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TAR

Transport Activists' Roundtable North West

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cc Debra Holroyd, NWRA

Mr. Alex White,
Project Manager,
Sustainability Appraisal, Partial Review of the NW RSS,
Scott Wilson,
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Sunday, May 11th, 2008

Dear Mr. White,

Sustainability Appraisal for the NW Regional Spatial Strategy Partial Review

This is a response on behalf of the North West Transport Roundtable (NW TAR) to the invitation to comment upon the Scoping Report – Sustainability Appraisal for the Partial Review of the Regional Spatial Strategy. Our comments are below.

Access to the Consultation Material

NW TAR have complained in the past about the lack of genuine inclusivity with regard to consultations on regional planning documents. There has been an increasing over emphasis on electronic consultations and this one even contains an element of exclusion within that mode. Respondents wishing to view or print out the maps associated with the Sustainability Appraisal are required to access them from a different source than the main report. They are not only referred to the NWRA extranet, which itself is exclusive, but to the Executive Board part of it which is even more exclusive. This is completely unsatisfactory. There should be more open access to the relevant material and paper copies should be available.

Acronyms

AONB stands for Area of Outstanding Natural Beauty (p.3). Insert missing word.

1. Introduction – ‘Integration of Assessments’ and also ‘Background’

Fig. 1 (p.7), is a different **Fig. 1** than the one offered on the NWRA extranet (ie. That one is the Indices of Multiple Deprivation). Similarly **Fig. 2** (p.9) is different from **Fig. 2** on the extranet (crime figures). This is unnecessarily confusing.

1. Introduction - The Partial Review – ‘Revision of District Housing Figures’

Para. 1.4.7 The extraordinary leap in proposed housing figures is due to a blind acceptance by the government of the seriously flawed Kate Barker report which, amongst other things, failed to take into account the 700,000 empty homes in the UK and made the assumption that providing vast numbers of new homes would lead to more affordable ones. The expectation still prevails that developers will be prepared to provide significant numbers of affordable homes, despite evidence to the contrary. NW TAR do welcome, however, the injection of

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realism in this paragraph which the reference to environmental capacity brings (p.11).

1. Introduction - The Partial Review - 'Growth Points and Eco Towns'

Para 1.4.8 The Eco Towns text needs up-dating to reflect the current situation.

continued ...

2. Sustainability Appraisal

Para 2.1.3 The statement is erroneously made (p.14) that Scott Wilson is following the guidance for assessment of RSSs as published by the DCLG. This is in fact not the case. The number of bodies invited to contribute to this consultation from the voluntary and environmental sectors is nominal and not

in the spirit of the wider stakeholder demanded by the guidance published in 2005 which requires “a *balance* [of consultees] *between those concerned with social, environmental and economic issues*” (para. 2.2.20, p.27 – Consulting on the Scope of the SA). For instance, the ‘Non statutory consultee list’ provided in Debra Holroyd’s e-posting on the NWRA extranet on April 4th is disingenuous because it implies that a degree of open discussion which has actually taken place. The scoping report on the SA for the Partial Review of the NW RSS could have been an agenda item for the Regional Transport Advisory Group meeting which took place on April 29th, during the consultation period, but it was not. It could also have been an agenda item for the Regional Planning, Regional Housing and Regional Transport Group meetings taking place only three days after the minimum period of consultation recommended for this process, but it is not. Writing to individual members of these bodies is one thing, but not allowing members of them the opportunity to engage in a frank and open debate – even when they happen to have well-timed meetings when such discussions could have easily taken place – passes up on excellent chances to engage and share perspectives. It also means that it will be entirely inappropriate to claim that these groups, as opposed to some individuals on them, have approved the scoping report.

Also, **Fig. 3** (p.14) does not concur with **Fig. 3** on the extranet (Barriers to housing and services). Nor does **Fig. 4** (p.15) concur with the extranet **Fig. 4** (Education & Skills Training).

3. Stage A - Table 2

It is notable that the ‘Key Messages’ table fails to contain one reference to any publication by the government’s own Sustainable Development Commission in the national list and the regional list fails to provide a reference to the region’s sustainability checklist (p.18-21).

Figs. 5 & 6 In the SA report (p.30) do not concur with **Figs. 5 & 6** from the NWRA extranet (Employment and Health Deprivation and Disability respectively).

Landscape

Para 3.3.16 The reference is provided here to **Fig. 8** as illustrating the Areas of Outstanding Beauty [NB. the word ‘*Natural*’ is missing from between ‘*Outstanding*’ and ‘*Beauty*’]. However, the **Fig. 8** which is used on page 33 of the SA actually shows Joint Character Areas. There does not appear to be a reference in the text to Joint Character Areas. This needs remedying. Also, this again does not concur with the maps downloadable from the NWRA extranet. Of those, the map of AONBs is **Fig. 9** and the Landscape Character Areas map is **Fig. 12**.

Flood Risk

Para 3.4.1 It is not at all apparent why only the number of dwellings is required. Should there not also be an assessment of the number of health and educational premises and food manufacturing plants?

Key Issues (A3)

Para 3.4.2 This refers to the Indices of Multiple Deprivation (on p.35) as being illustrated in **Fig. 9** which appears on the following page (p.36). However, confusingly, this is **Fig. 1** on the NWRA extranet.

Appendix 1 – Plans, Policies & Programmes Reviewed

The North West Food & Health Action Plan (pub. Jan 2007) should be removed from the bottom of the National **Spatial Level** list and inserted in the **Regional Spatial Level** list (p.51).

Yours sincerely,

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