

# General and Section 1 Comments

## Id No Respondent

## General Comments

422 Acorn Business Park Durham Ltd

Paragraph 1.14 - The North East of 2021

In order to assist with achieving the 'Vision' of the RSS, as set out at paragraph 1.9, notably in relation to a "dynamic economy" it is suggested that freight handling facilities involving those at the region's ports, airports and also inland sites that are connected to the rail and principal road network (our emphasis) would have a key role in economic growth of the region. It is suggested that the last sentence should be amended by inserting "rail network" after "region's ports" on the penultimate line of this paragraph. This revision would be consistent with one of the key challenges, namely "Changing Travel Behaviour" at paragraph 1.27.

Paragraph 1.48 – Development Options

We object to the selected 2.8% GVA growth over the plan period and development option (4) which "focuses development in the conurbations and main towns." It is noted at paragraph 1.50 that the draft RES proposes an annual average growth in GVA of 3.4%. In addition, in order to achieve growth in the GVA, our preference is for option (3), namely "reducing economic disparities with significant growth achieved through a dispersed pattern of development". It is considered that the focusing of development in the conurbations and main towns will constrain the GVA growth of the region to 2021 and beyond. It is suggested that the selected option (4) is too narrow as clearly there are some forms of development that are either inappropriate for inclusion within the conurbations and main towns or, could be accommodated in a sustainable manner either within or on the periphery of the existing urban areas or within more rural locations

345 Age Concern

In general section 1 of the RSS is positive, particularly in its vision Para 1.9 that 'the three main regional strategies – the RSS, the RES and the IRF should share a common vision for a better North East and a set of common values to guide decisions'. However it is somewhat concerning that Para 1.8 states 'there is a broad consensus amongst public and private sector organisations about the main challenges which the region faces' – the opinion of the voluntary and community sector about the challenges which the region faces should be included.

Para 1.12 which notes the regions population is increasing could include more detailed information about the ageing population. For example ONS forecasts that by 2028 the proportion of the North East's population that is aged over sixty is projected to increase by 45%, or 250,000 people.

It is positive that Para 1.16 recognises the importance that 'to achieve the regional vision, it will be important that all other plans, strategies and programmes at all levels seek to engage all members of communities to ensure that their views are incorporated and inform their preparation and development'.

We welcome the contents of Para 1.20 regarding the introduction of the requirement for planning authorities to require major planning applications to complete a 'Sustainability Statement' in support of their applications.

We agree that a key challenge noted in Para 1.27 is to reduce 'Regional Disparities – re-skill and increase participation within the workforce to enable the region's population to share in the growth of the economy and improved quality of life and help reduce deprivation'. However it would be valuable to note the importance of ensuring that older people are able to maximise their contribution to the region's economy. It is worth noting that unpaid work by older people nationally is worth a cautious estimate of £24 billion each year, equivalent to 2.9% of economic output. Also that in 2001, 6.7 million people over 50 was in paid work. They contributed £201 billion to national economic output, approximately one quarter of the total economy (Source – The economy and older people, Age Concern Reports, Feb 2004 – copy available upon request.). As the population ages, measures must be in place to enable older workers to remain in full-time or part-time employment, to encourage retired workers to return to employment, and to deliver on commitments to lifelong education and training. There should be reference to the substantial contribution of volunteers, not only in voluntary organisations but in other key roles such as in education and health. Moreover, the training needs of the region's many thousands of volunteers should not be overlooked or under-estimated. The voluntary and community sector has a vital role to play in addressing these challenges and helping to reengage excluded individuals in both learning and employment

## Id No Respondent

## General Comments

97 Alnwick District Council

The document is still confused on the shift in emphasis to city regions—references to conurbations are scattered throughout the document. For example Northumberland Districts of Blyth Valley & Wansbeck are apparently in the Tyne & Wear city region but are not treated as such in policies. If the city region philosophy is to be fully adopted throughout the RSS then it should be reflected as such in the policy text and background.

Para 1.3 Reference is made to PPS11 to justify approach taken towards RSS superseding the region's structure plans. Paras 2.54 to 2.56 of PPS11 make it clear RSS is expected to supersede the county structure plan as soon as it is adopted, unless the RPB decides to allow the 3 year period of "saved" policies to expire. No justification has been put forward as to why this approach is being advocated. Alnwick District Council argue that the RSS should immediately and fully replace all structure plans in the region on its adoption. It seems unnecessarily complicated to have different strategic policy in different sub regions and to have RSS policies 19,28,29, & 30 in place and superseding the structure plans before the rest of the RSS.

As soon as RSS is published by Secretary of State it should replace all structure plans in the region in their entirety.

12 Alpha Recovery

M&J Burke own this site on the northern edge of Killingworth on the eastern edge of Burradon Village known as Camperdown and potentially accessed via some Council land from the new roundabout serving the Wimpey and Barratt development known as Greenhills off the A1056 Killingworth Road. The site is allocated in the adopted Tyne and Wear Green Belt in the North Tyneside UDP Policy E 20/1 and as a Site of Local Conservation Interest Policy E12/3. However the site is previously developed land being the former Burradon Colliery and Seaton Burn Wagonway. The former colliery spoil heap has been subject of reclamation scheme. The site has a pond which could be incorporated into any redevelopment. The site has been a licensed landfill site for the disposal of inert construction waste with a clay cap. They are therefore substantial land owners with strategic sites in the RSS area.

Para 1.27 includes "providing an inclusive range of housing " and "Stemming and reversing population decline by.... Good quality housing and living environments that meet their aspirations and a good quality of life". This is conditionally supported.

However, para 1.31 and 1.32 in the Consultation Draft was more explicit in stating "better living environments will also encourage people to stay or enter the region" and " there needs to be a sufficient choice of better quality housing " and " higher regional housebuilding rates". It is hoped this is not a deliberate lack of emphasis.

Object to para 1.51 which downgrades the previous 160,000 dwelling forecast to 141,000. Limiting numbers would impact upon the ability for some growth renewal of secondary towns across the Blyth valley such as Seghill which have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development. To remove this objection the figure 160,000 should be reinstated. Limiting numbers would impact upon the ability to provide for some growth and renewal of settlements such as Killingworth Village which have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development. For this objection to be removed, the previous forecast of 160 000 should be retained.

158 Bain Swan Architects

No one doubts the need for regeneration of the urban centres at the heart of the north east. But viewed from the periphery, the Strategy is one dimensional, concentrating on the macro scale , addressing problems mainly in relation to the city region concept. It overlooks the need for properly tailored proposals specific to the needs of the Borough. The Strategy as proposed will impose an iron grip on the area preventing it from thriving and making a sick joke of your boast of a 'rural renaissance'.

We urge you to give consideration to developing the strategy in relation to the following:

- The effect of development in the Borough on urban regeneration in the south of the region must be extremely limited and this should not be used to deny a proper future to the peripheral areas.

- a balanced responsible strategy should surely pay more attention to the needs of the peripheral areas.

## Id No Respondent

## General Comments

- An appropriate housing allocation is a vital tool for regeneration of the market towns and the rural areas. Housing is an extremely important component in economic regeneration. In rural areas even small numbers can be highly significant. Berwick's decaying centre is in dire need of investment and housing is the key component to bring new vitality and assist tourism by improving the urban fabric. To eliminate virtually all new housing of any kind is to put a brake on economic development.
- The need to address depopulation and reverse demographic trends towards an ageing population.
- The need to address rising house prices and emigration of young people priced out of the housing market
- the need to provide opportunities for affordable housing - the Housing Associations are already finding that acquiring sites is becoming increasingly difficult as vendors exploit the rising demand produced by constrained supply of land and allocation. We can expect this to seriously worsen if the plan restrictions are put into effect.
- the need for a strategy which is sufficiently flexible to meet the demands of the area throughout the period of the plan. The Structure Plan process is glacially slow and unable to respond effectively to change. Slavish extrapolation of figures based on the recent past will not be sufficient to meet the needs of the future. No commander ever won a war by basing his strategy on the last one.
- The need for a strategy which is flexible enough to allow local opportunities to be exploited as they occur. Many of these will be small scale but will enhance economic, social and environmental sustainability.
- We need an allocation of at least 150 units and this should not include affordable housing
- Most of all we need some vision for the future. We care about our area and want it to thrive and we do not see why this should be thought detrimental to regeneration opportunities in the urban areas. Our area has been subject to considerable change over recent years, much of it adverse, particularly where economic decline in the market towns and the recent wholesale revolution in agriculture is concerned. Confidence is dangerously low and unless the particular character and requirements of the area are understood and a sufficiently vigorous and sensitive plan adopted, we can only foresee further decline. Ironically, the position just north of the border gives rise for some optimism and it would be dreadful if the lack of ambition currently embodied in the strategy prevented the release of what potential there is in North Northumberland.
- 

429 Bain, Stewart, Burchell, Thompson,

No one doubts the need for regeneration of the urban centres at the heart of the north east. But viewed from the periphery, the Strategy is one dimensional, concentrating on the macro scale , addressing problems mainly in relation to the city region concept. It overlooks the need for properly tailored proposals specific to the needs of the Borough. The Strategy as proposed will impose an iron grip on the area preventing it from thriving and making a sick joke of your boast of a 'rural renaissance'.

There is no recognition in the Strategy of the fact that the northern half of Berwick's hinterland lies in the Scottish Borders. In terms of city regions, Berwick is influenced as much by Edinburgh as Newcastle.

It is quite extraordinary that in preparing a strategy for Berwick for the next 15 years there has been no contact with the Scottish Borders Council where a markedly different approach within the same geographical area is being adopted. We protest at this oversight which we regard as negligent and we strongly urge you to put right this omission.

**Id No Respondent****General Comments**

257 Hales,Aichison,Sale, Craig,Richardson  
Bellway Homes NE Division

Para 1.15

Para 1.51 downgrades the previous 160,000 dwelling forecast to 141,000. Limiting numbers would impact upon the ability to provide for some growth and renewal of secondary towns across County Durham such as Ferryhill which will have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development.

Para 1.27 includes “providing an inclusive range of housing” and “stemming and reversing population decline by...good quality housing and living environments that meet their aspirations and a good quality of life”. This is welcomed. However, para 1.13 & 1.32 in the Conclusion Draft was more explicit in stating “better living environments will also encourage people to stay or enter the region” and “there needs to be sufficient choice of better quality housing” and “higher regional house building rates”. It is to be hoped this is not a deliberate lack of emphasis.

177 Berwick-upon-Tweed Borough

RSS 2005 generally welcomed, however there are a number of detailed representations which the Council wishes to make. The city regions concept still has not been fully integrated throughout the strategy, a point made in previous representations. The strategy is confusing and inconsistent in its application of the concept of city regions. Some settlements within Northumberland are referred to as within the City Regions I.e Hexham and Morpeth in Policy 6 and also as within the Rural Areas - Policy 8; this approach is not consistent. Districts are then collectively referred to as Northumberland in Policy 30 New Dwelling Provision. This requires greater clarification and a more consistent approach.

Paragraph 1.3 - The approach set out to the replacement of the County Structure Plans with the RSS in paragraph 1.3 requires further clarification. Whilst Paragraph 2.56 of PPS1 allows for this approach, the justification for doing so is not evident. A single date upon adoption of the RSS would be simpler for all involved in the planning process to understand.

40 Blyth Valley Council

Overall vision and objectives

The Council supports the overall vision which is consistent with it's own visions and objectives set out in the Community Strategy 'The People's Plan'.

The publication of the RSS was delayed in order to incorporate the principles of the 'Northern Way Growth Strategy' published In September 2004 which seeks to reduce disparities between the North and the rest of the UK. Blyth Valley lies within the Tyne and Wear City Region. The incorporation of the City Region concept is generally beneficial to Blyth Valley as it implies a more dispersed development strategy than simply focusing all new housing and employment development on the conurbations. The Northern Way strategy does not appear to have been incorporated consistently throughout the RSS however, with some policies still having an urban/rural focus rather than embracing the city region concept. These are highlighted in the detailed comments set out in Appendix B

Page 13 Para 1.36 Whilst the City Region approach is generally welcomed, the concept has not been applied consistently throughout the documents with some policies still not fully incorporating the city region concept. These are picked up through the detailed comments where necessary. . Page 16

Para 1.49 The growth assumptions are ambitious and may be difficult to justify. Unless the assumptions are fully justified there is a risk that the housing figures will be reduced again, most likely from the shire counties. A reduced housing allocation would impact on the ability of south east Northumberland to achieve its regeneration initiatives.

73 Bowey Homes Ltd

Chapter 1 Page 11 Paragraph 1.27 Bowey Homes have an interest in a site adjacent to Middle Farm/ Rose Villa builder's yard, now a small industrial estate, in Seghill, Northumberland. Together with land owned by Northumberland County Council, it forms a potential mixed use site. With the adjoining industrial estate including residential use on a PDL site. The site is allocated in the adopted Blythe Valley Local Plan as identified for Local/General Employment and Business Park Use, involving some restriction on the range of uses permitted. The site is previously developed

## Id No Respondent

## General Comments

land being the former Seghill Pit which has been subject of a reclamation scheme.

Para 1.30: Bowey Homes have acquired a legal interest in a site off Ryhope Road, Sunderland. This site is of considerable size and capacity and therefore cannot be seen as a 'small windfall site' as allowed in the Interim Strategy and provided for in RSS. This site passes the tests in para 31 of PPG3 in that it is 1) in a location accessible to jobs, shops and services by modes other than the car 2) the capacity of infrastructure exists 3) development would build communities 4) there are no insurmountable physical or environmental constraints.

Permission was first sought in 1994 to erect 29 dwelling houses on the land off Angram Drive. This was refused planning permission related to the loss of open space which was at that point in time judged to be in very short supply. There were also traffic considerations which contributed to the refusal. The current position is that two applications were lodged simultaneously in October 2004, one for 49 dwellings on the Angram Drive site and the other for sports new provision at Shirley Banks. The second of these was granted planning permission by the Council on 16 February 2005. A resubmission on the housing site is being made with a sequential test. The recognition of Sunderland as an urban centre of national importance is welcomed.

14 Brian Cazaly Ltd

Para 1.27 page 11 includes "Providing an inclusive range of housing" and "stemming and reversing population decline by...good quality housing and living environments that meet their aspirations and a good quality of life". This is welcomed. However, para 1.13 & 1.32 in the Consultation Draft was more explicit in stating "better living environments will also encourage people to stay or enter the region" and "there needs to be sufficient choice of better quality housing" and "higher regional housebuilding rates". It is to be hoped this is not a deliberate lack of emphasis.

Para 1.51 page 16 downgrades the previous 160,000 dwelling forecast to 141,000. This approach is over cautious as it does not do enough to stem population decline in areas such as Northumberland. Nor does the figure sufficiently take clearance of older housing stock fully into account which is accelerating in Northumberland.

16 Camtech Properties Ltd

Camtech Properties Ltd own land at entrance of Newcastle Great Park (Northern Development Area) which is in the adopted Tyne & Wear green belt. The site is considered suitable (subject to planning) for indoor leisure/office use. It is known as the former Brunton Quarry.

Support para 1.30 which recognises the site as the gateway to the region and the city as the regional centre.  
Also para 1.43 recognises the A1 serves Scotland and this trunk road provides access to the subject site.

Para 1.27 includes "providing an inclusive range of housing" and "stemming and reversing population decline by...good quality housing and living environments that meet their aspirations and a good quality of life". This is to be welcomed. However, para 1.31 & 1.32 in the Consultation Draft was more explicit in stating "better living environments will also encourage people to stay or enter the region" and "there needs to be a sufficient choice of better quality housing" and "higher regional house building rates". It is hoped that this is not a deliberate lack of emphasis.

Para 1.51 downgrades previous 160,000 dwelling forecast to 141,000. Limiting numbers would impact upon the ability to provide for some growth and renewal of secondary towns across County Durham such as Newton Aycliffe which have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development.

198 CBI

This response focuses on the wider growth targets set out in the RSS and our analysis is that the current document does not have enough flexibility to allow the North East the opportunity to fulfill its economic potential.

We recognise the importance of the RSS in setting out the framework within which the growth of the region will occur and the key role it will play in informing the local planning regime in the region. We too recognise the need to be realistic about future growth prospects. However, we feel that the Assembly, as the 'Voice of the Region', is being far too conservative in its estimates of future North East growth. There is a real danger that the policies and framework set out by the RSS will become a self-fulfilling prophecy of continued lower growth and investment in the North East, as

## Id No Respondent

## General Comments

compared to the rest of the country.

Forecasts based on historic data are an incomplete view of the economic potential of the region. Certainly the North East has seen severe structural decline over the last 20 years in some of its key sectors. However, there is evidence that change is happening. Particularly in terms of urban regeneration, population rises in certain parts of the region and the emerging growth of higher value added industries, in many cases growing out of the North East's traditional industries. We feel strongly that not only is the RSS underestimating the potential for North East growth but that in doing so is likely to undermine that growth.

We would expect the starting point for the RSS to be at least in line with the Government's 'PSA2 target: Reducing Regional Disparities in Economic Growth', however we are disappointed to see that these targets, in the formation of the various 'scenarios' set out in the RSS have not been picked up.

- 46 Chester-le-Street District Council
- The Submission RSS is a high quality document with an overall vision and objectives that are worthy of support. The growth assumptions in the document expect annual GVA (Gross Value Added, which is Gross Domestic Product minus taxes plus subsidies and is a recognised measure of economic growth) to rise from 1.8% in 2001 to 2.8% over the plan period. This level of growth will reduce the disparities in economic performance between the North East and the other regions and lead to an economic renaissance in the Region. The Council should fully support this aspiration.
- Most of the concerns this Council expressed at the consultation stage have been addressed by the Assembly. In particular the increased housing allocation for County Durham is a welcome change in emphasis that recognises the contribution that the County can make to the future prosperity of the Region. Although the dwelling allocation for the District has not changed it may be acceptable if it is recognised that this figure is a floor and not a ceiling allocation and that flexibility remains to address specific issues of regeneration, affordable housing or housing market pressures. This would reflect the test of soundness in Planning Policy Statement 11: Regional Spatial Strategies, which requires RSS to be robust and be able to deal with changing circumstances.
- 352 Church Commissioners for England
- Paragraphs 1.36 to 1.38 – The Northern Way
- Whilst welcoming the reference to the Northern Way Growth Strategy it is considered that there needs to be greater recognition of the need to improve the range and choice of new housing in the region in order to make it a more attractive place to live. The 'Northern Way' makes several references to the need to provide 'aspirational housing' and to replace the existing housing stock at a much faster pace. It is considered that greater emphasis needs to be placed on the importance of a choice of housing throughout the RSS. In this respect it is considered that greater regard should be had to the 'Regional Housing Aspirations Study – Final Report – March 2005' that was prepared by Nathaniel Lichfield and Partners on behalf of One North East and the North East Regional Assembly.
- Paragraphs 1.49 to 1.52 – RSS Growth Assumptions
- The Church Commissioners are concerned at the level of the overall housing provision that is based on a cautious and too pessimistic approach and an annual growth in GVA of 2.5%. This contrasts with the annual growth of 2.8% that has been used to forecast economic growth. In this respect the Commissioners support the concerns that have been expressed by the HBF in their response.
- 448 Cyclist Touring Club
- Para 1.27 Support all proposals that reduce the need to travel and that give priority to non car modes.
- 335 Derwentside District Council
- Para 1.8 - 1.10 Council supports values
- Para 1.48 - Support chosen option 4 - "reducing economic disparities with development focused within both the conurbations and towns in the city regions" but

## Id No Respondent

## General Comments

Vision and values - Support as they seek to deliver economic prosperity and growth to the region whilst ensuring that this helps build sustainable communities and protects and enhances the environment.

- 401 Duplicate discarded
- Oppose: 1.51 M & J Burke own land east of Killingworth Road north of Nicholson Terrace and south of East Farm purchased from British Coal in 1996 from their Northumberland Agricultural Portfolio. This site is not included in the adopted Tyne and Wear Green Belt but is allocated as Protected Open Land under policy E21/1 of the adopted North Tyneside UDP. We cannot tell the Councils response to development on the site since they have not yet issued their Urban Capacity Study which may identify it as a source of unconstrained green field capacity. The Regional Assembly is asked to monitor the publication of the UCS from this and the other local planning authorities in its region.
- 1.51 downgrades the previous 160000 dwelling forecast to 140000. Limiting numbers would impact upon the ability to provide for some growth and renewal of settlements such as Killingworth village which have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development. For this objection to be removed, the previous forecast of 160000 should be retained.
- 202 Durham County Council
- Para 1.14 refers to "no significant increase in car based commuting". The vision for the region should aspire to actively reduce car use, particularly in the conurbations, alongside vital public transport improvements in the region. Para 1.27 sees a key challenge as stemming urban-rural migration. Whilst there are opportunities to provide better urban housing to retain and attract more people, the choice that people make to live in rural areas should not be seen as a problem. As para 2.135 points out "attractive rural environments are an important part of the region's 'offer' to migrating and returnee entrepreneurs" and make a valuable contribution to the regional economy.
- 336 Durham County Council
- There remain internal inconsistencies and conflicts in the Strategy, particularly with regard to how the Northern Way City Region approach will actually impact on rural areas. The primary focus of development and regeneration on the core areas of the conurbations, which already have significant growth potential, must not be at the expense of compromising the stability of growth in the region as a whole, by increasing disparities with more peripheral rural areas. I object to the failure of the RSS to fully recognise the positive contribution that the whole of County Durham, both urban and rural, can make to the regions future. Balanced new development outside the conurbations should be regarded as an asset, not a threat, to the region's future prosperities. Furthermore, the importance of employment provision focused on the towns in the former coalfield areas and the rural service centres needs greater recognition. Over-reliance on new employment in the conurbations encourages long distance commuting and exacerbation of existing congestion problems, contrary to another of the Strategy's objectives to reduce the need to travel by private car. Local jobs clearly benefit rural areas in terms of retaining population and supporting local services. Para 1.27 sees a key challenge as stemming urban-rural migration. Whilst there are opportunities to provide better urban housing to retain and attract more people, the choice that people make to live in rural areas should not be seen as a problem.
- I would strongly suggest that the Examination should consider the impact of RSS on rural areas and I would be grateful if you would keep me up to date with progress on the RSS.
- 102 Durham Tees Valley Airport
- Vision
- DTVA supports the fact that the aims of delivering economic prosperity and growth and improving connectivity and accessibility within and beyond the region are key themes of the locational strategy of RSS at paragraph 1.5. It also welcomes the recognition, at paragraph 1.14, that the Region's ports and airports have a "key role in the economic growth of the region". An Economic Impact Assessment which accompanies the current planning application for development of the Airport confirms that the development is likely to create 2,300 to 2,500 jobs and add £126 million GVA to the Tees Valley economy.
- In this context it is considered that the vision for the RSS should make clear that development at airports is supported (as per paragraph 2.11 of the Consultation Draft). DTVA objects to the removal of this reference from the Submission Draft.

## Id No Respondent

200 Environment Agency

## General Comments

Generally, the RSS provides a clear strategy for the region and the Environment Agency supports much of it. However, we are concerned that the language of the RSS is not strong enough. For example, policies use words like 'encourage' and 'should', which may be construed as meaning implementation is optional, rather than 'will' or 'shall', which are less open to interpretation.

Although the RSS mentions resource use, we are disappointed that it does not go far enough to promote the challenge of sustainable consumption and production. We should be looking at not only achieving more with less (resource efficiency) and consuming less, but also at how goods and services are produced, as well as the environmental impacts that the products and materials will have over their lifetime.

added to ensure the need for climate change adaptation is represented. For instance: "Developments incorporate mitigation, compensation and adaptation measures to minimise environmental harm and reduce the effects on and of climate change".

the region's problems, we think a short mention of significant areas of poor environmental quality (e.g. air, soil), plus the fact that parts of the region suffer poor health, could be included. The term "high levels of socioeconomic deprivation" does not truly reflect the health status of the region.

Para 1.27 Key Challenges 'Sustainable Consumption and Production' is the only priority from 'Securing the Future', the UK's sustainable development strategy, not reflected in the 'key challenges' section. We believe that sustainable consumption and production is a 'key challenge' for the region.

paragraph 1.8, that it is very important to reduce economic and social disparities. However, it is important to acknowledge that the environment plays an important role in alleviating economic and social disparities and that these issues are interrelated. Taking this on board will enable the region to tackle these issues within the concept of sustainable development.

In addition to the other organisations mentioned in these two paragraphs, the Environment Agency will also be working closely with Natural England, in accordance with the Rural Strategy. A Memorandum of Understanding is being developed nationally.

1.50

What does "...outcomes of RES consultation considered at RSS Examination in Public" mean? Does it indicate that the RES consultation outcomes, with respect to their impact on the RSS, will be considered?

1.51

This paragraph doesn't make sense – the population and dwelling figures, and the justifications for them, are unclear.

Para 1.13 We suggest that wording is

Para 1.26 As this is the paragraph detailing

Para 1.27 Key Challenges 'Sustainable Consumption and Production' is the only priority from 'Securing the Future', the UK's sustainable development strategy, not reflected in the 'key challenges' section. We believe that sustainable consumption and production is a 'key challenge' for the region.

Para 1.8 We agree with the comments in

1.34 – 1.35

163 Friends of the Earth North East

Para 1.5 The first of the four themes in the RSS is stated here as being to 'deliver economic prosperity and growth.' There is no evidence that economic 'growth' as currently defined in terms of GVA delivers a high quality of life which is what the RSS is seeking to achieve overall (as described in the Vision on page 6). There is considerable evidence that aiming to increase economic growth is incompatible with sustainable

02 January 2006

Page 8 of 49

**General Comments**

development, as it all-too-often leads to prioritisation of economic goals over social and environmental objectives and is difficult to integrate with these other two, equally important, components of sustainability. This is undoubtedly why the UK Government has now abandoned the pursuit of higher economic growth in its revised Sustainable Development Strategy published in March this year. Instead, the economic objective has been amended to, 'building a strong, stable and sustainable economy which provides prosperity and opportunities for all' (p.16). PPS1 makes clear that, 'development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy' (para 13). By pursuing economic growth, the draft RSS fails to take account of this significant shift in Government policy, and is in breach of PPS1 by not reflecting the principles of the UK Sustainable Development Strategy.

We believe that the current emphasis on economic growth in the draft RSS is responsible for many of the Strategy's inherent contradictions and inconsistencies, whereby growth-driven policies (for example airport and road expansion, greenfield land development) clash with efforts to achieve sustainable development.

In order to be consistent with Government policy, and so as to make the RSS a fully coherent document that will achieve its stated vision of a high quality of life for all, we strongly recommend that the first theme is renamed 'Delivering a Strong, Stable, Sustainable Economy with Opportunities for All.'

**Para 1.9 -1.10**

Friends of the Earth welcomes the aim to ensure a high quality of life for present and future generations, and the set of values outlined, particularly those on nurturing environmental assets and recognising global responsibilities. Both the vision and values demonstrate the need to take urgent and effective action to tackle climate change, which is now widely acknowledged as the greatest long-term threat to society. Failure to do so will seriously endanger the quality of life of future generations, whilst also imposing a heavy toll on communities around the world, including many of the poorest, who will suffer the severest climate change impacts.

Delivering the RSS vision and adhering to the RSS values such as recognising global responsibilities requires tackling climate change and, in particular, reducing greenhouse gas emissions, to be a central, cross-cutting theme throughout the RSS. Making it a key, central theme of the Strategy also necessitates the inclusion of a specific climate change policy to coordinate action on this issue. This will provide clarity to other public authorities in the region exactly what they need to do on climate change, with an explicit policy framework for them to do this in. The policy needs to be accompanied by clear, ambitious targets, and implementation and monitoring mechanisms to ensure it happens. For more on this, please see our comments on a new policy 3: climate change.

Recognising global responsibilities also highlights the importance of making 'one planet economy' thinking central to the RSS's policy approach. The North East is currently using over two and a half times its share of the earth's resources (data from Stockholm Environment Institute). Given that we have, and will only ever have, one planet, this pattern is highly unsustainable, and means that there is less available for other communities around the world and for future generations (source: WWF Living Planet Report). Furthermore, chapter 3 of the 2005 UK Sustainable Development Strategy is all about 'one planet economy' or OPE living, making it a central theme of this Strategy, which the RSS needs to reflect if it is to be consistent with PPS1. As a minimum, we strongly recommend that the region's ecological footprint is made a key RSS indicator, and that stabilising and reducing the footprint is a key, cross-cutting policy objective. This is essential if the region is to develop in a sustainable manner.

**Para 1.13**

Friends of the Earth supports this part of the vision for the North East in 2021. If the region is to be developing sustainably, delivering a high quality of life for present and future generations and recognising global responsibilities, it will need to have reduced its ecological footprint significantly by 2021. This needs to be a key part of the vision for 2021. Reducing the region's ecological footprint will require significantly lower levels of consumption, and so this paragraph should also state that new developments should be zero carbon and zero waste by that date.

Paragraph 1.11 should be amended to remove references to GVA growth, and focus instead on the North East of 2021 having higher, stable employment rates, greater economic diversification and a strong indigenous business sector and entrepreneurial culture which provide greater opportunity for all. It should state that areas of high unemployment/worklessness and deprivation have now experienced a major reversal in fortunes, with more people in meaningful and stable employment, levels of sickness and benefit claims down and many more opportunities available to local people.

Paragraph 1.14 should be amended to state that there will have been a reduction in car-based commuting instead of 'no significant increase' which would suggest a failure of the RSS's policies on reducing the need to travel and achieving modal shift. The word 'sustainable' needs to be inserted in the first line, and the reference to the airports handling more passengers removed, as this is incompatible with sustainable development.

Para 1.16

Friends of the Earth supports the statement that, 'the IRF underpins all these strategies by identifying broad objectives to ensure that activities are sustainable and that future generations are considered.'

However, if this statement is to have any practical meaning, the RSS needs to be made the delivery mechanism for the IRF's 17 objectives and all the targets attached to them. This includes the targets to 'reduce emissions of the basket of 6 greenhouse gases by 12.5% relative to the 1990 level over the period 2008-10' and 'cut carbon emissions by 20% below 1990 levels by 2010.' At the moment, the RSS neither explicitly mentions nor fully reflects these targets, and does not provide a robust framework for their delivery. This is one of the Strategy's greatest weaknesses.

Para 1.16-1.22

Friends of the Earth believes that the process of conducting the SEA/SA of the RSS, and the final report itself, are wholly inadequate and flawed, and that this failing is a key reason why the Submission Draft RSS in its current form will not guide the North East to a more sustainable future. In particular, we are very concerned at the failure of the SEA/SA to conform with the requirements of the EU directive in the following ways:

- There is no evidence that the SEA/SA has looked at a range of policy options and their implications, and then made recommendations as to which should be included in the RSS. It appears that the SEA/SA process has been run one-step behind that of the RSS, so that it has merely assessed the policies already chosen for inclusion in it, rather than playing a key role in forming those policies in the first place. This would explain why the SEA/SA seems only to have been successful in 'tweaking' some elements of the strategy to make it a little more sustainable rather than ensuring that sustainability was a key driving force in the policy development process.
- The SEA/SA does not identify reasonable alternatives to any of the Draft RSS policies as required by the Directive (Reg 12(2)(b)). It does make suggestions for some additions to RSS policies, i.e. requiring new developments to meet the BREEAM and Eco-Homes 'excellent' or 'very good' ratings, but where likely negative environmental impacts have been noted, it fails to suggest alternative policy options to address these. By far the most significant omission is on climate change. Page 37 of the SEA/SA states, '...although the policies within the RSS are likely to promote less unsustainable energy generation/use patterns, it is unclear whether these measures can deliver significant greenhouse gas emissions reductions when compared to regional targets. Furthermore, there is an obvious tension between the economic growth objectives of the RSS and the need to significantly reduce greenhouse gas emissions, and the need to 'decouple' growth and climate change is not a central policy principle within the RSS.' Despite this conclusion, the adjacent column entitled, 'Possible further amendments?' is blank.
- Overall, the RSS fails in its duty to make recommendations to avoid, mitigate or compensate for serious adverse environmental impacts of RSS policies. The SEA/SA reaches some damning conclusions on the Submission Draft, stating that, "...the rate of development proposed by the RSS for the North East will inevitably cause some environmental problems. In particular, the following problems are set to increase:

- pressure on water resource infrastructure (e.g. wastewater treatment);
- waste arisings; and

**General Comments**

- energy use and emissions of greenhouse gases

Furthermore, if the RSS policies are not implemented in full through other regional, sub-regional and local strategies, plans and programmes, it is likely that aspects of the region's environmental performance will worsen. Potential problems include:

- increased greenhouse gas emissions;
- increased road traffic and congestion;
- reduced tranquility;
- damage to biodiversity; and
- inappropriate development in floodplains.' (Pages 4-5)

Despite these conclusions, the SEA/SA makes no suggestions as to how RSS policies should be amended, or new ones added, to address these serious adverse environmental impacts. This is part of a wider failure of the SEA/SA to address the climate change impacts of the RSS in the manner outlined in the document 'Strategic Environmental Assessment and Climate Change: Guidance for Practitioners' (Countryside Council for Wales, Environment Agency, English Nature, UKCIP, Levett-Therivel, CAG consultants, University of Oxford and Environmental Change Institute, May 2004)

•The SEA/SA is required by the Directive (schedule 2, para 1) to identify all the national plans, strategies and policies of relevance to the RSS and which have been reviewed as part of the appraisal process. The list on page 12 of the document fails to mention the UK Sustainable Development Strategy, a crucial expression of Government policy whose principles the RSS should endorse and provide a positive delivery framework for. The fact that the SEA/SA has not seen the linkage between the UKSDS and the RSS means that the latter has not been assessed for its consistency with the Government's sustainable development agenda. This is a major flaw.

• The SEA/SA also neglects to make recommendations to ensure the effective monitoring of the environmental effects of the RSS's implementation. No indicators are suggested, nor is a monitoring regime agreed to track the impacts resulting from the Strategy's delivery. This means that there will only be very patchy understanding of the environmental impacts of RSS policies, which will hinder the further amendment of these policies in future reviews of the RSS.

• Other omissions from the SEA/SA include the failure to provide information concerning the likely evolution of the environment without the adoption of the RSS (as required by para. 2 of Schedule 2); the absence of reference to the Natural 2000 network and the failure to have particular regard, as required, to problems relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive (para. 4 of Schedule 2); the failure to mention other 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 (as required by para. 5 of Schedule 2) including, for instance, the EU Sixth Action Plan, the Aarhus Convention, the noise directive, and other directives. This is particularly surprising having regard to the fact that both the EU Sixth Environmental Action Plan and the Aarhus convention are listed in the ODPM's 'indicative list of sources of social, environmental and economic objectives' of possible relevance in the RSS context. If those responsible for drafting the SA Report consider that the UKSDS, the Aarhus Convention and the EU Sixth Environmental Action Plan (and others) are not relevant to the SA Report then it should be clearly explained why that is so. The SEA/SA also includes insufficient information as to the environmental characteristics of the areas to be affected (as required by paragraph 3 of Schedule 2).

•Finally, the SEA/SA was developed with very little stakeholder or public engagement. Opportunities for engagement have been largely limited to the consultation on the draft SEA/SA between November 2004 and February 2005, when it was published alongside the Draft RSS. However, in contrast to the proactive approach taken by the Assembly to consultation on the Strategy, the very minimum effort possible was put into seeking opinions on the SEA/SA. No copies were sent out, and anyone not already aware of its existence or who did not happen to stumble across it on the viewnortheast website would have had difficulty knowing its publication. Neither did the Assembly actually promote the fact that comments were welcome on the SEA/SA. While the Assembly has published appendices of the consultation comments received on the Draft RSS, there is no publicly available record of the comments received on the SEA/SA and how these have been considered in the document's subsequent revision.

**General Comments**

Recommendations

So significant are the deficiencies in the SEA/SA report that it fails to provide an acceptable basis on which to adopt the RSS. Their significance also means that it would not be acceptable in this instance to simply amend the existing SEA/SA report, as the whole basis on which it was produced is flawed. In order to avoid a possible subsequent legal challenge after the RSS's adoption, which would cause considerable disruption to the development plan process in the North East, we strongly recommend that a new SA report is commissioned immediately, following all the requirements of the SEA directive and in particular addressing the shortcomings in the current SEA/SA.

We recommend the East of England Plan Sustainability Appraisal Report (Levett-Therivel, November 2004) as a model of good practice that should be followed.

Para 1.27

Friends of the Earth broadly supports the key challenges for the region listed in paragraph 1.27. Tackling the impacts of and adapting to climate change rightly features on the list, but it should be at the very top to reflect its status as the greatest long-term threat to society. Unless it is urgently addressed, the North East like the planet as a whole will suffer severe economic, social and environmental consequences, meaning the efforts to reduce regional disparities and maximise productivity will be in vain. Furthermore, it is the only one of the key challenges without a clear policy framework to address it, which reinforces once again the need for a climate change policy with emissions reduction targets.

This paragraph also needs to recognise that a key challenge for the region is to reduce resource consumption and move to a 'one planet economy' way of living so that we start living within the environmental limits of the planet. This needs to be included as a new bullet point.

Para 1.31

This is the only place in the whole RSS where reference is made to the UK Sustainable Development Strategy, despite the requirement in PPS1 for development plans to deliver sustainable development in line with this strategy's principles.

The paragraph correctly states that the new strategy's focus is on five principles, notably environmental limits, and four agreed priorities. However, it does not outline the relationship between the strategy and the RSS, or explain how the five principles and four priorities in the UK SDS are reflected in the draft RSS. This probably explains and reflects the RSS's failure to embed these principles and address the priorities adequately. In particular, the Strategy is extremely weak on ensuring the region operates within environmental limits, does not embrace the 'one planet economy' approach and fails to tackle climate change. These major flaws in the draft RSS need to be rectified as a matter of urgency.

There is no mention of the fact that the economic strand of the Government's approach to sustainable development has shifted away from growth per se to building a strong, stable and sustainable economy. The draft RSS's economic policies are inconsistent with this, and need to be altered accordingly

Para 1.48

Friends of the Earth strongly opposes these sections of the RSS on the basis that the development options and the process by which they were developed were substantially flawed and do not comply with the requirements of PPS11 (paras 3.24-6). PPS11 identifies a number of requirements:

- principally, that the Regional Assembly "working on the basis of community involvement and partnership working referred to above, should identify different strategic options for delivering the vision that it wishes to see for the region";

## Id No Respondent

### General Comments

- a wide range of matters are to be considered 'in developing these options', including the sustainability appraisal;
- continuing involvement by the community is emphasised (the RA should 'work on a partnership basis as issues and options papers are produced');
- as is effective integration with the sustainability appraisal process ('The findings from the SA as it evolves should be available to partners and the community in considering options ...' 2.36);

Friends of the Earth contends that the crucial process of identifying and selecting 'different strategic options' PPS11 has been significantly non-compliant in the following respects:

- the options do not relate to the task of delivering the broad vision of draft RSS 1.9, the key challenges to its realisation 1.2, or fulfill PPS11's requirements to consider broad, strategic options. Instead, the options reflect a narrow focus on economic growth, which is in turn not consistent with the principle of sustainable development and importantly the statement in PPS1 that sustainable development is the core principle underpinning planning. Whilst the Regional Assembly may have considered some of the other (including some of the environmental) implications of the options in selecting and recommending their preferred option (in the Technical Papers section 2), the options themselves were solely economically derived.

Para 1.3 of Technical Paper 1: Development Options outlines the 'four broad strategic options that were considered', which were:

1. Continuing past trends;
2. Reducing economic disparities with development focused in the conurbations;
3. Reducing economic disparities with significant growth achieved through a dispersed pattern of development; and
4. Reducing economic disparities with development focused within both the conurbations and towns in the City Regions.

These are all economic-focused. Para 2.1 makes the unsubstantiated claim that, 'It is unanimously accepted that the region needs to improve levels of economic growth and this objective is central to the proposed RSS strategy.' On this basis 'a range of positive future scenarios for the development of the North East economy [our emphasis] were formulated.' Para 2.3 goes on to outline the 'four economic [our emphasis] scenarios' that 'were initially considered.' From here, the preferred economic growth rate of 2.8% was selected, and then fitted into the four, economically-focused development options outlined in para 1.3. It is therefore clear that the development options considered for the RSS were entirely economically-driven instead of being designed to deliver sustainable development and the RSS vision of a high quality of life for present and future generations. Consequently, they are inconsistent with the requirements of PPS1, PPS11 and the SEA directive, and mean that the whole Submission Draft RSS has been developed on a fundamentally flawed basis.

- Secondly, the strategic options have not been framed and selected 'on the basis of community involvement and partnership working', but were rather predetermined by the regional and local authority partners. As para 1.10 of the Technical Paper states, 'Stakeholders have been involved in discussing each of the four broad development options and their implications...through the officer and member groups set up to oversee and help develop the RSS.' All other stakeholders, and the wider community, were not offered any choice of options outside those pre-selected by those partners, and weren't given any opportunity to comment on them until the Technical Paper was published alongside the Consultation Draft RSS in November 2004. By this stage, the preferred option (L4) had already been selected, and the RSS developed on this basis. Wider stakeholders and the community had the limited choice of endorsing or not endorsing the choice that had been made, with no real prospect of it being changed. This was not in any way meaningful consultation and does not constitute community involvement and partnership working as defined in PPS11.

- the sustainability appraisal of the options appears to have been undertaken with only partial use of SA criteria. After a concise summary of three

**General Comments**

options (L1-3), without comment as to their appropriateness or breadth, they are then appraised against Integrated Regional Framework (IRF) objectives and detailed SA criteria. In 19 cases the words 'not relevant to spatial housing options' are used, combined with a nil return, without explanation. Priority criteria such as climate change are in practice excluded ('the greenhouse gas emissions from each option are not clear' SA p.25).

Consequently the option selection itself was inadequately informed. Furthermore, there is no evidence that the Assembly took account of the adverse impacts, particularly environmental, that it highlighted as likely to result from each of the three development options. The Assembly then decided to create a fourth option, a hybrid of L2 and L3, without this being subject to a sustainability appraisal, and without any of the problems with L2 and L3 being addressed. The SA/SEA therefore appears to have had no discernable impact on the developing and selection of options for the RSS.

We recommend that a new set of development options is produced following the Yorkshire & the Humber model, accompanied by proper community involvement and consultation, so that one can be selected which provides a sound, widely-accepted and crucially sustainable basis for the RSS.

In terms of the option on which the submission draft RSS is currently based, we agree with the focusing of development in the conurbations and main towns, but we strongly disagree with the decision to base the RSS on a GVA growth rate of 2.8%. This is for the following reasons:

- As a matter of principle, we believe that the RSS should not be focused on GVA growth. As previously highlighted, this is inconsistent with the 2005 UK Sustainable Development Strategy which PPS1 requires development plans to follow. The economic objective is now 'building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays) and efficient resource use is incentivised.' The economic objectives in the RSS need to be realigned to reflect this new position, which means the chosen development option needs fundamental alteration. Policies based on the UK SDS's economic approach are much more likely to deliver the high quality of life for all which the RSS says is its goal and purpose, as it explicitly connects economic development to meeting social needs and protecting the natural environment on which everything depends. At present, the RSS wrongly assumes that achieving a 2.8% annual GVA growth rate will deliver a high quality of life for all. Quality of life depends on a range of factors, including many social and environmental ones which either do not benefit from or are adversely affected by an economic growth-driven approach. This is why, despite their very high GVA growth rates, London and the South East regions do not perform best overall in the Government's assessment of quality of life (see 'Regional Quality of Life Counts- 2003'). The lack of evidence to show the link between economic growth and quality of life is in contrast to the strong anecdotal evidence that many in the North East consider the region to offer a better quality of life than areas such as the South East with a much higher GVA growth rate. Prioritising GVA growth is not only at odds with sustainable development, but is empirically unfounded.
- We believe that the GVA growth rate of 2.8% per annum is a highly optimistic aspiration, and one which does not provide a sound or reliable premise on which to base the future development of a region. It would mean the North East leaping from considerably below the England average rate of GVA growth to above it in a very short space of time, without any evidence of the likelihood of this occurring or assessment of the implications of doing so.
- It is clear from reading the RSS that this GVA growth rate is driving the whole strategy, and the objectives which the RSS claims to have at its heart (quality of life for all and sustainable development) are, by implication, effectively relegated to secondary considerations as a result. This is why there are so many inconsistencies and contradictions within the RSS between its narrow economic growth agenda and essential sustainable development imperatives, as the RSS prioritises the former and instead of seeing it as one equal component of sustainability.

In conclusion, Friends of the Earth believes that this apparent current non-compliance leaves the subsequent RSS process open to challenge under the SEA requirement to consider all of the options.

Para 2.3

The fact that 'to promote an urban and rural renaissance' and 'to contribute to the sustainable development of the region' are two separate

## Id No Respondent

## General Comments

principles is a key reason why there is an inherent conflict between the two throughout the RSS. Concerned as it is with the setting the framework for the future development of the region, sustainable development is not something that the RSS can merely 'contribute to'. If the RSS is to achieve its stated vision of a high quality of life for all, now and in the future (as per the vision and statement in para 2.4), sustainable development has to be the chosen development model for the region, and drive everything within it. There is no alternative. A mix of sustainable and unsustainable policies will not lead to sustainable development, and will therefore not result in the achievement of a high quality of life for present and future generations. If sustainable development is not to be put at the very heart of the RSS and made the prism through which all policies and proposals are developed, the region will need to select a new and very different vision for its future.

Friends of the Earth supports the aim of bringing about an urban and rural renaissance throughout the North East, as this is a key part of achieving a high quality of life for all. However, it is the latter which is the overarching objective for the RSS, and this needs to be explicitly stated.

We therefore recommend that paragraph 2.3 is amended to read as follows:

'The spatial strategy for all future development in the North East is based on the following principles:

- To deliver a high quality of life for all, both now and in the future, through the sustainable development of the region;
- To reflect a sequential approach....
- To include appropriate phasing mechanisms....'

Page 12-13

- The implementation mechanism/framework for policy 2 is inadequate, as it fails to state that one of the primary delivery mechanisms are LDFs. The reference to 'specific sustainability strategies, plans and programmes' is so vague as to be meaningless. These either need to be explicitly named, or this phrase removed. We would suggest the wording is changed to the following; 'Achieved by the successful implementation of all IRF objectives through LDFs, the RES and all other regional and local strategies, plans and programmes with a land-use dimension.'
- Progress on delivering sustainable development needs to be made the key, central feature of the Annual Monitoring Report.
- The key actions listed for policy 2 are also inadequate. In the first bullet point, we would like to see the word 'support' replaced with 'require' or 'drive forward'. A new bullet point should be added which reads, 'ensure strategies, plans and programmes embrace and contribute to delivering the 17 IRF objectives and the UK Government's sustainable development principles.'
- The key action for policy 3 should be amended to read, 'adopt the sequential approach to development' rather than 'a sequential approach' which suggests that planning bodies could choose an alternative approach to the one outlined in policy 3.
- For a new policy 3 on climate change, the implementation mechanism/framework should be Local Development Frameworks, Local Transport Plans, Regional Economic Strategy and Annual Monitoring Reports. The key action should be 'ensure policies and actions contribute to reducing greenhouse gas emissions in line with regional targets.'
- For a new policy 4 on sustainable consumption and construction, the implementation mechanism/framework should be Local Development Frameworks, Local Transport Plans, Regional Economic Strategy and Annual Monitoring Reports. The key actions should be 'stabilise the region's ecological footprint by 2012 and reduce it thereafter' and 'ensure adoption of BRE's sustainability checklist for development and the principles in the 'Building-In Sustainability' guide by planning authorities.'

**Id No Respondent****General Comments**

8	Gateshead Council	Overall, Gateshead Council welcomes Regional Spatial Strategy, in particular the locational strategy that supports the northern Way through the concept of the Tyne and Wear City Region and the priority for regeneration in the Tyne Corridor. However, there are some points of concern that the Council would like to see addressed in the final version of the document.
215	Government Office For The North	<p>Structure and presentation of Draft RSS</p> <ol style="list-style-type: none"><li>1. We consider that the draft has excessive amounts of descriptive material and suggest that much of the material could be provided within technical appendices and cross-referenced in the main text.</li><li>2. The structure of the document, with sub-regional and thematic sections, runs the risk that there may be inconsistencies in the presentation of policies and supporting text.</li></ol> <p>Supporting evidence</p> <ol style="list-style-type: none"><li>3. We acknowledge that a great deal of work has gone into the supporting technical papers. In some cases specific cross referencing of the links between these and the content of the RSS is needed. For example, the housing technical paper contains much detailed analysis which supports the approach adopted in the RSS. Similarly the Retail technical paper also contains a significant amount of evidence which does not read across into the main RSS. Better cross-referencing would help the reader understand how the Regional Planning Body (RPB) has arrived at it's conclusions in determining the policy content of the RSS.</li></ol> <p>Spatial Vision</p> <ol style="list-style-type: none"><li>4. This is set out in paragraphs 1.11 to 1.14. It is reasonably broad and comprehensive in thematic terms, but there is not enough spatially specific content, and it is very difficult to discern what the region or sub-regions including rural areas will look like in 2021, particularly from a housing perspective.</li></ol> <p>Growth assumptions</p>

**General Comments**

5. In Section 1 paragraphs 1.49 -1.52 contain growth assumptions which underpin the RSS.
6. The North East Region has a record of economic growth that lags behind other regions of England. The RSS sets out proposals based on assumptions about potential growth rates. The basic assumption is that growth in Gross Value Added (GVA) in the region will reach levels that equate to an average annual growth over the plan period of 2.8% per annum. This is an increase from a level of 1.8% per annum in 2000-2001. An average figure of 2.8% implies that there are likely to be both lower and higher annual increases at various times during the plan period. The strategy does not present any trajectory of growth. The RSS recognises that there may be an element of uncertainty in this and proposes that a GVA growth trend that would equate to an annual average of 2.5% per annum over the plan be used to underpin proposals for housing growth.
7. If past trends are examined, however, it is clear that the growth assumptions in the RSS are aspirational.
8. In developing options of the RSS four economic scenarios were considered by the RPB:
- a) baseline – assumes an annual growth rate of 1.8%;
  - b) bronze – assumes an annual growth rate of 2.3%;
  - c) silver – assumes an annual growth rate of 3.4%; and
  - d) gold – assumes an annual average growth rate of 4.9%.
9. A further scenario was then developed between the bronze and silver scenarios based on an annual average economic growth rate of 2.8%.
10. The current consultation draft RES contains the target of a growth rate of 3.0 to 3.5%.
11. The draft RSS does not in itself convincingly demonstrate how the levels of growth proposed will be achieved, and it will be to some extent for the RES – currently under review – to provide this evidence and analysis. The RES will need to set out the key drivers of change in terms of economic and household growth over the period, and provide sensitivity testing of the key variables underpinning growth (e.g. migration). It is essential that the housing figures are considered in the context of the RES.
12. We suggest that whilst the target of 2.8% GVA growth be accepted as an aspirational target for the economic growth of the region by 2021, we have concerns about adopting this as an average over the plan period, as this implies periods of much higher growth, and request that the Panel test the realism and implications of this target.
13. We anticipate that further guidance on good practice in developing the evidence base for RES and RSS preparation will be published during the Autumn.
- Phasing and Plan, Monitor and Manage (Policy 4)
14. In recognising that the housing figures are based on an aspirational growth target, the RPB have supported them, and their distribution, with a Phasing and Plan, Monitor and Manage policy (Policy 4) to ensure that the RSS and subsequently Local Development Frameworks (LDFs) are responsive to changing circumstances. The phasing element of the policy contains a number of triggers linked to economic growth which are to be monitored through the Annual Monitoring Report.
15. The RSS, in adopting the Plan, Monitor and Manage approach, then provides for the release of land in three phases (2004-11, 2011-2016; and 2016-2021). The initial period is longer to allow for the existing planning consents currently in the system to be taken up or expire.
16. This general approach will need to take into account the evidence put forward that suggests particular growth trajectories, the risks that are

**General Comments**

involved in the approach adopted, and the contingency provisions that the RSS makes should the actual trends depart significantly from those envisaged. It is not fully clear how the phasing of proposed housing land release would be regulated to reflect changes in growth rates.

17. We consider that further consideration is needed as to whether in the early years of the plan the growth scenarios are sufficiently robust, and build on a movement from existing trends and levels into a credible acceleration of growth. We are concerned in particular over the proposals for new housing in the early years of the RSS, and develop this further under our comments on Policy 30. This accentuates the risks if actual growth rates are lower, and we question whether more of a measured approach is needed whilst actual growth trends are monitored.

18. A phased approach, in which growth is allowed in response to positive indicators of economic, demographic and household change, might offer a solution, both initially and later in the plan period. For the RSS and the Development Plan system to respond to feedback on the actual outcomes requires,

- a) that policies are capable of being monitored and reviewed as a result of monitoring
- b) that effective monitoring arrangements are in place to give awareness of these trends, using appropriate indicators;
- c) that there are systems in place to debate and respond effectively to them, for example by speeding up or slowing down land release.

19. We therefore ask the Panel to consider:

- the evidence base for the housing figures, particularly in relation to the growth assumptions in the RES;
- whether the proposed trigger mechanisms to monitor change are the correct ones;
- whether the division of the overall plan period into three time periods is appropriate and capable of being delivered through Local Development Frameworks (LDFs);
- whether there is an over-reliance on the phasing policy in the possible scenario of economic and housing growth aspirations not materialising;
- whether this approach provides sufficient certainty to investors; and
- whether it contributes effectively to a robust strategic planning system that can respond to actual change.

**Sub-regional Growth**

20. The growth projections are at regional level. The region currently shows considerable discrepancies in GVA growth rates between the sub-regions, and we question whether this has been sufficiently taken into account in the regional working through of economic growth, demographic and land demand projections. It is possible that growth will continue to be unevenly distributed across the region, at least in the initial years of the plan, and the way in which the RSS proposes to deal with this needs to be clearly spelled out. This will have implications for land uses and transport and other infrastructure investment in each sub-region or city region.

**Development Principles and Locational Strategy**

21. The overall strategy is set out in Section 2 and comprises both a descriptive paragraph and five policies.

22. We recognise the diverse range of interests that this strategy seeks to reconcile, including the needs to:

- realise the potential of economic growth, particularly in the context of the city regions
- provide for the needs of an increasingly knowledge based economy
- regenerate areas of low demand for housing
- improve the balance between the need for and supply of housing in terms of house types, locations, prices and tenure
- address issues of affordability
- address trends of internal migration from the cores of the city regions to less central locations
- address the distinctive issues of former coalfield areas outside the cores of the city regions
- sustain the role of market towns and rural service centres

**General Comments**

- facilitate access to services for rural populations

23. A key question for the strategy, in the context of the forecast levels of projected growth in economic activity, households and demand for dwellings, is how the spatial patterns of these should best be influenced. Achieving a balance between the various needs set out above, is a challenging task.

24. Our view is that this strategy:

- Continues the broad approach set out in RPG1
- Provides a general guide to the spatial patterns proposed over the plan period
- Is broadly in line, in its core policies, with Government policies regeneration of urban areas, and the encouragement of sustainable communities
- Would benefit from clearer definition of the relative scales of development proposed for the different areas of the region identified in policies 5,6,7 & 8.. The strategic descriptions need to give sufficient guidance to allow difficult choices to be made and to include a basis for changes over time in response to trends
- Needs to be tested on the overall balance of growth between the different spatial areas identified, and the impact of this on the communities involved

25. We consider that more could have been done to demonstrate the reasoning for the spatial patterns of new development, particularly as expressed in the numerical allocations of land and associated investment. The allocations of housing numbers, employment land, and the proposals for transport investment are among the main means by which these patterns are to be influenced. This requires a more comprehensive presentation of the links, at sub-regional level, between the spatial patterns of economic and demographic change; the spatial linkages between dwelling and employment locations and the commuting implications of these; and the provision of infrastructure and related services, including both current provision and forecast capacity.

26. The same argument applies, at a more local scale, in the definition of areas within the City Regions and the policies that are to apply to them.

27. The RSS could also be clearer on whether the same planning influences on the spatial pattern of development are proposed to remain the same throughout the plan periods or whether there are to be any sequential changes in response to economic growth, demographic change and housing demand.

28. In summary, we broadly support the spatial strategy, although we would seek to see it strengthened to prioritise where new development should be located by asking the Panel to consider whether :

- the wording of the written policies needs to be clearer on the how overall growth is to be apportioned between clearly defined areas; and
- to examine how the spatial strategy has been reflected in the thematic policy sections, in particular those covering the distribution of housing and employment land; the interactions between land use and transport investment; and provision of other infrastructure and services

**Sustainability Appraisal**

29. We understand that consultees have raised concerns over the appraisal; these need to be considered.

30. We consider that further debate would be useful to ensure that the draft RSS has given sufficient weight to issues of sustainability in terms of:

- clearly setting out the relative scales of development of all relevant types (including economic as well as housing) in different parts of the region and the sustainability implications of these in terms of movement of people and goods

**General Comments**

- addressing climate change issues, as set out below

**RELATIONSHIP WITH OTHER STRATEGIES**

**Northern Way Growth Strategy**

31. The Government's view is that the NWGS forms an important part of the context for the three northern RSSs and sets out principles which the Northern Way steering group considers should feature strongly in each RSS. The RSS is a primary delivery vehicle for the NWGS and it is important that the Regional Assembly takes it properly into account. The Government expects the spatial implications of Northern Way to be further developed, tested and delivered through the statutory RSS process.

32. There were three main elements in the Northern Way strategy against which the RSS needs to be considered.

33. a) Growth rates. The Northern Way seeks much stronger economic growth in the Northern regions. This point is covered in the section on growth assumptions above.

34. b) City Regions. The Northern Way placed a strong emphasis on the importance of City Regions as the basis of economic growth. It identified two city regions in the North East, based on Tyne and Wear and Tees Valley. The RSS has taken on board the city region approach in that has adopted the two city regions proposed in the Northern Way and developed analysis and some policies that relate to them. This happened fairly late in the RSS process, and we consider that there is still a lack of clarity over whether the city region content provides a full sub-regional element to the plan as advised in PPS11. This needs discussion at the EIP. The question is worth considering, for example, of how the RSS would handle significantly different growth trajectories between the city regions.

35. Increased rates of housing renewal. The Northern Way stresses the need for higher rates of demolition and replacement of housing in the three regions. The RSS has taken some steps to address this issue, however we consider that – without necessarily seeking to achieve the very high levels implied by the Northern Way – a clearer discussion of the role of the RSS in helping to guide the regeneration of the existing stock is needed.

36. We consider that the RSS has made progress in taking on board the Northern Way principles, We would wish the Panel to consider if there is sufficient consistency between the adoption of the two city regions as the basis of the sub-regional guidance, and the policy sections which follow.

**Integrated Regional Framework**

37. The IRF underpins all regional strategies and its 17 objectives are incorporated into Policy 2 of the RSS.

**Regional Economic Strategy**

38. The current Regional Economic Strategy for the North East was produced in 2002. A full review is underway, and the final version is expected to be submitted to Government in mid November 2005. The consultation draft shows that the review involves a substantial overhaul of the strategy, with new evidence and analysis, including a major future scenarios exercise Shaping Horizons in the North East (SHiNE). Government guidance makes it clear that the RES and RSS for each region should be complementary and mutually supportive. We understand that the final version will be published in November.

**Regional Housing Strategy**

39. The North East Regional Housing Strategy (submitted to Ministers in May) states that regular review of future housing requirements – in terms

**General Comments**

of numbers of dwellings and types of property – will be essential if we are to respond appropriately to change in our housing markets.

40. The strategy also examines the need to meet specific community and social needs for groups such as people with care and support needs, older people, homeless and vulnerable groups, black and minority ethnic groups and students, gypsies and travellers.

41. The Housing Strategy recognises two particular pressures for the North East:

- A shortage of affordable housing in some parts of the region which can make it difficult for households to find a suitable home in their area.
- A shortage of housing which meets the aspirations of households who want to move to better quality homes and neighbourhoods or of those considering whether to move into the region.

42. It considers that executive or prestige housing is needed to improve the overall quality of the housing offer of the region, keeping pace with rising aspirations, encouraging population in-migration and retention.

43. The RHS considers that sub regional targets on house types defined by housing market area could be established in future depending on HMA outcomes. There continues to be a mismatch between what the region needs/aspires to and what is being built.

**Regional Transport Strategy**

44. PPS 11 requires that the RSS incorporates a Regional Transport Strategy which is fully integrated with the wider aims and objectives of the RSS whilst being evidence based and having a strong analytical underpinning. We are concerned that the RSS is weak in these key areas. We develop this further in our detailed comments on the transport section below.

**Rural Strategy**

45. The RSS mentions the Rural Strategy 2004 but could go further towards embracing it, in particular:

- when exploring the population of rural areas it uses a ward definition of 'rural' rather than looking towards the new output area definition included in the Strategy;
- whilst there is reference to the economic challenges facing some rural areas there should be a stronger link made with the lagging districts identified for the rural productivity PSA target. This link is made in the draft RES consultation and we would expect to see greater coherence between the RES and the RSS.

**Sub-regional content**

46. We consider that the City Regions approach adds value as a sub-regional analysis tool, although some of the detail could usefully have been relegated to technical papers. We are keen to encourage arrangements that foster working across administrative boundaries as part of a sub-regional approach.

47. It is not clear however whether the RSS has fully adopted the City Regions as sub-regional policy in the sense that this is set out in PPS11 sections 1.13 to 1.15. The draft contains reasonably comprehensive descriptions and some analysis of the economic and social geography of the city regions, and Policies 6 and 7 contain elements that are specific to each city region. It would be useful to discuss at the EIP how well this fits with the thematic sections of the plan, and whether the current structure of the document leaves it open to risks of potential inconsistencies between policies in the City Region section and those in the thematic sections.

**Housing**

**Housing Growth Assumptions**

**General Comments**

48. The RSS works on the basis that a growth rate of 2.8% implies the requirement for up to 160,000 net new dwellings over the RSS period. However, as the level of growth cannot be guaranteed and the inappropriately phased provision of housing land locations could adversely affect the housing market in general and more specifically the delivery of housing market restructuring initiatives such as the Newcastle Gateshead Pathfinder, the more cautious approach of basing new housing needs on an annual average GVA growth rate of 2.5% has been adopted. This leads to a proposal for 107,000 net additional houses (an annual average of 6,295 dwellings per annum) between 2004 - 2021.

49. This means the RSS adopting a new land release rate which reflects an increase in the region's population, rather than a continuation of population decline which the region has experienced over recent decades. This needs to be considered in the context of the latest ONS 2003 mid year estimate based projections which continue to show a declining population in the North East – although this is based on past trends which do not take account of development policies.

50. We accept that this figure has been based on a comprehensive modelling of economic growth and demographic change, although we wish to request that the Panel consider some of the assumptions that have been made in determining the overall provision, in particular the extent to which:

household change has been considered in determining the provision;  
existing consents, both in total and an understanding of their spatial distribution, have been considered in determining the provision; and  
the policy approach to additional new housing is inter-related with a strategy which contributes to dealing with the existing housing stock, including the position on demolition and the quality of the existing stock.

51. We also have particular concerns about the assumed trajectories of growth in the early years of the plan. We wish to request that the Panel test the realism and implications of the trajectories of economic growth, demographic change, and housing demand in the early years of the plan. This is likely to be especially important to ensure that the RSS does not over provide housing land, particularly as there are already substantial amount of housing land allocated or with permission. This debate should be linked to the question on adequate mechanisms for monitoring and review. There may also be questions over the capacity of the building industry to deliver the planned development.

**Spatial distribution of new housing**

52. As well as the overall level of new housing stock, the RSS proposes allocations of new dwellings by district for the three plan periods. There have been considerable sensitivities over this aspect of the Plan.

53. The region has a long history of economic difficulties and population decline. Official forecasts are that it will be the only region that will continue to have a falling population beyond 2021, and the recent national study "Regional Futures" (published by the English Regions Network, and which ODPM contributed) suggest that this is a long term and difficult challenge. Local authorities do not accept this forecast as they consider it is based on past trends and does not reflect policy initiatives to reverse the trend. This means that, unlike the position in the south of England, local authorities throughout the region are very concerned to retain and attract population and regenerate their areas through economic and housing development, and that there is in effect competition between local authority areas in some respects.

54. The draft strategy proposes to guide the majority of new development to the conurbations and main towns. This is to address the need to regenerate areas such as the Newcastle Gateshead pathfinder and to reduce the movement of people from the older urban areas into rural areas, which increases commuting.

55. In a region with a declining overall population we appreciate that it has been a challenge for the Regional Planning Body to come up with a solution that supports:

- the regeneration of the conurbations, dealing with low demand
- attempts to reduce migration out to rural areas and increasing commuting from these areas to the main urban areas;

**General Comments**

- satisfies the desire of rural and former coalfield areas to stabilise their populations.

56. The constraints on overall housing figures at regional level, and the concentration on the urban areas, is that rural districts in Northumberland and Durham, including a number of former coalfield areas, are concerned that they will not be able to stem population loss and regenerate their areas.

There are concerns in the metropolitan areas, in Tyne and Wear in particular, that high levels of housing allocation in the adjoining areas would constitute a threat to the regeneration of low demand areas in the conurbation. There has not been general agreement on strategic resolution of these issues, and It is unlikely that a consensus will be reached on housing numbers.

57. The proposals for the distribution of new housing, in terms of absolute numbers of additional dwellings, appear to be broadly in line with the strategy. However when the numbers of new dwellings are considered in relation to the percentage additions to the existing stock, some apparent anomalies emerge. We question whether the distribution of housing numbers fully reflects the spatial strategy and policies.

58. The current presentation on housing numbers does not go far enough in relating the location of development to employment locations, commuting patterns, existing and proposed infrastructure and its funding, and access to services such as health and education. A more systematic approach is needed including examination of current infrastructure provision, forecast capacity, and any issues of provision. The strategy indicates housing numbers at district level but there is a need for more locational guidance within districts to address the above issues.

59. The strategy also needs to reflect more fully the patterns of existing allocations and consents, which are extensive in some areas.

60. We therefore ask the Panel to examine the justification for the distribution of housing in relation to the overarching spatial strategy, sub-regional policies and infrastructure requirements.

**Housing types**

61. The RSS also refers to questions of the types of housing that are required.

62. The RHS takes the view that there are deficiencies in the range of choice of house type across the Region – with more two bedroom dwellings and fewer four bedroom houses as a percentage of total housing than any other English Region. Also the North East has fewer owner occupied homes than any other region outside London.

63. The North East has the highest proportion of semi detached and one of the highest terraced stock proportions as a percentage of total dwelling stock and the lowest proportion of detached housing compared to all other regions. The stock profile demonstrates that the region has a lower proportion of detached housing. Altering this balance is seen as key to providing a better mix and quality of housing in the region to meet the needs and aspirations of the regions current and future population. More emphasis is needed in the housing section on the lower quality legacy that the region needs to confront if it is going to increase its attractiveness as a place to live and work. The table below illustrates this point.

**Current Housing Stock**

Area	Detached (%)	Semi-Detached (%)	Terraced (%)	Flat	Maisonette	Apartment(%)
England	22.59	31.69	25.93	19.37		
North East	14.51	39.40	32.14	13.4		

Source: ODPM 2004

**General Comments**

64. The region is also characterized by significant areas of single age housing which suffer disproportionately from market failure.

65. There is intensive housing market assessment work going on in the region which seeks to provide new information based on new approaches. More detailed and comprehensive information on housing markets would in time enable an approach closer to that outline in the Government's recent discussion paper "Planning for Housing Provision". We feel that the draft is still weak is that it has not developed an approach of planning for household types in line with demographic trends and emerging Housing Markets Assessments. This is an area where policy is developing and more information is likely to be available at the review of the RSS.

66. More could be said from a housing point of view in terms of design quality, particularly new construction, and the maintenance of character and heritage where appropriate

Existing stock

67. The RSS does not give sufficient coverage to the issues associated with the existing housing stock. The existing housing stock will provide the majority of housing for the region's population over the plan period.

68. A discussion is needed on how the RSS can contribute to addressing the rationalisation and improvement of the existing stock to meet future demands. Good progress has been made in achieving the Government Decent Homes Initiative in the public and voluntary sector; there remain problems in achieving improvement in the private sector, particularly the private rental sector. The interplay between rates and locations of demolition and the provision of replacement and new housing stock are key issues.

Housing renewal

69. An important issue is the potential impact of land allocations and new housing development in areas adjoining and near to Housing Renewal areas. These include Bridging Newcastle Gateshead, and the Tees Valley Living Initiative. Whilst there may be debate over the details of the interactions between the Pathfinder areas and housing development in surrounding areas, it can perhaps be agreed that the movement of population from the cores of the city regions to outlying areas has not assisted their regeneration.

70. It is important that the strategy explains how the proposed spatial distribution of new housing relates to housing provision in Pathfinder areas, particularly in the early years. The strategy must phase provision to ensure that housing delivery across the region (and particularly in adjacent areas to Pathfinders) does not undermine Pathfinder objectives. Housing numbers, strategies and plans should be based on understanding the differential demand for different types of housing in different places. The strategy should consider setting out clear criteria where new build may not be appropriate in the context of adjacent or nearby Pathfinder schemes.

71. We ask the Panel to consider the impact that an over-provision of new housing in neighbouring areas could have on low demand areas. Our view is that in such cases consideration needs to be given to housing markets, the different types of housing needs which they have and their spatial distribution. A number of Housing Market Assessments are currently being undertaken in the region which the Panel will need to take into account in their consideration of this issue.

Housing densities

72. The submitted draft RSS proposes to allow each local authority to determine whether or not they consider it appropriate to adopt a lower density level than that set out in PPG3 (average of 30-50 dwellings per hectare) by setting criteria within Local Development Frameworks. The policy refers to densities being assessed at local authority level rather than for each site, and allows LDFs to set out criteria to define the circumstances where provision of lower density developments are needed to provide a better mix of dwelling type, size and tenure.

73. We object to this blanket approach. The proposed approach does not reflect PPG3 para 58 with regard to housing densities, and the RPB has not provided sufficient evidence to justify this departure from national policy. However we consider that there is a debate to be had on how well

## Id No Respondent

## General Comments

the overall mix of housing in the region meets aspirations. We therefore ask the Panel to consider whether any evidence before them provides any justification for a departure from national policy. If this is the case we suggest that the RSS itself would have to be set clear criteria for where and in what circumstances a different approach to housing types and related densities might be acceptable.

### Affordable Housing

74. The draft RSS makes numerous references to affordability, but leaves the setting of targets to the Local Development Frameworks. There are sub-regional issues, including affordable housing delivery in market towns and rural areas, difficulties for first time buyers, and the impact of second homes, on which the strategy should be giving constituent local authorities a clear strategic steer. In addition, policies on affordable housing provision need to relate to overall housing provision across the region, within sub-regions and Pathfinder areas. We request the Panel to examine these issues.

### Housing in Rural Areas

75. As well as the issues of affordability the RSS needs to provide for the right levels of housing change in rural areas. There is a balance to be reached between encouraging an expansion of commuting based settlements and providing for housing for those employed locally. There are problems of maintaining sustainable communities and service centres in the remoter rural areas. We would ask the panel to facilitate a debate on this.

### Employment Land

76. The RSS process has made some progress – as required by the last RPG review - in reducing allocations of surplus employment land and attempting to rationalise the overall distribution of land.

77. Our concern is to how far the RSS has based its proposals on a full spatial analysis of current and future patterns of economic growth and employment, including the emerging needs of a knowledge economy and the patterns of residence, employment and commuting, including access to skill development opportunities via Further and Higher Education. The RES will provide new material on anticipated spatial patterns of growth.

78. We also have concerns over the proposals to continue to identify a number of large sites in out-of urban locations for inward investment or special purposes. We consider that further work is needed to justify these on economic and sustainability grounds, although we accept that many of these have some existing planning permissions.

79. We ask the Panel to test the general approach to the provision of employment land, in the context of wider expectations of economic growth and employment.

### Transport

80. “Improving connectivity” is a theme of the strategy in its own right, although the links between transport and wider RSS objectives are explained in general terms only. Whilst there are numerous references to the need to “improve transport” to “assist regeneration” there is a lack of evidence as to exactly what are the problems which need addressing and specifically how it is anticipated that improving transport will support economic regeneration.

81. We believe that the strategy needs to more precisely, and with spatial specificity, identify how key transport problems are preventing the achievement of wider objectives, and therefore how improving transport will contribute towards delivering the RSS as a whole.

**General Comments**

82. As identified in paragraph 76, it is also not clear that transport has been a key consideration in the formulation of other policies. For example a number of the strategic employment sites, are in locations not at all well served by public transport. Whilst policy 19 refers to the need to “ensure high levels of public transport accessibility and use” at these sites, given their location it is far from clear that this is realistic and, indeed, there are no specific proposals identified to help achieve it.

83. The RSS continues to have a very strong a focus on major transport infrastructure schemes. In the absence of specific evidence of the contribution these schemes will make to wider objectives, the proposals appear too much as a wish-list of projects seen as desirable “ends” in themselves. Table 3 makes some attempt to identify the impacts and outcomes the schemes are intended to deliver, although this appears to be very much secondary to the named scheme itself. Furthermore, for the many schemes which are identified as being subject to further investigation, there is no indication of other options to address the identified problems which will be considered. We believe that Table 3 would be much improved by focusing on spatially specific transport objectives, derived from the assessment of transport problems in relation to wider RSS objectives mentioned above. Indeed, the draft Guide to Producing Regional Transport Strategies makes clear that an objective rather than scheme based approach should be reflected in the tables covering transport priorities. For each of these the strategy should identify the range of measures proposed (or to be considered in more detail) to deliver the objectives. These should cover management measures and small scale infrastructure schemes in addition to major capital projects, and should include consideration of transport issues in rural areas;

84. Whilst the RSS recognises that a number of proposed schemes are unlikely to be affordable within the short-medium time it has not ranked schemes in priority order as required by PPS11. We recognise that it is extremely difficult to rank scheme priorities when the overall funding available is not known. However, indicative regional funding allocations for major transport schemes were announced by the Government in July 2005 and the North East has been asked to provide Ministers with views on scheme priorities by January 2006. It is anticipated that draft RSS as a whole will be an important input to the work now underway to determine these priorities; though there will be further work to do in defining spatially specific transport objectives as a basis for the prioritisation proposals because these are not clearly established in the draft RSS. It hoped that it will be possible to consider the emerging work on priority schemes at the EIP and, if appropriate, incorporate this in the published RSS.

85. We also believe that the analytical basis of the transport planning element of RSS continues to be weak. For example, para 1.14 states that by 2021 there will increased public transport use and no significant increase in car-based commuting, although there is no evidence or analysis provided to demonstrate that the proposed strategy will reverse current trends and deliver this. Since the proposed strategy is essentially a continuation of existing policies the evidence suggests that the current trend of increasing car-based commuting and declining public transport use is unlikely to be reversed. There are many similar examples and, overall, we are unconvinced the RSS contains the analysis or evidence to indicate that the proposed transport strategy is the most appropriate way forward, or that it is likely to achieve its objectives. We believe that the RSS needs to use analysis of data, trends and past experience from within and beyond the region to more strongly demonstrate that the proposed transport strategy is the most appropriate approach and is likely to achieve the desired objectives. Some data and evidence is set out in the technical paper although it is not clear how this has influenced the strategy.

86. We ask the Panel to consider:

- whether the strategy needs to be more precise, and with spatial specificity, in identifying how key transport problems are preventing the achievement of wider objectives, and therefore how improving transport will contribute towards delivering the RSS as a whole;
- whether the document would be improved by focusing on spatially specific transport objectives, derived from the assessment of transport problems in relation to wider RSS objectives. For each of these the strategy should identify the range of measures proposed (or to be considered in more detail) to deliver the objectives. This should cover management measures and small scale infrastructure schemes in addition to major capital projects;

**General Comments**

- the emerging work on scheme prioritisation, currently ongoing in the region, at the EiP and, if appropriate, incorporate this into the final published RSS; and
- Whether the RSS needs to use analysis of data, trends and past experience from within and beyond the region to more strongly demonstrate that the proposed transport strategy is the most appropriate approach and is likely to achieve the desired objectives.

Climate Change

87. PPS1, which contains the overarching planning policies on the delivery of sustainable development through the planning system, states amongst its key principles that Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change - through policies which take climate change impacts into account in the location and design of development. Section 39 of the 2004 Act requires RPBs to exercise their function with the objectives of contributing to sustainable development.

88. The implication of this is that RSS should take include material on of adaptation to climate change by addressing:

- The implications of the latest climate change scenarios and regional climate change studies in order to assess risk;
- The need to avoid major new development in areas that are likely to be at greater risk or are likely to be increasingly vulnerable in the future (for example those in areas of significant flood risk or where water resources are limited);
- The physical and environmental constraints on development of land, including, for example, how the issues of contamination, stability and subsidence, erosion and flood risks may alter with climate change, and the effects on biodiversity and nationally or internationally designated sites;
- The need to consider possible adaptation options for vulnerable areas.

89. The highlighting of climate change in the section on Protecting and Enhancing the Environment is to be welcomed. However the climate change policy (Policy 9 of the environment section) is very unspecific and generalised, merely referring to “policies and proposals”. We would expect to see something more specific in this section, plus appropriate cross-references to other parts of the Strategy which deal with policies for renewable energy and transport.

90. The RSS recognises that further work is needed, in particular, the need to compile reliable estimates on greenhouse gas emissions and improve the mapping of the potential impacts of climate change.

Renewable Energy

91. As part of its targets to reduce greenhouse emissions, Government has set a target to increase the proportion of electricity provided by renewable sources to 10% of electricity supplied by 2010, Policy 40 identifies a renewable energy generation target of 10% of the region’s consumption by 2010, and 20% by 2020 in line with the Energy White Paper targets. Policy 40 also states the broad sub regional targets to be achieved by 2010.

92. We are concerned that the text does not give enough weight to the need to meet the national targets, and a stronger policy could be used to back up PPS22 in pushing further renewable developments.

93. Policy 41 does not fully reflect national planning policy in PPS22 ,as it does not give sufficient weight to the wider environmental and economic

**General Comments**

benefits of proposals.

94. Policy 42 identifies the broad areas of least constraint for wind energy development and notes that realising the potential of onshore wind will be essential in meeting the targets outlined in Policy 40. Although onshore wind generation is well covered and will play the major role in meeting targets, the need to develop other sources such as offshore, and small-scale technologies (micro renewables) is given less importance. These could be vital for the region to meet its targets, for example, should the Kielder area not realise its full potential. Greater emphasis is needed on these alternatives.

95. The Energy Technical Paper contains an evidence base analysis of the Region's installed and potential capacity for renewable energy generation. The evidence base is taken largely from the work within the Regional Renewable Energy Strategy (RRES) published in March 2005. The RRES produced a breakdown of renewable energy by type and potential in support of the emerging RSS. The evidence contained within the RRES and reflected in the technical paper could be more fully developed into a broader range of renewable energy source policies in the RSS.

**Waste**

96. PPS10 supports Government policy on waste management, including on moving waste management up the waste hierarchy, set out in WS2000 (as revised). The RSS should include as a key component a concise strategy for waste management. It should be formulated in conjunction with other spatial concerns and should sit within RSS in its final issued form. The strategy for waste management should look forward for a fifteen to twenty year period, should comprise a distribution of waste tonnage requiring management, a pattern of waste management facilities of national, regional or sub-regional significance, and supporting policies. The RSS does not reflect this approach.

**Minerals**

97. MPG3 (para 8) states:

"In applying the principles of sustainable development to coal extraction, whether opencast or deep-mine, and to colliery spoil disposal, the Government believes there should normally be a presumption against development unless the proposal would meet the following tests:

Is the proposal environmentally acceptable, or can it be made so by planning conditions or obligations?

If not, does it provide local or community benefits which clearly outweigh the likely impacts to justify the grant of planning permission?"

98. RSS Policy 45 states:

"Minerals and Waste Development Frameworks and Local Development Frameworks should adopt a presumption against opencast coal extraction unless the proposal is environmentally acceptable, consistent with the principle of sustainable development, and the overall benefits to local communities outweigh the disturbance resulting from the development. Where opencast coal extraction is acceptable, provision should be made for the extraction and beneficial use of fireclay and the minerals should be transported by rail whenever possible".

99. Government's view is that a case has not been made for this departure from national policy and that a regionally specific policy is therefore not justified in the RSS.

**Retail policy**

100. The retail policies in the RSS do not make sufficient use of the retail study carried out by White Young Green which considered the need for, and distribution of new shopping and leisure development in the region between 2002-2016. It does not provide a clear statement on a retail hierarchy.

101. RSS refers specifically to the Metrocentre in Gateshead and proposes that the Gateshead Unitary Development Plan and Local Development Framework should provide the justification for any further expansion.

**Id No Respondent****General Comments**

102. This is in direct conflict with PPS6, which states that it would be unlikely, given the Government's town centre policy, that expansion of an out-of-centre or sub-regional shopping centre would be meet the requirements of that policy. Were a need for an expanded out-of-centre regional or sub-regional centre to be identified, it should be addressed through the Regional Spatial Strategy.

103. We object to this policy on the grounds that the Metro Centre proposal is not justified in context, and that if the RSS did seek to provide a clear policy line on the expansion of the centre, this should be done – and justified – in the RSS itself.

Para 1.27 Greater reference should be made to the strategic need to address the increasingly ageing housing stock that the Region possesses. It is more than 'creating equilibrium' and 'providing a more diverse housing stock'. Para 1.50 – 1.51 The 2.8% GVA growth aim should be more explicitly labelled as 'aspirational'. Policy 2 Appears to be a list of objectives rather than a policy. Improved water efficiency should be included in objectives (see also comments on Policy 36).

**Id No Respondent****General Comments**

144	Great Aycliffe Town Council	I refer to the Sedgefield Borough Council submission made in response to the above document and would be grateful if you would note that Great Aycliffe Town Council shares the views expressed in that submission. In my view, Sedgefield Borough Council has clearly identified the primary issues facing the Borough, but has addressed these issues in a considered and thoughtful way, recognition that the Regional Spatial Strategy, by its nature, has to take account of regional imperatives. The contents of the submission reflect genuine concerns relating to the wellbeing of the entire region.
147	Hartlepool Borough Council	Support is given to the overall vision and values set out in Section 1 of the RSS including the region's main characteristics, the key challenges facing the region and the international and national context for the RSS are all well presented. As are the various development options that relate to different economic scenarios and the implications for planning policy of an annual average of 2.8 % GVA growth over the plan period 2004 – 2021.
160	Highways Agency	<p>1.1 - 1.2 Primary Concern is with scale, location and phasing of development increase of from 1.8% GVA currently up to 2.8% GVA, by making region more competitive and utilising assets better, and will necessitate the provision of the necessary infrastructure. 1.11 - 1.14 Projections of annual increase of from 1.8% GVA currently up to 2.8% GVA, by making region more competitive and utilising assets better, and will necessitate the provision of the necessary infrastructure. 1.18-1.22 Five requirements including 'Sustainability Statements' for all major planning applications and an assessment of suitability of sites to include resource consumption. Some key concerns were the use of energy and emissions of greenhouse gases. The RSS has been amended in a variety of ways including a Sustainability Energy Use policy to locate development to minimise energy consumption. 1.27 Make the region more competitive and a more attractive place to live and to visit, by safeguarding the environment. Land use and transport policy should be integrated to reduce the need to travel and dealing with congestion hotspots. Stemming population decline and urban - rural migration of population and businesses, especially in the Tyne and Wear and Tees Valley conurbations. Stemming this trend will actually increase population, providing job opportunities and the right quantity, quality, and mix of dwelling types e.g. in Waterfront Developments (Newcastle/Gateshead).</p> <p>1.28 - 1.47 A variety of guidance and initiatives including the new 'UK Sustainable Development Strategy' (March 2005) which targets sustainable consumption; the Northern Strategy which focuses on the importance of the two city regions (Tees Valley and Tyne &amp; Wear conurbations) and the connectivity throughout the region and beyond; the RES which amongst other things has a strategic objective of meeting 21st Century transport, communications; the RHS examines how both public and private housing needs can be accommodated and how they contribute to creating sustainable communities and includes new housing provision; regional planning guidance for the neighbouring regions highlight the need for better connectivity between them including the A1, A66 and A69 corridors, whilst mitigating against the detrimental affects on the natural landscapes of the NE.</p> <p>1.49 - 1.52 In the Consultation Draft a cautious approach to housing allocations was suggested as under/over allocations can have serious consequences. It was estimated that the total population increase of about 32,000 up until 2021 (1,880/annum) will create demand for up to 160,000 new dwellings ( 110,000 net additional - Figures from Technical Option Paper), however this was dependant on a number of factors, such as the Newcastle/Gateshead Pathfinder objectives. These dwellings were to be made up of a mixture of improved, replaced and net additional dwellings. The Submission Draft now suggests a population growth of 37,300 or 2,190/annum (2004-21). The net in-migration is estimated to be 53,850 or 3,170/annum and the overall resulting gross number of dwellings that would be required would be 141,000.</p>
424	Home Builders Federation	Section 1

**General Comments**

immediately upon the adoption of this revised RSS. However, we are aware that all local authorities are currently producing Core Strategies for their LDFs and the status of the housing numbers suggested in this Draft RSS are for now untested. It would be helpful if the RSS text could offer additional guidance to industry and local authorities for the interim period between now and adoption of the RSS.

Northern Way Growth Strategy

Paragraphs 1.36 to 1.38. The HBF welcomes the early reference to and summary of the Northern Way initiative. In addition to the points made, the HBF request an additional reference in this section to the Northern Way recognition of the need to improve the housing offer in order to make the region a more attractive place in which to live and work. The Northern Way1 makes many references to the need to provide aspirational housing and to replace the existing housing stock at a much faster pace. If this goal is to be achieved in the region, a much stronger emphasis on housing needs to appear at this stage in the RSS Vision.

Growth Assumptions

Paragraphs 1.49 to 1.52. The HBF notes the various growth options considered in the RES and the RSS. We also note the more cautious approach to housing provision by adopting an annual rate of 2.4% and remain uneasy with the transparency of approach used to construct housing need based upon economic growth and population changes. We also remain unclear as the method of distribution to individual districts.

With reference to paragraph 1.51, we request the text be updated to include the most up to date population and migration figures for 2003/04. In this instance, the most recent data supports the RES and RSS forecasts of a turn around in economic fortune and show an overall population increase in that year of 5,700 (Table 10 Mid-2003 to 2004 Population Estimates. ONS Statistics 24.08.05). Whilst the natural change in population continues to be negative, even this trend is in a positive direction. Migration into the District continues to increase, no doubt demonstrating a clear linkage between a restructuring economy and its impact upon inward migration.

We note from paragraph 1.51 that this submission draft assumes a continued population growth rate of 2,190 per annum, a result of 3,170 in-ward migrations and natural change of -980 per annum for the plan period 2004 – 2021. Figure HBF1 charts the recent trends (past 5 years) for both data sets and indicates the projections used in this submission draft to be too pessimistic.

The HBF appreciates the relationship between jobs creation, in-migration and housing need is complex and regard the recently commissioned OneNE research to be crucial towards furthering everyone's understanding of the linkages in a changing economy. What is clear from Figure HBF1 is the relationship between an improving economy and its impact on inward migration. The related impact on economic activity rates will require more detailed analysis in the ongoing research work.

1. Northern Way – First Growth Strategy Report (Sept 2004), Chapter C9

In addition to expressing our general concern over the overall 'size of the cake', we also wish to extend that concern to the negative approach considered by the distribution scenarios outlined in the Technical Background paper No.1, page 13.

The distribution scenarios L1- L4 outlined in Section 2 of the background paper fail to reflect current trends. Furthermore, the sustainability appraisal of each dispersal option (Section 3) appear to have been written by Eeyore the donkey on one of his more depressed days with options L1, L2 and L3 being miss-represented in order to favour option L4.

Figure HBF2 provides for snapshot comparison on sub-regional population change in 2003/04 and compares that change against the annualised 'L' dispersal options considered in Section 2 of the background Paper No.1. Whilst the HBF acknowledge this comparison to be a snapshot of a single year, it does provide an insight into the likely sub-regional population changes to occur in the first phase of RSS. In our opinion, only option L3 is remotely familiar to the actual change experienced.

## Id No Respondent

## General Comments

When considering spatial policy approaches towards population change, the Regional Assembly need to take a balanced approach towards directing additional population towards both the urban cores and areas of growing employment. In making those decisions, it is essential that we start from a realistic position and move that change over time having regard to employment and housing markets.

Although we support the need to exercise some caution when considering growth and housing numbers, we believe the reasoning to be suggested in Background paper 1, Section 4, key question 4, as being flawed. Restraining house building outside regeneration areas will not necessarily attract people into less desirable areas. Restricting choice will drive people further away and encourage even less sustainable commuting patterns.

With the above in mind, and in response to the key questions being asked in Section 4 of Technical Paper No.1, the HBF request the EiP considers an Option L5 distribution scenario to operate in the earlier phases of RSS housing distribution. That L5 option is reflected in the HBF alternative sub-regional distribution scenario for Policy 28 as shown in the attached Figure HBF3.

451 Marchday Group

Para 1.8 - Marchday fully support the stated objective that in order to promote economic and social growth / improvement throughout the North East will require planning policies at a regional, strategic and local level to generally encourage accelerated economic activity and a "vision" which actively encourages a renaissance throughout the region. This needs to relate to a sub-regional policy framework that promotes a range of economic, social and land use planning matters and as promoted by the individual Boroughs through their respective Local Development Frameworks. The north east contains a number of sub-regions of which Darlington is one and clearly each have their own particular planning policy requirements. It is therefore necessary that the RSS and all relevant policies and supporting text recognises that in order to achieve the level of expected renaissance that a flexible approach to planning policy throughout the region is adopted. This will ensure that the correct planning policies can be adopted at a sub-regional level through the various Local Development Framework documents each Local Planning Authority will be producing. Otherwise, a rigid approach will result in Local Planning Authorities not being able to adopt planning policies, strategies and targets that suit their particular and individual requirements. However, throughout the north east a general policy framework should be established that makes it a priority to develop sustainable inclusive communities via a co-ordinated and managed public/private sector partnership approach to renaissance.

As part of this vision, policy should recognise that encouraging the renewal of existing residential areas should be balanced against making best use of available brownfield sites for new housing to satisfy a range of needs, encouraging both affordable public/private sector and increasing the supply of homes for middle and upper income families. Housing market failure may apply to certain sub-regions within the North East, but it is clear to King Sturge that this situation does not apply throughout the entire area and consequently planning policy should be flexible enough to recognise this, and particularly regarding Darlington's situation and position.

In our experience, encouraging development in appropriate locations for higher income groups of residents will also help to foster and sustain the urban renaissance of the region, underpinning the expansion of the regional economy.

1.10 - Linked to the above, Marchday also fully supports the stated principles in this paragraph and especially regarding accelerating the renaissance of communities in urban and rural areas.

Para 1.27 Marchday fully support the identified key challenges in para 1.27. It is suggested that reference should be made under "Providing an Inclusive Range of Housing" that planning policies relating to housing provision should be updated on a regular basis through the Local Development Framework system ensuring compatibility with local housing needs, market requirements and the locally adopted renaissance

## Id No Respondent

## General Comments

strategy. On this basis local planning policies and Action Area Plans can be updated to ensure housing supply rates to the delivery of affordable public/private sector housing and regarding the provision of houses for higher income groups who will help to assist in sustaining the regions urban renaissance.

This comment is made to support the representation that the RSS should place greater emphasis on recognising Darlington as a key settlement within the North East that will help deliver overall regeneration of the Region. In particular, Darlington is geographically well located to be identified as the "gateway" town in the North East with a strong local economy that will deliver high quality employment opportunities and a range of housing, including quality executive style homes. This representation also suggests that the draft RSS should specifically identify the 50 hectare brownfield mixed use development site known as Lingfield Point to the north east of Darlington town centre owned by the Marchday Group as being ideally positioned to accommodate a regionally important mixed use development and also providing a good range of housing types and other compatible land uses essential to ensuring Darlington attains the level of regeneration it deserves.

- 273 Member of Public
- TECHNICAL PAPER ONE
- I am pleased to note the Paper refers to the "range of views to the scale and distribution of housing and that it does identify there are conflicting views. What concerns me is that this is being considered just in economic or spatial terms as the build environment is the culmination of centuries of growth and change and we are apparently about to embark on the type of allocation by numbers which bears no heed to social or community needs and aspirations. If there is a consensus we need a Vision then that Vision needs to be supported and not constantly undercut by delegation to other ways of delivering it such as the LDF's.
- The analysis of the gold/silver/bronze/baseline is very scientific sounding but in reality is just a set of assumptions which may or may not be right. I can live with that but what does concern me is a reference to adverse effect on land and property markets. The RSS is not just about economics and markets but the people and community of the North East.
- 418 Member of Public
- Para 1.27 includes 'Providing an inclusive range of housing' and 'Stemming and reversing population decline by...good quality housing and living environments that meet their aspirations and a good quality of life.' This is conditionally supported, however, para 1.31 & 1.32 in the Consultation Draft was more explicit in stating 'Better living environments will also encourage people to stay or enter the region' and 'There needs to be a sufficient choice of better quality housing' and 'higher regional house building rates.' It is hoped this is not a deliberate lack of emphasis.
- Para 1.51 - downgrades the previous 160 000 dwelling forecast to 141 000. Limiting numbers would impact upon the ability to provide for some growth and renewal of settlements across Sunderland which have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development. Wishes for the previous forecast of 160 000 to be reinstated.
- 291 Member of Public
- Mr Calzini owns land between Drum Ind Est and Perkinsville, Chester-le-Street. This lies in the adopted Chester-le-Street Local Plan green belt. The site provides a logical extension to Drum Ind Est whilst maintaining a green wedge between it and the settlement limits of Perkinsville. Mr Calzini believes that part of the site is capable of having an allocation for employment purposes in the replacement Chester-le-Street Local Plan (LDF) or for mixed use.
- 449 National Trust North East
- Para 1.14 The Trust opposes the wording of this paragraph for a number of reasons. It sets the scene for the conflict that arise in policies throughout the RSS at later stages.
- Suggested alterations are:
- Insert "sustainable", so the first sentence reads: "The region's transport network is modern, sustainable, effective and reliable...".

**General Comments**

Replace “no significant increase in car-based commuting” (which is vague – what does “significant mean?”, with “a reduction in car-based commuting” (which is very clear).

Third sentence to read: “The North East is internally and externally more accessible than previously by sustainable modes of transport”

The last sentence should be deleted, there has been no evidence provided that airports contribute to the economic growth of the region. The Trust has provided real evidence to show that airports can contribute to the decline in domestic tourism, and therefore damage the economic growth of the region. The Trust would like to see the evidence and research that has been undertaken, that shows that on balance, airports and their expansion contribute to economic growth, and improve quality of life for people in the North East region.

This request will be repeated throughout the Trust’s response to the RSS. We have enclosed evidence by way of a research report that the Trust produced called “The Blue Skies” report, which shows how air travel can have a damaging impact on the domestic tourism economy.

Para 1.22 Although we support the recognition of climate change as an issue in this and other paragraphs throughout the RSS, the National Trust would like to see a new policy on climate change to feature in the RSS as a way of supporting statements made (albeit briefly) throughout the RSS about recognising the need to tackle the causes and impacts of climate change.

The first bullet point suggests that there have been significant changes to RSS on the matter of Climate Change following consultation. This is not the case. There is still no policy on Climate Change within the document, which is what the National Trust, WWF, Friends of the Earth, English Nature, CPRE, The Wildlife Trusts, the Regional Environment Forum, North East Environment Link and others have been asking for, right from the very start of the consultation process.

The Assembly recognises in paragraph 1.22 that more work needs to be done on climate change issues. In that case, there should be a clear policy, with justification paragraphs beneath, explaining how, when this work is to be done, and by whom. So far there has been no real work undertaken by the Assembly on climate change. The reason for this appears to be insufficient funds or staff resources. Considering climate change has been deemed the biggest threat to our global society, this seems a little careless. The National Trust has undertaken much research on climate change, and the effects it is having already on our properties around the country. We are happy to share this work with the Assembly should they be interested.

There should be a Policy on Climate Change within the RSS. Without this policy, the RSS is not fulfilling its legal requirements as identified in the Planning Act 2004, nor is it fulfilling the requirements of PPS1. A suitably worded policy, such as that which was incorporated into the Yorkshire & Humber RPG Partial Review, and is now part of RSS for that region. That policy was tested at EIP, and approved by the Inspector, and supported by the Yorkshire & North East Assembly. The South East Regional Assembly has also recognised the importance of incorporating climate change into the RSS and is currently producing a Climate Change Action Plan to be integrated into the RSS.

There is no reason why the North East RSS cannot incorporate a policy on Climate Change into its document. Comments such as “it is just repeating national policy” are inexcusable. The whole RSS is supposed to repeat national policy from a regional perspective, and there is no reason why the Assembly cannot do this with a climate change policy.

It is clear that if there were a climate change policy in the RSS, there would be serious conflicts with other policies which support airport growth, and which will lead to increases in greenhouse gas emissions. These conflicts need to be addressed.

The UK Sustainable Development Strategy states in Chapter 4 (Climate Change) states: “The UK government is committed to reducing the country’s greenhouse gas emissions. In its 2003 Energy White Paper, the government put the goal of moving to a low carbon economy at the heart

**General Comments**

of its energy strategy, and set out a long term goal of reducing CO2 emissions by some 60% by about 2050, with real progress to be shown by 2020.”

If this is the case, and all the planning guidance states that Climate Change is now a planning issue, and that sustainable development needs to be “at the heart” of planning, why is there no target or policy within the North East RSS?

Para 1.48 The Trust objects to the last sentence of this paragraph, which states: “Following the consultation process the RSS has adopted the annual average of 2.8% GVA growth over the plan period based on Option 4...”

We would like to see the evidence to support this statement, as the figure of 2.8% seems to have been a fait accompli, and there was no consultation about what that figure should be, or whether we should be focusing on other indicators rather than setting a target of 2.8% GVA. There has been no argument presented, as far as we are aware to justify this figure in a way that meets the requirements of sustainable development (i.e. how this figure can be environmentally and socially beneficial to sustainable communities as well as economically). Economic growth in itself does not mean sustainable development, nor does it mean improved quality of life.

There was certainly much information disseminated about this issue, but there was certainly no real consultation. The Trust made comments on this issue during early stages of the “consultation process”. None of our letters were acknowledged, and no reason was ever given for ignoring our comments.

The Trust does not support the figure of 2.8% GVA, and believes that the RSS should be focused on setting targets to meet quality of life indicators, rather than pursuing economic growth for its own sake. Setting a target of 2.8% and then building the RSS around this figure will not deliver sustainable development. It is a legal requirement for sustainable development to be at the heart of planning —not economic growth! Economic growth will flow from sustainable development, and this should be the model the Assembly should be using to guide the development of the RSS. Instead, the RSS appears to be almost entirely driven by the Northern Way (which is not a statutory document, and has not had the benefit of public consultation, or an environmental assessment) and the RES (which the Trust is responding on separately).

94 Nectar

Paragraph 1.10

The concepts of a high quality of life, and good health identified in the Vision statement (Paragraph 1.9) are unfortunately not carried through into the Values set out in Paragraph 1.10 and neither of these concepts features in the strategy map set out in Figure 2. Whilst these concepts may be considered to be intertwined throughout the document, if they are to have impact, NECTAR considers that they should be stated clearly in Paragraph 1.10, which should also contain a commitment to the ODPM’s concept of Liveability.

Commitment to the sustainable approach and recognition of climate change as the single most significant issue that affects global society in the 21st century (Paragraph 2.154) and consequently to the achievement of the Government’s target to reduce CO2 emissions by 60% by 2050 (Paragraphs 2.154, 2.157) should also be made in Paragraph 1.10. These commitments, set out clearly at this critical, early point in the Regional Spatial Strategy, would define the context for the Policies subsequently developed

Paragraphs 1.49 to 1.51

The Regional Spatial Strategy is based on the achievement of an assumed growth rate (Paragraphs 1.49 to 1.51) which is considered by the authors

## Id No Respondent

## General Comments

to be aspirational yet realistic. Since the current growth rate is far below the average level, then for much of the Regional Spatial Strategy period the average would have to be greatly exceeded; however, the consequence of a shortfall is neither quantified nor discussed. This omission should be rectified.

Similarly, the consequences of using Gross Value Added as a measure, with its dependence on financial gain rather than contribution to quality of life is not explored, despite being at the root of expressed concerns about regional disparities. This omission should be rectified.

Much of the Regional Spatial Strategy is necessarily concerned with transport and travel. However, the link between transport investment and economic regeneration is assumed rather than evaluated in either the Regional Spatial Strategy or the associated Technical Background Paper No.10: Transport. NECTAR is of the view that this assumption should be discussed as one of the Regional Spatial Strategy Growth Assumptions in Paragraphs 1.49 to 1.51. Attention should be drawn to the findings of the Standing Advisory Committee on Trunk Road Assessment (SACTRA) that the link between investment and regeneration is tenuous. The SACTRA findings are supported by more local Studies for ONE NorthEast (Steer, Davies, Gleave: Economic Benefits Appraisal of Existing and Future Transport Infrastructure Requirements for the North East, 2003), "There is virtually no evidence that transport investment on its own can generate economic development") and the A1 North of Newcastle Multi-Modal Study for the Government Office North East (Summary and Recommendations, 2002, "No evidence has been found to suggest wider economic development benefits would arise from completing the dualling of the A1 in Northumberland"). This extensive body of evidence should direct the Regional Spatial Strategy towards investment in public transport, in which context the Study for ONE North East drew the conclusion that "The changes in transport policy required to bring about significant and sustained locational changes would in our view be concerned with the cost of use of the system rather than with investing in more infrastructure."

341 Newcastle City Council

The Council supports the broad thrust of draft Regional Spatial Strategy, including the vision and values. However the Council has strong reservations about some parts of the document. These are shared by the other four local authorities in Tyne and Wear and a joint submission is being made on our behalf by Sunderland City Council. Comments in this document are generally in addition to those made in the joint submission.

Paragraphs 1.49-1.52 consider growth assumptions. The Council shares the concern of others that the current drafts of RSS and the Regional Economic Strategy do not directly share the same growth assumptions. It may be that the next version of the RES may resolve this, but it could be necessary for the Public Examination to look at this issue. The Council is not offering a view on the most appropriate growth level at this time, but is of the opinion that a more integrated approach should be taken.

Should such a convergence on growth rates take place, it will still be necessary to consider what level of house building and thus land release would be appropriate both locationally and over time. The Council along with the other Tyne and Wear authorities is cautious about the wisdom of releasing too much land too soon across the region as whole. There is a need for appropriate allocations backed up with a clear, firm and practical 'plan, monitor and manage' approach that can cope with either a slower or faster rate of growth than the baseline assumption.

Paragraphs 1.49-1.52 consider growth assumptions. The Council shares the concern of others that the current drafts of RSS and the Regional Economic Strategy do not directly share the same growth assumptions. It may be that the next version of the RES may resolve this, but it could be necessary for the Public Examination to look at this issue. The Council is not offering a view on the most appropriate growth level at this time, but it is of the opinion that a more integrated approach would be taken. Should such a convergence on growth rates take place, it will still be necessary to consider what level of house building and thus land release would be appropriate both locationally and over time. The Council along with the other Tyne and Wear Authorities is cautious about the wisdom of releasing too much land too soon across the region as a whole. There is a need for appropriate allocations backed up with a clear, firm and practical 'plan, monitor and manage' approach that can cope with either a slower or faster rate of growth than the baseline assumption.

## Id No Respondent

## General Comments

- 157 Nexus
- Para 1.20 - supports. Suggests that practical implementation of this process includes maximum use of existing public transport networks, failing which, the applicant should be required if necessary, to demonstrate a meaningful commitment to underwrite an appropriate level of public transport to provide sustainable access to the proposed development.
- Para 1.25 - Believe it naïve to forecast the continued level of current growth as the economy is potentially vulnerable to the impact of external factors.
- Para 3.244 Nexus considers that the revitalisation of the Tyne and Wear Metro system is of greater economic importance to the city region than the Ashington Blyth & Tyne scheme, and is more likely to be implemented, and requests that the relative priorities of the schemes be reversed accordingly.
- 256 North East Wildlife Trust
- No Policy Included - Climate change not adopted as a key cross-cutting theme - The North East Wildlife Trusts wish to express their general concern over the omission of a climate change policy in the RSS. In common with many regionally represented environmental organisations we feel concerned that this fundamental issue has been omitted, despite its obvious long-term implications, not only for the environment but also for the economy and communities of the North East. This should be a strong cross cutting theme throughout. Para 1.13 is far too short to capture the profound implications of global climate change on spatial use in the North East. This is particularly disappointing in the light of a comprehensive and well informed climate change policy and central consideration of this issue in the Yorkshire and Humberside RSS. The lack of a climate change policy makes the NE RSS dated and out of tune with the wider context for integrated development in the region. It is effectively partially irrelevant and redundant in this respect, as a strategy looking forward to the next 50 years, when climate change us set to accelerate markedly.
- Policy Omission - Agriculture - The argument against including agriculture in the RSS, that it is ubiquitous and not specific to the North East, is a contrived view and we feel that this is not reflective of the importance of this land use in the spatial use of the region. Agriculture dominates the region: to exclude it from the RSS gives a false and incomplete view of spatial land use. Special landscapes, which constitute economic as well as environmental and cultural assets, depend on continued agricultural management for their survival. These include the uplands, the coast, two National Parks, a third of the country's largest AONB, the Northumberland Coast AONB and most of the designated and non-designated sites identified elsewhere within the document. Currently, the document suggests the RSS authors still do not recognise how much agriculture is about to change with its resulting implications for land use and employment. In particular, new incentives and regimes will mean wider environmental outputs from all farmed landscapes and inspire a range of new, more diverse land use.
- 10 North Tyneside Council
- While many of the policies contained within the strategy are compatible with local objectives of the borough, there are still points that require further attention. The previous report on the Consultation RSS to Cabinet on 18 January 2005, raised concerns from the Authority's own officers and concerns raised by the Tyne and Wear District Officers (TWDO), these concerns related mainly to: (1) The locational strategy and its expression particularly in terms of employment and housing provision and; (2) Whether a number of policies and proposals are repeating national guidance rather than being regionally specific. (5.2) The previous report voiced concerns over the net additional dwelling allocation, which was set at 110 000 over the plan period. It was considered that such a number be too high, and result in an over-supply of housing land, which would have a negative effect on sustainability by reducing development on brownfield sites. 100 000 units was suggested as a more realistic target. The submission RSS has revised figures and has now set a target for 107 000 units over the plan period - still higher than suggested. (5.3) Concerns remain over the geographical concentration of housing development. The Consultation Draft targeted approximately 44% of the total housing to be allocated within Tyne and Wear. The TWDO recommended that the allocation to Tyne and Wear be increased by 50%, in order to realise the urban regeneration and locational strategy of the RSS. The Submission RSS has reduced the allocation further in Tyne and Wear to approximately 42%. (5.4) The TWDO also requested further clarification on the role of Cramlington, Blythe and Peterlee within the Tyne and Wear City Region. The

## Id No Respondent

## General Comments

Submission RSS does expand on the role of these towns, and their dependency on the larger towns within the region. However the TWDO's particular concern over conflict between the housing provision in these areas and those of the main conurbations has not been resolved in the Submission Draft. (5.5) Concerns raised over the phasing of the housing density policy are still to be addressed. In particular, the submission RSS states a 'regional' target for brownfield housing development of 60% of housing development on brownfield sites by 2008 and 65% by 2016 but does not clearly state that such a policy is also intended to be operated on a 'district by district' basis. It should do so. (5.6) In respect of the Employment Land it would seem as if the provision is intended to indicate an initial provision at the start of the plan period but not one that should be maintained throughout the plan period. There is no consideration given to the consequences of rapid land take up by businesses and therefore the potential requirement to ensure future employment land provision. In addition it is suggested that any shortfall of employment land provision in Tyne and Wear could be met in part through supply in Northumberland and Durham. This raises fundamental questions of sustainability, including commuting and its consequential effects, and the ability to deliver the locational strategy with its focus on the conurbation's and so needs reconsideration.

- 47 Northumberland Estates Para 1.51 Objection to the overall RSS housing provision. The figure should be increased to allow a greater of growth in rural areas. If the RSS is to achieve its stated aims of providing vibrant rural communities with a diversified economy, concentrated within the main settlements and service centres, then the policies setting development requirements must be enhanced, otherwise the policies are inconsistent with stated objectives.
- 136 Northumberland National Park The Draft RSS wishes to stem urban-rural migration. Whether planning can actually achieve this is debatable as this is a matter of free choice and it should be questioned as to whether the planning system should even be used for this purpose. Many people move to rural areas for life style reasons and will continue to do so, even if the housing stock is constrained. One result of this policy could be housing affordability being reduced still further in rural areas and an increase in reverse commuting from the urban areas. There is a certain naivety in the RSS that restraining housing development in rural areas will arrest this migration.
- 194 PD Ports (Teesport & Seal Sands) PD Ports support the inclusion at paragraph 1.27 of the ports and the recognition of Teesport as the 2nd largest port in England. Whilst PD Ports recognise the need to promote a diverse economy, including the development of knowledge based business, they are concerned at the apparent under-playing of the importance of existing and potential new manufacturing and chemical based industries. Logistics and handling of both imported goods and export of manufactured / processed goods and materials are areas of economic activity which can be effectively undertaken at Teesport alongside manufacturing. There remain opportunities on their land (for example at Seal Sands) and elsewhere for such industries to come forward. We therefore consider that a balanced approach is required for managing economic change, and that it is necessary to exhibit a broad base of expertise that has room for manufacturing, knowledgebased industries, and all other industries in between.
- 406 Port of Tyne International Planning Context
- Para 1.30 emphasises the strategy seeking to develop Newcastle as a City of European importance. We wholeheartedly endorse that aspiration but then question why the Port of Tyne, in subsequent references within the report, is not seen as an important and integral key driver in seeking to attain this status?
- Northern Way Growth Strategy
- As indicated earlier we believe the Northern Way document does not give the correct prominence to the Port of Tyne. We have previously written to the author of the Northern Way on the matter. Unfortunately we see the repeat of the problem in this current 'Regional Spatial Strategy' document.

## Id No Respondent

## General Comments

66	Railfuture NorthEast	<p>Paragraph 1.10 The concepts of a high quality of life, and good health identified in the Vision statement (Paragraph 1.9) should, in the view of Railfuture northeast, be clearly reflected in Paragraph 1.10.</p> <p>Commitment to the sustainable approach and recognition of climate change as the single most significant issue that affects global society in the 21st century (Paragraph 2.154) and consequently to the achievement of the Government's target to reduce CO2 emissions by 60% by 2050 (Paragraphs 2.154, 2.157) should also be made in Paragraph 1.10.</p> <p>These commitments, set out clearly at this critical, early point in the Regional Spatial Strategy, would define the context for the Policies subsequently developed</p> <p>Paragraphs 1.49 to 1.51 Much of the Regional Spatial Strategy is necessarily concerned with transport and travel. However, the link between transport investment and economic regeneration is assumed rather than evaluated in either the Regional Spatial Strategy or the associated Technical Background Paper No.10: Transport. This assumption should be discussed as one of the Regional Spatial Strategy Growth Assumptions in Paragraphs 1.49 to 1.51. Railfuture northeast recommends that attention be drawn to the findings of the Standing Advisory Committee on Trunk Road Assessment (SACTRA) that the link between investment and regeneration is tenuous. The SACTRA findings are supported by more local Studies for ONE NorthEast (Steer, Davies, Gleave: Economic Benefits Appraisal of Existing and Future Transport Infrastructure Requirements for the North East, 2003), "There is virtually no evidence that transport investment on its own can generate economic development") and the A1 North of Newcastle Multi-Modal Study for the Government Office North East (Summary and Recommendations, 2002, "No evidence has been found to suggest wider economic development benefits would arise from completing the dualling of the A1 in Northumberland"). This extensive body of evidence should direct the Regional Spatial Strategy towards investment in public transport, in which context the Study for ONE North East drew the conclusion that "The changes in transport policy required to bring about significant and sustained locational changes would in our view be concerned with the cost of use of the system rather than with investing in more infrastructure."</p>
42	Redcar & Cleveland Borough Council	Section 1 Para 1.48 Support the selected development option of focusing development in the conurbations and main towns of the city regions
294	Rose Park Caravan Park Ltd	Rose Park Caravan Ltd owns the area known as Rose Park Estate adjacent to Seghill Hall, Seghill. The site secured a CLEUD in 1999 for the stationing of residential caravans. Further discussions concluded that the CLEUD be granted for a minimum of 42 Caravans. An application for 41 caravan pads, resurfacing of the site road, gas bottle storage area and street light was submitted 29th October 2004. The application was for the operational development of the stationing of caravans the CLUED already permitted. After discussions with the council the application was reduced to 34 caravan pads. It was subsequently refused against an officer recommendation for approval. An appeal submitted July 2005 is ongoing.
124	South Tyneside Council	<p>Para 1.1 As the top tier of the development plan RSS should be more positive, providing overarching regional planning policy that does not have to be repeated again in LDFs.</p> <p>RSS should include a clearer statement of its role (paragraph 1.1) add the following text to the penultimate sentence.... "It is part of the statutory development plan system, as described in the Planning and Compulsory Purchase Act 2004. Local planning authorities prepare the other component of the Development Plan Document, Local Development Frameworks which should be in general conformity with the RSS. If that particular Local Planning Authority is in full agreement with policies contained within this RSS and does not need to add any further guidance, RSS polices can be relied on without further amplification in its own Local Development Framework. Local Transport Plans should also reflect the Regional Transport Strategy set out in the RSS."</p>

## Id No Respondent

## General Comments

There is also a lack of linkage between the key objectives and the policies in each section.  
Preamble to first policy in each section should say how the key objectives will be achieved.  
Para 1.27 13th Bullet Point – First sentence should give more encouragement to waste reduction and reuse - higher up the waste hierarchy than recycling.  
Amend this to read "...along with measures to encourage the reduction and re-use of waste materials"

- 89 Sport England  
Para 1.27 key challenges need to acknowledge & improve linkages between RSS & regional plan for sport
- 331 Stanhope Parish Council  
Para 1.27 sees a key challenge as stemming urban-rural migration. Whilst there are opportunities to provide better urban housing to retain and attract more people, the choice that people make to live in rural areas should not be seen as a problem. Indeed as para 2.135 points out "attractive rural environments are an important part of the region's 'offer' to migrating and returnee entrepreneurs" and make a valuable contribution to the regional economy.
- 228 Stockton Borough Council  
Recommendation to Council : -
- i) For the reasons set out in this report, expressions of support are given by this Council to : -
    - a) Policy 2 ~ Sustainable Development (paragraph 13 of this Report)
    - b) Policy 5 ~ The Locational Strategy (paragraphs 14 to 15 of this Report)
    - c) Policy 7 ~ Tees Valley City Region (paragraph 16 of this Report)
    - d) Policy 12 ~ Sustainable Economic Development with reference to Criterion A to C (paragraph 20 of this Report)
    - e) Policy 13 ~ Regional Brownfield Mixed Use Developments (paragraph 21 of this Report)
    - f) Policy 21 ~ Airports (paragraph 25 of this Report)
    - g) Policy 30 ~ Dwelling Provision regarding the principle of front loading the phased delivery of housing land at the start of the Plan period (paragraph 23 of this Report)
  - ii) For the reasons set out in this report, this Council objects to the following : -
    - a) Policy 2 / Glossary ~ the lack of any definition of "Major Development Proposals" (paragraph 13 of this Report)
    - b) Policy 10 ~ Green Belts and Urban Areas (paragraph 17 of this Report)
    - c) Policy 12 ~ Sustainable Economic Development with the requirement to insert reference to the potential employment allocations at Durham Tees Valley Airport (paragraph 20 of this Report)
    - d) Policy 18 ~ Employment Land Portfolio regarding the need for greater commitments to supporting / enabling soft end uses (paragraph 22 of this Report)
    - e) Policy 18 ~ Employment Land Portfolio regarding the need to accurately set out the correct allocation of Prestige Employment Land (paragraph 24 of this Report)
    - f) Policy 30 Dwelling Provision regarding the inadequate dwelling apportionments to the Tees Valley sub-region and Stockton Borough Council respectively (paragraphs 31 and 32 of this Report).
- 151 Sunderland ARC  
Development Principles and Locational Strategy
- Sunderland arc fully endorses the overall Vision, Key Challenges and Development Principles underpinning the Locational Strategy set out in the Submission Draft of the RSS, particularly the increased emphasis laid in the revised policies on directing the majority of new development into the conurbations and main towns. The requirement now is for the RSS to follow these through more rigorously in terms of the priority that is accorded to the location of new development and regenerative activity.

## Id No Respondent

## General Comments

### Growth Assumptions

There is some concern over the differences in growth assumptions between the draft RSS and the draft Regional Economic Strategy (RES). The draft RSS adopts 2.8% pa to 2021 (but 2.5% pa as the basis for the housing allocations), whereas the draft RES proposes an 'aspirational' growth aim averaging 3.4% pa to 2016. Sunderland arc considers that the two strategies should be better aligned in this respect and has responded to this effect in relation to the recent consultation on the draft RES.

61 Tesco Stores Ltd

Para 1.27 - agree with Key Challenge but feel that the actual developments and growth may take more time than originally anticipated. Therefore, feel that especially in the initial stages, a more cautious assumption on growth should underpin the strategy.

There is also some concern that appropriately located brownfield sites in major conurbations, which may be brought into productive use in the short term to provide for additional dwellings and enhancements in retail and leisure provision, may be kept sterile on the basis of some hoped future employment led development if overall optimistic assumptions on GVA and consequently land allocations are adopted. This may lead to prominent vacant areas which would act as a disincentive to new investment.

221 Thomas Stewart Architect

Concerned strategy regarding housing provision will have detrimental effects on our area and on other rural areas at the periphery of the region and, rather than leading to a "rural renaissance" as suggested in the title of sec 3, will in fact lead directly and speedily to rural stagnation and decline.

We are proud of our communities in rural areas, and have no wish to see the suburbanisation of the countryside or of our region's market towns; nor do we have any wish to hold back the obvious need to regenerate inner-city communities. We recognise that recent years have seen a growth in housing demand in towns and villages that are within easy commuting reach of the major urban areas and that this has put pressure both on the recipient communities, and on the urban areas from which the population are moving: The long term concern may be of a doughnut effect.

However, we strongly believe there is a lack of understanding of the current fragile state of communities and economies that lie beyond the outer ring of the doughnut, on the edges of the region, and subject to significant pressures from adjacent regions. The analysis within paras 1.71 - 1.76 of the Strategy, dealing with the context of neighbouring areas, is grossly inadequate.

In our own case, pressure from Scottish Borders and the Edinburgh conurbation is a reality: The economy of Berwick has always had a hinterland and dependent population that lies, over half its scope, in another country.

We note that within the Scottish Borders Structure Plan 2001-11, an overall housing allocation of 6313, or 630 per year, across a Local Authority with an existing population of 105,400, equates to a provision of additional new house per 170 head of population, per year: In Berwick-upon-Tweed, based upon the current allocation within your strategy, the equivalent figure is 1 additional house per 416 head of population, or 41% of the provision across the border. We therefore have very serious concern that the currently proposed allocation to Berwick-upon-Tweed will lead to grave imbalance across the border, and net out-migration to Scotland, where greater availability will keep costs lower: North Northumberland will stagnate and decline.

We are also concerned that the stated average allocation of additional dwellings per annum, at 60 representing 0.5% growth per annum in the current size of the housing stock, does not provide sufficient capacity for a natural growth in the number of the households within a static population, let alone provide any capacity whatsoever for any managed growth in population so as to maintain and enhance sustainable communities and would put greater emphasis on the need for social housing: The Housing Associations are already finding great difficulty acquiring sites as vendors exploit the rising demand produced by constrained supply of land and allocation. This will worsen if the current strategy is put into effect.

## Id No Respondent

## General Comments

We are aware that other communities and local authorities areas within the region also feel that the dwelling allocation for their area is insufficient for their economic and social needs: We are therefore strongly of the opinion that the overall allocation of new dwellings to the north east region will need to be increased, so that any improvement in Berwick's allocation does not oblige other areas to suffer: We believe that, within a proper framework, an overall figure of 150000 would be sustainable and prudent and not, as your para 3.67 suggests, "as much a problem as under provision."

It is essential that the provisions of the strategy are balanced across the whole region, and provide a vision for the whole region to grow in a sustainable manner.

415 Tithe Barn Land

Page 5, para 1.2

"It is primarily concerned with the scale, location and phasing of development, including future housing provision" This is the main reason that I am responding to the SUBMISSION DRAFT. The family own 29 acres of land in North West Stockton, which is suitable for development according to all of your criteria except, brown field. I have also represented by permission other adjoining landowners and various Stockton High Street retailers. Development of our land would financially benefit Bishopsgarth School and Stockton Council, who both have surplus adjoining land.

Page 6, para 1.8

I support the "common theme is the need to reduce the economic and social disparities between the North East and other regions,". I believe that the ODPM plans for the extra million plus houses in the S.E. is the biggest piece of social engineering ever designed that will take wealth away from the N.E. The infrastructure needed is equivalent to that say serving everyone north of Cambridge, east of the A1 and south of Middlesbrough. The N.E. fair share of the investment needed to replicate all of that would be a tremendous economic boost.

Page 7, para 1.12 and para 1.14

I support the RSS in saying that people take advantage of "better quality housing and living environments" and that there is "increased public transport use". These are two of the advantages that our site benefits from.

Page 9, para 1.20 bullet 2

I support "land is assessed...the potential for ...resource consumption." The authoritative "New Life in the High Street Survey" showed that our land was in the area from whence people travelled to the High Street in an environmentally manner, but until now little emphasis has been attached to this.

Page 9, para 1.22 bullet 4

I support the RSS "to be located and designed to minimise energy consumption;". This is a positive statement of an advantage nationally of the N.E. over the S.E. and probably worth ten thousand windmills!

Page 11, para 1.27 bullets 6,7, & 9

I support the RSS in its desire for good quality housing and environments. This is a policy I have followed with the houses I have built. It seems obvious to me that if people are mortgaging themselves for years they deserve a good quality home. If it is a family house it should have contaminant free soil for children to play on. Sadly, often little emphasis has been placed on these factors. Current planning guidance could act against good quality houses and environments with the desire for 50 homes per hectare on contaminated land. The House Builders Federation made representations to a Cleveland County Council inquiry a dozen years ago saying that "footloose executives" would move out of the area if suitable housing was unavailable. The subsequent mid 90s out-migration to North Yorkshire proved this, to the detriment of the economic well being of Stockton.

## Id No Respondent

## General Comments

I also support bullet 10.

Page 16, para 1.51

I disagree with the RSS on some of the conclusions they make from the facts. I base my opinions on observations of Stockton and surrounding area. "over allocating can be as significant a problem as under allocating" The massive allocation of housing at Ingelby Barwick in the borough (House Builders Federation saying 60% of the supply and 9% of the demand ) in my opinion accelerated and deepened the High Street decline. An over allocation of housing, with more in desired locations, would have kept customers in the High Street catchment area, rather than directing them to Middlesbrough. Eventually the market would have decided the completion rate at Ingelby Barwick, possibly at the speed that the developers provided some of the promised infrastructure.

"The North East experienced population decline largely due to the severe economic recession of the early and mid 1990s" When the Tees area was an oil rig port? At the same time North Yorkshire was allocating twice the number of houses that its population would indicate to allow for inward migration from Teesside. A major part of Stockton's problem was that insufficient housing was allocated in the town, particularly west Stockton, to allow a desirable and plentiful choice. It could merely be house prices that are driving the in-migration. Everyone with a care for the town's economic growth should hope that there is a generous housing allocation on quality sites. To deduce that 141,000 houses are needed and on page 89, para 3.67 to state that 107,000 are planned is incredible.

11 Tyne & Wear Authorities (Jointly)

### 2. KEY ISSUES FOR TYNE AND WEAR

2.1 It is considered that little account has been taken of the Tyne and Wear Districts' joint position put forward at the earlier stages from both Members and officers. Indeed, whilst the authorities support the overall strategic principles, policy revisions have succeeded in diluting the thrust of the strategy for strengthening the conurbations, which is given support in text (RSS paragraphs 2.19/21 & 24). These matters are discussed below. The key issues of concern to the five authorities remain the translation of the economic strategy for the Region in terms of sustainable development, employment location, population, migration and new housing.

2.2 A major concern for the 5 Tyne & Wear Districts is the weakness of the Spatial Strategy and, if the existing strategy is accepted, the translation of the general strategic priorities into specific priorities and actions.

There are two issues of particular concern:

1. The absence of any real testing of alternative scenarios for the long-term spatial development of the North East;

It is evident that the alternative forecasts contained in the Economy and the Population and Housing Technical Papers (they are forecasts not scenarios) are not translated into alternative spatial scenarios that are tested in RSS. As a consequence the likely outcomes of the possible alternative spatial patterns of development are not considered - this is a serious weakness and casts doubt upon the robustness of the Spatial Strategy contained in the draft RSS. Furthermore, it would appear to be the case that the general spatial pattern of future North East will conform to the current pattern of activities. Given that the current pattern is seen to display weaknesses, this would appear to be unsatisfactory.

2. The absence of any real link between specific spatial weaknesses identified in the analysis and proposals contained in the draft RSS;

There are a number of inconsistencies between the analysis and the policies suggested in the draft RSS. A particular matter of concern for the Tyne & Wear Districts is the seeming inability to carry through the telling point of analysis made in the earlier Consultation Draft Housing Technical Paper in 5:45 and 5:46 (and in similar vein in the revised Submission Housing Technical Paper in 5.46 and 5.47). In these paragraphs the link between affordability and spatiality is made, but without any attempt to translate this into policy. The only meaningful policy conclusion is that it

## Id No Respondent

## General Comments

is essential to prevent further migration from the conurbation's into the rural areas and that this will require additional emphasis to be placed especially on promoting the development of sustainable communities in Tyne & Wear. This point is considered further at 2:3.

this

2.3 Key Challenges (RSS Para. 1.27): Whilst elsewhere in the document the need to concentrate development in the conurbations is expressed,

section fails to articulate the main issues for the conurbations. This should be addressed by replacing text relating to stemming urban – rural migration, to read as follows: “A balance of employment and housing opportunities within the conurbations is needed to ensure greater sustainability in the Region, the key challenges being to maximise sustainable opportunities in the conurbations and for the urban areas to emulate the housing and living environments that people aspire to.”

2.4 This is suggested in order to ensure that a stock of affordable housing is maintained and to ensure that the viability of the sustainable communities within Tyne & Wear is not damaged or diminished.

2.5 Text to Key Challenge on environmental assets should address the need to enhance a range of environmental aspects, particularly in the conurbations where the greatest concentrations of problems are found – traffic congestion, green space infrastructure failings, erosion of built and natural heritage, noise, air quality, dereliction etc. Suggest wording addition is made to RSS to accord with proposed wording change to City Region Policy 6 as below.

Text to Key Challenges should add “Reducing social exclusion – the full range of required spatial policies should seek to reduce or eliminate social exclusion. This is best achieved through supporting further economic activity and residential development in existing settlements, which are well served by quality public transport; a particular emphasis should be placed on retaining population in Tyne & Wear.”

2.7 The fundamental strategic issue for the Region and Tyne and Wear is continuing population decline. For the Tyne and Wear Districts a major element of out-migration is the ‘urban flight’ of population from the conurbation to more rural areas of the Region. In this context the two key topics of concern to Tyne and Wear are Housing and Employment Land – housing being the more critical.

2.8 The four Planning Principles of Para. 2.3 are supported, however the RSS policies relating to the Tyne and Wear conurbation do not properly reflect these principles:

three

1. At a regional level the sequential approach to development is undermined by the apparent lack of control over green field development in out of the four sub-regions.

2. Whilst individual authorities have phasing imposed through annual housing allocations, there is no phasing at a sub-regional and City Region level.

105 Tynedale Council

The main change between the two stages has been that concept of two City Regions, based on Tyne and Wear (plus Durham) and the Tees Valley – reflecting the Government's “Northern Way” growth strategy – is now better integrated into the overarching locational strategy and continues as a theme throughout the main body of the document. This means that the main issue for this Council is to ascertain that the city region approach does not overlook rural areas like Tynedale and indeed to ensure that the approach benefits such areas.

As before, the four main themes of the RSS are:

**General Comments**

- Delivering economic prosperity and growth
- Delivering sustainable communities
- Conserving, enhancing and capitalising upon the region's diverse natural and built environment, heritage and culture
- Improving connectivity and accessibility within and beyond the region

It sets out policies relating to each, which are linked to measurable targets and indicators in the latter part of the draft RSS.

The Board considered that the most important points relate to city regions, the supply of housing land, the supply of employment land, transport connections and renewable energy generation:

•The Board noted that City Regions are better explained than in the previous draft, in terms of their relationship with surrounding rural areas. Hexham and Prudhoe are now described as being within the "sphere of influence" of Tyne and Wear. The descriptions suggest a dynamic relationship between City Regions and their surroundings, (rather than subservience or a "dormitory" role), and can therefore be supported. However the importance of improving connections within this wider sphere of influence, beyond the main conurbation, may be underestimated in some of the policies and proposals. This theme runs through a number of the comments in the attachment.

•In terms of housing, the Board welcomed the priority given to the rural districts of Northumberland, through its recognition of the affordable housing crisis that affects many rural areas, (although there remains a lack of a full regional perspective on the extent of this issue. The Board supported strongly, both for Tynedale and for the County as a whole, the annual build rate figures up to 2016, in that they are in line with the adopted Structure Plan, (125 per annum 2004 to 2011 and 100 per annum between 2011 and 2016). This should effectively allow population levels to adjust back to 2002 levels by 2016. The Board wished to stress the importance of achieving this agreed strategy, adhering as closely as possible to these figures, which should be neither raised nor reduced, so meeting housing needs and stabilising the population. The Board also noted that the RSS also plans for a further five-year period beyond the Structure Plan end-date for which it proposes a figure of 80 per annum. (2016 to 2021). The Board took the view that this is too low and should not be supported. It wished to make clear that this would not allow population levels to be maintained once population stability has been reached by 2016.

•The Board discussed the fact that the RSS document sets out a policy on employment land requirements but was concerned that the figure for Tynedale, (of up to 55 Hectares over a 17 year period) simply reflects the maximum potentially available on known sites and does not give an overall strategic planning framework for where additional employment land will be needed or its distribution around the region over the Plan period. The Board noted that, at 3.2 Hectares per annum, the figure represents up to a 50 % increase on Structure Plan requirements, while the actual development rate since 1991 is approximately 1.1 Ha. per annum. It therefore took the view that the figure given in the RSS needs to be explained and justified in terms of a spatial strategy for employment land in the region.

•The Board was pleased to note that the status of "Inter-Regional Transport Corridors" is given to the A69/Tyne Valley rail line in the draft RSS and that the key diagrams clearly indicate this, including a proposal to improve rail movement along that part of the corridor that lies within the sphere of influence of the Tyne and Wear City Region. The Board felt, however, that, in spite of this, there remains scope to reflect this intent better in the policies themselves. In terms of the Haydon Bridge Bypass and the renewed uncertainty over its timing, the Board supported having a table of "schemes with national funding support, (including those currently designated as remitted to the regions)". Even so, it considered that there should be further references within one or more of the policies. The Board was also concerned that the method of assessing the regional benefits of transport schemes may not give sufficient weight to the safety and environmental issues that were instrumental in justifying the bypass at national level, as well as underestimating its role in bringing tourism and other economic benefits at levels ranging from inter-regional to trans-European.

•The Board thought there to be room for further clarity on the renewable energy strategy and a number of other environment-related issues, as set out in the attachment.

## Id No Respondent

## General Comments

All the above points are repeated in the attached schedule in more detail, as well as a number of other points.

Continued...

I hope that it will be possible for all the attached points to be taken into account by the panel at the forthcoming EIP and that the Council can continue to be involved in future stages of the RSS process.

254 UK Coal Mining Ltd

Paragraph 1.14 - The North East of 2021

In order to assist with achieving the 'Vision' of the RSS, as set out at paragraph 1.9, notably in relation to a "dynamic economy" it is suggested that freight handling facilities involving those at the region's ports, airports and also inland sites that are connected to the rail and principal road network (our emphasis) would have a key role in economic growth of the region. It is suggested that the last sentence should be amended by inserting "rail network" after "region's ports" on the penultimate line of this paragraph. This revision would be consistent with one of the key challenges, namely "Changing Travel Behaviour" at paragraph 1.27.

Paragraph 1.27 - Key Challenges Harnessing the Environment's Economic and Regeneration Potential

We welcome the support for the establishment and growth of the renewable energy industry but consider that the phrase "within the capacity limits of the environment" is unclear. It is considered that this text should be amended by inserting "where it will be carried out in an environmentally acceptable manner or the benefits of the proposal outweigh an identified harm

Paragraph 1.27 - Key Challenges – Capitalising on Tourism

We support the aim of increasing tourism in the north-east, which would help diversify and strengthen the region's economic base. UK Coal have a large land holding in the Stobswood and Widdrington area of Northumberland, which in part includes two operational surface coal mine sites. In respect of this land UK Coal has supported the preparation of the Feasibility Study Report on the 'Blue Sky Forest' with the aim of creating a new all year round major tourism and leisure destination in the north-east. The proposed concept includes an indoor ski centre, indoor and outdoor adventure centre, a high quality hotel resort with two golf courses, a holiday village with villa and apartment type accommodation as well as an extensive forested landscape that will create a highly attractive environment for visitors. The project would generate significant economic and community benefits both locally and regionally in the northern part of the Northumberland Coalfield, an area identified in both the relevant local and Structure plan documents as a suitable location where this type of development could be encouraged. The Blue Sky Forest project would be enabled by the creation of the required landform for the projects as an element of the restoration operational surface mine sites. UK Coal would welcome recognition of the Blue Sky Forest project in the Regional Spatial Strategy.

Paragraph 1.37 - Northern Way Growth Strategy

As part of the Northern Way Growth Strategy, UK Coal welcomes the promotion of "the North as a single tourist destination.." The Blue Sky Forest project would be consistent with and support this strategy.

Paragraph 1.48 – Development Options

We object to the selected 2.8% GVA growth over the plan period and development option (4) which "focuses development in the conurbations and main towns." It is noted at paragraph 1.50 that the draft RES proposes an annual average growth in GVA of 3.4%. In addition, in order to achieve

## Id No Respondent

## General Comments

growth in the GVA, UK Coal's preference is for option (3), namely "reducing economic disparities with significant growth achieved through a dispersed pattern of development". It is considered that the focusing of development in the conurbations and main towns will constrain the GVA growth of the region to 2021 and beyond. It is suggested that the selected option (4) is too narrow as clearly there are some forms of development that are either inappropriate for inclusion within the conurbations and main towns or, could be accommodated in a sustainable manner either within or on the periphery of the existing urban areas or within more rural locations for example at rural coalfield areas.

446 Ushaw College

Para 1.27 includes 'Providing an inclusive range of housing' and 'Stemming and reversing population decline by.....good quality housing and living environments that meet their aspirations and a good quality of life'. This is conditionally supported, however, para 1.31 & 1.32 in the Consultation Draft was more explicit in stating 'better living environments will also encourage people to stay or enter the region' and 'there needs to be a sufficient choice of better quality housing' and 'higher regional housebuilding rates'. It is to be hoped this is not a deliberate lack of emphasis.

Para 1.51 downgrades the previous 160 000 dwelling forecast to 141 000. Limiting numbers would impact upon the ability to provide for some growth and renewal of secondary settlements across Derwentside such as Langley Park which have enjoyed some regeneration and this should not be prejudiced by an artificial restraint on development.

For this objection to be removed, the previous forecast of 160 000 should be retained.

411 VONNE

New Policy - The government is committed to promoting community involvement in Local Development Frameworks that will complement the RSS: "The planning system ... needs to be responsive to and better reflect the needs of all communities in Britain." It would therefore seem appropriate for this concern to be reflected in the RSS.

Sec 1 should include under "key challenges facing the region" a commitment to supporting the voluntary and community sector to engage meaningfully with planning strategies in order to ensure that the aims of planning are achieved with the support and active participation of local communities.

The Voluntary and Community Sector in the North East is a vibrant and vital contributor to the region's economy and its social fibre. Through its work, it is in direct contact with hundreds and thousands of people - including the most socially excluded members of our society. This makes it uniquely positioned to raise aspirations of communities, promote social inclusion and quality of life and make a vital contribution to the regions economy.

VCS organisations work across the board with a general aim to improve the quality of life of their members and clients. They are directly engaged in work that is relevant to the RSS such as housing, the environment and promoting entrepreneurialism. They are well positioned to ensure that the aims of the RSS are relevant to communities and that those communities are able to engage with the issues that the RSS seeks to address. They have accumulated expertise in a range of areas and this needs to be harnessed when planning the future of the region.

431 Woodland Trust

The Woodland Trust supports the addition of "whilst protecting and enhancing the region's environment" into Paragraph 1.8 as this recognises that sustainable development requires that the environment is not compromised or damaged by activities in social and economic sectors. This improvement brings this section of the draft RSS in line with the relevant legislation and policy on sustainable development, which we felt was lacking before.

Paras 1.21 and 1.22

The Woodland Trust supports the concerns of the sustainability appraisal with reference to the absence of adequate policies on climate change.

**General Comments**

Whilst this draft RSS is a significant improvement on the previous draft we believe it could be further strengthened with a specific policy on climate change and the further integration of climate change impacts and mitigation within the document.

Central Government policy on this issue is clear; PSS1 states that:

“Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development”. (Paragraph 13 ii)

And also:

“Development plan policies should take account of environmental issues such as:  
– mitigation of the effects of, and adaptation to, climate change through the reduction of greenhouse gas emissions and the use of renewable energy; air quality and pollution; land contamination; the protection of groundwater from contamination; and noise and light pollution”. (Paragraph 20)

In particular regional action is needed in the adaptation to or mitigation of climate change impacts. It cannot be overlooked that climate change is and will continue to have an impact upon the region and as such the region should have a response. The omission of this crucial response may be due to focus of climate change mitigation through reduction of greenhouse gas emissions.

Whilst crucial, focus on climate change mitigation is only half of the issue. Mitigation measures are very necessary but they are long term. Even with stringent emission control strategies, there is a continuing commitment to a warming of the atmosphere from past and present greenhouse gas emissions due to response lags in the climate/ocean system. Hence, some climate change is unavoidable. Therefore adaptation measures are necessary.

Such adaptation measures are critical within the environmental, and particularly biodiversity, sector in order to prevent loss of the region’s characteristic habitats and species.

Recommendation: include a policy on climate change which addresses both how the region can contribute to reducing greenhouse gases, through a regional target, and how the region will adapt to the impacts of climate change.

In terms of the information deficit noted in Paragraph 1.22 we would like to point out the following sources of information demonstrating the impact climate change is already having on the natural world and some of the types of measures that should be taken to help biodiversity adapt and survive:

- [www.phenology.org.uk](http://www.phenology.org.uk) in particular the report BBC Springwatch final report at: <http://www.phenology.org.uk/press/survey05.pdf>
- Our Autumnwatch survey in partnership with the BBC [www.bbc.co.uk/autumnwatch](http://www.bbc.co.uk/autumnwatch)
- Woodland Trust publication Space for Nature, available at [www.woodland-trust.org.uk/publications](http://www.woodland-trust.org.uk/publications)

**Id No Respondent****General Comments**

of the globe is likely to be increasingly affected by extreme weather events. One North East needs to commit to setting year-on-year targets for annual reductions in emissions of CO<sub>2</sub>, leading to a cut of at least 20% in CO<sub>2</sub> emissions by 2010. A commitment should also be made to measure CO<sub>2</sub> consumption-that is the amount of CO<sub>2</sub> emitted globally as a result of consumption in the North East. The region could be seen as global leader by:

1. Limiting power sector emissions of CO<sub>2</sub> and switching to renewable energy
2. Promoting energy efficiency in new and existing homes
3. Creating international exemplar "carbon-neutral" developments through the Northern way