



Transport Activists' Roundtable North West

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Thursday, July 16th, 2009

Dear Michael,

REQUESTED COMMENTS ON DRAFT RS2010 PROJECT PLAN

Thank you for your invitation to comment on the draft RS2010 Project Plan prepared by 4NW, the Leaders' Forum, and the North West Development Agency.

The North West Transport Roundtable would like to make the following remarks:-

Introduction

The opening phrase/statement reflects only half of what the new single integrated regional strategies are legally required to be about. The Local Democracy, Economic Development and Construction Bill describes the regional strategy as setting out:

*"(a) policies in relation to sustainable economic growth in the region and
(b) policies in relation to the development and use of land in the region".*

(Local Democracy, Economic Development and Construction Bill, Part 5, 65 (2), p.44)

The land use element is crucial and therefore the opening statement should be amended to:

"The Regional Strategy (RS2010) will become the statutory document setting out the 'blueprint' for sustainable economic growth and land use in England's North West".

A similar description should apply to references in other documents/consultations.

The 'Introduction' and the 'Scope' sections both explain that the North West is pressing on with the new regional strategy ahead of legislation being enacted but do not explain why this is the case, nor why the whole process is being approached at a breakneck speed - especially as the North West Regional Spatial Strategy (RSS) was only adopted last Autumn and other regions are further behind in their preparations.

N.B. Typographical error in the second sentence of the fourth paragraph on page 2.

The word *revising*' (prior to the words *'Part 1'*) should be *'revised'*.

continued ...

Scope

The description of the scope of the strategy is couched in terminology which might be expected from a Regional Economic Strategy, not in a way appropriate to a spatial planning document which gives equal weight to economic, social and environmental issues. Even the Third Sector is only referred to in terms of encouraging it to invest in the region, rather than to its crucial community role. There is no reference whatsoever to protecting those things which are worth preserving, such as biodiversity, landscapes and important open spaces, nor to community inclusion, quality of life, sustainable lifestyles or health. The statement about 'the approach' at the top of page 4 particularly needs amending to incorporate these facets.

Evidence Base

The *'large and comprehensive'* evidence base being assembled is almost entirely economic based and/or economically biased. The early evidence-based papers which were published and consulted upon and responded to by members of North West Environment Link last year lacked breadth, depth and balance and borrowed nothing from the RSS. Subsequent evidence papers, in the main, exhibit greater insights and a better knowledge-base, but have had no or token input from the environmental and social/voluntary sectors. The emphasis to date has been on stockpiling an economic evidence base. This should now be matched by a commitment to assemble evidence drawn up from a social and environmental perspective and representatives from those sectors should be involved in commissioning them.

Typical among the specially-commissioned documents assembled thus far is one on the 'Manchester Growth Corridor' which addresses a sub-regional area similar to that highlighted for development by the North West Development Agency during the run-up to the previous spatial strategy (RPG 13). The 'Mersey Belt Southern Crescent' was the title awarded to it then. This was dismissed by a panel of planning inspectors at the subsequent examination in public into the Draft RPG/RSS who agreed that the need was to focus development aspirations on areas of need, requiring regeneration. Notwithstanding that, this same area has now been focused in on again in a specially commissioned appraisal from SQW Consulting. It is notable that nowhere in their 84-page report are the words 'Green Belt' even mentioned – and yet there are significant swathes of Green Belt in the study area. This speaks volumes about the general approach and lack of concern for designated areas.

Principles and Issues Paper

The NW TAR responded to the consultation on the Principles and Issues Paper. We flagged the need for the new Regional Strategy to adhere to the UK's Guiding Principles of Sustainable Development and to focus on qualitative as well as quantitative measures, pointed to the government's goals of a low carbon economy, argued against dealing with stressed parts of the transport network by providing more highway infrastructure, called for more emphasis on sustainable transport and smart choices and objected to the proposed review of the Green Belt. As we commented then, Green Belt can be built upon using the 'exceptions' argument. That is sufficient.

Development of Part 1 & Part 2 of RS2010

The text in both sections promises to embed within the Regional Strategy those strategies currently being developed within the City Regions and other North West sub-regions. It should be noted that these are being formulated behind closed doors without wider stakeholder input. Whilst there are statutory requirements for wider involvement in Local Development Frameworks and Regional Strategies, this does not apply for the sub-regional level. A series of 'Multi-Area Agreements' (referred to later in the Draft Project Plan) are being drawn up and endorsed in a most opaque and undemocratic manner.

Publication of Draft RS2010 and Examination in Public process

This section of the Project Plan mentions “*the Sustainability Appraisal (et al) and Habitats Regulation Assessment reports*”. Precisely what this covers is explained later under a separate side heading of ‘Sustainability Appraisal’. We would add to the list of checking processes ‘climate-proofing’ and the need to submit the draft plan to the region’s sustainability toolkit.

Who is Responsible?

Regardless of the very large and unwieldy Regional Strategy Advisory Group, the two key bodies responsible for producing the new Regional Strategy are the Development Agency and the Regional Leaders Forum. The economic focus of the Development Agency must not be allowed to dominate the proceedings and the outcome. The essential balance which was obtained through the previous RSS processes must be retained.

Preparing the Evidence Base

The Project Plan returns to this subject and commits to preparing a comprehensive evidence base. We can only refer to our earlier comments on this subject (on page two).

Sustainability Appraisal

We note the composition of the Sustainability Appraisal Steering Group and would argue that, in view of the statutory requirement for the Regional Strategy to comply with climate change requirements, there should be an impartial climate change expert on the group. It should be noted that the Local Democracy, Economic Development and Constitution Bill requires that the strategy includes “*policies designed to contribute to the mitigation of, and adaptation to, climate change*”. (Part 5, Regional Strategy, 65(4)).

Adhering to the Project Plan

It is apposite to point out here that the Project Plan for the last Regional Strategy process was rendered irrelevant part way through its gestation when the NWRA Planning, Environment and Transport Key Priority Group was stood down and not replaced with anything. We trust that, this time around, once a (well balanced) Project Plan, which allows for full input by the voluntary and environmental sectors, is agreed it will be adhered to.

Recommendations

1. Descriptions of the RS2010 should include a reference to land use as required by the Local Democracy Bill
2. The timetable must allow for full inclusiveness and for a balanced evidence base to be assembled
3. The approach and the scope need to be amended to include references to protecting landscapes and other environmental assets worth protecting and to making commitments regarding quality of life, sustainable lifestyles, health and supporting the voluntary sector
4. The focus should be on carrying forward the extant Regional Spatial Strategy, not re-writing the RES
5. There should be a commitment to submitting RS2010 to the sustainability toolkit and to climate proofing and to an impartial climate change expert serving on the Sustainability Appraisal Steering Group
6. The Project Plan, once agreed, should be adhered to

Yours sincerely,

LILLIAN BURNS