

THE ROYAL TOWN PLANNING INSTITUTE

VIEW: SHAPING THE NORTH EAST

A response to the Government Office for the North East
on the Submission Draft of the Regional Spatial Strategy
for the North East of England

2005/37

October 2005

INTRODUCTION

1. *VIEW: Shaping the North East* is the Regional Spatial Strategy (RSS) for the North East Submission Draft. The Strategy has been prepared by the North East Assembly in liaison with local authorities and other regional stakeholders. On approval, it will replace the existing Regional Planning Guidance for the North East (RPG 1).
2. *VIEW* will determine how much development will take place in the region to 2021 and beyond, and where it will be located. It provides the long term framework for the region for developing a stronger economy and improving the quality of life of communities as places to live and work. It also sets out policies and proposals to protect the environment, and identifies the priorities for transport investment in the North East.
3. The North East Assembly published *VIEW: Shaping the North East Consultation Draft* in November 2004. Following the end of the consultation period, responses were considered by the Assembly, and changes made. This revised version has now been submitted to the Secretary of State, and, following the current consultation, will be debated at an examination in public beginning in March 2006.
4. *VIEW: Shaping the North East*, along with supporting technical documents, is available on the Assembly's website at www.viewnortheast.com.

GENERAL COMMENTS

5. The Institute welcomes the opportunity to comment on the Submission Draft of the Regional Spatial Strategy for the North East. This response has been prepared on the basis of comments received from members living and working in the Institute's Northern Region – ie Northumberland, Tyne & Wear, County Durham and Tees Valley – and so incorporates considerable local knowledge.
6. In formulating its response, the Institute's focus has been – is this draft RSS good planning? In this context, we concentrate on matters of process, overall form and content, and on the relationship with other regional strategies, rather than on detailed involvement with specific policies and proposals.

DETAILED COMMENTS

THE RSS PROCESS

Consultation and Communications Strategy

7. The Institute considers that the overall consultation and communication process has been effective, particularly taking into account the changes in timetable imposed by the regional referendum and the *Northern Way* initiative. Working arrangements – forums, groups and working parties – have in general worked well, though perhaps they have been dominated by public sector and, more particularly, local authority inputs at the working level.
8. The nature of the RSS process in the region has tended to favour a consensual approach. This is not a bad thing in itself, if a genuine consensus can be reached, but there has perhaps been a reluctance on the part of the Assembly to generate real debate on key spatial issues and options before trying to reach a jointly agreed view. Nevertheless, the Submission Draft is a marked improvement on the earlier Consultation Draft, with a much more robust and better-supported set of policies.

Sustainability Appraisal/Strategic Environmental Assessment

9. The Institute has some concerns about the efficacy of the sustainability appraisal/strategic environmental assessment process as it has been undertaken, some of which are echoed later in comments on the content of the Submission Draft.

A limited range of options

10. We believe that the Assembly may have met the letter rather than the spirit of the EU Directive on SEA. The Directive and related UK guidance on sustainability appraisal put great emphasis on an open process of identifying and appraising options before reaching the preferred options stage. The Assembly looked principally at various growth scenarios, with some spatial variations added late in the process. The Institute is concerned that, although the Submission Draft may essentially be sound, some opportunities for innovation in spatial policy making may have been missed.

Mitigation

11. We note that the sustainability appraisal report says that there would inevitably be some negative environmental impacts if the growth rates included in the Submission Draft were achieved, but that these have not all been quantified, or mitigation specified. This task is left, in many instances, to lower level plans and strategies. The sustainability appraisal report also suggests that RSS policies, in themselves, are unlikely to deliver significant greenhouse gas emissions, when compared against regional targets. It may be that lower level plans and strategies will indeed pick up the baton, but it is of concern that the RSS has not been able to be more specific and clear about the nature and scale of the impacts and the related mitigation.

Absence of any systematic examination of transport schemes

12. The Institute believes that consideration of transportation issues should be placed at the centre of the SA and SEA process, given the significant social, economic and environmental impacts – both positive and negative. We are not convinced that the implications of the schemes put forward in the embedded Regional Transport Strategy (RTS) have been fully thought through, or that they have been fully assessed, either individually or collectively.

13. It is also clear, from the sustainability appraisal report, that the environmental impacts of air travel have not been considered in any great detail. It is accepted that air travel is subject to international and national rather than regional regulation, but the RSS very actively supports the expansion of the region's airports, and thus the growth of air travel. In these circumstances, the implications should be explored, and explained, in greater detail than is given at present.

Open space

14. The Institute is surprised that the sustainability appraisal report, under *criteria 11.2 and 14.2*, does not draw attention to the lack of substantive RSS policies seeking to protect and enhance the "ordinary" open spaces in urban areas. There might be reasons for not having such policies in the RSS, but the sustainability appraisal should surely have highlighted their absence.

Conclusion

15. It is felt that, of all the English regions, the North East should be capable of moving relatively rapidly towards a more sustainable future. In some ways, historically, it has lagged behind other regions – in levels of car ownership and use, for example. This should not be seen simply as an indicator of economic failure, but as an opportunity to catch up with other regions and in a sustainable way, so that the problems that other regions now face can be avoided.

RELATIONSHIP WITH OTHER REGIONAL STRATEGIES

Regional Economic Strategy

16. The Institute draws attention to the apparent discrepancies in growth scenarios between the draft RSS and the draft Regional Economic Strategy (RES), and the implications of this for spatial planning. The draft RES proposes an "aspirational" average growth rate of 3.4% per annum GVA to 2016, while the draft RSS adopts 2.8% per annum to 2021, but only 2.5% per annum as the basis for its housing allocations. A greater degree of alignment between the strategies is required, or, at the very least, a more detailed explanation of the rationale for, and the implications of, the differences.
17. Generally, linkages with other North East regional strategies have been addressed appropriately.

The Northern Way

18. Whilst there were indications in the 2004 Consultation Draft that the *Northern Way* output had been rather hastily overlain on the earlier RSS material, this appears to have been resolved to some extent in the Submission Draft. However, the Institute believes that the current treatment of the central *Northern Strategy* concept of the city regions needs further consideration, so that the spatial implications are clearer. There appears to be a danger that everyone will see something for themselves in each of the city regions, resulting in a damaging lack of prioritisation in a number of key policy areas.
19. It has been said very clearly that the spatial aspects of the *Northern Way* must be reflected in reviews of the three relevant RSSs, as they emerge. Nevertheless, the Institute has some concerns that the *Northern Way*, and its city region development plans, could end up as an alternative spatial framework for the three regions. The role and status of these, in relation to RSS, would perhaps benefit from some exploration at the Examination.

The North West and Yorkshire & the Humber

20. We believe that cross-boundary issues relating to the North West region have been addressed satisfactorily. We are not convinced that the same is true of Yorkshire & the Humber, especially with regard to housing issues across the boundary with North Yorkshire.

National Planning Framework for Scotland

21. There is concern that important cross-boundary issues vis-à-vis the Borders and Lothians Districts in Scotland have not been given sufficient consideration. This relates particularly to housing policy and strategic transport infrastructure.

THE FORM AND CONTENT OF RSS

Overall approach and structure

22. The enlargement of the scope of the previous RPG 1 in the Submission Draft RSS is welcomed by the Institute, as are the attempts to achieve greater and better integration with other regional strategies, and to include issues that were outside the compass of RPG. It is noted that some of the “inputs” to RSS, in the form of regional topic and sector research, are still in the “development” phase. This highlights the crucial requirement for effective monitoring and review of the RSS.

23. With this proviso, the overall *Vision; Key Challenges; Development Principles; and Locational Strategy* are broadly endorsed, subject to the points set out below.

City regions

24. The Institute strongly supports the city region concept, but suggests that more could be done to emphasise the essentially polycentric nature of the two city regions. Within this, it is important to be clearer about the different roles that each centre at each level might and could have, in order that appropriate locational policies can be developed. We are not convinced that the *Submission Draft* is clear enough on definitions and distinctions within the city regions to allow meaningful decisions to be made where these have implications across local authority boundaries.

25. There are also some concerns that, in the absence of sub-regional spatial strategies, RSS may not adequately address the policy gaps that could be left with the progressive demise of structure plans in the region. Sub-regional policies and cross-boundary infrastructure projects (such as the A1-South East Northumberland Link Road) appear to be particularly at risk.

Economic prosperity and growth

26. The Institute questions whether the term “*step change*”, which is generally used in the draft in the context of increased economic activity, has been adequately defined, or is meaningful. We suspect there is little evidence from past experience in the UK that dramatic changes of this nature take place, especially in the more peripheral regions. It is certainly important to plan ahead for varying levels of growth, and have policies and processes - such as plan, monitor and manage – that can cope with unexpected surges, but we think the use of the term as it stands is not helpful. We also refer back to our comments on SEA/SA (paragraph 10, above), that the Draft RSS, according to its own sustainability appraisal, does not seem to have fully assessed the environmental impacts and necessary mitigation for higher levels of growth. While the need for increased numbers of well-paid, long term jobs is endorsed, it is important that a balance is achieved

between “standard of living” and “quality of life” objectives.

27. There must be some tensions between the stated priority of focusing new employment in the cores of the conurbations and the region’s extensive portfolio of “*Prestige Employment Sites (PESs)*”, the majority of which are in out-of-centre locations. In the absence of any clear differentiation of the roles envisaged for individual PESs, it is not clear that this issue will be capable of resolution through application of a sequential approach.
28. As a consequence, the Institute would look for more extensive guidance on the differentiation of criteria for the development of individual PESs – linked, for example to the RES work on sectors and clusters. This should prevent PESs from simply absorbing the growth in demand for conventional office uses, and direct the latter to city and town centres.

Sustainable communities

29. The Institute considers the use of the phrase “*market failure*” to be unhelpful. – so called “market failure” is simply an expression of a lack of demand for property of a particular type, or tenure, in a particular area, at a point in time. The Government’s definition is that “*sustainable communities are places where people want to live and work, now and in the future*”. It is the “where people want to live” that must be addressed, in order to “turn round” areas of low demand and abandonment.
30. It does not seem a sensible way forward to base the overall economic growth strategy on a 2.8% GVA rate, and then base provision for one of the most important components of the strategy – housing – on a lower growth rate. It would be more practicable to adopt a single growth rate and put in place a robust “plan, monitor, and manage” regime. This would be used to keep plan components in step, should the target rate of economic growth be exceeded - or not achieved.
31. We endorse the approach to housing densities advocated in the Submission Draft (s3.72 and *Policy 30*).

Natural and Built Environment, Heritage and Culture

Waste and minerals

32. The Institute would argue that the Submission Draft does not satisfy the requirements of PPS 10 - there is insufficient guidance on sub-regional allocations, as required by the Government’s PPS.

Climate change

33. We welcome the inclusion of references to climate change in the Submission Draft, though we note that these were introduced late in the process. We believe that climate change is still not adequately represented in the Submission Draft, and suggest that consideration of its implications should be more fundamental to the RSS as a whole. As the sustainability report indicates, there is an obvious tension between the economic growth aspirations of the RSS and the need to reduce greenhouse gas emissions significantly. The need to “decouple” economic growth and climate change is not a central policy principle of the Submission Draft.
34. In contrast, the Submission Draft is very positive about reducing energy use in development and construction, and very supportive of renewable energy. This is welcomed. The Institute believes some of the proposals – for example, introducing policies

requiring 10% of energy use in buildings to be from embedded renewable sources – are challenging. It is essential that the clear requirement in the Submission Draft to cascade these provisions down to LDFs is maintained consistently, so as to provide a “level playing field” across the region.

Air quality and pollution to air

35. Air quality and pollution to air get very little mention in the Submission Draft, perhaps because the Assembly does not see any regionally specific issues to address. While the RSS should not simply repeat national policy for the sake of it, there are emerging problems of poor air quality, especially in the larger towns and city centres, and the RSS ought to give a clearer lead to local authorities in taking air quality seriously, both in planning policy and in development control.

Flooding

36. The Institute welcomes the comprehensive treatment of flooding in the Submission Draft, and is particularly supportive of the clear lead being given to the adoption of more sustainable forms of drainage and water management.

Open space

37. The Submission Draft deals effectively with strategic open space, but does not mention the need to protect and enhance “ordinary” open spaces in urban areas. These seem to have fallen into a gap between policies for green belt and open areas (*Section 2*) and those for protecting landscape character and trees, woodland and forests (*Section 3C*). The Institute recognises that there is recent national guidance, and that it might be difficult to demonstrate regional specificity on this issue, but most other forms of environmental asset do get a mention in the RSS, even if only fleetingly.

Connectivity

38. The proposals to secure the facilities for greater accessibility to the rail network for intra-regional journeys – particularly between the regeneration areas and the conurbations – are supported. However, as the strategic policy for the East Coast Main Line is for it to function increasingly as a “through route” between England and Scotland, the necessary improvements should be given higher priority for implementation.
39. The Submission Draft acknowledges the case for the completion of the dualling of the A1 between Tyneside and Edinburgh, but does not follow this up forcefully. The importance of this route in linking the North East with the dynamic Lothian region, and the cost in human terms of the poor safety record of the present road, demand that this road scheme should be given the highest priority.
40. The Institute cannot endorse the unqualified support for increased air travel in the Submission Draft. This should be tempered with some acknowledgement of the increasing contribution that air travel makes to total carbon emissions.