

Policy 4

Id No Respondent

135 Arcot Consortium

Policy 4

3.13 In respect of delivering development proposals the Arcot Consortium wish to object, in part, to Policy 4 of the submission draft RSS.

Arcot Consortium are concerned regarding implementation of the above policy. Firstly, at the current time the housing market areas still remain to be formally defined. Secondly, because no precise boundaries are identified for the City Region it is not practicable to undertake a sequential search at the City Region level. Moreover, when considering brownfield residential output, for example, concern is also expressed regarding the availability of data, accuracy and consistency of monitoring, albeit noting that annual monitoring reports are to be produced. It is also of note that 'major' is not defined in relation to criteria i and the appraisal of greenfield residential releases – presumably this is over 150 units or 5ha in accordance with the greenfield direction.

3.15 Importantly, however, housing requirements in Policy 30 are set down to meet local housing needs, linked to the overall spatial strategy of RSS. Accordingly, in the instance of Blyth Valley for example, it is difficult to understand how a residential release in Peterlee for example (which is also within the Tyne and Wear City Region albeit some 25 miles away) would assist in meeting housing needs within Cramlington. Additional clarification to confirm the importance of defining housing market areas within the City Regions would be helpful to ensure the City Regions concept does not cut across the importance of meeting needs within defined housing market areas.

3.16 Accordingly, we would suggest that Policy 4 be amended as follows:

"In determining new planning proposals and the renewal of lapsed planning consents, local planning authorities should:

(h) ensure that the release of housing land takes into the sequential approach as applied at the local authority level or housing market area housing market area and city region level; and

(i) major greenfield housing developments proposals over 150 units or on sites over 5ha are accompanied by an assessment of the impacts of the development on the successful delivery of the housing market restructuring areas and previously developed land targets within local authority areas the city regions."

3.17 In addition it is noted that Policy 4 (g) also requires that major developments that are to come forward over a long timeframe are 'capable of being responsive to changes in phasing as identified from monitoring processes'. It must, however, be noted that strategic developments often bring with them significant infrastructure, section 106 and other financial commitments, such as affordable housing, that require developers to have certainty regarding initial investment and this should be incorporated within the supporting text.

177 Berwick-upon-Tweed Borough

Criterion (a) of this policy relates to the sequential approach advocated by Policy 3. The objection to Policy 3 to the sequential approach as detailed in 3.1 above is therefore applicable to this policy.

Criterion (I): should relate to the regional previously developed land target, rather than simply the impact on the city regions target.

Id No Respondent**Policy 4**

40	Blyth Valley Council	Policy 4 Para 2.17 Welcome the revisions to policy 4 which help to clarify how the phasing approach is going to work. Also welcome the intention to provide more detailed guidance on how the approach is going to work at a regional/city regional/local level. It is not clear whether or how the regional assembly going to intervene in local decisions if they do not accord with these tests and the phasing policies? There is already a system of intervention in place at a national level which has significantly slowed down the pace of development in the Borough. The Council is concerned that a second tier of potential intervention could slow the development process down even more. We would, therefore, consider that the process should be 'front-loaded' with any necessary intervention through the Local Development Framework which will hopefully minimize the need for intervention at the planning application stage.
73	Bowey Homes Ltd	Para 2.19 Bowey Homes support the inclusion of the Blyth Valley District within the Tyne and Wear City Region where the majority of new development should be concentrated. This land is currently vacant land within a mixed use area. A proposal for housing would satisfy criteria set out in Policy H12 of the Local Plan as the site is not located in an area of predominantly single family accommodation and none of the buildings on the site adjoin a 2 storey dwelling. Policy H13 protects the residential amenity of housing areas and as such any proposal for development would be required to fit in with the surrounding properties in terms of scale, for and density and must not have substantial detrimental impact on infrastructure or on highway safety. Bowey Homes supports the inclusion of Castle Morpeth in the Tyne and Wear City Region.
428	Campaign To Protect Rural England	Support this policy but believes it could be improved: - Household size should be included as a key indicator of economic regeneration and the region's demographic trends. - The Regional Economic Strategy is deliberately seeking to change the balance of the region's economies to the less land-hungry, knowledge-based industries. We would therefore argue that 'employment density' (job/ha) should be adopted as an additional key indicator.
352	Church Commissioners for England	Criteria g) refers specifically to the phasing of 'major developments to be developed over a long timeframe.' Major developments in the form of urban extensions require significant expenditure on infrastructure works, community projects, affordable housing etc. Such developments require a degree of certainty in respect of phasing otherwise their financial viability may well be adversely affected. This should be recognized in the policy and the supporting text.
90	Corbridge Village Trust	We consider "housing provision, take up and phasing requirements" is not a key indicator, requiring a review of the RSS
202	Durham County Council	extra text...
200	Environment Agency	This is the only policy to use 'shall' or 'must', why can't other policies do the same?

Id No Respondent

163 Friends of the Earth North East

Policy 4

If the RSS's sustainable development aspirations are to be made a reality, ensuring more sustainable patterns of consumption, and the deployment of sustainable construction methods in all new development and redevelopment will be critical.

In terms of sustainable consumption, this is one of the shared priorities for action in the UK Sustainable Development Strategy, which introduces the concept of 'A one planet economy'. Research from WWF-UK shows that the North East is currently using three times more than its share of the earth's resources. For this to continue, we would need three planets when we only have one- hence the 'one planet economy' concept. RSS policies will have a considerable influence on resource consumption in the North East through setting standards for new economic, retail and residential development, energy generation, transport and waste in particular. It is essential that sustainable consumption is put at the heart of the RSS through an overarching and cross-cutting policy in section 2 if the region is to move towards using an equitable share of the earth's resources and living with environmental limits.

One of the key ways of reducing resource consumption, living within environmental limits and tackling climate change is through sustainable construction. The RSS can have a huge influence in this area through the requirements it makes for new development and redevelopment. Policy guidance in section 2 is essential to ensuring that the implementation of the RSS adheres to sustainable construction principles and therefore helps to make 'one planet living' a reality.

Friends of the Earth therefore recommends the following policy for inclusion, which draws heavily on policies CC3: Resource Use and CC4: Sustainable Construction in the draft South East Plan:

Policy 4: Sustainable Consumption and Construction

In pursuit of more sustainable consumption and to ensure the region lives within environmental limits, strategies, plans and programmes will contribute to stabilizing the North East's ecological footprint by 2012 and reducing it thereafter through the following measures:

- Minimizing energy, water and resource consumption in all new development and redevelopment. As a minimum, all new residential developments and redevelopments will meet EcoHomes 'excellent' rating, with all new commercial and industrial developments meeting the equivalent BREEAM standard. Standards should be continually driven up, with a view to all new developments/redevelopments being carbon and waste neutral by the end of the plan period (as achieved at the Beddington Zero Energy Development).
- Shortening supply chains and using local labour, materials and produce wherever possible.
- Using and promoting recycled and sustainably sourced products wherever possible.
- Maximizing the potential for embedded renewables (including renewable sources of heat) in new developments/redevelopments.
- Adopting and promoting green procurement policies.
- Implementing waste minimization schemes as a priority, and maximizing the potential for recycling and composting.
- Ensuring construction minimizes the use and production of toxins and waste, and the use of non-renewable resources.
- Designing all new developments to be highly accessible by public transport, walking and cycling.
- Ensuring new developments harness the potential for tree cover, green infrastructure and biodiversity.
- Ensuring new development does not damage, and where possible makes a positive contribution to, local air quality.

All planning authorities will use the BRE Sustainability Checklist for Developments and follow the principles set out in the document, 'Building-in Sustainability: a Guide to Sustainable Construction and Development in the North East'.

Id No Respondent

329 Friends of the Earth South Tyneside

Policy 4

If the RSSs sustainable development aspirations are to be made a reality, ensuring more sustainable patterns of consumption, and the deployment of sustainable construction methods in all new development and redevelopment, will be critical.

In terms of sustainable consumption, this is one of the shared priorities for action in the UK Sustainable Development Strategy, which introduces the concept of 'A one planet economy'. Research from WWF-UK shows that the North East is currently using three times more than its share of the earth's resources. For this to continue, we would need three planets when we only have one- hence the 'one planet economy' concept. RSS policies will have a considerable influence on resource consumption in the North East through setting standards for new economic, retail and residential development, energy generation, transport and waste in particular. It is essential that sustainable consumption is put at the heart of the RSS through an overarching and cross-cutting policy in section 2 if the region is to move towards using an equitable share of the earth's resources and living with environmental limits.

One of the key ways of reducing resource consumption, living within environmental limits and tackling climate change is through sustainable construction. The RSS can have a huge influence in this area through the requirements it makes for new development and redevelopment. Policy guidance in section 2 is essential to ensuring that the implementation of the RSS adheres to sustainable construction principles and therefore helps to make 'one planet living' a reality.

South Tyneside Friends of the Earth therefore recommends the following policy for inclusion, which draws heavily on policies CC3: Resource Use and CC4: Sustainable Construction in the draft South East Plan:

Policy 4: Sustainable Consumption and Construction

In pursuit of more sustainable consumption and to ensure the region lives within environmental limits, strategies, plans and programmes will contribute to stabilizing the North East's ecological footprint by 2012 and reducing it thereafter through the following measures:

- Minimizing energy, water and resource consumption in all new development and redevelopment. As a minimum, all new residential developments and redevelopments will meet EcoHomes 'excellent' rating, with all new commercial and industrial developments meeting the equivalent BREEAM standard. Standards should be continually driven up, with a view to all new developments/redevelopments being carbon and waste neutral by the end of the plan period (as achieved at the Beddington Zero Energy Development).
- Shortening supply chains and using local labour, materials and produce wherever possible.
- Using and promoting recycled and sustainably sourced products wherever possible.
- Maximizing the potential for embedded renewables (including renewable sources of heat) in new developments/redevelopments.
- Adopting and promoting green procurement policies.
- Implementing waste minimization schemes as a priority, and maximizing the potential for recycling and composting.
- Ensuring construction minimizes the use and production of toxins and waste, and the use of non-renewable resources.
- Designing all new developments to be highly accessible by public transport, walking and cycling.
- Ensuring new developments harness the potential for tree cover, green infrastructure and biodiversity.
- Ensuring new development does not damage, and where possible makes a positive contribution to, local air quality.

South Tyneside Friends of the Earth fully recognizes the danger of over-development in relation to the economic and

Id No Respondent

Policy 4

social needs and the environmental capacity of the region. We therefore support the phasing and plan, monitor and manage approach as vital to ensuring the sustainable development of the North East. However, we are concerned that the current approach advocated in the RSS relates solely to whether the rate of development is in-line with the region's economic growth rate, so as to ensure that the level of employment land provision and housing development is appropriate and consistent with this. Equally important is that the region's development takes place within the overarching framework of sustainability, and crucially that the region contributes to staying within global environmental limits by reducing its consumption of natural resources and its contribution to climate change. It is essential that policy 4 is amended to reflect this.

In addition to the indicators listed as being potential triggers for a full or partial review of RSS, we would like to see added:

- Regional greenhouse gas emissions
- The North East's ecological footprint

Other changes that should be made are:

h) replace takes into account with follow

i) amend to read, 'ensure that major greenfield housing development proposals are only considered where it can be demonstrated the sequential approach has been followed and no other suitable sites are available, and where an assessment has been made of the impacts of the development on the successful delivery of the housing market restructuring areas.....'

215 Government Office For The North

'j' – there could be a case for including large PDL sites as they could have impact particularly where they are in or adjacent to areas of low demand.

Id No Respondent

195 Grainger Trust

Policy 4

A greater timetable of assessments is given under Policy 4, which helps to ensure that a regionally structured assessment can be made. The need to look at up-to-date information as well as the need for flexibility and change is emphasized.

Policy 4 states that the North East Assembly must produce an Annual Monitoring Report assessing the delivery of the RSS locational strategy and policies by the end of February each year. A significant change in a number of key indicators could necessitate a partial or full review of the RSS. The Assembly will also produce guidance on the application of the phasing and plan, monitor and manage approach.

LDFs shall plan for the managed release of land for development over the periods 2004-11; 2011-16; and 2016-21, based on a number of prescribed factors including:

- the use of the sequential approach;
- up-to-date information provided through the LDFs Annual Monitoring Reports;
- up-to-date population and housing provision requirements indicated by the RSS Annual Monitoring Reports and Strategy;
- the recognition of phasing requirements.

LPA's are required to review the phasing approach and priorities set out in the LDFs every five years or earlier if monitoring reports from the RSS or LDFs indicate a need otherwise.

Although this policy is seen as a significant improvement, it still only addresses a situation where comprehensive LDF coverage is in place. In reality this may take many years and in the meantime the system is 'silted up' with unimplemented permissions and inappropriate allocations. Therefore, this needs to be tackled by the RSS by requiring annual monitoring reports by those councils who have not produced their LDFs, to ensure that the information base for determining land release is available to allow necessary development to proceed in the interim in accordance with the principles of the RSS

164 Hallam Land Management Ltd

Policy 4 has been substantially redrafted and has introduced "key indicators" to be employed in assessing the delivery of the RSS locational strategy and policies each year. Unfortunately it is not clear how the annual results of the key indicators will be interpreted in managing the release of development in the future. For example; if the delivery of a housing market restructuring area were delayed and has not come forward as planned one decision might be to continue to prevent any potentially competing sites from being released but this could in turn have an adverse impact on the delivery of the overall objectives of the RSS. The listing of the key indicators to provide the monitoring element of "plan, monitor and manage" is therefore limited in its usefulness unless further guidance is provided to show how the information obtained will be applied to guide the "manage" element.

Policy 4 states, "The Assembly will prepare guidance on the application of the phasing and plan, monitor and manage approach". This guidance is not included in the RSS Policy 4 and should be provided now to give a complete picture of what is actually being proposed.

160 Highways Agency

RSS to support RES in order to reduce regional disparities. To ensure the managed release of land. LDFs and existing development plans should incorporate mechanisms for the periods 2004/11, 2011/16, 2016/21. Further detail will be provided after further study, but essential to Plan, Monitor and Manage. Essentially up-to-date information (GVA growth, population changes, housing take-up figures, employment rates, employment land take up and development on brownfield vs greenfield sites will guide policy decisions such as when and where to release land for development (for the same periods as before) and the process also enables the prioritization of brownfield before greenfield. For example there is a need for local authorities to phase and better priorities the release of employment sites. Local authorities should look to review their LDFs every five years or as necessary In accordance with the RSS review).

Id No Respondent

424 Home Builders Federation

Policy 4

With reference to Policy 4, we request house price data be added to the list of bullet points acting as a key indicator. Whilst we accept that new build does little to impact on house prices in the wider NE housing markets, reducing new housing in both Durham and Northumberland below current market demand will without doubt inflate house prices in those areas. This in turn will impact upon affordability, which in turn will require more new homes in the long-term to stabilize an affordable housing crisis.

With reference to the phasing of major developments, we request supporting text to acknowledge the increased pressures placed on housing developments to fund infrastructure works, community enhancements and affordable housing. It must be recognized that major housing developments should not be phased over a period beyond that which is financially viable

432 Member of Public

To recognize the ongoing impacts and risk of climate change, in addition to the reporting listed, the following should be provided:

1. An annual regional level of CO2 emissions, broken down by source groupings: transport, industry, domestic;
2. A similar report of the volumes of renewable energy produced annually within the region.

293 Member of Public

Why is there no mention of what will be done at regional level if policies don't work?

273 Member of Public

The context of phasing and monitoring seems to be out of phase with what existing permissions are around for housing. As an observer the regional picture is distorted by permissions already given and land held by developers who hang on rather than develop it. Thus you should have some stick in the policy that if permissions are not implemented then they will be lost with no presumption of renewal. The major house builders have major land banks so are effectively distorting the market and have done so for decades. The RSS should have no allegiance to what house builders as their business led needs but start to listen to what communities want. Who in their right mind would have planned some parts of Tyneside which are merely developer's housing estates?

In terms of employment land supply how will RSS disengage with the dogma followed for years by Economic Development people that we must hang on to employment land that has stood idle for decades and blighted huge areas of riverside which could take all the region's housing needs for decades but remains just in case some of the defunct industries return? How will the LDF ensure local politics don't keep this historic legacy perpetuated?

Id No Respondent

453 Member of Public

Policy 4

It is essential a new policy is included to lay down firm criteria regarding sustainable development. I refer to the Friends of the Earth response:

In pursuit of more sustainable consumption and to ensure the region lives within environmental limits strategies plans and programmes will contribute to stabilizing the North East's ecological footprint by 2012 and reducing it thereafter by the following measures

- a) Minimize energy, water and resource consumption in all new development and redevelopment.
- b) Shortening supply chains and using local labour, materials and produce wherever possible
- c) Using & promoting recycled and sustainable sourced products wherever possible
- d) Maximizing potential for embedded renewables in new developments / redevelopments
- e) Adopting and promoting green procurements policies
- f) Ensuring construction minimizes the use and production of toxins and waste and the use of non renewable resources
- g) Ensuring new developments harness the potential for tree cover, green infrastructure & biodiversity
- h) Ensuring new development does not damage and where possible makes a positive contribution to local air quality

Phasing & plan, monitor and manage approach is a sensible way to manage development

The following changes are required:

h) replace "takes into account" with "follow"

i) amend to read "ensure that major Greenfield housing development proposals are only considered where it can be demonstrated the sequential approach has been followed and no other suitable sites are available, and where an assessment has been made of the impacts of the development on the successful delivery of the housing market restructuring areas

94 Nectar

The phase plan monitor and manage approach is supported by NECTAR but it is recommend that as with the introduction to Policies 4a to 4e, the introduction to Policies 4f to 4i should end with 'shall' and not with 'should'.

Policy 4i gives NECTAR cause for concern and appears to be inconsistent with Policy 5a. The thrust of the housing policy, the numbers of dwellings envisaged in Policy 28 and the overall emphasis of the Strategy on sustainability, should ensure that major greenfield housing developments are not proposed; this point should be made clear at Policy 4i.

341 Newcastle City Council

Policy 4 refers to plan, monitor and manage approach. The Council strongly supports the inclusion of such a policy and the detail is generally supported. The Council particularly welcomes the inclusion in the last section of the policy of the requirement on local authorities to look beyond their own boundaries when considering housing land allocations and also when assessing major greenfield housing developments.

The Council believes, however, that the mechanisms to ensure that this happens are not necessarily in place and this part of the RSS (in the supporting text if not in the policy) needs to be clearer about how cross boundary issues are identified and acted upon by individual local authorities. Paragraph 2.17 refers to work in hand on defining housing market areas and the Council believes that this needs further elaboration in the final version.

Id No Respondent**Policy 4**

152 PD Ports (Victoria Harbour)

Victoria Harbour depends upon an early injection of public and private capital and on-site activity in order to secure its success. This is necessary when considering the proposal is essentially creating a new and unique market and the early activity creates a critical mass of development, which in turn is rewarded by further investor confidence. Unless great care is taken, the proposed phasing strategy could serve to restrain the ability for this to occur by restricting (or reducing) the ability to achieve this critical mass. In other words, there would seem to be suitable evidence to assert that phasing policies that link housing development to economic development (and potentially restrict housing activity for a 7-year phase) could have the opposite effect to that intended. We wish to explore this further at the Public Examination.

42 Redcar & Cleveland Borough Council

Policy 4 and Para 2.12

Whilst the Regional Spatial Strategy recognizes the importance of phasing, the policy relies on Local Development Frameworks incorporating phasing mechanisms to ensure the managed release of housing and employment land. It fails to set out any mechanisms to control the release of land strategically to prevent an over supply of land in one local authority area jeopardizing the release of land elsewhere. A sub-regional approach to phasing the release of land is called for with clear mechanisms established to control the release of land should an over supply situation develop. If an undersupply occurs, a process should be established to understand the reasons for the failure to develop land and to put measures in place to redress the problems, if possible.

Whilst the improved approach to phasing and monitoring is welcomed, it is considered that Policy 4 is not sufficiently clear to ensure the Council's concerns are met. Paragraph 2.12 recognizes that further guidance is required to outline how the approach will be practically applied regionally, city regionally and locally.

It is considered that it is critically important for the RSS to take a lead in this matter throughout the region to ensure a co-ordinated approach. The Council reserve its position on this matter until this guidance has been prepared.

151 Sunderland ARC

Phasing & Plan, Monitor and Manage is supported. It now provides a means by which release of housing land can be speeded up or slowed down in line with economic and demographic trends. This more robust approach is favoured by Sunderland arc, since the housing market renewal and URC initiatives will be more difficult to complete successfully, if excessive development takes place outside these areas.

Locational Strategy

Sunderland arc supports the city region concept as a key component of the locational strategy and the clear priority that is accorded to the regeneration of the core areas. Therefore:

Id No Respondent

29 Sunderland City Council / Tyne &

Policy 4

Phasing & Plan Monitor and Manage: Part of this policy asks for Local Development Frameworks to manage the release of land in the periods 2004 – 11, 2011 – 16 and 2016 – 21 based on, amongst other matters:

“c) up-to-date population and housing provision requirements at the housing market/city region level, as indicated through the RSS Annual Monitoring Reports and Strategy” and

“d) a recognition of the phasing requirements (presumably of all types of development) in relation to the affects of new development on the delivery of wider strategies and programmes within the city regions and rural areas, particularly housing market restructuring initiatives”.

RSS allocates numbers of dwellings and employment land for individual districts by the aforementioned time periods to enable Local Development Frameworks to identify and distribute appropriate amounts of land. LDFs are required to comply with the specified amounts and the LDF Annual Monitor must manage its land release programme so as to meet the rates and not breach the allocations. The allocations can only be altered through full or partial review of the RSS and are not open to change through the LDF or RSS Annual Monitor processes. It is considered that Policy 4c should be deleted.

In addition the development allocations identified in RSS to be included in LDFs, have been determined by RSS after taking account of housing market restructuring initiatives, which should, therefore, not be affected adversely. Further consideration of phasing requirements within an individual district to take account of the wider regeneration of the City Region would be inappropriate, but should properly be considered as part of the RSS Review process. Policy 4d should be deleted.

Part h) requires local planning authorities to undertake a sequential approach to the allocation of sites “as applied at the housing market area and city region level”. Use of housing market areas for allocations may in the future be introduced at national policy level (discussed in Draft PPS3 – Housing) but it is not policy nationally and regionally at present and should be resisted until proven and effective methods of assessment are determined. City region assessments are similarly indeterminate. RSS proposes (Policy 30) district-by-district housing allocations and ‘brownfield’ targets that are sufficient and appropriate to the allocation of housing land. Sequential assessment at any wider level is inappropriate and should be resisted.

Part i) requests an assessment of the impact of any major greenfield housing development on housing market restructuring areas and previously developed land targets within city regions (where, it should be noted, RSS does not propose city region targets). Similar considerations also apply as to Part h and the policy should be resisted.

207 Tees Valley Joint Strategy Unit

The inclusion (compared to the consultation draft RSS) of a more detailed plan, monitor, manage and phasing policy is welcome. The lack of detailed guidance on how the approach will be applied practically is, however, an issue and the policy will need to be assessed regularly on its effectiveness. It does highlight the need for effective monitoring systems to be in place at both the regional and local levels, and the need for high priority to be given to the monitoring process. A co-ordinated approach to monitoring and managing the release of land throughout the region is required.

Id No Respondent

148 Tees Valley Regeneration

Policy 4

This policy has been significantly expanded since the consultation draft although no explanation of the 7 year first phase is given (as requested by TVR last time around). We appreciate that RANE is attempting, in good faith, to apply Government Guidance on phasing to the local context.

This policy attempts to introduce Plan Monitor Manage at the Local Development Framework level and also includes a number of criteria for new planning proposals. For example:-
g) ensure that major developments to be developed over a long timeframe are phased over the three periods 2004-11; 2011-16; and 2016-21, and are capable of being responsive to changes in phasing as identified from monitoring processes;

Each of the TVR mixed-use projects, namely Middlehaven, Victoria Harbour, Central Park and North Shore, depend upon an early injection of public and private capital and on-site activity in order to secure their success. This is necessary when considering that each proposal is essentially creating a new and unique market and the early activity creates a critical mass of development, which in turn is rewarded by further investor confidence. Unless great care is taken, the proposed phasing strategy could serve to restrain the ability for this to occur by restricting (or reducing) the ability to achieve this critical mass. In other words, there would seem to be suitable evidence to assert that phasing policies that link housing development to economic development (and potentially restrict housing activity for a 7-year phase) could have the opposite effect to that intended. We wish to explore this further at the Public Examination.

61 Tesco Stores Ltd

Welcome inclusion of this policy, but feel that the targets/allocations for the 2004-2011 period should be reconsidered in advance of the adoption of the RSS.

415 Tithe Barn Land

Page 19, para 2.10

I disagree with the sentence "In particular, the phasing approach allows the planning process to priorities the order in which development takes place, such as prioritizing previously developed land before green field development, in order to ensure planning objectives are realized." The economic prosperity of the area can be aided by the planning process and this prosperity alone should be of such overriding importance as to make irrelevant the significance of current planning fads e.g. housing on contaminated brown field sites and business parks on green field sites. The nightmare for owners of houses on contaminated sites are sudden restrictions on insurance, or a drying up of mortgage funding making the houses un-sellable. The nightmare for the planning authority is that they are found to be liable, because it approved the use.

Page 20, para 2.14

I disagree because of the same reasons as Page 16, para 1.51

Page 21, Policy 4

I disagree in that the list of factors could be more comprehensive. Actually I realize that there will have been little chance to list such factors as fuel cost rises, Thames mouth flooding or terrorists. The compact and un-crowded N.E. has advantages over the S.E.

Id No Respondent

411 VONNE

Policy 4

The government's code of practice on consultation contains the following advice:

- Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.
- Ensure that your consultation is clear, concise and widely accessible.
- Give feedback regarding responses received and how the consultation process influenced the policy

With reference to the above, the consultation document was extremely long and complex. Progress could be made on making planning issues relevant to communities and producing more accessible documents. Ongoing dialogue with voluntary and community groups about what form consultation could take would be one way of doing this.

There should be a commitment in the RSS to ensure that communities play an active role in developing planning strategy if the RSS is indeed to be a framework for facilitating sustainable development in the region and if the governments aim to "change the culture of planning from one of objecting to one of constructive participation.

It would make also be positive if - as recommended by government guidance - feedback could be given on how communities were consulted about the RSS and what influence this had on the final version of the document.

We do not feel that the composition of the Focus groups that were consulted on this strategy in various parts of the region fully reflects diversity and are concerned that in some instances a large part of a focus group presented as reflecting the views of ordinary people was in fact made up of local councillors. If the RSS is to deliver on sustainable development it needs to find a way of meaningfully engaging communities in planning issues. This will best be done through dialogue with local groups. If this is not enshrined as a policy and if meaningful dialogue does not take place, the RSS will not lead to development that meets the needs of the people of the North East.

187 Yuill Homes

We acknowledge the need to plan, monitor and manage development. With regard to housing, reference should be made to changes proposed by new PPS3, which includes dealing with future supply of new housing. The draft document proposes a more responsive approach to market signals and this should be reflected in RSS, perhaps with house prices being included in monitoring programmes, along with housing completion rates and allocations take-up.