spatial interpretation of how to manage the environmental assets of the region and, where appropriate, provide a regionally or sub-regionally specific framework to promote, enhance and maintain it in its built and natural forms⁴.

1.4 In terms of ‘policy tests’, as mentioned in the response by Cumbria CC to the Draft Matters and Participants, we acknowledge that a number of respondents would like to see further detail within EM1. We invite Cumbria CC and others as appropriate to bring forward how they would like to see EM1 changed.

¹ GONW Comments on emerging RSS – Letter of 12th July 2005

² Planning Policy Statement 11 ODPM, 2005, paragraphs 1.5-1.7 (**PP11**)

³ Planning Policy Statement 9: Biodiversity and Geological Conservation, ODPM, 2005, (**PP9**)

⁴ for example, the element of policy to exploit the regeneration potential of historic assets across a wider sub-regional area, or areas, such as the maritime heritage of the coast or the traditional architecture of villages in Cumbria, Lancashire and Cheshire

Panel Question (ii)

Does the draft RSS provide an appropriate steer in relation to green infrastructure aspirations and requirements? How will this policy be implemented?

2.1 The recently produced Draft Green Infrastructure Guide for the North West⁵ provides further guidance on how to plan green infrastructure and implement policy EM3 to local authorities and other partners who will be involved in Green Infrastructure delivery. The Guide has been developed with a number of key stakeholders in the region and underwent a period of consultation in the summer, with an associated seminar event. The Guide provides an explanation of what Green Infrastructure planning is and the benefits to be derived from it. It offers advice on data sources, tools and techniques for mapping green infrastructure resources, making an assessment of functionality of different pieces of green infrastructure and subsequently producing an intervention plan. The policy will require a partnership approach to implement it – it will not be done solely by LDFs and local authorities, although they may play an important role in procuring new green infrastructure resources where capital works are required through methods such as planning conditions and obligations. They may also play key co-ordination roles in green infrastructure plan making. The policy includes two important dimensions; firstly to advance the targeted delivery of green infrastructure in areas of deficit, and secondly to integrate green infrastructure provision into new developments.

2.2 The inclusion of green infrastructure within LDFs will be essential to ensure effective delivery at the local level that is integrated with wider spatial planning concerns. The Draft North West Green Infrastructure Guide provides a regional definition of green infrastructure, and guidance on how to put a green infrastructure plan together. This may be adapted to suit local circumstances, which obviously differ throughout the region.⁶

2.3 Ultimately, local planning authorities, in consultation with their local stakeholders, are best placed to determine the most appropriate way to respond to the unique opportunities and challenges at the local level.

2.4 There are a multitude of existing organisations that have a strong role to play in taking this forward. Examples include the Community Forests and urban forestry delivery agents, local authorities, The National Trust, the Land Restoration Trust and private sector organisations to name only a few. As far as possible, existing partnerships and structures are used as the vehicles for driving this agenda forward, rather than adding to an already crowded delivery landscape. An informal partnership, either regionally or sub-regionally could be very useful in developing an unofficial coalition to champion the cause of green infrastructure, preferably centred on the emerging Natural Economy Northwest programme, to which specific

⁵ Draft Green Infrastructure Guide for the North West, NWRA et al, 2006,

⁶ For example, key green infrastructure resources could be identified and safeguarded through the use of Area Action Plans, particularly in areas where focussed intervention and conservation effort is required. Alternatively, policy and guidance reflecting specific local circumstances could be set out within a Supplementary Planning Document. This could be applied to a major regeneration site, a whole Local Planning Authority area, or an area that covers more than one local planning authority, as need and circumstances dictate. However, as green infrastructure resources will cover much of the geographical area of a local planning authority's jurisdiction, elements of one particular local authority's Local Development Framework should not be seen as the sole delivery vehicle as they only relate to certain areas within an LPA boundary. Other plans and strategies will play their part, and provision should also be made for cross-boundary working.

resources are allocated for disseminating the economic objectives of green infrastructure.

2.5 The key outcome of green infrastructure planning would be a measurable improvement in the provision of quality, integrated networks of green spaces that overcome functionality deficits in areas of greatest need.

Panel Question (iii)

Does the draft RSS take adequate account of the need to consider the implications of development in areas of flood risk?

3.1 Draft RSS applied a broad strategic consideration of flood risk when developing the broad spatial strategy, based on current levels of knowledge of areas of high flood risk, and the possible impacts of climate change. Briefing Paper 4⁷ sets out details of known areas of flood risk, in the form of Flood Maps, produced by the Environment Agency, as at March 2006. These display areas of risk throughout the North West, with Flood Zone 3 being at a higher level of risk than Flood Zone 2. Also, climate change has the potential to create further impacts in the form of excesses of rainfall in the winter, which could also be increasingly more intense than what the region has previously experienced. This knowledge, along with other research outcomes and recommendations such as those outlined in the Tyndall Centre/CURE report⁸ are taken into account. Policy EM5 contains strategic measures to help minimise flooding impact (e.g. Sustainable Urban Drainage and ensuring that development is protected to appropriate standards). As well as the economic costs of flooding, the individual social and health costs are also taken into account through the policy requirements in policy EM5⁹.

3.2 Due to the timing in submitting Draft RSS and the issuing of PPS25, further work on flood risk in addition to that already known was not possible. Previous consultations during the RSS process had not thrown up flood risk as a major issue that could pose problems for the implementation of the growth levels identified in RSS, and one that could do with urgent further research. However, following submission of Draft RSS, work undertaken by the Environment Agency¹⁰ provides a quantitative assessment of flood risk in relation to proposed growth in the North West to assist with the production of a Regional Flood Risk Assessment which in turn can inform Strategic Flood Risk Assessments carried out by local authorities. Further development of this work will provide a framework for the consideration of flood risk at varying geographical scales across the region and subsequently provide further information to assist in the assessment of the implications of development and areas of flood risk¹¹. As this work is developed, RSS could start to develop areas of work as identified by AGMA in their response.

⁷ Briefing Paper 4 – Map of Flood Risk Areas and how they relate to development proposals, NWRA, September 2006

⁸ The Spatial Implications of Climate Change for the North West, Tyndall Centre North & Centre for Urban and Regional Ecology, 2003

⁹ By requiring that development exceptionally must take place in current or future flood risk areas is resilient to flooding, this acknowledges some of the social and health-related risks to communities, such as increased levels of stress from flooding events, and possible collapse in property values due to flooding causing people to relocate and consequently breaking communities up.

¹⁰ Flood Risk Ranking for the North West Region Report, Environment Agency, 2006 (Produced to support the development of a regional flood risk assessment)

¹¹ Although work can be developed further on a strategic consideration of flood risk, one important point to bear in mind when asking this particular question is that it is complicated for the Regional Spatial Strategy to assess actual flooding impact because it cannot prescribe development to occur on specific

Panel Question (iv)

Are water resources and the capacity of both water and sewerage infrastructure adequately considered in the draft RSS?

4.1 Draft RSS seeks to address this issue in Policy EM5, taking a precautionary approach of ensuring that infrastructure can be provided ahead of development. Since the submission of Draft RSS, the Environment Agency and United Utilities have undertaken further work¹² on assessing water capacity within the region. The work takes a coarse-scale look at this by using water company water resource zones as the basis for assessment. Various data assumptions were made (see report for further details of methodology), however the report shows that (considering the water company's 'Final Planning' figures that go up to 2030), within the 'Integrated Water Zone', which covers approximately 95% of the North West region, there is projected to be a deficit in supply-demand by approximately 2010 (with no increased water efficiency rates), and a deficit by approximately 2012 if a 25% increase in water efficiency rates is achieved. The housing growth rates in the draft RSS mean that the zone may be in deficit by between 20 Ml/d and 50 Ml/d (depending on which water efficiency scenario is considered) by 2021. There are however, a lot of unknowns surrounding this work, such as possible changes to United Utilities abstraction licences, the levels of water resource available, and the levels of water efficiency in all development types. There is also the issue of how much investment the utility companies are allowed to invest by the regulator as part of future Asset Management Plan (AMP) process.

4.2 The Environment Agency has submitted suggested changes to policy EM5¹³, which Assembly officers would support. The Assembly is keen to work with the Environment Agency, United Utilities and other organisations with a predominantly environmental remit to ensure that proposals in the RSS do not prove ultimately unsustainable in terms of the region's water resource capacities.

sites – it can only prescribe areas in the form of broad locations. Flooding is often a specific-site related phenomenon.

¹² Water Resources Implications of RSS, Environment Agency and United Utilities, 2006

¹³ Environment Agency (585/1464)