

Appendix I. Rapid feedback on pre-draft RSS

INITIAL SEA/SA FEEDBACK ON 'DEVELOPING THE REGIONAL SPATIAL STRATEGY' CONSULTATION DOCUMENT DEC. 2004

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The aim of this note is not to 'appraise' the consultation document, but rather to give early feedback on it: what aspects are unclear and what additional information may be helpful, and whether any parts of the document are obviously unsustainable or unrealistic. It takes on board a very rushed two-day appraisal, and will take on board comments from Monday's SEA steering group meeting. I plan to carry out a sustainability appraisal of that more finalised consultation document.

I have focused my comments and appraisal on Sections 1-5 of Annex B(2), in particular Table 7 and Section 5. Sections 6 and 7 present housing and economic models (not outcomes): I propose to only briefly check whether there are any obvious sustainability problems with them. Section 8 proposes that the Green Belt and transport infrastructure remain substantially the same. I plan to discuss at the steering group meeting whether/how this should be appraised.

Overall

- This possibility of giving early feedback is very valuable from an SEA/SA perspective. It must be difficult for the RSS team to take time from strategy development in order to allow the emerging document to be appraised and discussed, and they should be commended for doing so.
- The RSS team should also be commended for being willing to change tack substantially since the vision document, and open the debate about scenarios. The current document responds very well to the SEA/SA requirement to consider options. It is in many ways a model of how options should be considered at a regional level.
- The document is very readable and clearly structured.
- It clearly takes on board the findings of the previous SEA/SA stages and consultation comments.
- The idea of documenting the drivers, needs etc. for the area as a whole and for each sub-area is very good, and provides a useful basis for the scenario development.
- The document is delightfully jargon-free (no mention of 'sustainable communities' though 'connectivity' still rears its ugly head from time to time).
- It should act as a very useful basis for discussion about the future of the region.

Context (bits that are unclear)

The document basically hangs together very well and is clearly written, and the following points are for fine-tuning purposes only:

- The first few sentences of the document plunge the reader right in at the deep end. 1-2 very introductory sentences are needed at the very beginning, e.g. "This document consults on a range of issues arising during the development of the RSS for Y+H."
- Section 4 does not reflect the team's extensive discussions about what the implications of each regional approach (A-C) would be for the different sub-regions, so that the document (incorrectly) looks as though the region is being planned primarily at the sub-regional level. Should the document include a brief explanation of the links between the regional and sub-regional approaches?
- Section 4 currently has no associated consultation questions, e.g. "which outcome do you prefer and why?" Should it do so?
- The links between Table 8 and the 'strategic issues' and 'issues arising' for each sub-area are not clear. Does this require 1-2 sentence of explanation?
- The strategic issues identified for the Vale and Tees sub-area are rather cryptic: for instance it is not clear to me how the A1 East Coast Mainline corridor is an 'issue'. It would be helpful to see a few more words of explanation around each of these.

Gaps and initial bits that could be added

The document seems to take little or no visible action to take on board regional-level problems of:

- waste and resource consumption
- rural and urban landscapes
- ageing of population

Table 8 is essentially a little SWOT analysis of each sub-area, and will provide a very useful basis for the sustainability appraisal. I have looked at the key SEA baseline information documents¹ and added some supporting data and additional points to the table (in italics).

I have also highlighted points in the table that I did not understand: for instance, it was not clear to me how to interpret 'Cleethorpes transport

¹ Yorkshire Forward (Nov. 2004) *Information baseline of the Yorkshire and Humber Region: Description of the baseline for the purposes of the sustainability appraisal of the Regional Spatial Strategy*; Yorkshire Forward SEA Geographical Information System data; YHY (Nov. 2004) *Sustainability appraisal of the Yorkshire and Humber Regional Spatial Strategy: Stage 2 Scoping Report* (2004)

corridor' as a driver. It would be helpful to see a few more words of explanation around each of these.

Table 8: Key development influences in each sub-area

italics = suggested additions

highlights = not clear to me: add a brief explanation?

Sub-Area	Drivers <i>and opportunities</i>	Needs	Constraints
The Coast	<ul style="list-style-type: none"> • <i>Attractive</i> environment & settings • <i>Potential for offshore</i> energy • <i>Potential for more</i> conference trade • Scarborough York corridor • Bridlington • Driffield/Hull corridor • <i>Potential for more</i> outdoor recreation • Cleethorpes transport corridor • Influence of Hull Humber City Region • <i>Agriculture, biofuels?</i> 	<ul style="list-style-type: none"> • Economic diversification – structural decline of traditional industries • Deprivation (<i>IMD does not suggest that deprivation is a particular issue along the coast</i>) • Connections with the wider region: <i>limited road and particularly rail access</i> • <i>Need for affordable</i> housing • <i>Improved health in northern part of sub-area</i> 	<ul style="list-style-type: none"> • Coastal erosion • Flood risk along Humber • Managed retreat • National Park, SPA, SCA, SSSIs in north of sub-area • Heritage coast • Ramsar site in south of sub-area • Nitrate vulnerable areas in south of sub-area
The Humber Estuary	<ul style="list-style-type: none"> • Urban areas of Hull, Scunthorpe and Grimsby as critical masses of activity • Humber Ports • Humberside Airport • Multi modal transport links • High demand areas • Hull Humber City region • Links to Doncaster & Finningley • <i>it's not clear to me what the points above would DO as drivers</i> 	<ul style="list-style-type: none"> • Economic diversification • <i>Tackling of</i> deprivation, particularly in Hull and Grimsby • <i>Increased</i> housing demand • <i>Improved standards of</i> education & health in Hull and Grimsby areas • Affordable housing 	<ul style="list-style-type: none"> • Flood risk • Water <i>resources already over-committed</i> • Humber estuary: 15,000 ha Ramsar site in west of sub-area, and the area is sensitive to eutrophication • Managed retreat • Landscape • Air quality (<i>baseline does not suggest that this is particular problem</i>) • Nitrate vulnerable area through much of sub-area

Sub-Area	Drivers <i>and opportunities</i>	Needs	Constraints
Vales and Tees Links	<ul style="list-style-type: none"> • Demand for housing from commuters from Tees city region • North south road and rail transport corridors • Tourism • High quality environment 	<ul style="list-style-type: none"> • Economic diversification with reliance on traditional industries • Affordable housing north and east, and fringe of Leeds City Region • East--West transport links and relationship with rural areas 	<ul style="list-style-type: none"> • Localised floodplain constraints • Air quality – A1 corridor • Local heritage significance at Richmond and Ripon • Geological constraints at Ripon • <i>National Park/SPA/SCA/ SSSIs in north of sub-area</i> • <i>Nitrate vulnerable areas throughout much of sub-area</i>
Remoter Rural	<ul style="list-style-type: none"> • Tourism • Agricultural diversification, <i>biofuels?</i> • High quality environment • Forestry 	<ul style="list-style-type: none"> • Local employment • Sustaining <i>and improving access to</i> local services • Access to larger centres • Affordable housing 	<ul style="list-style-type: none"> • National Parks/SPA/SCA, AONBs • Flood risk • <i>Need for catchment management: no additional groundwater resources available, and additional surface water resources available only in west</i> • Relative isolation: <i>high access deprivation (IMD)</i> • Topography, particularly its impact on communication links

Sub-Area	<i>Drivers and opportunities</i>	Needs	Constraints
Leeds City Region	<ul style="list-style-type: none"> • Scale and potential of the City of Leeds economy • The potential regional role of Leeds city centre • The multi-centred nature of the area • Public transport infrastructure • Extensive areas with high demand for housing • High investment levels in business • A critical mass of services for local communities and for business • The strategic transport network • Leeds/Bradford airport 	<ul style="list-style-type: none"> • Further economic diversification • <i>Improvements to significant areas of deprivation (overcrowding, inadequate housing, health deprivation, educational deprivation)</i> • Areas of both low and high demand for housing • <i>Improved housing demand</i> • <i>Improvements to areas of degraded environment in coalfield and urban fringe areas</i> • Improving economic performance to match comparable European cities • <i>Reduced congestion and improved connectivity/ access</i> • Needs of distinct communities and centres of the main urban areas of Bradford, Halifax, Huddersfield, Leeds, Wakefield and York and towns such as Harrogate, Skipton and Selby 	<ul style="list-style-type: none"> • Flood risk • Contaminated land • <i>Poor air quality (nitrogen oxides)</i> • Topography and landscape • Heritage – particularly the setting of York and the character of historic market towns • City of York heritage • <i>SPA/SCA in west of sub-area</i> • <i>educational deprivation</i> • <i>poor standard of housing</i>

Sub-Area	Drivers and opportunities	Needs	Constraints
South Yorkshire	<ul style="list-style-type: none"> The role of Sheffield as a core city The roles of Barnsley, Doncaster and Rotherham <i>Economic spin-offs from? universities and key clusters</i> <i>Robin Hood Airport</i> Links to adjoining subregions and the East Midlands. Demand for out of town/centre locations Areas of high housing demands 	<ul style="list-style-type: none"> Economic transformation, diversifying the employment base. <i>Improvements to areas of multiple deprivation: housing, education, health</i> <i>Areas of low and high demand for housing</i> Holistic regeneration of the former coalfield areas including Dearne Valley Improved internal and external connectivity; <i>the need to improve connectivity, in some areas by private transport</i> 	<ul style="list-style-type: none"> <i>Poor air quality</i> Flood risk, particularly along Rivers Dearne and Don. Area to east of Doncaster is all floodplain Some major areas of brownfield land in unsustainable locations Area to west of Sheffield is SPA/SSSI <i>Over-committed groundwater resources and limited additional surface water resources</i> <i>Nitrate Vulnerable Area through much of the sub-area</i>

Bits that are unsustainable or unrealistic

Big sustainability problems/issues with document (from analysis below) are:

- Scarborough-York corridor should not be a corridor
- The Goole-Hull 'corridor' should not be a site of major development because of its significant environmental constraints (flooding, Ramsar).
- The A65 and Skipton/Settle/Bentham 'rail corridor' (with one train every 3-4 hours at peak time) should be developed only to support local needs beyond Skipton.
- Northallerton should not be considered as commuter suburb for Teeside
- Several of the towns proposed for the York hinterland would not be sustainable as dormitory towns for York
- Generally should more development be promoted on the coast, given lack of accessibility and environmental constraints?
- Need for Leeds and S Yorks sub-areas to stress regeneration of areas of multiple deprivation more?

I have only commented on some strategic locations, i.e. there are not comments for all of them.

Coast

Role of settlements/general:

- Do all scenarios need to more clearly take on board constraints posed by flood risk and Ramsar site at south of sub-area?

- This sub-area (like the others) focuses on growth/development. But accessibility throughout the area is poor, and environmental constraints reasonably high. Should emphasis be on consolidation or even shrinkage?
- The effects (if any) of changes to agriculture (e.g. biofuels) and offshore energy don't seem to feature: should they?

1. Whitby: ... is in a National Park, hard to get to (especially by train: only a few trips per day), with excellent water quality. Should all scenarios take this on board more? In particular, should Scenario A really 'improve connectivity' with the Tees city region when this would essentially mean driving more cars for 30 miles through the NP? If so, should this be on condition that train services are radically improved?

2. Scarborough:

- ... is 40 miles from York by road, and one train service per hour which takes more than 45 minutes. There is only Malton in between. Journey goes through Howardian Hills, which aren't designated but having to climb hills would further increase emissions. Rural and urban landscapes are a regional-level issue. Does one really want to think of a 'Scarborough York corridor'?
- For the same reasons, conference facilities might pose sustainability problems: conferences invariably mean large groups of people... how should they get there?

3. Bridlington Driffield:

- Bridlington is 30 miles from Hull along A165. Driffield is 'only' 22 miles, but along a more convoluted network of smaller roads. Train services are half-hourly and take respectively 45 and 30 minutes. Should links to Hull really be emphasised (certainly less of a problem than Scarborough-York)?
- There is an SCA off Bridlington, and coastal water quality is quite high and improving: environmental constraints, particularly for Scenario C.

4. Cleethorpes: ...is virtually surrounded by areas that are vulnerable to flooding, and coast is SPA, Ramsar, SSSI. Likely to constrain development.

Humber Estuary

This is an area which is sensitive to eutrophication: does the RSS need to say anything specific about farming and sewage treatment around the estuary?

1. Wider Hull: Need to emphasise regeneration more in Scenarios A and C?

2. Scunthorpe/Doncaster/Finningley: See S. Yorks. 3a. Finningley = Robin Hood: need for consistency.

3. Immingham/South Humber (and 5. Humber Ports): This is an area of high multiple deprivation, but Immingham has quite a good record of moving

things inland by train, and the quality of the water in the Humber Estuary has been improving. Focus Scenario A more clearly on dealing with deprivation; is Scenario C too negative about the impacts of development around the port?

4. Goole-Hull corridor: This is one big Ramsar site, the whole area is vulnerable to flooding, and there is no need for major regeneration. the 'multi-modal transport links' are the M62 and a train service which runs every 45 minutes: I wonder which people would use if given the choice...? I cannot see major development as being sustainable in this area (Scenario A), nor the promotion of 'multi-modal movement along the corridor' (Scenario C) as doing much more than increasing car traffic. All the scenarios should be much clearer about the very significant environmental constraints of the area.

6. Humberside Airport: What is the airport's regional-level role expected to be? Would it be expected to provide links to London, e.g. as alternative to train or motorway? The answers have obvious sustainability implications.

Leeds City Region

Role of settlements/general:

- Given the relative deprivation of the region, should all of the scenarios put more emphasis on regeneration, improved housing conditions, training/ education, improved health?
- No mention of the 'needs of distinct communities' highlighted in Table 8: should there be?
- What is distinction between 'market housing' and 'commuter housing'?
- Specify what 'accessibility' (Scenario B) means: presumably private *and* public transport?
- Should all scenarios for development of towns focus on maintaining/ achieving a minimum standard of service provision, e.g. they are service centres for their hinterland?
- No mention of Leeds-Bradford Airport. Does there need to be?

1. S and SE of Leeds: what are 'sustainable locations'? Locations easily accessible by public transport? not in environmentally sensitive areas? near amenities?

2. Aire Valley:

- Does it make sense to include Skipton in this sub-region? characteristics (reasonably well-off, quite isolated) seem more in keeping with rural region.
- Environmental constraints (Keighley Moor SCA, SSSI etc.) could limit potential for greenfield development for Scenario A.

3. W of Leeds:

- Scenario A seems descriptive of conditions – "Market interest... smaller settlements". What would this mean in terms of RSS?

- Scenario B: What does “Protect the supply of employment land” mean: provide a generous amount?

4. York, Harrogate, Skipton

- No mention of tourism: should there be?

5. Big cluster of transport links:

- Given the particular concentration of multiple deprivation in this area, should there be more emphasis on regeneration etc.; and also on improving air quality?
- Given the concentration of development already in the area, I’m not sure that Scenario C should limit development: should it take advantage of its centrality aim to balance housing and jobs, promote live-work facilities, and improve services?

Remoter rural

“Linkages between the western part of the sub-area and the Leeds City Region and adjoining regions” (summer consultation document) would almost inevitably be in the form of roads.. through the National park. Does one even want to consider this, given the environmental sensitivities, that there is little real deprivation (other than access) deprivation in the area, and that plenty of development is being proposed elsewhere? Would such links really support *local* economic activity, or simply make it easier to commute to Leeds? Can social cohesion be promoted in other way?

1. York hinterland:

- Area to the east side of York has no additional surface or groundwater resources available: should development there be constrained?
- I’m not at all sure that all the settlements listed should be considered as part of the York hinterland, so that e.g. housing would be encouraged for people who work in York (all scenarios):

town	distance by road (mi)	type of road	time by train	frequency of trains	notes
Malton	18	A	30 min	hourly	NOT SUSTAINABLE: car much more likely than train, long car journey
Selby	14	A	30-60 min	every 20 min	NOT SUSTAINABLE: OK-ish transport-wise: frequent trains, car journey shorter. But much of it is prone to flooding
Haxby	5	B		none	OK, especially if cycle routes were improved
Easing.	13	A		none	Hm. Perhaps just about OK
Stamford Bridge	7	A		none	OK transport-wise, especially if cycle routes were improved. Problems with water provision.
Market	20	A		none	NOT SUSTAINABLE: only car

town	distance by road (mi)	type of road	time by train	frequency of trains	notes
Weighton					journeys possible, and car journeys would be long. Problems with water provision.

2. York/Malton/Scarborough & 3. York/Driffield/Bridlington: see Coast 2 & 3.

5. A65 and Skipton/Settle/Bentham rail corridor: The rail provision in the 'rail corridor' is one every 3-4 hours at peak weekday time, and takes more than an hour from Settle to Leeds (about 50 miles, further to Bentham). Skipton is much better: more than one train per hour, about 20 miles). Air quality in the Leeds area is already bad. Any development beyond Skipton should support only *local* needs.

South Yorkshire

Water resources are likely to pose a real constraint for this sub-area. Growth in water demand (e.g. through new housing, economic changes) should at minimum be balanced out by reduced water demand in other activities (e.g. existing housing and businesses).

Role of urban areas: Considerable areas of multiple deprivation (housing, health, education) in Barnsley, Sheffield, Doncaster. Emphasise need for renewal more in all scenarios?

Role of dispersed settlements: Acknowledge constraints of Peak District NP to west of Sheffield; floodplain to east of Doncaster

Connectivity: Air quality in the sub-region is already poor. Consider just how much additional 'connectivity' is possible? e.g. types of improvements to motorways.

3. Robin Hood Airport: What is the airport's regional-level role expected to be? Would it be expected to provide links to London, e.g. as alternative to train or motorway? The answers have obvious sustainability implications.

3a. Doncaster/Robin Hood/Scunthorpe: Almost the entire corridor is at threat from flooding. Hatfield Moors to S of M180 and Thorne Moors to N of M180 are SCA/SPA/SSSI. I'm not sure that Scenario A is feasible, particularly due to the flooding.

5. Dearne Valley etc.: Much of the Dearne Valley is prone to flooding. Is Manvers Lakeside within floodplain?

6. Rotherham:

- Not sure what “Examine implications of emergence of Sheffield-Rotherham-Doncaster corridor” means (also under 2. Doncaster).
- I couldn't find Waverley on the map, so not clear how sustainable it is as a location for a manufacturing park.

7. M1/M18: Junctions 33 and 34 of M1 are at risk of flooding: not sure whether development should be promoted near them.

Vale and Tees

1. Northallerton & Tees: Unsure what ‘market housing’ means. Given that Northallerton is 25 miles from the Tees city region with (at present) only hourly train services, and that transport in the region is already perceived as a problem, should any scenario consider Northallerton as a commuter suburb for the Tees city region?

2. Richmond/Catterick: Given the relative isolation of Richmond and Catterick, should any scenario consider something other than a balancing of any imbalance in housing v. employment for the Richmond/Catterick area?

3. Ripon: There seem to be no major environmental designations... remove from Scenario C?