

Overall General comments

Id No	Respondent	Overall General comments
135	Arcot Consortium	<p>In Regional Planning Guidance 1 the role of Cramlington is set down at paragraph 2.63 which identifies that sub regional guidance for South East Northumberland should include an appropriate degree of specificity: "a sub-regional strategic policy for continued development at Cramlington".</p> <p>The current version of the submission draft RSS does not contain such a policy and no explanation is provided as to why not. This omission should be addressed and rectified</p>
158	Bain Swan Architects	<p>As a group we would wish to strongly endorse the comments put by the Berwick Borough Council in their formal response, and the various representations made by the Rt Hon Alan Beith..</p> <p>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.</p> <p>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.</p> <p>We believe Berwick Borough deserves a more positive, proactive approach. Instead of viewing the Strategy only through the distorting lens of the city region we urge you to focus on providing solutions which are properly tailored to the problems of the Borough, which take advantage of untapped potential and allow it to thrive.</p>
429	Bain, Stewart, Burchell, Thompson,	<p>As a group we would wish to strongly endorse the comments put by the Berwick Borough Council in their formal response, and the various representations made by the Rt Hon Alan Beith..</p>
347	Bellway, Persimmon, Miller, Yuill	<p>The consortium would generally support the overall spatial strategy proposed for the Tees Valley City Region outlines in the Draft RSS and in particular the clearly expressed aim of reducing population out-migration through an increase in new house building rates over and above those identified in the Tees Valley Structure Plan.</p>
142	Bett Homes (North East)	<p>Please refer to the representations made on behalf of Bett Homes & Bellway Homes. The representations made in that statement are drawn upon within this additional statement</p>
450	Bishop Middleton Parish Council	<p>We support Sedgefield Borough Council's response to the Draft RSS</p>
51	British Ceramic Confederation	<p>Feel that no regard has been paid to earlier submission. Ask the Assembly to consider our earlier submission which still stands.</p> <p>Wish to draw attention to a draft guidance published since the consultation draft by OPDM which supports the points we made. The guidance is Consultation Paper on Minerals Policy Statement 1: Planning and Minerals, and Consultation Paper on Annexes to Minerals Policy Statement 1. We are informed that the final guidance and annexes will be made available by ODPM within the next three months, in which case there will be an obligation on the Assembly to take it into account in preparing the Regional Spatial Strategy.</p> <p>The industry contributes to consultations within the framework of the planning system responsibly and in good faith. We recognise the importance of the development of sound Regional Spatial Strategies as the basis for other development frameworks. It is disappointing to say the least, that our contribution appears to be disregarded.</p>

Id No Respondent

248 CABA

Overall General comments

CABA support the four key themes of the RSS set out in section 3 and we also support the broad locational strategy set out in section 2. However we feel that the Regional Spatial Strategy fails to cohere these themes into a regionally specific unifying vision that Local Planning Authorities, communities and other stakeholders can get behind.

CABA supports the key theme of the RSS to 'conserve, enhance and capitalise upon the region's diverse natural and built environment, heritage and culture. However this broad theme does not appear to be adequately addressed in detail. For example the indicators given in section 3 for this theme are air and water quality. CABA does not consider that these two indicators, even taking into account additional indicators for individual policies, encompass this theme adequately.

- The draft RSS includes a section on the environment, 3C. Although the introduction at para. 3.82 recognises the importance of creating and retaining high quality environments, the policies put forward limit themselves to valued and designated landscapes, historical environments, biodiversity, geodiversity, the aquatic and marine environments and trees, woodlands and forests. No mention is made of the importance of good design and quality, inclusive, safe and sustainable environments for the rest of the region. Considering the RSS recognises problems in the region brought about in part by poor quality environments, it seems particularly remiss to provide no regionally specific advice on the need for quality new developments and public spaces, and the general importance of design to the aims of the RSS. CABA would not like to see the RSS repeating policy in PPS1 any more than other PPGs and PPS are repeated in the draft, nor would we wish to down play the rightful attention given to the environmental issues covered in the draft, but it is suggested that an additional policy on good design and the built environment should be added to section 3c.
- A key objectives listed at para. 3.86 is 'to promote the benefits of a quality environment as complementary to measures aimed at urban and rural renaissance'. CABA considers that a quality environment is fundamental to any renaissance, and cannot be seen simply as a complementary factor. Similarly Policy 26, Sustainable Communities fails to take account of the full range of issues reliant on good design. PPS1 says that without good design it is not possible to have sustainable development. This goes beyond the need for design to ensure safety and security as stated in policy 26. PS1 includes a list of relevant objectives and it is suggested that Policy 26 be amended to take full account of these.
- Policy 27, Urban and Rural Centres says that the design of any new development should be in harmony with its respective built environment. This is very true, but in line with PPS1, development should also take the opportunities available to improve the quality, character and functioning of its surroundings. It is suggested that the policy be amended accordingly.
- In a number of places the RRS talks about the use of brownfield land, reducing the need to travel, particularly by car, and the importance of development ensuring access between homes, facilities and jobs. CABA supports these objectives, but considers that further attention could usefully be given to the importance of mixed use at the neighbourhood level, and the relationship between intensity of land use and potential public transport accessibility. Although the detail of these issues is best dealt with at the LDF level, the RSS could still offer more complex advice on the different types of

Overall General comments

development appropriate in different types of areas in terms of these objectives. For example para. 43, when talking about executive housing and previously developed land, should acknowledge that a variety of densities for such housing may be appropriate depending on the character and accessibility of such land, and that such developments should aim to create and support vibrant, mixed use, sustainable neighbourhoods. This may require higher densities than seen in traditional detached executive housing developments. Similarly para. 1.57 could provide more distinct guidance on the relationship between density, land use and accessibility. Increases in car use may not be solely dependant on migration, but may reflect the location of services and jobs, which in turn may be partly dependant on the number of people living and working in any locality. So land use intensity, as well as public transport provision, may also influence car use.

- CABE is aware of the many problems and opportunities facing areas of low housing demand, and recognises the need for some demolition in tandem with environmental and other improvements. However it is suggested that the RSS makes a very clear commitment to the processes involved that help to ensure demolition helps to improve the quality, ease of use and appeal of an area, and does not solely focus on housing numbers. For example public involvement in the process and the provision of open spaces, new housing stock and other facilities should accompany demolitions. The location of demolitions should be strategic, and sensitive to the way local movement networks, uses and communities function. Para 1.40 in particular could acknowledge the importance of physical environmental quality when calling for an integrated policy approach to areas of low demand and abandonment. The RSS should also acknowledge how knock on effects from restructuring programs to surrounding areas are to be assessed, and should ensure that actions look to tackle the underlying cause of low demand problems, not the effects. CABE has been working with a number of pathfinders and has produced guidance on this issue. It is suggested that this guidance, 'Creating Successful Neighbourhoods: Lessons and actions for housing market renewal' be referred to within the RSS and RSS policy should make a strong commitment to strategic design and built environment quality objectives for these areas.

- When dealing with regional characteristics the RSS could make greater mention of the success of regenerated waterfronts and the impact this can have on local and wider distinctiveness, quality and success. It is acknowledged that such development is mentioned, but could usefully be added to para. 1.15. Similarly para. 1.48 could make reference to the importance of local distinctiveness and quality in areas not designated already listed. The region itself may have a distinctive character to be enhanced through the RSS, and the RSS should encourage sub regional plans and LDFs to recognise the importance of local character to people's lives.
- CABE supports the wording in para. 2.15 on renaissance in the northeast, but suggests that the last line in policy 1 should be a bullet in the same way as other 'actions' listed. As it stands it is not clear how high quality design will be ensured.
- CABE supports the reference given in para. 1.45 to promoting healthy lifestyles, and suggests that the role of high quality environments and open space/leisure/play provision are a key to meeting this objective.

Id No	Respondent	Overall General comments
		<ul style="list-style-type: none"> • CABE supports the intent of policies 3.39 and 3.40.
419	Campaign to Protection of Rural	There has been literature written about the effectiveness of wind farms - the issue has now been raised at a major Public Enquiry into a proposal for a wind farm in Whinash, Cumbria. Wish to bring some of the literature concerning this to those making policies in the RSS.
352	Church Commissioners for England	The Church Commissioners support the overall approach that encourages the growth and continued regeneration of the North Eastern economy
332	Darlington Borough Council	<p>37. Various diagrammatic maps are used throughout the document to represent the policies and other spatial information. On the Tees Valley City Region Darlington (and Hartlepool) are represented by the symbol for 'Conurbation and main Town' – a grey shaded area. On all the other maps, the conurbation is shown as this grey shading, but does not include Darlington (or Hartlepool). The maps should be consistent and therefore should be amended to match the symbols used for the Tees Valley City Region.</p> <p>44. In summary, it is recommended that the Council supports most of the draft RSS and specifically supports the Locational Strategy, the Transport priorities, the recognition of the role of Durham Tees Valley Airport, and the recognition of Darlington's role in economic, retail, leisure and related development.</p> <p>45. Support is also given to the employment land provision policies which identify the flagship mixed use development at Central Park, 205 ha of land for general employment, and confirms the Reserve Site status of land at Faverdale.</p> <p>46. A holding objection should be made to the housing requirement figure for Darlington, pending further work on housing distribution.</p> <p>47. A change to submission draft RSS should be sought in relation to the Key Diagrams so that they are consistent with the Tees Valley City Region Map.</p>
351	ESH Group	<p>The RSS is well thought out document but is in danger of stifling growth. From discussions with people within the Regional Development Agency, Local Authorities and across the Private Sector (especially within the construction sector) it is apparent that there is insufficient flexibility in the strategy. This will give insufficient scope for entrepreneurialism – which is so key for the Regional Economic Strategy and the RSSs wider goals.</p> <p>Many planning authorities can already see where much of their allocation is coming from throughout the term of the strategy. Any thoughts of proposing more regeneration before 2021 may well not be entertained. We are in danger of determining the future in a way which will be constraining, not enabling. The lack of any market forces is very unlikely to assist economic growth.</p> <p>Some local authorities, such as Derwentside, have used a very successful policy to encourage economic growth by using speculative house building as the catalyst. This option will no longer be open to anyone.</p> <p>Here in the North East we lack the necessary range of housing stock to attract people at every level. This will be exacerbated by the RSS. There will be insufficient room for maneuver to provide all housing types.</p> <p>The aim to keep vacant dwellings below 3% is very laudable. It will support the housing market by maintaining demand and supply in equilibrium – with resulting support for the economy as a whole. However, it will reduce the ability to regenerate areas with unwanted house</p>

types by reducing people's opportunities to find better homes. Meeting the target to see nearly 55,000 demolitions during the period will be hard to meet without fuelling the market forces needed to ease resettlement.

All the above may seem very negative but noises are already being heard which suggest that the planning authorities responsible for the implementation of the RSS are encountering real problems. They cannot see how to accommodate developments they wish to support because of permissions already granted which use up all their numbers allocation. Many existing permissions were granted in a different climate and offer less benefits than others now being proposed. The potential for economic improvement will be lost as a result.

In summary, the RSS is a powerful document which successfully addresses many of the issues facing the North East. However, early indications are that the implementation will stifle the very economy the RSS aims to support and more flexibility in application will be required.

440 Friends of the Earth Durham

We support the overall aim of the RSS – i.e. to bring about a major renaissance throughout the region. However, we feel that some of the approaches, not only will fail to deliver sustainable prosperity but will damage the region's natural environment, heritage and culture. We fully support the detailed response to the RSS, provided by the national Friends of the Earth.

4 Friends of the Earth Tyne Bridge

It is our belief that the most important change that needs to be made to the RSS is the formal inclusion of an overarching climate change policy and targets.

The scientific case for anthropogenic climate change with significant global physical, biological and social impacts is irrefutable. The North East will not be exempt from these impacts and our coastal policy particularly must acknowledge this. Our global responsibilities are explicitly acknowledged in the Values (para 1.10) presented at the start of the document. If we are to take these responsibilities seriously then the RSS must introduce, thorough, consistent and robust measures to effect greenhouse gas emission reductions at a sufficient rate to meet our national commitment to 60% reductions by 2050. We cannot afford to wait for technological innovation to miraculously deliver us – legislative conditions and prescient leadership must drive the process. Long term structural changes must go hand in hand with the improvements in quality of life we aspire to in the North East.

This is a very significant issue that we highlighted in the Consultation Draft earlier in the year, yet there seems to have been very little progress. The Sustainability Appraisal states in its opening pages that as the RSS stands "In particular the following problems are set to increase... energy use and emissions of greenhouse gases". It furthers this by identifying the need to "decouple" growth and climate change. We believe this decoupling should be a central policy principle within the RSS.

350 LXB Properties Ltd

In summary there is a significant level of trade leakage from Blyth Valley to more distant shopping facilities outside the Borough and that the level of existing and projected trade leakage is unsustainable. It is in the interests of sustainability, good planning and regeneration of the area that the level of trade leakage should be stemmed and LXB are working with Blyth Valley Council to establish a planning framework for accommodating part of this retail need within the town centre of Cramlington.

Id No	Respondent	Overall General comments
353	Member of Public	<p>In summary, LXB supports the principal objectives of the emerging RSS, and particularly its recognition of Cramlington as an appropriate location for further development to support the regeneration needs of the town. LXB also support the RSSs recognition that Cramlington has the physical and social infrastructure to support both local and sub regional needs. LXB recommend that modifications should be made to the RSS, in particular Policy 5 and 6, in order to give Cramlington enhanced status in the development hierarchy, for those reasons outlined above. Cramlington has the opportunity to meet the economic and social needs of a wider area than its indigenous population; this much is recognised in the RSS which suggests that it can meet sub regional needs as well as its own.</p> <p>LXB are currently working up a development strategy for the future expansion of Cramlington town centre, in conjunction with Blyth Valley Borough Council. The company are actively involved in the Council's emerging Local Development Framework, in order to provide a policy mechanism for the delivery and management of future retail floorspace within the town centre, to meet the recognised shopping needs of the Borough's residents, whilst delivering regeneration and economic prosperity to the town.</p> <p>LXB recommend modifications to Policy 13 to provide protection to all shopping centres which could be affected by the major mixed use schemes supported by this policy; at present the policy indicates a protection to "adjacent" centres only and consequently is inconsistent with the overarching policy objective of protecting and enhancing all centres.</p>
427	Member of Public	<p>I feel it is a major omission of this strategy that it does not include one single strategy to directly deal with tackling the causes of Climate Change. This should be modified and a strategy setting targets for the gradual and continual reduction of the emission of green house gases should be included. The Yorkshire And Humber RSS has such a policy, and I feel it appropriate that the north East should too.</p>
425	MGM Mirage & Newcastle United	<p>I wish to register my broad support for the RSS document</p> <p>Would welcome the inclusion of a panel discussion in the programme for the Examination in Public in Spring 2006, that related to Regional Casino Development and an opportunity to present this item.</p>
447	Morden Parish Meeting	<p>We fully support the document from Sedgfield Borough Council</p>
410	National Offender Management	<p>CIRCULAR 3/98: PLANNING FOR FUTURE PRISON DEVELOPMENT</p> <p>In February 1998 the Government published Circular 3/98 which provides the most recent planning advice in relation to planning for new prison developments. The Circular sets out advice to local planning authorities on the need to make adequate provision through the planning system for new prison developments. It recognises that the ongoing programme of prison development is a matter of national importance and indicates that potential locations for new prison development should be identified through the planning system. The provision of land for the secure accommodation of prisoners must be shared between the Prison Service and planning authorities.</p> <p>The Government considers that wherever possible, sites for new prisons should be identified as part of the process by which development plans are adopted or approved. Whilst the Circular notes that the broad requirement for new prisons over the next 10 years is principally in London, the Midlands, North West and Yorkshire it also states that 'the need in other areas cannot be ruled out, however, in order to provide an appropriate pattern of coverage or to meet the requirements for particular categories of prisoners'. It goes on to say that 'in</p>

order that local planning authorities may be enabled to make provision for new prisons in their development plans the Prison Service will consult them about likely areas of future need'.

Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans and regional planning guidance on community facilities and infrastructure requirements and also that they should take account of the need for new prison developments, which should be identified through the planning system.

The Circular notes that in identifying potential prison sites, the Prison Service has to take account of local and regional requirements for additional prison places, the court catchment areas served and the relationship of the site to nearby population centres. It goes on to specify a number of other site development considerations and also recognises that the objectives of sustainable development and in particular the need to reduce unnecessary travel should apply to site selection. Prisons should not be located too far from the centres of population they serve and there should be reasonably good accessibility to public transport services.

The Circular also recognises that new prisons have potential for a substantial and beneficial impact on the economy of a local area. New jobs are created on site (both during construction and permanent jobs), goods and services are purchased in the community and extra local income is generated as a result of the disposable income of prison staff.

PPS11: REGIONAL SPATIAL STRATEGIES

PPS11 confirms that Regional Spatial Strategies (RSS) will have more weight than Regional Planning Guidance (RPG) as they will form a part of the development plan. In addition new local development documents (LDDs) have to be in general conformity with the RSS. PSS11 also indicates that the RSS should be more regionally and sub-regionally specific than RPG. It should provide a broad development strategy for the region for a 15-20 year period which takes into account a range of factors including transport, infrastructure and economic development alongside priorities for the environment.

The RSS is required to confine itself to matters of genuine regional, and where appropriate, sub-regional importance. Policies in the RSS need to be sufficiently detailed to provide clear guidance for LDDs. In line with the Government's policy on spatial planning the RSS should integrate policies for

Overall General comments

the development and use of land with other policies and programmes which influence the nature of places and how they function.

PSS11 states that the RSS must not specify sites as suitable for development but should 'establish the locational criteria appropriate to regionally or sub-regionally significant housing, business, retail and leisure uses, or to the location of major new inward investment sites'. The broad location of such development may be identified in the RSS itself; 'broad location' meaning the area of search suitable for the development in question.

PSS11 also highlights potential participants in the RSS revision process. This includes HM Prison Service and indicates that the area for consultation is 'policies that may impact on penal establishments or prisoners'.

THE CASE FOR NOMS

A key element of the National Offender Management Service's case is the recognition of continuing change in the operation of the Service and the demands placed upon it. The significant growth which has taken place in the prison population in recent years is set to continue; at the same time there is a change in the focus of the provision of prisons with the emerging concept of multi-functional prisons and the recognition that some older prisons are in need of replacement. These changes will result in the need for new sites to be identified and the possibility of closing outdated prisons. Such change has planning implications and needs to be addressed at national, regional and local levels.

Nationally Circular 3/98 recognises that the ongoing programme of prison development is a matter of national importance. It highlights priorities for new prisons for a 10 year timeframe but acknowledges that the need in other areas cannot be ruled out. The Circular states that potential locations for new prison development should be identified through the planning system and specifically as part of the process by which development plans are adopted or approved. As Regional Spatial Strategies will form part of the development plan and local development documents have to be in conformity with the RSS there is a clear need for the RSS to address future prison development.

Whilst it is important to understand the national picture of growth in the prison population, the regional situation is extremely important to NOMS in undertaking responsibilities to provide sufficient places to accommodate prisoners.

In addition the RSS is required to integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. The Prison Service is identified as a consultee in PSS11 in recognition of its role in relation to penal establishments and prisoners, and therefore has a particular status in terms of its representations. Further, the scale of the Prison Service operation in the region in terms of land ownership and as a major employer also highlight the appropriateness of the RSS making specific reference to the issue of prison development.

Id No Respondent

Overall General comments

The RSS should fully recognise the regional requirements to provide new prison places in accordance with Circular 3/98 and should establish the broad location for new prisons. This should also reflect the priorities for growth in the North East over the RSS period to ensure that new prison development is co-ordinated with the growth of houses, jobs and other community facilities. Modifications to Section 2 of the RSS dealing with development principles and locational strategy for the region are necessary to bring this about.

Given the scale of growth proposed and NOMS's existing site search requirements there may potentially be a need to provide new prisons in the Tyne and Wear City Region and the Tees Valley City Region. Policies in relation to these sub-regions in Section 2 of the RSS should therefore be revised to address the requirement to meet the objectives of the Prison Service expressed through Circular 3/98.

Whilst Section 3 of the Draft RSS (Delivering An Urban and Rural Renaissance: Delivering Economic Prosperity and Growth) sets out policies in relation to specific sectors of development, including in particular, support for further and higher education and casino development, the Draft RSS fails to make specific reference to prisons or penal establishments in spite of the advice in Circular 3/98.

It is important that the final version of the RSS includes an appropriate policy reference to future prisons or penal establishments in accordance with the advice in paragraph 2 of Circular 3/98. At present the Plan does not adequately address the land use implications at a regional or sub-regional level of a range of social and community facilities including the prison estate. This is a further matter which should be addressed in the final version of the RSS.

The employment benefits of a prison development both in quantitative and qualitative terms have been accepted in appeal decisions and in Circular 3/98. In the Draft RSS for the North East there is no specific recognition of the value of a prison in terms of employment and throughout the Plan, particularly in Sections 3A, employment is seen primarily as being provided through businesses. Policies in relation to employment are too narrowly focused and should not necessarily rule out other employment possibilities. The promotion of 'prestige employment sites' or 'reserve sites' should not preclude other employment uses such as prisons where the range of employment opportunities will be broad and the number of jobs provided will be comparable to business uses and of a permanent nature unlike some business ventures. Modifications need to be made to Section 3 of the RSS to address these issues.

The RSS should also recognise that the network of existing prison establishments may change over the plan period and that LDDs should recognise the need for new prison development and make provision which would allow the expansion of existing prison facilities.

Id No	Respondent	Overall General comments
230	North East Chamber of Commerce	<p>The RSS' development principles and locational strategy, its four themes and central thrust are commendable. Unfortunately, the RSS is written in a particularly inaccessible and complex style that does not encourage engagement. It contains 57 important and far-reaching policies; each is accompanied by technical narratives and papers, which are difficult for the layperson to grasp. These policies, if implemented, will have wide-ranging implications on development plans for many years. Because of its strategic and legislative importance the RSS would benefit from having a less technical explanation or summary to encourage greater participation</p> <p>Nevertheless, many of policies are welcome, particularly those that complement the objectives of the Regional Economic Strategy (RES); aspire to improve sustainable economic development; encourage the development of emerging bio-science, environmental and knowledge-based industries and to improve internal and external connectivity. The aspirations of the RSS could also be frustrated by local planning authorities. Many businesses remain concerned that the length of the planning applications and approvals process stifles economic development and growth.</p> <p>The region's economy is undergoing deep structural changes. The scenarios that are described in the RSS are based on historic data and the data it uses are fairly limited in scope. It is not always possible to predict with any great accuracy what the region will need using such data and scenario planning, which are always open to different interpretations. The RSS interprets these data and scenarios cautiously whereas the RES approaches them with greater ambition and optimism</p> <p>The growth assumptions that are made in the RSS will need to be consistent with the strategies it seeks to support</p> <p>The RSS should lead the debate to shift aspirations from the conservative average. Merely to argue that it would be imprudent to make planning decisions based on scenarios that are too optimistic lacks confidence and fails to inspire</p> <p>Continuous monitoring of the RSS' assumptions and other data is necessary. The proposal to produce an annual monitoring report is welcome, but business would have greater confidence if the report were produced by an independent organisation.</p> <p>It is important to ensure that the burden of regulation upon business is not increased to the detriment of economic growth. The RSS should facilitate growth whilst providing appropriate mechanisms to prevent the planning blight that the region suffered in previous decades</p> <p>However, policies relating to major planning proposals are not clear and the term 'major planning proposal' is not defined. The requirement for Sustainability Statements for major developments may be government policy; however this should be explained more fully. The requirement for such statements, when considered alongside traffic impact assessments, environmental impact assessments, the production of master plans and other documents present an increasing cost to business. This may inhibit growth if such regulations are implemented slavishly without due regard to the overarching imperative of sustainable economic growth.</p>
39	North Yorkshire County Council`	North Yorkshire County Council broadly supports the strategy and policies in Draft RSS for the North East
152	PD Ports (Victoria Harbour)	The Regional Development Agency for the North East region, One North East, has prepared the Regional Economic Strategy (RES) which is being reviewed in 2005. Unfortunately, the emerging RES and the emerging RSS do not completely 'dovetail' at present. Both do refer to the Northern Way and embrace the concept of City Regions with emphasis on the conurbations and main towns (which PD Ports support). It is the precise level of growth and knock-on effects

Id No Respondent**Overall General comments**

- that remain open to debate and must be resolved at the Public Examination (see also the representations of TVR). PD Ports support the vision, remain optimistic as to the prospects for the Tees Valley City Region and agree with the emphasis on accessible locations in the conurbations and main towns.
- 406 Port of Tyne
- It is disappointing and frustrating to us here at the Port of Tyne that the authors have consistently failed to recognize and emphasise the Regional, National and International significance of the Port of Tyne. We suggest that it is essential that the text of the report be modified to correct this oversight.
- Essentially we see the documents and the initiative as positive and proactive in seeking to set out a regional Strategy. However, in relation to sea ports, we see a repeat of the fundamental mistake contained in the previously published 'Northern Way' document. That document failed to recognise and emphasise the importance of the Port of Tyne as a Regional, National and International Gateway. The Port of Tyne is such a gateway, long established, and in our view an essential and important link in assisting future economic growth of the Region. This current document does not recognize the importance of the Port of Tyne. For example, Policy 22 – Ports identifies to me a lack of knowledge of the industry, and in particular the Port of Tyne
- 810 Regional Growth Lobby
- Main concerns about RSS are
it sets a low economic growth target for region, below that set out in key national targets for re-balancing the economy of the UK
- the low target for economic growth is then further reduced when the targets for new house building are set
- the net result is that just half of the new development that's necessary is being allowed so people's aspirations for a better quality of life will not be fulfilled and the region will become a less desirable place to live
- the strategy becomes self fulfilling as the limited range of new opportunities stifles growth
The performance target set by the government in the PSA2 target should be the starting point for the RSS. However it is not. The RSS pays little more than lip service to the PSA2 goal.
- The RES developed by One North East propose a target of 3.4% for regional economic growth
The RSS reduces this to 2.4% because it felt a target in excess of this would be difficult to achieve but no attempt to justify this was made
- the for the purpose of planning supply of new housing the target was watered down further to 2.5% with no attempt to justify the stance as to the reason why
- Economic growth of 2.6% will merely stop us falling behind. At 2.85 it would take 100 years to catch up to national average.
The implications for the region are dire
setting targets so low is planning to fail. The more logical position would be to plan for growth rate of 3.4%
The RSS concludes targets for new residential units should be planned for on the premise that jobs will be taken by unemployed living in the area so not so many new houses are needed. This ignores prevailing wisdom that new economic migrants to the region will be essential if the region is to accelerate its low levels of new business formation, innovation, skills etc.

Id No Respondent**Overall General comments**

The net effect is to reduce new houses that will be permitted to be built and this is exactly half of that needed to meet regional growth targets that national government says they want us to achieve.

Local planning authorities will have to base their new planning on figures the RSS allocates to them and will be locked into a planning framework which will not be flexible and will not allow for increases as the economic performance improves.

The RSS is a muddled and inconsistent piece of work. It will not facilitate regional economic growth, it will hold it back. In doing so it fails to meet one of the Government's most pressing national policy objectives of re-balancing the national economy.

348 Royal Town Planning Institute

Sustainability Appraisal/Strategic Environmental Assessment

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

A limited range of options

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

Mitigation

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

Absence of any systematic examination of transport schemes

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

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

Id No Respondent

Overall General comments

Open space

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

Conclusion

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

RELATIONSHIP WITH OTHER REGIONAL STRATEGIES

Regional Economic Strategy

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

17. Generally, linkages with other North East regional strategies have been addressed appropriately.

89 Sport England

In order to help the preparation of the submission document Sport England North East suggested a number of points where linkages ought to be made and a policy which started to express areas where joint policy could be established. These suggestions were made with an open invitation to commence dialogue with Sport England on properly establishing the spatial linkages between the two documents. Unfortunately the NEA did not take up the invitation.

While we acknowledge the difficult job that the NEA has in seeking to balance the competing development demands of the North East’s sub-regions, I must advise you that Sport England and the Regional Sports Board are extremely disappointed in the lack of evolution of the Submission RSS.

We believe that, like its predecessor, it remains rooted in land use planning and has failed to make the transition into a spatial plan, and that the significant spatial elements of the sport and physical recreation agenda (in its own right and in respect of the significant linkages into other agendas such as health, culture, tourism, economy, and more broadly sustainable communities) have yet to witness any policy linkage.

The Regional Plan for Sport and Recreation went through a rigorous regional consultation exercise of which the NEA was a major stakeholder. Sport England is therefore, particularly disappointed with the absence of the policy linkages between the draft RSS and the Regional Plan for Sport and Physical Activity given that the NEA has endorsed the plan and is a stakeholder in securing it’s delivery.

Id No	Respondent	Overall General comments
29	Sunderland City Council / Tyne &	<p data-bbox="674 172 757 199">General</p> <p data-bbox="674 231 2049 399">National Planning Policy Statement 11 (PPS11) states that the RSS should provide a concise spatial strategy confining itself to matters of genuine regional, and where appropriate, sub-regional importance. RPBs (the NEA) are encouraged to be innovative in making the RSS as understandable as possible. The Submission RSS document is very long, having increased since November from 131 pages to 171 pages. It is overburdened with lengthy description that obscures the key issues. It is short on strategic thinking and long on lists of policy criteria and individual schemes. It is considered that it does not meet the tests of PPS 11 as stated and its current document length, clarity of purpose and format should be objected to.</p> <p data-bbox="674 430 2049 566">PPS11 states that RSS should have regard to national planning policies but not repeat them. Many of the policies include statements of national planning policy that, therefore, should not be included. Also there is much repetition between policies, particularly between Policies 2 and 3 (Sustainability and the Sequential Test) and Theme policies, also between City Region policies (6 and 7) and Theme policies. Comprehension and scope for misinterpretation would be improved if the national policies and repetition were removed. This also raises objection.</p> <p data-bbox="674 598 2049 710">PPS11 requires that the RSS should make clear whether its policies are: i) Strategic development control policies which are to be implemented directly through the grant and refusal of planning permission; ii) To be delivered through Local Development Documents (LDDs) and Local Transport Plans (LTPs); iii) To be delivered through other means.</p> <p data-bbox="674 750 2049 837">Nearly all the policies begin “Strategies, plans and programmes should....” It is considered that identification of which policies or parts of policies should be delivered by each of the above three methods is inadequately expressed. This will lead to difficulties for authorities in preparing LDFs and in discharging their development control functions, and should be subject of objection.</p>
148	Tees Valley Regeneration	<p data-bbox="674 877 1599 1045">The emerging RES and the emerging RSS do not completely ‘dovetail’ at present. Both do refer to the Northern Way and embrace the concept of City Regions with emphasis on the conurbations and main towns (which TVR support). It is the precise level of growth and knock-on effects that remain open to debate and must be resolved. TVR support the vision, remain optimistic as to the prospects for the Tees Valley City Region and agree with the emphasis on accessible locations in the conurbations and main towns.</p>
446	Ushaw College	<p data-bbox="674 1085 2049 1332">Ushaw College occupies a 100 ha site between Bear Park Durham City and Langley Park Derwentside. The College is one of 7 national centres responsible for training students for the Roman Catholic priesthood. It has a proposal for some 75 dwellings on land at Midhill Close, Langley Park based on a density of 30 per ha. The site is included as Site 125 in the Derwentside Urban Capacity Study. Langley Park is considered as capable of accepting suitable urban sites by virtue of Site 161 in the UCS. Overall we agree the figure of 1800 approx as the constrained capacity but reduce that number by deleting inappropriate sites then add 75 to reflect the sites put forward in this report. The College has considered the site against the adopted Derwentside Local Plan and PPG3: Housing March 2000 and PPG 13: Transport March 2001. It has found that the site is in accordance with national planning policy guidance and that the site is highly accessible to jobs, shops and services by modes other than the private car. They concluded that the site at should be substituted into the Urban Capacity Study for less sustainable alternatives.</p>

Id No	Respondent	Overall General comments
411	VONNE	<p data-bbox="674 240 1973 300">New Policy - Climate change is identified by the RSS as the single most important issue that we face in the 21st century. It is therefore paradoxical that the strategy does not outline a policy on climate change that ensures that the region plays a full role in tackling it.</p> <p data-bbox="674 331 2040 411">We propose that the RSS should include clear targets on reducing the region's carbon dioxide emissions. Realistic intermediary targets should lead to a reduction of 30% by 2021. The RSS should also provide for the drafting of a regional climate change action plan that would deliver reductions in emissions within two years of the adoption of the RSS.</p>
187	Yuill Homes	<p data-bbox="674 427 2047 510">Overall Yuill Homes supports the North East RSS, particularly the commitment to regional growth. The vision and key themes are appropriate for the needs of the north east, and we consider that overall, an appropriate balance has been struck between housing delivery, environmental protection and responsiveness to market forces.</p>