

**REGIONAL SPATIAL STRATEGY: FURTHER PROPOSED CHANGES –
RESPONSE OF THE CITY COUNCIL.**

REPORT OF THE DIRECTOR OF DEVELOPMENT AND REGENERATION

1.0 Purpose of Report

1.1 The Secretary of State's Further Proposed Changes to the Draft Regional Spatial Strategy (RSS) were published for consultation on 6th February by Government Office North East (GO-NE). This report highlights specific issues resulting from the modifications which are of significance to the future development and land use within the City. Comments on these matters have been forwarded to GO-NE to meet the consultation deadline of 2nd April 2008 and endorsement is sought for the officer response.

2.0 Description of Decision

2.1 Cabinet is requested to recommend the council to endorse the response to the further proposed changes to the RSS, as attached in the appendices to this report.

3.0 Background and Current Position

3.1 The RSS sets out a long-term strategy (2004 – 2021) for the development of the region and provides the spatial context for the delivery of other regional strategies. The RSS is part of the statutory Development Plan process and Local Planning Authorities must ensure their Local Development Frameworks are in general conformity with the RSS once it is adopted.

3.2 The Submission Draft of the Regional Spatial Strategy (RSS) for the North East was published in June 2005. A Panel appointed by the First Secretary of State conducted an Examination in Public (EiP) of selected issues arising out of the Draft of the RSS. Following the EiP a Panel Report (July 2006) was produced delivering key recommendations for the policies, guidance and allocations within the Draft RSS.

3.3 The Secretary of State (SoS) published Proposed Changes in 2007 incorporating many of the Panel's recommendations. Cabinet on 12 September endorsed an officer response made on behalf of Sunderland City Council as well as a jointly agreed response prepared by Sunderland in discussion with the other Tyne and Wear districts.

3.4 The SoS has now published further proposed changes for consultation taking account of representations made at the previous stage.

3.5 The Director of Development & Regeneration has submitted an Officer response to meet the consultation deadline, as outlined below. The response also includes an agreed joint response on matters of common interest to and on behalf of the five Tyne & Wear districts.

4.0 Previous response to the Proposed Changes RSS (2007)

4.1 Key issues within the previous response

i) Housing

The Proposed Changes included a regional increase from 107,000 dwellings to 112,000 dwellings to reflect revised population projections and an assumed economic growth rate. For Sunderland there was a modest increase from 11,130 dwellings to 12,060 dwellings.

The Tyne & Wear Districts jointly submitted the view that an increase in the region of allocations to 118,000 net additional dwellings may be acceptable, if necessary to achieve economic growth, and that growth should be focussed in the sustainable core areas of the Tyne and Wear and Tees Valley city regions.

The Tyne & Wear position was that the housing policy should ensure allocations are in proportion to the levels of employment in the four sub-regions of the North East.

In respect to the City of Sunderland, it was requested that the overall allocation should be increased to 15,150 net additional dwellings by 2021.

ii) Economic Development

The Council and other Tyne Wear Authorities were concerned particularly about the lack of explicit definition of prestige employment sites, in terms of the types of employment that they may seek to accommodate; and there is a risk that out of centre locations would still be favoured over city and town centre sites for offices.

It was the joint Tyne & Wear districts' view that employment provision should be increased in the conurbation to compensate for the impact caused by the loss of Tyne Wear Park and to meet projected needs.

Sunderland's allocation of general employment land within the RSS should be significantly increased to an amount able to allow the City to provide for the period to 2021.

iii) Hetton le Hole / Houghton le Spring

Hetton-le-Hole and Houghton-le-Spring should be included as part of the conurbation – and hence be available for strategic growth if necessary, rather than just 'indigenous' growth

iv) Other Matters

Other matters of concern to Sunderland and the other Tyne & Wear Districts related to waste management, in that regional waste targets have not yet been incorporated into the consultation process.

5.0 Main changes and issues arising from the RSS Further Proposed Changes

5.1 The most significant elements of the officer response comprise that:

- The RSS is too long, repetitious, overburdened with lengthy and unnecessary description, making it difficult to identify the strategic issues.
- The Secretary of State's statement of reasons fails to adequately summarise the responses to the Proposed Changes, nor does it in general provide suitable justification for the individual Further Proposed Changes.
- Control over the development of land, particularly of Greenfield sites, is considerably weakened through changes to Policy 4 which could be to the detriment of heavily urbanised districts reliant on brownfield development such as Sunderland.
- The Tyne and Wear districts object to the re-inclusion of major, largely Greenfield, employment sites in peripheral and unsustainable locations in the region, particularly the inclusion of very large, formerly 'reserve' sites into the mainstream of allocations.
- The term 'core regeneration areas' that refers to areas such as central Sunderland, where the arc has been set up to pursue regeneration, have now been taken out of all policies. It is felt that this significantly dilutes the focus of policies aimed at regeneration of the core localities of Tyne and Wear (and Sunderland).
- Sunderland maintains its request to have Hetton and Houghton re-designated as part of the Tyne and Wear conurbation.
- The City Council wishes to ensure that the potential shortfall of employment allocations in the three districts south of the Tyne is recognised in RSS to provide flexibility to respond to forthcoming 25 years employment land assessments. Only with such caveats in place would it be acceptable to support the proposed increased land allocation to Sunderland.
- The net additional housing allocation for the region has been increased to 128,860 dwellings. The Tyne and Wear districts maintain their view that 118,000 would be an acceptable figure. The number now proposed, whilst increasing the allocation for Tyne and Wear also increases allocations in the shire counties and the potential for those districts to bring forward unsustainable Greenfield sites that would divert market interest away from the regeneration of the conurbation. The allocations outside the Tyne and Wear sub-region are weighted towards the early part of the plan period which could help exacerbate the above situation.

- Notwithstanding, the allocation to Sunderland equates to 14,960 dwellings and this is considered acceptable in relation to the 15,150 requested at the Proposed Changes stage.
- Further clarification of policy 32 is requested to the wording concerning the provision of land for gypsies and travellers.
- Sunderland and the other Tyne and Wear districts object to the weakening of Policy 39 for renewable energy and seek the re-instatement of targets for the provision of on-site renewable energy generation capacity in major new developments.

5.2 The detailed submissions on behalf of both the City Council and the joint Tyne and Wear districts are attached in Appendix 1 and Appendix 2.

6.0 Next Steps

6.1 The Secretary of State will give consideration to responses submitted to the consultation and publish the final RSS, expected later in 2008. On publication the RSS will formally become part of the Sunderland development plan. As such it will carry full weight in determining planning applications. Also development plan documents being prepared as part of the Sunderland Local Development Framework, such as the Core Strategy, must conform to adopted RSS policies.

7.0 Reason for Decision

7.1 To ensure a consistent and direct involvement in the development of the RSS, and through proactive participation ensuring that policies and guidance promote the wider socio-economic growth and sustainability objectives of the City Council.

8.0 Alternative Options

8.1 Cabinet could choose not to support the officer response to the proposed modifications of the RSS. Withdrawal of the response would weaken the Council's position in influencing the development and delivery of policies, guidance and allocations, in accordance with the previously agreed Council position.

9.0 Relevant Consultations/ Considerations

- Financial Implications** – Submission of response to the proposed modifications to the RSS will not involve any direct costs.
- Legal Implications** – None.
- Policy Implications** – The RSS is part of the statutory Development Plan, the City Council will ensure the emerging Local Development Framework's general conformity with the RSS.

- d) **Consultations** – The RSS has been prepared following the statutory consultation requirements of Planning Policy Statement 11 Regional Spatial Strategies (Annex D), the City Council is directly involved within the consultation process in the formulation of the RSS.
- e) **Sustainability Appraisal and Appropriate Assessment** – A Sustainability Appraisal (SA) and Appropriate Assessment (AA) are an integral part of producing the RSS, and have been published by GO-NE. The findings of the SA and AA are available to assist stakeholders and the public in considering their options and further developing the RSS.

10.0 Background Papers

Regional Spatial Strategy for the North East – Submission Draft
(North East Assembly, June 2005)

Regional Spatial Strategy for the North East – Examination in Public
March – April 2006
(July 2006)

North East of England Regional Spatial Strategy – The Secretary of
States Proposed Changes to the Draft Revision Submitted by the North
East Assembly
(May, 2007)

The Secretary of State's Further Proposed Changes to RSS (February
2008)

PPS11: Regional Spatial Strategies
(ODPM, 2004)

Sustainability Appraisal of Regional Spatial Strategies and Local
Development Frameworks
(OPDM, 2004)

Contact Officer: Barry Luccock (0191) 553 1577
Barry.luccock@sunderland.gov.uk

APPENDIX 1

Regional Spatial Strategy Team
Government Office for the North East
Citygate
Gallowgate
Newcastle upon Tyne
NE1 4WH
Tel: 0191 202 3528



By Post and E-mail

Date: 2 April 2008
Our ref:
Your ref:

Dear Sir

North East of England Regional Spatial Strategy ~ The Secretary of State's Further Proposed Changes to the Draft Revision Submitted by the North East Assembly.

I would thank you for the opportunity to comment on the above document.

Please find attached a schedule of responses submitted on behalf of Sunderland City Council. These will be shortly be considered and endorsed through the Council's own committee cycle.

You will also be in receipt of Joint Responses from the Tyne and Wear Authorities. Those comments are fully endorsed by this Council.

I trust the comments are self explanatory, but should there be any issues, please do not hesitate to contact Neil Cole (Planning Policy Manager on 0191 553 1574).

Yours faithfully

Phil Barrett
Director of Development and Regeneration

Tel :

0191 553 1501

E-mail

phil.barrett@sunderland.gov.uk

The North East of England Regional Spatial Strategy ~ Further Proposed Changes (February 2008).

Detailed Response of Sunderland City Council

General Comments

The City Council reaffirms its previous objections regarding its overall length, having increased from 131 pages (November 2004) to 257 pages in this version. Accepting this draft contains text that will be deleted from the final adopted version would still mean the final document will be considerably lengthy (in excess of 200 pages). Given the new streamlined system, the RSS will be considerably longer than its predecessor, RPG1.

The RSS is too long because it : -

- o It continues to be overburdened with lengthy and often unnecessary descriptive detail, particularly in the supporting text. This makes it extremely difficult to identify the real strategic issues for the region
- o There continues to be significant repetition throughout the document in both the policies and supporting text eg Policies 2, 2A and 3 all make reference (in)directly to minimising development in floodrisk areas. Yet Policy 37 deals specifically with the issue of floodrisk.

It is considered that the RSS as currently drafted does not meet the tests of PPS11 and is therefore **OBJECTED** to on the grounds that its current length and format do not provide the necessary clarity required of a development plan document.

Specific Policy Comments

Policy 2 ~ Sustainable Development

At FPC10, the City Council **OBJECTS** to the inclusion of Criterion [i] ie "to increase public involvement in decision-making and civic activity". Its principle is not in question, although its relevance in the RSS is questioned given that all authorities have their own adopted Statements of Community Involvement to cover this issue.

That said, the RSS does little to engender credibility of the RSS process and in fact deters the public from getting involved in the process. The Statement of Reasons to this Draft have summarised responses to the point that they are meaningless. The justification itself similarly fails to adequately address how individual comments have been analysed and taken forward and is completely 'silent' on why a number of objections have been dismissed eg the joint Tyne and Wear response to housing at Policy 30. Equally, the Justification for many of the changes are so inadequate, they give rise to further ambiguity.

Policy 4 ~ Phasing and Plan, Monitor and Manage

As currently worded Policy 4.3[c] (FPC17), is ambiguously worded and is effectively unimplementable and is therefore **OBJECTED** to. The principle is supported but it requires additional text setting out clear and consistent guidance regarding : -

- what such assessments should or could contain
- how the policy will be put into affect at a spatial level eg is it to be implemented at a district level or housing market area level and how it is related or indeed differs from the requirements Policy 6.1[c]
- who will be the principle guardian / enforcer of the Policy.

The City Council further **OBJECTS** to the deletion of the reference to assessing the impact of major Greenfield proposals on meeting previously developed land targets of the City Region. Deletion of this reference significantly weakens the key objective of the Locational Strategy / Policy 3 which is to prioritise the re-use of such sites. It is requested that the reference is reinstated. The City Council endorses the separate objections from both the North East Assembly and the joint Tyne and Wear districts.

A major issue of inconsistency arises between Criterion [c] and its supporting text at para 2.17 and para. 1.78 (concerning growth assumptions) (FPC7). The former references suggest that there will be instances where major Greenfield allocations will be required (hence the need for Criterion [c]). However in accepting the NEA's justification for an increased regional housing total, para 1.78 summarises the NEA's response by stating that : -

*“They advised that sufficient land had been identified in recent urban capacity studies to accommodate this scale of growth, **and that no major Greenfield allocations would be required with this level of growth.** In each sub-region the PDL targets set out in the RSS could be met or exceeded”.*

This is a key issue which requires further clarity as it is central to the long standing objections submitted by the Tyne and Wear Districts to the housing distributions of the other sub-regions and the impact this would have on realising the RSS's fundamental objective of delivering the renaissance of the conurbations. Either there will be a need to consider major Greenfield allocations or there won't. The Tyne and Wear districts remain unconvinced that the latter will prevail and given the NEA now requests that reference to PDL targets be reinserted at criterion [c], one must question the validity of para. 1.78 and the NEA's evidence.

Policy 5 – Locational Strategy

The City Council **OBJECTS** to the deletion of : -

- *“Core regeneration areas. These are areas within the two conurbations which have special priority for regeneration in terms of regeneration or economic development”* at para 2.30 (FPC19)
- The reference to *“particularly within the core areas”* within Policy 5 (FPC20).

The Statement of Reasons are unclear and appear to be without evidential backing as to why these changes have been made *ie* they merely state *“In view of Clarity and Representations”*.

In spatial planning terms, these references provided the precise level of guidance needed in a regional document to differentiate the priorities for the City Regions, conurbations and urban areas. Given this is the overarching policy to deliver the RSS, their deletion further weakens the corresponding City Region Policies 6 and 7. It is therefore requested that these references be reinstated.

Policy 6 - Tyne and Wear City Region

The City Council **OBJECTS** to the deletion of “*City Region’s core areas*” at Policy 6.1[a] (FPC31) for those reasons set out to Policy 5. Whilst reference to River Wear Corridor in Central Sunderland is made at Policy 6.19A bullet two, the cumulative effect of corresponding deletions at Policies 5 and 12 serve to further dilute the broader RSS strategy. It is requested that the opening limb of Policy 6.1A be reworded to state “...*Giving priority to the regeneration of the City Region’s core areas :-.....*”

The City Council **OBJECTS** to the deletion of reference to Sunderland Housing Group (now Gentoo) from the 6.3[a]. Gentoo are a strategic delivery agency of housing market renewal across the whole City with demolition / replacement programme of some 6,000 properties and modernisation programme of the remaining 30,000 properties. Recognition of their role therefore needs to be reflected in the RSS on a par with the other delivery agencies.

The City Council notes the deletions (in bold) at Policy 6.1[c] to Regeneration Areas only accommodating “*regeneration and development....for sustainable **indigenous** growth ~~to meet local needs~~ without adversely impacting on the regeneration initiatives within the Tyne and Wear conurbation*” (FPC32)

The City Council firstly **MAINTAINS ITS OBJECTION** to the continued inclusion of Hetton and Houghton within the list of “Regeneration Areas” that are the subject of this criterion. These towns are within the City of Sunderland which itself forms part of the Tyne and Wear conurbation. Hetton and Houghton have far greater physical and functional relationships to what the RSS currently defines as the ‘conurbation’ than less centrally located Regeneration Areas of Consett, Stanley and Crook have to the existing Tyne and Wear conurbation. This is particularly important given they contain major strategic employment centres of Rainton Bridge and Doxford Park. To group Hetton and Houghton with the other listed settlements would fetter the strategic role these areas play for the wider sustainable regeneration of the conurbation as a whole.

The City Council therefore requests that either the Houghton and Hetton are : -

- included as part of the conurbation at para 2.30 or are treated or
- are subject to separate criterion at Policy 6 to reflect their physical and functional relationships to the wider Sunderland area.

The City Council **OBJECTS** to Criterion 6.1[c] as it is considerably weak, ambiguous and lacks clarity on how it can be consistently applied. Additional text is required setting out clear and consistent guidance regarding : -

- o what such assessments should or could contain
- o how the policy will be put into affect at a spatial level eg is it to be implemented at a district level or housing market area level and how it is related or indeed differs from the requirements Policy 4.3[c]
- o who will be the principle guardian / enforcer of the Policy ie will every authority outwith the conurbation require such assessments for schemes over 10 dwellings and will they be in the best position to judge its impact on the housing market restructuring / regeneration initiatives of the conurbations ?

Failure to put in place such clear measures could render the Policy being ignored to the detriment of the overarching RSS objectives.

Policy 12 - Sustainable Economic Development

Consistent with the above comments to Policies 5 and 6, the City Council **OBJECTS** to the deletion of the reference to “core areas” at 12.1[a] (FPC50).

Policy 18 – Employment Land Portfolio

Recognition is welcomed to the expected shortfall in employment land within Tyne & Wear. However, to ensure the ongoing availability and deliverability of employment land in Tyne & Wear over the 25 year period, the City Council **OBJECTS** to para 3.30 as currently worded (FPC56). It is requested that the text in bold be inserted at the end of the third sentence to read : -

*“Whilst a critical review should be undertaken, there are indications that a potential shortfall of employment land exists in Tyne & Wear to 2021, **in order to provide for a 25 year supply of employment land, there is could be a requirement for new allocations in the three Tyne & Wear authorities located South of the Tyne (Gateshead, South Tyneside and Sunderland)**”.*

The City submitted robust evidence to the RSS Proposed Changes (using 25-year employment land take-up rates adapted to the assumed 2.8% GVA growth figure to formulate the expected take-up rate of employment land in the City). This illustrated the expected shortfall of employment in the City over the plan period. This method was used in the Core Strategy Preferred Options which identified a need for some 260ha. However, it is unclear in evidential terms why only an additional 30ha has been apportioned to Sunderland giving an employment target of 225ha.

The City Council would wish to reaffirm the position that the Port of Sunderland has in the past been labelled as one of the largest brownfield sites available. This is incorrect given that the majority of the Port is operational with little capacity to accommodate further additional development.

Whilst the City recognises that the Sunderland LDF should aim to conform to the RSS and that the current employment land allocation within the Draft RSS is lower than the emerging Sunderland LDF (Core Strategy), for these to be aligned it is considered prudent to provide clear and robust evidence demonstrating how the current employment land has been achieved. This would allow the City to review the current employment land allocation in the emerging Core Strategy and recognise any ability to conform to the current RSS allocation.

The City Council would only be prepared to support the 225ha allocation on the basis that RSS recognises the necessity to plan-monitor-manage the employment land portfolio, and to provide the ability to remain flexible with the allocation and development of sites within the plan period. To that end it is requested that an additional criterion be added after 18.2[e] to read

“f) the need for Tyne & Wear to meet any shortfall in employment allocations recognised in the local employment land assessment through identifying additional allocations”

Policy 19 – Key Employment Locations

The City Council notes that the overall employment land requirement has increased by 340 hectares (as reflected at Policy 18). However, the City Council **OBJECTS** to additional increases in employment land and the reintroduction of ‘Reserve sites’ (that now fall under the banner of Key Employment Locations) (FPC60 and 61). These Greenfield sites were either previously deleted by the Proposed Changes (eg Heighington Lane West and Faverdale) or restricted in size (eg NETPark). It is considered that the additional Greenfield peripheral growth would : -

- Lead to an oversupply of employment land in non-central locations contrary to the locational strategy at Policy 5
- Is contrary to the RSS’s acknowledged position that there is already an oversupply of employment land in Northumberland, Tees Valley and Co Durham
- Dilute the Tyne and Wear conurbation’s role as the region’s principal economic driver
- Exacerbate high levels of unsustainable travel around the North East

The re-introduction of these sites have not been adequately evidenced by the NEA and the Secretary of State in reaching this further change.

It is further noted that the Glossary retains the definition of “Prestige Employment Sites”. Given this terms is now replaced by “Key Employment Locations, the glossary change needs. This is therefore **OBJECTED** to.

Policy 30 - Gross and Net Dwelling Provision

It is noted that the reference is given in the supporting text (para 3.71) that the gross and net dwelling requirements are guidelines which is a reflection of PPS3. However the City Council **OBJECTS** to the reference that "...LDFs may make the case for higher figures as appropriate" (FPC77). It is considered that it is too open ended and would undermine the whole RSS strategy. The City Council would endorse those representations recently submitted by the NEA and the joint response of the Tyne and Wear Authorities.

The City Council **SUPPORTS** the housing requirement (14,960) set for this District which broadly reflects the requirement set out in the emerging Core Strategy (December 2007).

However, the City Council maintains its **OBJECTION** previously submitted to the RSS Proposed Changes concerning the NEA's evidence for supporting a higher regional housing requirements and the distributions that it proposed. The City Council strongly endorses the joint representations submitted by the Tyne and Wear Authorities on this matter.

The City Council is particularly concerned that the Strategy for 'managing down' housing delivery outwith the Tyne and Wear conurbation post 2011 will never be realised : -

- If authorities across the region are permitted to flagrantly treat the RSS district apportionments as 'guidelines' (FPC77)
- If as we enter an economic downturn, developers will continue to favour the easier to develop the more marketable greenfield sites outwith the conurbation and not take up the more challenging brownfield sites in the core urban areas
- When the RSS is subsequently reviewed. As evident during the preparation of this RSS housing requirements have inflated across the Region, without any bearing on the Locational Strategy, in light of more up to date population / household projections. There is strong concern that the same issues will arise
- If the Growth Point bids outwith this conurbation are accepted.

Policy 32 – Improving Inclusivity and Affordability

The City Council **OBJECTS** to the inclusion of data and Table taken from the Gypsy and Traveller Accommodation Study at Policy 32 (FPC82-84). Given that Policy 32.3 by its own admission states that authorities should carry out their own assessments it would appear confusing and potentially contradictory should further assessments identify different requirements. For example, the Tyne and Wear study is expected in Autumn 2008.

Given that authorities are required to accommodate their own needs, it is unclear why and how the groupings of authorities have been made.

Policy 39 – Sustainable Energy Consumption

The City Council **OBJECTS** to changes set out in Policy 39. This considerably weakens the Policy in terms of the promoting greater resource efficiencies through the BREEAM / Code for Sustainable Homes and in the removal of the 10% embedded renewables minimum target for major developments. Consistency, is required as to how these will be implemented across the Region, which will not be the case if left to independent LDFs.

The City Council would endorse the representations of the NEA and the joint Tyne and Wear Response on this matter.

Regional Spatial Strategy Team
Government Office for the North East
Citygate
Gallowgate
Newcastle upon Tyne
NE1 4WH



Date: 2 April 2008
Our ref: BL
Your ref:

Dear Sir

CONSULTATION ON RSS FURTHER PROPOSED CHANGES

Thank you for your consultation on the Secretary of State's Further Proposed Changes to the RSS, published on 6th February 2008.

On behalf of the Tyne and Wear districts please find attached a synopsis and detailed schedule of our joint concerns to the Further Proposed Changes. These jointly held concerns do not replace or supersede any responses you may receive separately from the individual Tyne and Wear districts on local issues.

We await the outcome of the consultation with interest.

Yours faithfully

A handwritten signature in purple ink that reads "Phil Barrett".

Phil Barrett
Director of Development and Regeneration
Direct Line 0191 553 1502
E-mail Phil.barrett@sunderland.gov.uk

NORTH EAST OF ENGLAND REGIONAL SPATIAL STRATEGY
SECRETARY OF STATE'S CONSULTATION ON FURTHER PROPOSED
CHANGES

JOINT RESPONSE OF THE FIVE TYNE AND WEAR DISTRICTS

1.1 At the previous stages of consultation on the Regional Spatial Strategy the five Tyne and Wear districts have submitted jointly agreed responses on a limited range of matters of importance to the sub-region, in addition to submissions by the individual authorities.

1.2 Attached is a schedule of jointly agreed objections to the latest round of consultation from the Secretary of State. The objections largely refer to the new changes proposed, but also maintain some of the earlier concerns where the authorities feel that they have not been adequately dealt with.

1.3 Whilst several matters raised previously have been amended to meet some of the joint concerns, the Tyne and Wear districts are generally very disappointed in the outcome of the latest proposed changes. It is considered that the changes do not address the heart of our concerns, i.e. that whilst the strategy in itself has been and still can be supported, the details of the policies largely undermine the achievement of a sustainable and truly strategic outcome. No more so is this evident than in the increased scale, distribution and lack of control over the building of new housing in unsustainable locations and on Greenfield land, and the re-insertion of major Greenfield employment locations.

1.4 Our main concerns, as detailed in the schedule are:

- The credibility of the RSS process to date in relation to public involvement. The wholly inadequate "Statement of Reasons" document is just one example of this, as it fails to adequately summarise individual comments made to the previous round, nor explains in any meaningful sense the Secretary of State's justification of proposed changes.
- Open ended policies that support or exert little control over new development on unsustainable greenfield sites for housing and employment in the region, with consequent adverse impact on the regeneration of the districts of the Tyne and Wear conurbation.
- The deletion throughout to references to the "core areas" which are considered a critical element of the RSS strategy for re-generation.

- The re-insertion of employment sites outside of Tyne and Wear leading to an over-supply in non-central locations, notably unsustainable greenfield locations deleted by the EiP Panel, including the re-introduction of former 'Reserve' sites into the main land allocations. Development of these sites are likely to undermine regeneration of the Tyne and Wear districts, including the core areas.
- Policies for housing are now apparently open-ended for LDFs to increase amounts of housing above the 'guidelines'. The impact on the RSS strategy should be a prime consideration. Whilst broadly supporting the overall housing allocation numbers for the Tyne and Wear districts (though certain districts have detailed concerns that they are raising individually) we object to the increased regional allocation of 128,860 and its phasing as it continues to maintain the mis-alignment between employment and population as the appropriate way to manage the distribution of new housing across the region.
- The higher allowance for Greenfield sites, coupled with the proposed increased housing allocations outside of Tyne and Wear will lead to increased competition with the more difficult brownfield regeneration sites in the Tyne and Wear conurbation. It will have an adverse impact on the crucial regeneration of the Tyne and Wear districts and in particular the inner areas where regeneration agencies have been created to facilitate their regeneration. The Tyne and Wear districts seek a reduction and greater control over the numbers of houses allowed outwith the conurbation, particularly in the early years of the plan.
- The Tyne and Wear districts would support a stronger and clearer line on requirements for sustainable energy generation on major development sites than is now being proposed.

1.5 The Tyne and Wear districts submit the attached detailed schedule as their joint response to the RSS Further Proposed Changes consultation and urge the Secretary of State to give consideration to them so as to align policies with the RSS strategy and fully support the regeneration of the Tyne and Wear conurbation through the RSS.

Tyne and Wear districts joint agreed response to Secretary of State's further proposed changes to RSS

FPC No.	RSS Area	Description of Change	Policy No.	Secretary of State's Justification	T&W districts response to Secretary of State's proposed changes
FPC7	RSS GROWTH ASSUMPTIONS	Updated RSS growth assumptions section.	-	Explanation of the amended approach to population and housing growth, and the reasons for adoption of the revised housing figures proposed by the North East Assembly.	<p>Object: The Tyne and Wear districts do not consider that the Assembly's subsequent proposal, incorporated in the RSSFPC, to increase the regional housing allocation based on net additions to stock from the 112,000 recommended by the EiP Panel to 128,900 is adequately justified, in particular the phasing where front loading of the non-Tyne and Wear districts could lead to an imbalance of new development to the detriment of the regeneration of the Tyne and Wear conurbation. The reliance on trend based population projections as justification is inappropriate to formulating a spatial strategy that should seek to distribute new housing to the most sustainable locations, viz: the conurbations and main towns related to main employment locations and facilities. We consider that this scale of increased allocation, notably in 2004 - 11, coupled with other related changes in the RSSFPC, would significantly increase the risks of over-supply, with an adverse impact on the regeneration of the Tyne and Wear conurbation. The Tyne and Wear districts at the previous consultation submitted a 'minority report' relating to the NEA proposals to increase numbers from 112,000 to 128,900, concluding, with justification, that a more appropriate total was 118,000 and we are not convinced that the higher figure has been justified..</p>

FPC No.	RSS Area	Description of Change	Policy No.	Secretary of State's Justification	T&W districts response to Secretary of State's proposed changes
FPC10	SUSTAINABLE DEVELOPMENT		2		<p>The Tyne and Wear districts object to the continued inclusion of Criterion (i) "to increase public involvement in decision making and civic activity. Its principle is not in question, although its relevance in the RSS is questioned given that all authorities have their own adopted Statements of Community Involvement to cover this issue.</p> <p>That said, the RSS does little to engender credibility of the RSS process and in fact deters the public from getting involved. The Statement of Reasons summarises responses to the point where they have become meaningless. The justification itself similarly fails to adequately address how individual comments have been analysed and taken forward and is completely 'silent' on why a number of objections have been dismissed, e.g. the joint Tyne and Wear districts response to housing at Policy 30. Equally the justification for many of the changes are so inadequate they give rise to further ambiguity.</p>

FPC17	PHASING & PLAN, MONITOR AND MANAGE	Amend final sentence of policy by removing "and previously developed land targets within city regions".	4	In view of representations.	Object to FPC17 that allows for major Greenfield sites to be proposed without regard to the impact on City Region brownfield targets. This proposal conflicts with the application in broad terms of Policy 3 (sequential approach) which is fundamental to the RSS strategy. The SoS's justification as set out is totally inadequate. It is submitted that this will weaken the application of the sequential approach, will tend to undermine the effective delivery of regeneration within the urban cores and is inconsistent with the fundamental aims of the strategy in relation to PDL.
FPC19	LOCATIONAL STRATEGY	Amended text to clarify the position on Sub-regional centres, and removal of references to the general term "core areas" and their replacement by more specific locational descriptions, for greater clarity.	-	In view of clarity and representations.	In relation to FPC 19, the Tyne and Wear districts object to the proposed deletion of the reference in the penultimate section of 2.30 (and elsewhere in the RSSFPC) to the 'core regeneration areas', on the grounds that this is contrary to the strategy as submitted to and tested at the EiP, wherein the core areas are a critical element of the RSS strategy.

FPC20	LOCATIONAL STRATEGY	Amended policy with removal of references to the general term "core areas".	5	In view of clarity and representations. Also clarifies a minor discrepancy in the order of wording between May 07 Proposed Changes RSS and Statement of Reasons (PC29E).	The Tyne and Wear districts strongly object to the proposed deletion of the words 'particularly within the core areas', on the grounds that this would have the effect of diluting the focus of the RSS on the core areas of the conurbations. According priority to the core areas is critically important to the RSS strategy. The justification for this change in the Statement of Reasons is inadequate and lacks any proper evidential basis.
FPC32	TYNE AND WEAR CITY REGION	Add "and development" to Policy 6.1 c). Substitute "local needs" with "the needs of their local areas".	6.1 c	In response to representations questioning whether the New Towns themselves are being regenerated or are part of a wider regeneration solution. Also questions whether the towns are only serving their local needs.	The description of change for FPC32 does not match the actual change made to policy 6.1c, in that "indigenous" and "to meet local needs" have been deleted but the substitution of "the needs of their local areas" has not been included as stated in the Statement of Reasons. The Tyne and Wear districts object to this omission which could lead to adverse impact on the conurbation from untoward growth of its satellite towns, due to inadequate monitoring controls.
FPC50	SUSTAINABLE ECONOMIC DEVELOPMENT	Replace terminology "other local rural centres" with "secondary settlements". Also minor changes to reflect changes to policies 13 and 19. Also remove vague term "particularly the core areas".	12	In view of representations. Also in view of changes to other policies, making the application of this policy clearer.	In relation to subsection 12.1a, as set out in FPC 20 the Tyne and Wear districts strongly object to the deletion of the text "particularly the core areas", on the grounds that this would have the effect of diluting the focus of the RSS on the core areas of the conurbations.

FPC58	EMPLOYMENT LAND PORTFOLIO	<p>Employment land figures amended with regional brownfield quantity added to general column in view of Policy 13 becoming location rather than site specific. Also 30ha extra general land added each for South Tyneside, Sunderland and Gateshead in view of deletion of Tyne Wear park (formerly policy 19). Also, 40ha extra general land for Easington in view of deletion of South of Seaham (former policy 20). Amended criteria also in response to representations. Table preceding Policy 18 amended accordingly. [Note: For Newcastle, the 170ha in the Key Employment Locations category does not reflect an additional allocation. This is because Newburn Riverside location amounts to approximately 90ha overall (land developed & to be developed), in line with paragraph 3.37 of the Proposed Change noting 92ha. Policy 18 of the submission RSS, and subsequently the</p>	18	<p>Changes made in response to representations and in view of amendments to policies 13, 19 and deletion of policy 20.</p>	<p>The Tyne and Wear districts, on a sub-regional basis generally support the proposed changes to the provisions of employment land in Tyne and Wear (though North Tyneside has identified an error in the amount of land in that district that should have been included in the table and policy) and considers that these changes are justified by the relative lack of land for B2 and B8 uses within the conurbation.</p> <p>However we strongly object to those changes which increase the provision of employment land outside Tyne and Wear beyond those recommended by the Panel, on the grounds that these increases would</p> <ul style="list-style-type: none"> • Lead to an oversupply of employment land in the region in non-central locations • fundamentally undermine the planning principles enunciated in the strategy (2.3) • be inconsistent with the sustainable development objectives set out in Policy 2 (notably 2.2g&h), the sequential approach set out on Policy 3, the locational strategy set out in Policy 5 (notably 5a) and the accessibility objectives underpinning Policy 5A (notably subsections a-d) • effectively reinstate the 'Reserve Sites' (former Policy 20) into the general provision of employment land, contrary to the recommendations of the Panel that these be deleted (and contrary also to the Submission Draft itself)
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		proposed changes, only reflected remaining land available for development in this location within the total of 130ha for Newcastle].			<ul style="list-style-type: none"> undermine the regeneration of the Tyne and Wear conurbation, notably the core areas not be subject to appropriate testing at examination in public. are not justified by an adequate evidence base or by the Statement of Reasons.
FPC61	PRESTIGE EMPLOYMENT SITES (NOW – KEY EMPLOYMENT LOCATIONS)	Policy 19 renamed to "key employment locations" moving away from specifying sites to locations and adding two locations from previously deleted policy 20. (Amendment to terminology reflected in other parts of RSS).	19	Updated in view of proposed changes representations, PPS11 and draft PPS4.	The re-instatement of several of the large Greenfield sites previously deleted by the Panel, as set out in FPC60, will lead to increases in unsustainable travel around and through the north east region and will adversely impact on development of the Tyne and Wear employment base to the detriment of the whole region. The re-instated sites are generally at odds with the strategy for employment land set out in FPC 56 which notes an oversupply of general employment land in parts of Northumberland, County Durham and Tees Valley and indications of a general shortfall of land in Tyne and Wear. It goes on to say "De-allocation of some of the less sustainable and/or viable sites should not present any problems to the overall offer"; and "Sustainability principles are vital to attracting investment in the Region supporting the engines of economic recovery, namely the core cities and urban areas" The Tyne and Wear districts are astounded that FPC 58 and FPC60 can be proposed in the same breath as the statements of FPC56 and therefore strongly object to the re-instatements in FPC60.

FPC77	IMPROVING THE HOUSING STOCK	Emphasis that figures on housing are for guideline only.	-	To reflect the latest Government housing policy.	Object to FPC77 that leaves it open-ended for <u>all</u> LDFs to increase amounts of housing above the 'guidelines'. The Tyne and Wear districts would support the NEA objection that the impact on the RSS strategy should be a prime consideration. In this respect we would support the guidelines status for the conurbations but propose that elsewhere eventual allocations are maxima, subject to review in relation to future consideration of growth points.
FPC78	IMPROVING THE HOUSING STOCK	Overall rationalisation of policies 28, 29 and 30. New replacement and demolition figures. Figures reworked taking account 2004 based household projections. Deletion of sentence with regard to compensatory replacement of demolitions, as taken into account in new information in Policy 30.	30	In response to representations. Amalgamating Policies 29 and 30 for ease of reading and adding new information on replacement and demolitions. Figures reworked in light of 2004 based household projections. To reflect new demolition and replacement information.	<p>The Tyne and Wear districts support the total housing allocation numbers in FPC78 for the Tyne and Wear districts (though certain districts have detailed concerns that they are raising individually).</p> <p>The Tyne and Wear districts object to the increased regional allocation and its phasing which continues to maintain the mis-alignment between employment and population which was advanced by the Tyne and Wear districts at the Proposed Changes stage as the appropriate way to allocate the distribution of new housing across the north east region.</p> <p>Objection is raised to the distribution of 74,120 net additional dwellings to Northumberland, County Durham and Tees Valley Districts and to the front-loading of these allocations, in comparison to 'rear-loading' of the Tyne and Wear districts'</p>

allocations. The increase for these sub regions is 8,755 dwellings over Proposed Changes 2007. The higher allowance for Greenfield sites in these sub areas, notably in Northumberland (see FPC80 – Policy 31) coupled with the increased allocations will lead to increased competition with the more difficult brownfield regeneration sites in the Tyne and Wear conurbation. In the current housing climate, with national sales down 20% and likely to continue over next few years, builders will turn to the easiest and most profitable sites. In a time of weak housing markets, which might pertain for some years the frontloading of 'easy' sites outwith the conurbations will have an adverse impact on the crucial regeneration of the Tyne and Wear districts and in particular the inner areas where government agencies have been created to facilitate regeneration.

The Tyne and Wear districts seek increased controls over the amounts of development in the other sub-regions to 2021, in line with the employment related arguments put forward at the Proposed Changes stage by the Tyne and Wear districts; also a reduction in the numbers to be brought forward 2004 to 2011.

Of particular significance for the Tyne and Wear authorities is the potential impact on demand for the more difficult-to-develop inner urban sites which the Sunderland arc and BNG have been set up to address. There are now concerns as to the extent to which the

					RSS aspirations for regeneration of the central parts of the conurbation are deliverable in the context of what amounts to a significant relaxation of restraint policies in the outer areas.
FPC80	MANAGING HOUSING SUPPLY	Reordering of parts of previous Policies 30 and 31.	31	Reordering of parts of previous Policies 30 and 31 for clarity and ease of reading. Minor grammatical changes.	The Tyne and Wear districts object to the retention of the PDL targets for Northumberland and Co Durham, particularly the very low 50% PDL target in Northumberland, combined with increased allocations in these counties, that would seriously undermine the urban renaissance within the conurbations and the achievement of sustainability objectives. It is considered that a minimum of 60% (in line with PPS3) should be applied in Northumberland and 70% in Co Durham.
FPC110	SUSTAINABLE ENERGY USE (INCLUDES SUSTAINABLE CONSTRUCTION)	Combining and rewording of criteria (b) and (c) into a new (b), and amendment to former criterion (e) now becoming a revised (d).	39	In view of representations, Energy White Paper 2007, Climate Change PPS supplement, and CLG "Building a Greener Future" policy statement 2007. National policy and building regulations cover matters.	The Tyne and Wear districts object to the weakening of proposed controls that would ensure that new developments would respond to the environmental agenda set by PPS1. It is requested that the policy is revised to <u>require</u> the achievement of high energy efficiency and minimise energy consumption in new developments. It is also requested that 10% is re-instated as a minimum target for energy from renewable resources in major developments, since the proposed insertion of "ambitious but viable percentage" is vague and not defined.

