

## **Barwick in Elmet and Scholes Parish Council – 1PP**

4.1 – Yes: Police/ NHS Trusts/ WY Rural Transport Partnership/ Stakeholders

5.1 – Yes: Individuals are perceived as being patronising and are often excluded particularly at the final stages of plan preparation (EIP) more emphasis should be provided for grass root involvement? Planning Aid.

6.1: Work Stream 3 - The Regional Spatial Strategy- Settlement Study (June 2004) is flawed. Villages with occupancy of less than 3000 'ONS' figures are excluded. Many such villages east of Leeds require to know how/if expansion is to occur; bearing in mind urban extension allocations: para 2 4B may be reluctant (page 25 RSS- 2026). Question - should a study be carried out which would or could establish the sustainability of housing development & expansion of village in rural areas - where population is currently less than 3000.

## **Leeds Gate – 2PP**

4.1 – Yes: Leeds Gate/ Northern Network of Travelling People

5.1 – No: Must use focus groups for seldom-heard groups

6.1 – No: Myself and colleagues representing Gypsies and Travellers were present at the EIP section which dealt with Gypsy and Traveller accommodation. The inspector accepted that figures for new pitch requirements as identified in the regional GTAA research were minimum figures not disaggregated to Local Authorities. The inspector stated then that there would need to be a review when figures from sub regional research was available (deadline July 08) either as a single-issue review or as part of a mini review or update. It has been very difficult to understand how this matter has been overlooked in project planning for this update and it is critical to ensure that this oversight is corrected not least to avoid the expense of a single-issue review.

## **Ramblers Association – 3PP**

4.1 – No:

5.1 – No: Our experience is that local authorities and elected members are very poor at disseminating information to the public and local groups expecting Local Strategic Partnerships and there is no drip down from them. We therefore request that local groups, with a list of local contacts/consultees within their administrative area and in turn that you mail or email the information direct to them as they desire. We feel sure that this arrangement will help them increase awareness and assist in engaging communities to become involved.

6.1 - We consider the additional housing should primarily be directed towards areas of wealth creation in sustainable locations. Continued wealth creation is the key to future success and offers the potential for true sustainability. If you accept the above thesis the additional housing should be directed to support successful business areas which offer future potential. In respect of the latter we consider there is a need to examine our asset base in the widest sense viz: our people, our businesses, our education institutions and all the significant supporting infrastructure with a view to identifying and exploiting our existing successes, but perhaps more importantly to identify future opportunities for business and in this respect consulting futurologists could prove very helpful. Looking to the future we have in mind the tremendous business opportunities that will arise to replace and develop our ageing electrical infrastructure as well as the technological developments necessary to reduce our Nation's and the World's carbon footprint.

CPRE – 4PP

4.1 – No

5.1 – Yes: It would be helpful if the draft Update RSS was available online as a separate file. The Draft Y&H Plan was only available online as individual chapters, not as a whole document. This made it very difficult for us to circulate to our wider membership in the region. It would also have been helpful if this Project Plan response form and the response form for the Call for Evidence exercise had been available to complete electronically!

6.1: The SA of the draft Yorkshire and Humber Plan noted key significant negative impacts relating to air travel, road development, the economy, climate change and flooding. The SA of the Proposed Changes noted that these key negative impacts remained generally unchanged at the later stage. We therefore welcome the comment in para. 13 that 'Discussions during the preparation of the Project Plan also re-enforced that the Sustainability Appraisal needs to carry 'weight' in the process and must not be treated as a tick box exercise'. It would be helpful if YHAssembly could require the SA consultants to prepare a letter to the EiP Panel, asking the EiP to consider areas where there is concern that the SA recommendations have not been adequately addressed. YHAssembly should also lobby Government where national policy is holding back the region's aspirations (e.g. for climate change).

**Fisher, Harriet**

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**From:** Megson, Philip [Philip.Megson@lancashire.gov.uk]  
**Sent:** 26 June 2008 15:20  
**To:** rssupdate  
**Subject:** The Yorkshire and Humber Plan 2009 Update

Our ref: R.11/4

Draft Project Plan

Q About You: see contact details below

Q1.1: mail out

Q2.1: yes

Q3.1: public sector organisation

Q4.1: no

Q5.1: yes

Q6.1: no additional comments

The Housing Challenge: Call for Evidence

No observations.

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23/07/2008

## **GOYH – 6PP**

The main section where the PP would benefit from tweaking is in Section 5. From initial YHA reports and discussions, it appears that the intention is to engage with the public rather than simply consult. This brings to mind that the process is not about telling people what is planned and asking just for comment, but that the process is circular with on-going discussions and opportunity for feedback taking place with stakeholders through the stages of the initial drafting process. A circular dialogue with opportunity for discussion and feedback rather than a one-way stream of information is also likely to prove useful to help raise issues early on in the process. It is not however apparent in the PP that engagement is the intention as the Statement of Public Participation suggests there will be a series on consultation exercises. The role of feedback and discussion in the process could be made more explicit if a one-way approach is clearly not the intention of engagement.

Specific opportunities to clarify the intention to engage rather than consult include the matters listed below:

In relation to the 'Call for Evidence' exercise there is no mention as to whether the results will be made public, distributed for further comment or followed up by further discussions with any of the stakeholder groups.

There is a lot of emphasis on big consultation exercises, such as workshops and planning for real exercises but there is little detail on opportunities for creating on going dialogue with stakeholders through more informal or other formal means. More detail could be set out about open dialogue and opportunity for information to be received rather than just disseminated by the Assembly.

There appear to be number of professional groups missing from the stakeholder list and Statement of Public Participation table that may prove useful in the process. These include RTPI, RICS and RIBA. Has a web based chat room or user group forum been considered as a means of engagement? Could an opportunity to post comments on each of the topic webpages be created (see The Times website where you can comment on a story).

Further in relation to public consultation, there is at the moment little detail about the structure of engagement and whether it is to be addressed on a regional, local authority, sub region or sub area basis.

This could be addressed in the PP not least so that the approach is clearly set out but also to demonstrate that an evaluation of the quality to be gained from any particular approach has been fully considered.

## OMISSIONS

Para 2.3 of PPS11 sets out what should be included in the PPS11 and I have already mentioned above a couple of omissions that need to be addressed for the PP to accord with national guidance. There are a couple more matters that need to be addressed and these are now set out below:

### Resources

At the moment the PP does not provide an assessment of the resources needed to complete the review. As well as an evaluation of YHA resources and need for consultants, it should also address Section 4(4) authorities and the extent of their involvement where known.

### RSS Context

The PP could more fully explain the relationship between the RSS review and other regional strategies. This could include reference to whether other strategies are being updated and if such updates have changed the context for the RSS review. Reference to the emerging SRS and its role in the RSS review could also be mentioned along with implications of the SNR and the possible changes to the RPB.

The timetable at the moment only shows those stages that YHA will be responsible for and so stops at submission stage, but the timetable should really show the whole process. This includes the stages through to publication, not least so it is clear to the reader when the RSS Update will be published. The final stages have been discussed previously and the timetable appears in various publications so hopefully it can simply be lifted and inserted, but let me know if you want the dates again.

The stages of the SA process and how they fit into the process could be made more explicit. Furthermore, it is not clear to what extent public engagement will be at each stage. This includes the coverage expected for depositing documents (no. of libraries, council offices, etc) as well as consultation methods or use of the steering groups/TAG that are already in operation. Rather than adding lots of new words, it might be possible to address some these points by drawing a flow diagram to show how the process fits together, maybe along the lines of fig 2.1 of PPS11. This could include a diagrammatic depiction of how the SA may

be reviewed a few times between the stages of the RSS process where the options are being drawn up or reviewed. It might also draw out the key players during periods of consultation and the means of engagement (questionnaires, workshops, deposit locations). Given your time constraints, I can put some more thought to this and provide a draft version if it would help?

There is no mention of 4(4) authorities in the PP at the moment. Given their involvement could impact on the timetable for RSS and as YHA has already written to the 4(4) authorities to find out about first proposals, would it be possible to now set out what involvement they will have in the process and evidence collection? Some questions to address in the PP might include: is there a structure for their involvement or have they waived their rights in favour of YHA taking the lead? Is there a timetable/framework for considering first proposals? How will duplication of work be avoided?

Once published (shortly?), the Matthew Taylor Review may have an impact on how growth across rural/urban areas is to be addressed. To make sure the PP is complete, could reference to it be added in? The end of paragraph 18 could be an appropriate place.

The final point is about the SA, but this is really for consideration in relation to drafting the Options and is a comment on the implementation of the PP. Paragraph 14 of the PP states that the existing SA/SEA/AA are to form the starting point for the RSS update. This is absolutely right as the review is expected to be an update rather than wholesale review. It will however be necessary to think about how the existing SA/SEA/AA can be used as evidence as part of the RSS review process. This need not be addressed in any great detail in the PP but it is something to think about in developing the evidence base and making best use of existing information.

Richard Wood  
Head of Planning Strategy  
Yorkshire and Humber Assembly  
18 King Street  
Wakefield  
WF1 2SQ

27<sup>th</sup> June 2008

Our Ref: YF08/186

Dear Richard,

**THE YORKSHIRE AND HUMBER PLAN – 2009 UPDATE:  
DRAFT PROJECT PLAN**

Thank you for seeking Yorkshire Forward's views on the above document. The Agency welcomes the publication of the draft Project Plan for the update of the Regional Spatial Strategy (RSS) for Yorkshire and Humber (The Yorkshire and Humber Plan). In general it clearly outlines the scope of the 2009 Update, which is focused upon planning for housing growth within the region.

Whilst the scope of the Update has been determined by the Housing Green Paper (July 2007), we welcome the starting point as being *'to maintain the Core Approach'* (paragraph 4). This aligns strongly with the Regional Economic Strategy, which seeks to support the renaissance of the region's towns and cities. In addition, paragraph 10 highlights that policy development will focus *'largely on the sub area and housing policies'*. However, this would appear to imply that policy development will also occur for other elements of the Yorkshire and Humber Plan. We suggest that the Update should be tightly focused on planning for housing growth within the region. Therefore, the Project Plan should outline all policy areas that will be reviewed as part of the 2009 Update to the Yorkshire and Humber Plan.

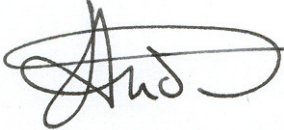
In particular, it would be helpful to reflect the following points within the final Project Plan.

- Work stream 1 (Sustainability Assessments), which covers the sustainability appraisal of the 2009 Update, should clearly state that any appraisal work, including the use of any targets or trajectories, will be focused on housing growth rather than wider regional activity/issues.
- Work stream 4 (Infrastructure) seeks to consider the importance of infrastructure in supporting the scale and location of growth within the region. It would be helpful to recognise the importance of utility infrastructure when bringing development forward by ensuring early engagement with key stakeholders. However, it is unclear how the assessment of town centre capacity will be used to inform the Update, and if this would relate to the provision of infrastructure in support of housing growth.

- Work stream 5 (Adaptation) should clarify that the work undertaken as part of this work stream would comprise part of the evidence base for the 2009 Update. This should not necessitate those policy areas listed under paragraph 25 of the draft Project Plan being considered through the policy revisions (work stream 8). In developing the evidence base and information provision it may be useful to incorporate further use of the REAP and REEIO models. REAP has previously been used to consider the environmental/ carbon impacts of housing growth in the Leeds City Region. Therefore, there is scope for extending this approach across the region.

I hope the above comments are helpful in shaping the Project Plan and look forward to future opportunities for involvement in the ongoing update of the Yorkshire and Humber Plan. Please do not hesitate to contact me if you have any comments or queries regarding this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jan Anderson', enclosed within a large, loopy oval flourish.

Jan Anderson  
**Executive Director, Environment**

## **Yorkshire Play – 8PP**

4.1 – No

5.1 – No: Voluntary organisations that are not represented in regional partnership bodies have no opportunity to contribute other than as members of the public through an extremely brief questionnaire. This expertise and point of view of different sectors should be sought more actively.

6.1 - We have commented as fully as we can, given the extremely limited scope, in the call for evidence, about the importance of providing for children's play in the context of the RSS Update. Our observations are very relevant to the work stream on sustainability assessments. We would welcome the opportunity to submit a further briefing paper on the topics raised in our call for evidence response, or for any other opportunity to present our views more fully during the conduct of the review.

## **Land Development Consultants – 9PP**

4.1 – No

5.1 – Yes

6.1 -

**Your ref:**

**Our ref:** RSS 1.3/MS

**Contact:** Malcolm Spittle

**Ext:** 2428

**Policy Development**

Development and Countryside Services

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23 July 2008

Dear Richard

**DRAFT PROJECT PLAN AND CALL FOR EVIDENCE**

Thank you for consulting the County Council on the above documents.

In relation to the draft Project Plan, the Council considers that this provides a sound basis for the preparation of the 2009 Update. There are no additional issues that the Council wishes to raise on this document.

In relation to the 'Call for Evidence', the Council notes that current RSS was only issued by the Secretary of State in May following a lengthy preparation period which included several consultation stages and an examination in public. The strategy at both the regional and sub-regional levels was endorsed by the Panel and supported by the Secretary of State.

The County Council was fully involved in developing this strategy. County Members and officers worked closely with the Regional Assembly, the District Councils, the National Parks and the City of York to establish a joint approach to the sub-regional proposals in RSS for North Yorkshire and York which reflected local needs and aspirations.

In this context, and in the absence of any fundamental changes in circumstances, the current strategy should be the starting point for the 2009 Update. It is important from a North Yorkshire perspective that RSS should retain the strong urban focus for housing growth and not seek to disperse development across the rural parts of the region.

R Wood  
Head of Planning Strategy  
Yorkshire and Humber Assembly  
18 King Street  
Wakefield  
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The Council is aware that the National Housing and Planning Advice Unit has recently published its advice to the Minister about the regional supply of housing to 2026. The 2009 Update will test these figures in due course and consider their wider implications for the development of the region. However, an urban focus to this additional development will help to provide a better relationship between homes, jobs and services, minimise the use of land and the need for travel and safeguard the rural environment. The sub-area statements in current RSS also provide a sound basis for future development in North Yorkshire and should be the basis for any similar policy statements in the review.

Yours sincerely

Malcolm Spittle  
Planning Policy Manager

West Yorkshire Police – 11PP

I write to you today in connection with "The Housing Challenge – The Yorkshire and Humber Plan 2009 Update: Call for evidence". I do so as Chair of the Northeast of England Regional Architectural Liaison Officer Group (which represents the police forces of Cleveland, Durham, Humberside, Northumbria, North Yorkshire, South Yorkshire and my own force, West Yorkshire), and as the Force Architectural Liaison Officer for West Yorkshire Police.

4.1 – Yes: Police authorities. Indeed at Section 37 of the Project Plan you list the stakeholders who you consider likely to have an interest in the RSS Update but police authorities are not recorded. This omission is despite your acknowledgement at Section 35 that "Effective engagement is about involving the right people at the right time in the process". It is never too early to consider designing out crime but to wait till large-scale developments are built, occupied and experiencing problems is not in anyone's interest and is at odds with your desire to "Learn from our previous experiences" (Section 35).

5.1 - My colleagues and I look forward to further consultation with regard to the Regional Spatial Strategy. We are extremely keen to see the various areas of Yorkshire and Humber affected by these proposals prosper and thrive for the benefit of current and future communities who may visit, work or reside there.

6.1 - The past teaches us that the physical environment in which we all live, work, socialise or simply move through, has a significant part to play in how safe we feel and how easy, or otherwise, crime is to commit. It also teaches us that when this element is flawed it leads to high levels of crime and fear, permanently vulnerable communities and huge expense for all agencies who then strive hard to rectify defects that would have been apparent long before the first family moved in had somebody taken time to consider them.

Understanding how the criminal may take advantage of these opportunities and then designing them out of future developments is the role of the Architectural Liaison Officer (ALO). This valuable service is provided by all police forces throughout the UK. Contact details for the ALO service can be accessed via the link:-

[www.securedbydesign.com/forces](http://www.securedbydesign.com/forces)

Your opening paragraph in "Call for Evidence" acknowledges the importance of responding positively to challenges such as flood risk,

climate and economic change, population increase, household and transport growth and that these topics will have "a major bearing on what the Region will be like in 20 years time". Missing from this list of considerations is crime which throughout the whole of the document fails to receive one single mention. Indeed, there isn't even a suggestion that these new developments, and the inhabitants of them, should be safe. Such a fundamental error needs urgent attention otherwise the later documents that will flow from the 2009 Update, and which will provide the additional detail, will also fail to deal with this most vital of factors.

It is right to consider the additional infrastructure required to support the increase in housing supply that the RSS and other initiatives such as the Governments Eco-towns will bring, but policing must also be seen as a part of this. Therefore, I believe that policing should be considered as an element of "Work Stream 4: Infrastructure".

Developer contributions should be sought for the provision of community buildings to provide access to the resources of strategic partners, including local policing. This would help to ensure that these communities are not disadvantaged by any failure to recognise their needs, so that the services required for modern day living are readily available, and so that the resources of any agency are not overstretched as a consequence of poor planning.



## Department of Regeneration

RSS 2009 Update Project Plan  
Yorkshire and Humber Assembly  
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E-Mail: Andrew.marshall@bradford.gov.uk  
My Ref: R/P&P/LDF/RSS Update 2009  
Your Ref:

9<sup>th</sup> July 2008

Dear Richard

### **The Housing Challenge, Yorkshire and Humber Plan - 2009 Update**

Thank you for your letter dated 30<sup>th</sup> May 2008 regarding the Housing Challenge, Yorkshire and Humber Plan - 2009 Update Project plan, Call for Evidence and invite to strategic planning bodies to undertake 'first detailed proposals'.

I can confirm that Bradford Council would not wish to make 'first detailed proposals' and are happy for the Assembly to lead on these matters with input from Bradford through the existing governance arrangements.

The opportunity to comment on the project plan is welcomed. The opportunity to examine housing growth strategically as well as supporting infrastructure as part of the update is supported. However, we have concern regarding the unreasonable timetable and also the disruptive implications for ongoing LDF preparation in particularly Core Strategy. It is important that any update is based on robust evidence and that all stakeholders have sufficient opportunity to consider this evidence as part of the process. This is particularly important given the complexity of some of the evidence e.g. NHPAU housing projections and regional economic projections.

In terms of the call for evidence the four approaches suggested should all form part of the solution taking account of local realistic and deliverable alternatives and also timescales. The Bradford Core Strategy in dealing with the significant existing levels of growth is already looking at alternatives beyond the current strategy of RSS, which include in the longer-term major urban extensions which would potentially impact upon Green Belt. The focus of the update should be on the current urban regeneration focus within the short to medium terms, with the other approaches having a potential role in the longer term. Given the challenge of delivering the existing level of growth for Bradford, we have serious concerns about even higher rates of growth being imposed upon the District.



INVESTOR IN PEOPLE



It is important for this review to acknowledge the requirements of employment land given the expectations of the Bradford economy for job creation and, of course, the priority for transport investment. Whilst this may be implicit in achieving an effective and considered approach to housing, this needs to be made clear in recognition of Bradford's role as a Regional City.

In terms of local evidence the Council has produced or is in the process of preparing the following:

Employment Land Study (completed December 2007)

Urban Potential Study (due for completion July 2008)

Strategic Housing Land Availability Study (Initial findings November/December 2008 and final report due Spring 2009)

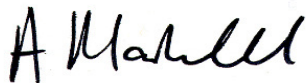
Bradford Local Housing Assessment (completed May 2008)

Bradford Housing Requirements Study 2007/08 (final report due July 2008)

Bradford Future of Social Housing Study 2007-08 (final report due July 2008)

If you require any further information or clarification on any of the above please contact me.

Yours sincerely

A handwritten signature in black ink that reads "A Marshall". The signature is written in a cursive style with a large initial 'A' and a long, sweeping underline.

Andrew Marshall  
(Strategy Manager)

## **Crigglestone Parish Council – 13PP**

The Parish Council feel that the major down turn in the global economy and particularly that in the UK clearly indicate the following: availability of mortgages will be substantially less; the number of house building starts will be substantially less; the market for house sales will be significantly less. This means that the projected House Building targets are totally unrealistic and widely inflated above the realities of the economic situation. The Yorkshire and Humber 2009 Plan Update, should, therefore, reflect the reality and the numbers of additional housing, should be revised significantly in a downwards direction. There should be no reviews or changes to the current Green Belt boundaries in Yorkshire, and particularly in West Yorkshire. Any additional housing should be accommodated within the boundaries of urban centres and through bringing empty properties back into use and by the use of vacant space in existing buildings. The real challenge is not one of housing, but of reducing the population to a sustainable level, which would have the additional effect of reducing the impact on the global system. The UK and the county of Yorkshire cannot sustain population growth and maintain the quality of life and the environment for existing residents and communities.

## **English Heritage – 14PP**

4.1 – No

5.1 – Yes

6.1 - Sustainability Assessments: As one of the three statutory Consultees on SEA, we broadly support the approach which is outlined for the SA's of the RSS 2009 Update. This 2009 update gives an opportunity to review the approach in the light of the experience from the appraisal of the Plan. As you will be aware, English Heritage had a number of concerns about how effective the approach taken in the last SA/SEA had been in identifying the likely effects which the strategy might have upon the historic environment. In a large number of cases, it appeared that 'access' to the assets rather than their 'protection' or 'enhancement' which was the over-riding consideration in terms of assessing the impact of the policies and proposals of the RSS. In terms of the baseline data, targets and indicators for this work stream, the Assembly might explore the possibility of using a single dataset for all the regional documents. At present Yorkshire Futures produces an annual state of the region report which uses different indicators to those in the Yorkshire and Humber Plan which are different again from those in the RSS SA. Infrastructure: The CLG Practice Guidance on SHLAAs advises on the need to identify constraints which may preclude areas from being developed for housing. Whilst work stream 4 appears to be identifying infrastructure constraints, it is not entirely clear whether this work stream will also be seeking to identify wider environmental constraints (or capacity). In order for a robust analysis to be made of the possible options, such an assessment would appear to be essential at this stage.

## **Rotherham MBC – 15PP**

4.1 – No

5.1 – Yes: Electronic forms and/or email responses preferred to hard copy

6.1 - The timetable set out is very challenging. Accept that several informal consultation stages not possible but not convinced that relying on promotion of RSS Update by stakeholders (I.e. LPAs) is a noble alternative. Agree that the Assembly should focus resources on engaging stakeholders at strategic options stage.

## **West Yorkshire Housing Partnership – 16PP**

4.1 – No

5.1 – Yes

6.1 - In Yorkshire and the Humber, it is essential that housing growth is considered in the context of regeneration. This means a more creative approach than simply building new homes. Consideration needs to be given to re-using empty homes and counting these towards the growth targets. There is also a need to continue the regeneration of frail and failing housing markets and not undermine this with ill-timed or poorly located growth. Phasing of growth will therefore be crucial as will checks and balances to ensure that growth on the easier / more attractive sites does not take place straight away, so reducing the demand and increasing the turnover in other more fragile areas.

Housing growth is about more than numbers of units/number of bedrooms. In order to be inclusive of all sections of the community, creating good quality places needs to include access to the facilities and services that different groups require. Housing affordability has to be part of the planning equation, not least because this has implications for economic development. This place making agenda needs to be emphasized with the need to develop good quality places rather than growth at all costs. Consideration should also be given to the current (already challenging) RSS housing numbers and the recent market changes likely to affect these. There is also a need to take account of existing local, sub-regional and regional strategies.

Consideration needs to be given to the accommodation needs of disadvantaged people especially Gypsies and travellers – since:

- Gypsies' and Travellers' and Travelling Showpeople's accommodation needs are part of overall affordable homes requirements and wider housing growth and supply
- The Housing Act 2004 requires local authorities, to assess the need for Gypsy and Traveller (including Travelling Showpeople) accommodation in their areas, to then develop a strategy which addresses that need and to identify sites (land) in their Development Plan Documents (DPDs) in line with requirements specified in the Regional Spatial Strategy (RSS). Taking account of the relevant evidence, such as robust Gypsy and Traveller Accommodation Assessments (GTAAs), local authorities therefore require the support and guidance of the Yorkshire and Humber Plan in this area

- Planning legislation and guidance requires the YH Assembly – on the basis of assessed need – to determine how many pitches are required across the region and to specify in the Yorkshire and Humber Plan how many pitches should be provided in each LA area, ensuring there is collective and equitable provision which meets the assessed scale and pattern of need
- The current RSS Policy H6 Provision of sites for Gypsies and Travellers refers to addressing a shortfall of at least 86 pitches in West Yorkshire by 2010, based on a 2006 report by CRESR at Sheffield Hallam University. More recent sub-regional GTAA's supersede this with more accurate and detailed data. The West Yorkshire GTAA 2008-15 has been completed and can be forwarded to the Assembly shortly when WYHP's Board has agreed an action plan for its implementation
- It is assumed that planning inspectors will challenge LDFs / DPDs that do not take account of relevant, current, robust evidence such as the West Yorkshire GTAA and the RSS clearly forms part of the framework that should be updated, through the 2009 Update, to incorporate the GTAA evidence

Workstreams 3 and 4 should be merged, the locations of growth can only be considered in relation to the available and future infrastructure.

## **Department of Communities and Local Government – 17PP**

The timetable at the moment only shows those stages that YHA will be responsible for and so stops at submission stage, but the timetable should really show the whole process. This includes the stages through to publication, not least so it is clear to the reader when the RSS Update will be published. The final stages have been discussed previously and the timetable appears in various publications so hopefully it can simply be lifted and inserted, but let me know if you want the dates again.

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**Response to Yorkshire and Humber Plan 2009 Update.  
July 2008  
Project Plan**

Organisation Name: Environment Agency  
Address: Environment Agency, Rivers House, 21 Park Square South, Leeds  
Postcode: LS1 2QG  
Telephone Number: xxxx  
Email:xxxx

**Questions**

**1.1 How did you hear about the draft Project Plan for the 2009 Update consultation?**

Mail out and email

**2.1 Did you get involved in the preparation of The Yorkshire and Humber Plan (2004 – 2007)?**

Yes

**3.1 What is your interest (or who you represent's interest) in the draft Project Plan for the 2009 Update?**

a. Public sector

**5.1 The draft Project Plan includes a Statement of Public Participation, as set out as a table at the end of Section 5. Do you agree with the methods for engaging stakeholders?**

a. Yes

**6.1 Do you have any additional comments you'd like to make on the draft Project Plan? If so, please tell us in 500 words or less.**

We support recognition of the need to ensure the SA/SEA process carries weight. If used effectively it can be a useful tool in evaluating options for growth and for improving the Plan. We are also supportive of the need to engage stakeholders early in the process, especially given the short timescales involved for Update 2009, and we expect to begin working with the Assembly and others on the SA/SEA process soon.

We commend the Assembly's efforts to gather the evidence base needed to inform the 2009 Update - in particular the RFRA, Adaptation and infrastructure studies. We will continue to work with the Assembly on these projects, and the Review process in general.

While we appreciate there are short timescales involved, we would welcome the opportunity for consultation on and redrafting of the draft policies prior to formal consultation – and Examination in Public. We assume the Assembly will be maintaining regular contact with key stakeholders throughout the process.

We would like the engagement plan (referred to in Agenda item 8, annex 8), to set out how the Assembly intends to achieve the ongoing engagement of key stakeholders. This will enable such stakeholders (including ourselves) to plan their own effective involvement in the process.

## **RSS Draft Project Plan**

### **1.1 How did you hear about the draft Project Plan for the 2009 Update consultation?**

The draft was mailed out to North Lincolnshire Council.

### **2.1 Did you get involved in the preparation of The Yorkshire and Humber Plan (2004-2007)?**

North Lincolnshire Council were involved in the preparation of the Yorkshire and Humber Plan.

### **3.1 What is your interest (or who you represent's interest in the draft Project Plan for the 2009 Update?**

Public sector organisation (North Lincolnshire Council)

### **4.1 The draft Project Plan identifies a list of stakeholders (see Paragraph 37) which may have an interest in the Update of the RSS. Are there any other stakeholders you feel should be engaged in the process?**

No

### **5.1 How could we better engage with stakeholder during the update of the RSS?**

Public engagement is particularly important during the update of the RSS, people need to have a clear understanding of what the RSS is and what implications the plan will have for them. They also need to understand the relationship between the RSS and LDF.

North Lincolnshire Council feels the use of regional media, such as newspapers can be minimal as less of the community read them. The Council considers the use of local media to be a more successful consultation tool because more of the community will have a better opportunity to get involved.

### **6.1 Do you have any additional comments you'd like to make on the draft Project Plan?**

#### **Work stream 2- Scale and type of Growth**

The Council feel it is important that LDF Evidence Bases are used to influence this work stream, particularly Strategic Housing Land Availability Assessment, Water Cycle Studies and Strategic Flood Risk Assessments.

#### **Work Stream 3: Possible Locations of Growth**

The Call for Evidence is welcomed by the Council, however it is important that where Eco Towns and Growth Point Bids have been submitted the information already gathered is used in the decision making process.

#### **Work Stream 4: Infrastructure**

The Regional Integrated Infrastructure Scoping Study must be taken into account, as this piece of work highlights Growth Locations and defences.

This must also be considered alongside Work Stream 3.

#### **Work Stream 5: Adaptation**

Support in principle however consideration must be given to growth aspirations as flood risk is a huge issue for some Local Authorities in delivering growth in compliance with national and

existing regional policy. Mitigation measures will be an important factor and need to be given adequate consideration.

As stated in paragraph 12 it is important that work streams are not considered alone.

## **West Midlands Regional Assembly – 20PP**

The West Midlands Regional Assembly does not wish to say anything about the Project Plan but would still like to be informed of progress of the 2009 Update as things develop.

## **North East Lincolnshire Council – 21PP**

In respect of the Project Plan I would support the current proposals. As part of the public engagement I think it is imperative to fully engage with all key sectors who are on the frontline in providing housing, particularly the construction industry, infrastructure providers and providers of social housing. Their evidence is key in terms of scale of provision and location. The timescales for the provision will also need considerable and in depth evaluation as, clearly, the current annual RSS housing targets are likely to be significantly in deficit.

## Yorkshire and Humber Regional Plan 2009 Update Project Plan

### Workstream 1: Sustainability Assessments

We support the commitment in paras 15 and 16 to ensuring that the Sustainability Appraisal considers the likely performance of the revised RSS in relation to both climate change mitigation and adaptation and that regional emission reduction targets will continue to be included in the plan.

Encouraging cross-boundary working is particularly important in enabling climate change adaptation, as effective measures in relation to biodiversity will require working at a landscape scale.

### Workstream 3: Possible Locations of Growth

Policy ENV6 of the RSS gives strong protection to ancient woodland. This is supported by national planning policy in the form of PPS9. In revising the policies in the RSS, we would like to see more explicit protection given to ancient and veteran trees, which are included in PPS9 but not in the wording of policy ENV6,

We believe it is important that these policies are upheld in determining future locations for housing growth and we would like to see them translated into local development frameworks.

### Workstream 4: Infrastructure

Policy YH8 of the RSS already provides a strong policy on green infrastructure and we would like to see its provisions maintained and enhanced in the review.

GI should include a variety of different types of green space, so as to provide a strategically planned, multi-functional resource capable of delivering a range of ecological services and quality of life benefits to local communities.

We believe that trees and woodland can play a particularly important role as part of green infrastructure. Woodland has the ability to contribute to 10 of the 20 of the UK Framework Indicators of sustainable development, including contributing to biodiversity, reducing air pollution, improving health, education, employment, environmental equality, wellbeing and helping the economy grow.

The RSS already contains in Policy ENV6 a commitment to improving access to woodland by adopting the Woodland Trust's woodland access standard, with percentage targets attached to it:

We would like to see this standard and targets adopted by all local authorities in the region, particularly where new areas of housing are proposed, for example in the new eco-towns, for which two possible sites have been identified in Yorkshire and Humber region.

### Workstream 5: Adaptation

Enabling climate change adaptation is a further key benefit of having a well integrated network of green infrastructure.

Green infrastructure can enable adaptation by providing sustainable urban drainage, by providing a natural cooling effect (work at the University of Manchester has shown that trees in particular can have a significant cooling effect in urban areas) and allowing species to migrate in response to the impact of climate change. Improving the permeability of the landscape to wildlife by for example extending and re-connecting ancient woodland and other semi-natural habitats is of particular importance in enabling wildlife to adapt to climate change and we would like to see this given greater emphasis in the revised RSS. This can be informed by the findings of the regional climate change adaptation study which is about to be carried out by Royal Haskoning.

#### Section 5 : Consultation and Engagement

We would like to see NGOs such as the Woodland Trust specifically mentioned in the list of stakeholders in para 37. The Woodland Trust owns 85 sites in the region including 600 hectares of land and we have been very active in discussions on the RSS and other regional policy documents over many years.

## Response from Friends of the Earth on RSS Review Call for Evidence



**Friends of  
the Earth**

This submission considers the RSS interim review from the perspective of climate change which is the most important consideration for the RSS to address. It is not that other matters do not carry important weight but rather that they need to be 'folded into' a policy analysis centred on climate change.

In terms of the interaction between climate change and housing, in November 2007 Friends of the Earth published a major research report "Home Truths" – prepared by the Environmental Change Institute for Friends of the Earth and the Cooperative Bank. ([http://www.foe.co.uk/resource/reports/home\\_truths.pdf](http://www.foe.co.uk/resource/reports/home_truths.pdf)) We would urge that this RSS be informed by the findings of that report, and also the carbon footprinting work undertaken by SEI (in various publications).

### **The primacy of the climate change policy driver for RSS**

The primary lesson that we took from our contribution to the RSS process review undertaken by Arup last year was the necessity of starting an RSS review with some overview forecasting that integrated key trends: climate change emissions, economic growth, and in this case, housing/household numbers.

In the process that developed the RSS now adopted, the sequencing of this basic forecasting work went the other way round. Whilst it is true that economic and housing forecasts were inserted at the start, and subsequently drove policy development, emissions forecasts were not prepared; and in fact it was only **after** the RSS process had substantially concluded (after the Examination in Public) did the Assembly/Arup/SEI report reveal that the policy proposals contained within draft RSS would not only not contribute to the delivery of the climate change reduction target the RSS itself contained but could possibly even increase emissions generation. This amounted to a major policy process failure.

Consequently we strongly urge that the RSS process plan must start work with a review of these primary trend drivers, which need to be examined separately and then integrated. So far as climate change is concerned, this would involve 'picking up the story' from the Regional Assembly 2007 report, both in terms of its actual findings and also those recommendations that are relevant to an RSS. We think this is consistent with the proposals for 'Work Stream 1 Sustainability Assessments'.

A second lesson learnt from the last process is that the iteration between the transport

proposals and the spatial plan was not carried out effectively. Since transport is a principle component of sustainable location – which can work in a number of ways: for example, guiding the location of housing development towards sustainable transport nodes or corridors, or constraining development in locations where it seems unlikely that sustainable transport access can be provided – then we would urge that a formal stage when the transport iteration can be effectively carried out is securely located in the project plan. This would respond to the requirements of RSS para.13.4

## **Housing Issues**

There are three major considerations to be made when considering the sustainability and environmental impact of future development of housing in the Yorkshire and the Humber region. These are:

- Demand for housing and the quantity of new build
- Sustainable location of development
- Design quality

### **Demand for housing and the quantity of new build**

Each newly-constructed home results in a marginal increase in greenhouse gas emissions through the energy embedded in construction materials, energy consumed during the construction process and in the energy used by residents over the lifetime of the home.

It is therefore essential that new housing is only constructed when and where there is a real demand to meet a genuine social need. Much of that social need will be subject to market conditions. The Government's projected house building figures for the period of the RSS seem to be a substantial overestimate of the likely demand.

In fact, the period since debate around now adopted RSS finished has seen what amounts to a collapse in the 'supply side' model which has been required by the Government to determine the housing proposals. This model has two basic parts:

- The identification of a series of individual demand components for housing which when aggregated represents a large increase in the demand for new housing. These components include household formation; increased regional economic growth rates leading to inward migration; national nett inward migration; the requirements of affordability; and so on.
- The judgment that this large forecast increase in housing 'demand' then has to be met

by a matching large increase in supply. This was accordingly reflected in the housing numbers in Policy H1 and Table 12.1 which require an increase in regional annual additions from 15,000 to 22,000 with immediate effect from 2008. In fact, there has been a documented significant downturn in both starts and completions of house building in the region over the last few years. A 12% fall in house building starts between 2004/5 and 2007/8 has been followed with the commencement of a downturn in completions.<sup>1</sup>

Recent evidence from Stephen Nickell, the chair of the National Housing and Planning Advice Unit (NHPAU), has shown that this trend is likely to continue into the middle of the next decade making the projected new-build from the NHPAU of up to 30000 new completions per year in the region seem simply implausible.

At the same time as this change in market circumstances, the 'Housing Challenge' document is recording further increases to the regional economic growth rate and household formation rates. It is not clear how this widening gap can be bridged and whether some of these trends will deteriorate over the coming period. This will need to be the subject of particular examination.

This is not the place to examine the validity of the 'supply-side' model but it should be noted that the sudden and increasing collapse in both housing market demand, and consequently, house building supply, has *de facto* separated the housing number requirements of Policy H1 from the real world. With every year that the target of 22,000 additions cannot be achieved then the more unachievable the end total becomes. After just a few years of underperformance – which are by now almost certain – then no amount of increase in future year's provision can make up the shortfall.

We welcome the comment *Project Plan para.18* that the Assembly intends to 'test the advice' of the NHPAU; that testing needs to be robust.

This therefore poses the question of the realism of the overall housing numbers contained in adopting RSS – and of the demand components driving them - and extent to which a plan can continue which is divorced from the real world. It tends to strike at the very rationale for this Government-instigated immediate review of RSS: 'the need to increase the supply of new homes across England'. And then there are particular consequences arising. The discrepancy between the projected and actual figures will potentially lead to a failure to implement optimal spatial planning policy and, consequently, lead to significant environmental and economic inefficiency with social consequences.

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<sup>1</sup> House building completions data – March 2008. DCLG  
<http://www.communities.gov.uk/documents/housing/xls/837020.xls>

Economic cycles notwithstanding consideration now needs to be given as to whether the link between regional economic growth and housing growth is reliable both for the purpose of economic sustainability and for consistency with the imperatives of sustainable development.

House building on the projected scale will have significant impacts on the environment through loss of green infrastructure and greenhouse gas emissions (from both the housing and transport sectors).

In considering housing quantity, there is also a need to make the best use of existing vacant housing stock and previously developed land. In 2007, the region had over 76,000 vacant homes<sup>2</sup> many of which could be filled through and alongside regeneration programmes to meet housing demand in key areas and thus reduce the environmental impact of new build.

Lastly, our concern for social sustainability leads us to conclude that an alternative approach to responding to housing affordability needs to be examined. Whilst the decline in market prices will provide some general easement of pressures, there will be differential effects in different housing markets and it is likely that alternative approaches towards affordable provision will need to be considered.

### **Sustainable location of development**

Setting aside the question of whether the market will actually deliver increases in supply, the Housing Challenge document identifies four potential spatial and strategic approaches for consultees to respond to: 1. maintaining the current strategy; 2. major urban expansions; 3. new settlements; and 4. growth points and growth areas. We make some basic observations on these.

It seems unlikely that 'Eco towns' can actually meet their sustainability aspirations because intrinsically the requirement to create a new settlement separated from existing urban areas and associated employment is likely to build in emissions generation and probably also social separation. We indicated as such in our more detailed response regarding Rossington to the "Living a Greener Future" consultation.

Whilst the document also makes vague references to 'new growth points' and that 'we will be testing the advice and announcements from government ministers throughout the RSS 2009 update', we are not aware of any proposals for such growth points which have been publicly announced and made available for public consultation. So we would suggest under Approach 4 that the Assembly should now provide information on

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<sup>2</sup> Empty Homes Agency statistics 2007 <http://www.emptyhomes.com/documents/stats/yh07.pdf>

what and where these 'growth points' are. Without this it is of course impossible to comment.

This leaves two approaches remaining: the existing RSS pattern and Major urban expansions, defined as 'a small number of very large expansions at a more limited number of towns and cities'. The document provides no example of where this might be applied in Y&H; in order of magnitude individual expansions of between 2,500 and 10,000 are referred to. Immediately the only location where such proposals were contemplated during the last RSS were around Leeds as regional centre. It will be interesting to see whether housing developers will want to be supporting such proposals with enthusiasm this time.

The last approach 'Maintaining the current strategy', as described, has particular advantages. The document talks of: 'The emphasis is placed on the continuing transformation of existing towns and cities. Making the best use of brown field sites and opportunities is the first priority ... A transport oriented approach [focuses] development where best use can be made of existing infrastructure and capacity'. These criteria have a lot to commend themselves.

However, and as a general statement, it will still be necessary to test the particular locational choices included within adopted RSS to establish whether they are genuinely sustainable. The previous process in our view did not permit sufficiently detailed scrutiny e.g of the Airedale growth location (policy LCR1 E) 4 BP1 and we would request that the opportunity to do that this time is provided.

Making some general points, reducing emissions from transport is essential to achieving optimum reductions in greenhouse gas emissions.

For this to happen, spatial planning is necessary to guide both the location of housing development and its accessibility and proximity to essential services and employment opportunities by sustainable modes of transport. The recent supplement to PPS1 on climate change<sup>3</sup> requires Regional Spatial Strategy to provide a framework to focus substantial new development on new locations that have good accessibility by modes other than private car (para 13).

This is optimally done through the development of previously developed 'brownfield' sites as part of existing communities rather than separate locations. This development should be sited close to employment and services or to key public transport hubs – failure to plan for this will lead to a higher level of car dependency and consequent greenhouse gas emissions.

### **Design quality and type of provision issues**

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<sup>3</sup> <http://www.communities.gov.uk/documents/planningandbuilding/pdf/ppsclimatechange.pdf>

Regional strategy should drive and support ambitious measures to reduce the amount of greenhouse gas emissions from housing. The 2007 Arup study<sup>4</sup> identified a significant role in reducing greenhouse gases from housing by increasing the energy efficiency of new housing stock. The report assumed compliance with the relevant Code for Sustainable Homes (CSH) standard. Regional Spatial Strategy should encourage developments which go beyond the CSH standards.

RSS should also encourage the development of decentralized energy by encouraging the implementation of the so-called Merton Rule by local authorities whereby for larger developments a specific level of energy consumed is required to be generated from renewable sources on site.

The energy efficiency of housing is very dependent on the size of houses constructed. Part of the rationale for the growth in homes is the projected increase in single person households, and particularly of pensioner households. In the last 3 RSS processes we have identified this particular characteristic as important and worthy of detailed scrutiny and policy response; however this has not happened. In our evidence to the last Examination in Public we identified some of the analysis linking single person households to sustainability and emissions performance. We would urge the Assembly to include this issue within their policy development. This change might be reflected in the potential to build smaller, higher density homes which would lead to a substantial energy saving compared to single households occupying larger homes; and more collective provision particularly suitable for elderly people. For further information on good quality housing design, refer to our "Home Truths" report.

## **Summary**

Housing has a major impact on overall sustainability and our environment which can be minimized by ensuring the right numbers are built in good locations, to a high design quality with readily available amenity and services meeting social need.

Failure to do so reduces the region's ability to move toward sustainable development operating within environmental limits and handicap the region's response to climate change and role in safeguarding and enhancing our biodiversity.

Friends of the Earth recommends that the new-build projection figures reflect a robust evidence base based on genuine social need for housing within a low carbon economy and which contributes to the sustained downwards emissions trajectory that will be required by the forthcoming Climate Change Act, rather than a high carbon GVA-centred growth agenda which is not consistent with sustainable development.

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<sup>4</sup> Evaluating the Contribution that Key Regional Strategies Make Towards Addressing Climate Change – May 2007

<http://www.yhassembly.gov.uk/dnlds/Contribution%20of%20Key%20Regional%20Strategies%20Towards%20Addressing%20Climate%20Change%20-%20full%20report.pdf>

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## **Dacre, Son and Hartley – 24PP**

More direct consultation with landowners/developers pursuing schemes which in combination are strategic in nature

## **Leeds City Council – 25PP**

As you will know this authority has consistently raised concerns regarding the scale of growth promoted in RSS for housing in particular. We have been, and continue to be, concerned that the rate of growth is unrealistic, will put unnecessary pressure on greenfield sites (and greenbelt) and is not accompanied by a clear infrastructure delivery plan.

Whilst recognising that the RSS is a long-term plan our concerns are exacerbated by the current economic climate which is likely to see a downturn in housing delivery in the short to medium period. Indeed there is the real prospect that housing output will fail to catch up with the total requirement by 2026. We should be attempting to minimise the shortfall in delivery rather than developing proposals for even more unrealistic levels of growth.

This Council supports the approach of RSS in concentrating development on the main urban areas, recognising the regeneration challenge faced by many authorities. We would therefore suggest that the RSS update focus on the delivery of this strategy. This would complement the work being done in individual local authorities through their LDFs. Certainly, in Leeds, we do not yet have a clear view on the location and delivery of development which will emerge through our Core Strategy.

As you know we are still to complete various elements of our evidence base, including the SHLAA and PPG17 audit. We will be happy to share this work the Assembly as it develops but there are concerns that the tight timescale for the update creates difficulties in this respect.

You will also be aware of the City Region work on New Growth Points and Ecotowns and we are still awaiting the government's response. In terms of the approaches referred to in the Call for Evidence, then I would reiterate that this Council believes the update should concentrate on the delivery of the Core Approach in RSS and what this means in practice. In reflecting current RSS targets in Leeds we are already contemplating a mix of the approaches in the Call for Evidence. Our East Leeds Extension is likely to be larger than many of the examples given but at the moment there is no commitment to the sort of infrastructure improvements that will accompany those schemes. Aire Valley is a suggested New Growth point.

Overall the scale of growth in Leeds far outstrips somewhere like Ashford but we have not benefited from the same kind of financial support. This Council is happy to work with the Assembly through the various officer and member mechanisms to shape the RSS Update along these lines.