

February 2008



**Friends of
the Earth**

Briefing

Growing within limits

The Yorkshire & Humber Regional Spatial Strategy

The Yorkshire & Humber Regional Spatial Strategy (RSS) is the region's masterplan, guiding future development up to 2021 and beyond.

The Plan can make a significant difference in creating *sustainable communities* – which the Government defines as places that 'meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life'. But it will also:

- Promote rapid growth in jobs and housing
- Tell every council how much housing they must provide by 2021
- Set out priorities for investment in roads and other transport

And it could:

- Lead to the weaker protection for green belt areas
- Promote an unsustainable growth pattern for areas covered by 'city regions'
- Support the growth of regional airports in the face of climate change

This briefing summarises the draft Plan and key issues facing the region.

Friends of the Earth inspires solutions to environmental problems, which make life better for people.

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- **a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland**
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Friends of the Earth, 26-28 Underwood Street, London N1 7JQ

Tel: 020 7490 1555 Fax: 020 7490 0881 Email: info@foe.co.uk Website: www.foe.co.uk

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WHO IS BEHIND THE PLAN?

The body responsible for the Regional Spatial Strategy (RSS) is the **Yorkshire & Humber Regional Assembly**. The Assembly is currently unelected, comprising mainly local councillors chosen by each local authority in the region and representatives of chosen social, economic and environmental partners.

Two other regional bodies, Yorkshire Forward, the Regional Development Agency (RDA) and Government Office for Yorkshire & the Humber are also key players in the process.

- The **Yorkshire Forward RDA** is the region's economic development body and the Regional Spatial Strategy will be expected to support the level of economic growth that the RDA plans for, by ensuring enough land is available for new jobs, houses and economic activity.
- The **Government Office** comprises civil servants from each Whitehall government department whose task is to ensure that national policies are applied in the region.

The 24 local planning authorities in the region, including North Yorkshire County Council, North York Moors National Park and the Yorkshire Dales National Park, are required to produce a **Local Development Framework (LDF)** detailing local planning policies. LDF's must be in 'general conformity' with the spatial policies contained in the RSS.

The policies adopted in the RSS will therefore have great influence on the planning policies that each local authority eventually draws up. This two tier approach (RSS and LDF's) represents a new planning system, with the RSS and LDF's replacing the 'old system' of Regional Planning Guidance, Structure Plans, Local Plans, or (in the case of West and South Yorkshire) unitary development plans.

PLANNING FOR SUSTAINABLE DEVELOPMENT

Government planning policy now recognises that "Sustainable development is the core principle underpinning planning"¹. The UK Sustainable Development Strategy gives the guiding principles for all policy as:

- Living within **environmental limits**
- Ensuring a strong, healthy and **just society**
- Achieving a **sustainable economy**
- Promoting **good governance**
- Using **sound science** responsibly²

The strategy also makes clear that these goals should be integrated and pursued together, rather than traded off against each other.

An earlier version of the Yorkshire & Humber RSS contained a policy called, 'Applying the sustainable development principles' (Policy S1). The latest RSS currently omits this policy,

¹ Planning Policy Statement 1: Delivering Sustainable Development – Department for Communities and Local Government – 2005 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/147393>

² Securing our Future - The UK Government's Sustainable Development Strategy – Defra March 2005 http://www.sustainable-development.gov.uk/publications/pdf/strategy/SecFut_complete.pdf

ostensibly in order to avoid repetition but in doing so effectively weakens the concept of sustainability. It has been suggested that this omission is not coincidental but necessary to clear the way for the economic privileging of the **Northern Way Growth Strategy (NWGS)**.

Friends of the Earth Yorkshire & Humber have argued for the re-instatement of a sustainable development policy in the final version of RSS.

THE INFLUENCE ON THE PLAN OF THE NORTHERN WAY GROWTH STRATEGY (NWGS)

In February 2004 the then Deputy Prime Minister John Prescott asked the three Northern RDAs to start work on a strategy that would seek to promote economic growth across the North of England in an attempt to bridge the so called “North-South economic divide”.

The RDAs came up with *The Northern Way* initiative and an aim to promote growth and to “achieve national UK average GVA [Gross Value Added] per head within 25 years”.

There are concerns that the Yorkshire & Humber Plan has become a ‘delivery vehicle’ for the NWGS’s growth ambitions which will ultimately lead to the adoption of unsustainable policies. The concerns are threefold:

- The NWGS focuses on the narrow aim of GVA growth. Aiming for improved economic performance alone does not lead automatically to environmental protection or social inclusion
- Unlike the RSS, the Northern Way is a non-democratically tested plan that has not been subject to Strategic Environmental Assessment
- The NWGS puts great emphasis on long distance connectivity, increasing air transport and freight haulage which poses both environmental and social problems

The draft Plan has been subject to a Strategic Sustainability Assessment³, as required by European law, and the independent consultants who carried this out raise similar concerns.

CLIMATE CHANGE TARGETS

Climate change is now almost universally acknowledged as the most severe crisis facing human societies, and the natural environment, the world over. The UK Government recognises this and is currently passing a Climate Change Bill through Parliament that will introduce a target-based approach of carbon reduction.

Friends of the Earth Yorkshire & Humber through our **Big Ask** campaign have led campaigning for this legislation and for the greater reductions of carbon emissions of 80% by 2050. This is because scientific consensus shows that this is the level of cuts that is necessary. There is now greater scientific consensus that the emissions over the next one to two decades will be critical in determining our eventual fate. We are calling for a strong Climate Change Act to make it a legal duty on the Government to reduce carbon emissions by at least 3% year on year and to include aviation and shipping emissions.

³ Sustainability appraisal (integrating strategic environmental assessment) of the Yorkshire and Humber draft RSS – Levett-Therivel December 2005
<http://www.yhassembly.gov.uk/dnlds/RSS%20SA%20final%20rull%20report%20Dec%2005.pdf>

Growing within limits – the Yorkshire & Humber Regional Spatial Strategy

Spatial planning has a major and positive contribution to make in meeting this challenge by promoting policies which reduce the threat of climate change.

The Y&H RSS in particular has a key role, because it is the statutory plan for the whole region and, because it runs up to 2021, it can set intermediate targets to ensure that the region is contributing to the achievement of the required cuts by 2050.

In the Plan **Policy YH2** commits the region to reducing greenhouse gas emissions by at least 20% below 1990 levels by 2010 and 25% below 1990 levels by 2015. The Y&H RSS was the first in England to adopt a policy on climate change emissions reduction and Friends of the Earth is working in each of the other nine regions to encourage an adoption of a similar policy within each RSS. It is important to note however, that the figures contained within Policy YH2 would not deliver the annual 3% annual CO₂ reduction which Friends of the Earth believes is essential and we therefore propose a 30% reduction by 2015 as the appropriate target.

Disappointingly, the Secretary of State's proposed changes to the Yorkshire and Humber Plan removed Policy YH2 from the draft RSS. The rationale was that the Government's draft Planning Policy Statement (PPS) on Planning and Climate Change stated that aspirational targets should be avoided. However, when the final PPS⁴ was published this guidance had been removed allowing a target-based approach. We are now calling for Policy YH2 to be reinstated into the final RSS.

External to the RSS, but having a significant influence upon its ability to achieve the cuts in greenhouse gas emissions identified in Policy YH2 are:

- Support from the Regional Development Agency (RDA) – which in Y&H comprises policy support in Yorkshire Forward's Economic Strategy⁵ combined with pioneering work carried out by the RDA and Cambridge Econometrics identifying current greenhouse gas emissions produced in the region by source
- A Yorkshire & Humber Climate Change Action Plan which identifies the responsibilities of various sectors (homes, businesses, transport etc) and the actions they are required to take to reduce emissions in the region
- Studies carried out by a number of consultancies showing how regional strategies contribute to tackling climate change.⁶

EFFECTIVE IMPLEMENTATION

The RSS states that better climate change monitoring is required at every level but no effective feedback loop has been established between monitoring and performance and

⁴ Planning Policy Statement: Planning and Climate Change – Department for Communities and Local Government December 2007 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/614742>

⁵ The Regional Economic Strategy for Yorkshire & Humber 2006-2015 – Yorkshire Forward - http://www.yorkshire-forward.com/asset_store/document/res_complete_final_152519.pdf

⁶ Regional Strategies and Climate Change – Stockholm Environment Institute, Arup and Cambridge Econometrics – August 2007 <http://www.yhassembly.gov.uk/dnlds/ARUP%20climate%20change%20exec%20summary.pdf>

implementation. The Y&H Assembly has failed to undertake an emissions assessment of the consequences of proposed RSS; a vitally significant omission given the region's vulnerability to climate change impacts such as flooding.

FLOOD RISK – THE REGION'S REASON FOR ACTION

A sixth of the Yorkshire & Humber area lies within flood risk areas and the region has the second highest number of people living on these floodplain areas (some 600,000 people).⁷

The RSS identifies the increased risk that will result from climate change caused by greenhouse gas emissions growth. Specific threats detailed in RSS include:

- continued erosion of the East Coast
- increased flood risk and loss of inter-tidal habitats in the Humber Estuary
- increased winter flood risk in the Vale of York and Aire/Calder river catchments; and,
- increased pressure on urban water supply and drainage systems.

Recent research that is particularly relevant to Y&H's East Coast⁸ has shown a strong correlation between coastal flooding risk and deprived populations.

RSS contains a specific policy on flooding (ENV1) and the risks are adequately dealt with in some of the sub-area policies (Vale & Tees Links, Coast and Remoter Rural) but are totally inadequate in others (York, Humber Estuary).

The interim Pitt Review report which investigated the devastating floods of summer 2007 also identified the need to mitigate climate change and adapt to it through effective flood risk management.⁹

We have argued that the vulnerability of the region to climate change impacts is sufficient to require the development of progressive regional policies. These would prevent the RSS climate change targets being undermined by increasing emissions from aviation, transport and the amount and spatial pattern of economic growth.

The most effective way to avoid the worst impacts would be to secure effective implementation of Policy YH2 on climate change throughout the RSS Plan. There are six areas where RSS policy can make a significant impact in this respect:

1. Sustainable location
2. Discourage rising emissions sectors (e.g. Aviation)
3. Transport
4. Energy use
5. sustainable waste management
6. sustainable agriculture and protected biodiversity

The Yorkshire & Humber RSS succeeds to varying degrees in each of the areas:

1. Sustainable Location?

⁷ Environment Agency National Flood Risk Assessment 2005

⁸ Addressing Environmental Inequalities – floodrisk (Environment Agency April 2006)

⁹ Learning lessons from the 2007 floods – Sir Michael Pitt (December 2007)

The RSS focuses on ‘City Regions’ as the main location for new economic growth. This is a consequence of the influence of the Northern Way Growth Strategy. Leeds City Region (LCR) is the main location of economic growth that the RSS plans for, the intention being to focus growth where existing economic assets can be capitalised on and then ‘managing and spreading the benefits of the Leeds economy’ to surrounding areas.

It is unclear in practise how this is going to be achieved and there is real concern that LCR lacks the necessary infrastructure (e.g. public transport, homes) to be able to cope with the scale of growth that is planned and that RSS in its present form may require a return to extensive Greenfield housing sites.

The draft Plan’s **Policy YH8** concerns location of development and advocates a sequential approach which would see first priority given to the re-use of previously developed land (PDL). However, several of the **Economic Policies (E1B, E3)** could cause conflict as they focus too narrowly on economic activity in terms of its contribution to competitive advantage, rather than delivering sustainability. A previous draft of **Housing Policy H1B** called for a target for using previously developed land (PDL) of 65% but this was subsequently removed in the Secretary of State’s modifications and has been replaced with an imposed policy of increased housebuilding rates that cannot be sustained. The 2005 Regional Employment Land Study¹⁰ states that there is a huge overhang of land in Yorkshire & Humber capable of de-allocation so this figure could, in fact, be higher.

2. Discouraging Rising Emission Sectors?

The combined effect of RSS **Policies T6 and E1G** is to promote a huge expansion of air travel and with it, an equal expansion in aviation emissions. Aviation emissions represent the greatest threat because a) they are rising at such a high annual rate and b) they are presently outside of regulatory control (for example the Emissions Trading Scheme where legislation is currently being processed through the European co-decision procedure). The principles of sustainable development require a decoupling of economic prosperity from rising road and air traffic – the opposite approach to that contained within this RSS, particularly in the South Yorkshire region where the cornerstone of planned economic regeneration is growth around Doncaster Airport.

3. Transport

Aviation is identified within the Plan as ‘an important city regional asset’ whereas other much more economically significant methods of transport (East Coast Main Line or local bus networks) are not. The LCR lacks meaningful reference to public transport which will result in unsustainable outcomes. **Policy YH1** contains no targets for absolute reduction in road traffic and the support in the Plan for very extensive road proposals to widen motorways and build new roads lack adequate linkage to the primary policy driver of climate change.

For these reasons and others, we believe that the Regional Transport Strategy section of RSS is not fit for purpose and has called for it to be fully revised.

4 Energy Use

Policy ENV5 contains sub-regional energy targets for renewable energy in line with government targets (10% by 2010 and 20% by 2021) and it also contains a policy to promote and secure greater use of local renewable energy in new developments. We fully support

¹⁰ Regional Employment Land Study – Arup – September 2005

<http://www.yhassembly.gov.uk/dnlds/Employment%20Land%20Forecasting.doc>

these policies, but would like to see them go further. Friends of the Earth would like to see Y&H RSS implement a much stronger policy on energy efficiency in all new developments.

RSS should require that local councils seek to ensure all new development, either new build or conversion, be required to demonstrate that it does not add any net CO₂ emissions over the life-cycle of its operation (employing Z-squared standard for large-scale housing developments, Eco-homes 'Excellent' standard for smaller (one unit or more) and BREEAM 'Excellent' standard for any commercial development).

There is currently no policy to address energy consumption in general. We have argued for the inclusion of such a policy in line with Tyndall Centre for Climate Change advice that more attention should be paid to energy demand than supply.

5. Sustainable waste management?

The opening sentence in **Policy ENV12** makes good reference to the waste hierarchy (reduce, reuse and recycling waste) but the policy contains no targets for waste prevention, minimisation or reduction. The policy requires the achievement of statutory performance targets by 2016 (40% recycling and composting by 2010 and 50% by 2020).

Friends of the Earth would like to see an adoption of targets of 50% recycling and composting by 2010 and 75% by 2015. The approach taken in Y&H RSS does not necessarily facilitate a rapid switch from landfill and/or incineration to recycling and amounts to a lack of aspiration on waste management for the region.

6. Agriculture and biodiversity

Policy ENV7 seeks to safeguard good quality agricultural land through a policy of farm diversification. This Policy will act to prevent development on high quality agricultural land and is fully supported. It also provides for the production of biomass on farmland in areas like Selby which can be used in co-firing in near-by power stations.

Policy ENV8 is also fully supported as it seeks to retain and incorporate biodiversity in development and encourage networks of urban greenspace and ecological corridors in line with the region's habitat enhancement map.

Next steps...

In Autumn 2007 the RSS was extensively modified by the Secretary of State despite the strategy being subjected to rigorous scrutiny through consultations and an Examination in Public. We responded to these proposed modifications and we expect the final Regional Spatial Strategy to be published in May 2008.