



# Transport Activists' Roundtable North West

[www.nwtar.org.uk](http://www.nwtar.org.uk)

## NW TAR CORE GROUP

### Convenor:

#### LILLIAN BURNS

Director, TravelWatch NorthWest/  
CPRE NW Regional Group  
25 Heybridge Lane,  
Prestbury Cheshire SK10 4ES  
t: 01625 829492  
f: 01625 828015  
e: BrLln@aol.com

### Members:

#### DAVID BUTLER

CTC Right-to-Ride representative  
10 Gladstone Grove  
Stockport, SK4 4DA  
t: 0161 432 4611  
e: dsbutler@ntlworld.com

#### PETER COLLEY

Federation of Cumbrian  
Amenity Societies/ NW ACTs  
Friends of the Lake District  
12 Rawes Garth  
Staveley Cumbria LA8 9QH  
t: 01539 821629  
e: colleygarth@btopenworld.com

#### JANET CUFF

Ramblers Association/ CPRE  
33 Tatton Road North  
Stockport SK4 4QX  
t: 0161 431 7654  
e: Janet.Cuff@talktalk.net

#### ADRIAN DUNNING

NW Association of Civic Trusts  
11 Crombouke Fold, Worsley  
Manchester M28 1ZE  
t: 0161 790 9507  
e: ajdunning@gmail.com

#### SANDRA DUTSON

NW TAR Treasurer/ Road Peace  
12 Queenscroft,  
Eccles, M30 9QQ  
t: 0161 707 3546  
e: smdutson@btinternet.com

#### HELEN RIMMER

North West Campaigner,  
Friends of the Earth  
60 Duke St Liverpool L1 5AA  
t: 0151 707 4328

### Webmaster:

#### GRAEME SHERRIFF

e: Graeme@edibleecosystems.net

Environmental Assessment Team,  
Department for Communities and Local Government,  
Zone 1/J6, Eland House,  
Bressenden Place,  
London, SW1E 5DU.

Saturday, December 29<sup>th</sup>, 2012

Dear Sir or Madam,

## REVOCATION OF NORTH WEST REGIONAL SPATIAL STRATEGY

### Over-arching comments

**The North West Transport Roundtable**, an umbrella body that promotes sustainable transport and healthier lives, responded to the first DCLG consultation on the revocation of Regional Spatial Strategies (RSSs) and on the North West of England plan exactly a year ago. In doing so, we mounted a defence of RSSs because our experience of working with the regional agencies and being closely involved in the RSS process was primarily a positive one. We were not alone in this experience, nor in our opinion that regional strategies have been largely beneficial. Therefore, it is a source of regret that the Coalition Government's determination to do away with RSSs has not wavered

As the latest DCLG consultation document itself acknowledges, the Coalition Government has, from the outset, adopted a determinedly negative approach towards RSSs, making numerous statements that encompass them all and many promises to do away with them completely. And, indeed, the first one - the East of England RSS - has now been annulled. However, whilst there are many factors common to all RSSs as they all had to abide by certain over-arching criteria, the fact of the matter is that they are all individual legal entities. They each had to go through their own separate formal processes which culminated in separate examinations in public (EiPs), separate panel reports and separate final, endorsed, documents that set the planning policy framework for all Local Plans and Local Transport Plans in their region.

There were aspects to each RSS which were not agreeable to environmental non-governmental organisations (NGOs), such as the North West Transport Roundtable (NW TAR), but there were also aspects to each that were laudable. The balance in each case differed. In this region the 'North West of England Plan' had far more aspects to it that were agreeable from an environmental perspective than were disagreeable. The NW TAR took a very active part in the process with its own seat at the EiP table on many matters and it also interacted via North West Environment Link (NWEL) of which it is a member.

Whilst the housing numbers discussed through the NW RSS process were considered to be on the high side, they were not judged to be unrealistically high - as was the case in some regions - and whilst there were road schemes listed that NW TAR opposed, because all the local highway authorities in the region had to confine their major infrastructure aspirations to a mutually agreeable overarching strategy, there was a sanity check in place. The housing, transport and other RSS policies had to sit within frameworks that encompassed environmental capacity and protection and which took on board the need for a balance between economic, environmental and social matters. Local authorities were required to work with all other local authorities in their region (not just those they had borders with as is required by the 'duty to co-operate') and to observe best practice and work towards it themselves. It was a process that had bedded in and was working well at the time funding was withdrawn for the regional institutions that supported it. In addition, environmental NGOs had a firm stake in the process as members of the SEEP (Social, Economic and Environmental Partners) consortium, and felt that their points of view were afforded some weight. This wider stakeholder involvement has now been lost.

### **What are the likely effects of the plan to revoke the NW RSS and the reasonable alternatives?**

Explaining why there would be significant negative effects if the RSS was revoked, the current consultation document states:

*"The Government encouragement to increase the supply of new housing and promote economic growth is likely to lead to a requirement for a significant amount of construction aggregates and materials. Similarly increases in households could lead to increases in waste"* (page xi).

Although the text goes on to place a positive spin on the "likely" minimisation of negative effects through the application of the National Planning Policy Framework (NPPF) and DEFRA's National Waste Policy Review, the fact of the matter is that government pressures to build, aligned to the requirement for local authorities to have a five year housing supply plus a 5% buffer, is leading to a growing raft of planning permissions being granted around the country which will place a high demand on construction aggregates. And many of these developments are in unsustainable locations. Local authorities that do not have Local Plans in place are rushing to produce them and are aspiring to high levels of development in an attempt to assuage government pressure and, as RSSs fall away, they will not have that all-encompassing framework to ensure their plans retain a realistic balance. Planning inspectors, under instruction from government, are rejecting Local Plans that do not meet the government's pre-determined levels of growth. This prompts the obvious question - where is the 'localism' in this approach? At a higher level than UK political feel-good catch phrases such as 'localism', there is the issue about whether the direction the government is headed measures up to European Union Law Directive 2001/42, Article 1. It states

*"The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.

The current pressures for economic growth at all costs appear to be losing sight of this basic requirement and it is very disturbing. Although, since the NW TAR made its last submission on the revocation of RSSs a year ago, the final version of the NPPF has appeared and it includes some improvements on the draft, it fails to provide the necessary restraining measures which will ensure environmental capacity is not over-reached and the necessary protection measures for the countryside. Also, since then, Local Enterprise Partnerships (LEPs) have been given even more powers (including a key role transport decisions) and access to new funding streams and yet they have not been made any more democratic, accountable or transparent to the public.

The NW TAR do not agree with the key conclusion of the consultation document – that there would be more positive effects to revoking the NW RSS than there would be negative effects. We find the summary table conclusions (NTS 2) bear no resemblance to where benefits have been achieved under the RSS regime, nor to what is happening now. Local authorities are not setting for themselves high brownfield building targets (which the RSSs did) and the NPPF does not require them to do so. We are already witnessing what the effects of revocation would be.

A prime example of how local authorities are approaching the weakened planning system is the way in which one of the larger Unitary Authorities, Cheshire East Council, is currently behaving.

Cheshire East is on the verge of launching a public consultation into its Development Strategy (ie. the preferred options stage of its first Local Plan). The strategy documents are already displayed on its website prior to the opening of the consultation ([www.cheshireeast.gov.uk](http://www.cheshireeast.gov.uk)). Up to the end of the period that would be covered by the RSS, if it remained in place, Cheshire East is seeking housing figures that equate to the RSS. Beyond that it is seeking a significant rise in housing numbers. In order to find the land for the high housing and employment growth aspirations, the proposal is to remove large areas of Green Belt from the North and, in South Cheshire, there is a strange proposal for a Green Belt 'swop' (which defies Green Belt purposes). This, despite the fact that the RSS says there is no need for a strategic review of the Green Belt in the foreseeable future. In addition, the panel which sat in judgement at the EiP into the NW RSS told Cheshire in 2007 that it was holding too much employment land - 28 years' worth - which would take it to beyond the period of the forthcoming Local Plan. The panel instructed Cheshire to release some of this land allocation for housing and for other purposes. In direct contravention to this, Cheshire East is aiming for a huge increase in employment land and it is proposing several new strategic roads without providing adequate evidence of need. If the RSS is removed, where will the restraining policies be that would ensure environmental capacity is considered and a sensible balance is struck between economic desires, environmental concerns and social needs/ impacts?

The NW RSS directs that development should be focused on the main conurbations and major towns and, in order to ensure the regeneration of towns and cities was given priority over green-field development, it requires very high levels of building on previously developed land. This was particularly appropriate in this region because the North West has more brownfield land than any other region. (It also has more empty homes than any other region). This crucial focus on regeneration is going to be lost and it will become easier to build on greenfields. The result will be sprawl into the countryside and more unsustainable movements of people and goods.

The government should be espousing the benefits of 'Smart Growth' ([www.smartgrowthuk.org/](http://www.smartgrowthuk.org/)) and requiring local authorities to demonstrate they are making efficient use of land, which is a finite resource. If the RSSs are removed, the government needs to come forward with amendments to the NPPF and/or to the Growth and Infrastructure Bill which require development to be primarily concentrated in compact urban areas that are laid out to enable good public transport and encourage walking and cycling. This reduces the need for new infrastructure necessitated by sprawl. The policies that will be left if the RSSs are removed are no longer adequate to ensure that genuine sustainable development will be achieved. NW TAR do not support the revocation of the NW RSS – the North West of England Plan. We trust these comments are of some value.

Yours faithfully,

**LILLIAN BURNS**

Convenor, NW TAR

E-mail: [BrLlln@aol.com](mailto:BrLlln@aol.com)