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**Friends of
the Earth**

Briefing

Challenges for Yorkshire and Humber

The Integrated Regional Strategy presents the region with an opportunity to address the significant problems of recent years and the failures of previous iterations of regional policy frameworks.

The fundamental challenge facing the region is to ensure that future development is truly sustainable and ensures that environmental limits including greenhouse gas emissions are at the heart of policy making.

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A Consultation response to the Yorkshire and Humber strategy

Introduction

The Integrated Regional Strategy for Yorkshire and Humber (shortened to the Yorkshire and Humber Strategy) will influence the development of the region over the next twenty years. This timescale is a crucial one for the region as it presents many opportunities to follow a path of sustainable development which brings a good quality of life to all people whilst playing a crucial role in tackling climate change and preserving and enhancing the region's biodiversity and reducing our impact on biodiversity in other parts of the world.

Friends of the Earth is engaged in the strategy development as an influential and informed regional stakeholder. The following briefing is a response to questions raised for consultation up to March 2010. The questions can be found at <http://www.yorkshire-forward.com/sites/default/files/documents/Yorkshire-Humber-Strategy-Submitting-Evidence.pdf>

Summary

The Integrated Regional Strategy presents the region with an opportunity to address the significant problems of recent years and the failures of previous iterations of regional policy frameworks.

The fundamental challenge facing the region is to ensure that future development is truly sustainable and ensures that environmental limits including greenhouse gas emissions are at the heart of policy making.

A failure to do so will inevitably lead, if it has not done so already, to a crisis of sustainability. This will lead to the regional economy committed to a high carbon trajectory and less biodiverse future where the quality of life for the people of the region will be diminished at the expense of high rates of unsustainable of economic growth.

There is a requirement for the proposed growth trends to be robustly modelled as part of the evidence base for the Regional Strategy. This modelling should also consider the outcomes of alternative growth models including the potential for improving quality of life through reduced levels of growth. This will inform the crucial policy decisions around the rate and type of economic growth and enable the Regional Strategy to reach the stated outcomes of "more resilient economic growth that is within environmental limits, supports a lower carbon economy and an enhanced environment, and which leads to improvements in social welfare and personal wellbeing."

Economy and Skills

ES1: Friends of the Earth has serious concerns over the extent to which “sustainable economic growth” (an ill-defined term) is regarded as **the** key issue for the region. Indeed, the principal driver of other workstream topics should be **sustainable development** and the delivery of a **low carbon economy**. The Stern Review into the Economics of Climate Changeⁱ and associated reviews for different spatial levels of the UK (for example, Manchesterⁱⁱ and Liverpool City Regionsⁱⁱⁱ) identified the threats to economic development of a systemic failure to reduce carbon emissions.

The Regional Strategy must be accompanied by a robust assessment of the effects different rates and types of economic growth will have on a full range of variables including the stresses it places on environmental limits.

A considerable and growing body of evidence shows that we need to reduce economic growth rates since the current model is inherently unsustainable. Work carried out for the Sustainable Development Commission^{iv} and the New Economics Foundation/Schumacher College^v detail some of the fundamental questions around the current model.

The evidence is clear that we need to rein in our carbon emissions for the future benefit of our economy. Whilst we can decouple carbon emissions from economic growth, this can only happen to a limited extent in the short to medium term. We must maximise this decoupling yet at the same time ensure that our economic growth rates do not outstrip this capacity for decoupling.

ES2: A means of achieving this is to direct future investment to those areas that contribute to establishing the low carbon economic model. There are potential growth sectors which have been identified within the UK Government’s Low Carbon Transition Plan^{vi} and the Low Carbon Industrial Strategy^{vii}. The region should consider how by supporting the delivery of these strategies, it can make a significant contribution to the national effort to reduce greenhouse gas emissions whilst carving itself a unique role in that delivery.

A particular growth sector which plays into the strengths of Yorkshire and the Humber is offshore wind. The recent Government announcements for Round 3 rights heralded a quadrupling of offshore wind generation in UK coastal waters. This announcement raised the prospect of 70,000 jobs being created in this sector alone (including servicing jobs) by 2020 and just under 100,000 jobs by 2030. Many of these jobs could be directed to Yorkshire and the Humber since a large proportion of the development is to be in the North Sea.

ES5: The current recession presents an opportunity for the region to emerge on the trajectory to a low carbon economy. A Regional Strategy which is underpinned and led by robust modelling on the environmental and social impacts of economic decisions will ensure that this trajectory is followed.

ES10: There is an urgent need to understand and communicate the likely costs of energy and resources in the future and to engage with businesses to become more energy and resource efficient. In challenging economic times, the potential for businesses to “invest to save” in installing energy efficiency measures is diminished. As part of the evidence base for the emissions projections for the UK Low Carbon Transition Plan, the Government published energy price projections to 2022^{viii}. These projections presented an increase to industry, in real terms, of 79% for electricity, 68% for gas and 28% for transport fuel. For the region’s industry to become more resilient to price rises, and as we have seen in recent years, price instability support must be given to the region’s businesses to become more resource efficient whilst also moving away from energy intensive business sectors.

These resource and energy cost rises are a symptom, however, of the unsustainable consumption patterns which are leading to the crisis of sustainability and we need to urgently address these issues if we are to avoid committing future generations to even more extreme resource constraints.

ES11: Place shaping can play a fundamental role in tackling climate change. The design of our towns, cities and rural communities from individual building design to community-wide development can set the region on the pathway to a low carbon, socially cohesive model. Ensuring the design of energy efficient housing, business and retail accommodation in mixed use developments that reduce car dependency and extend transport choice will improve the quality of life for the people of Yorkshire and the Humber.

Friends of the Earth is part of a coalition consisting of environmental groups, planning professionals and the Town and Country Planning Association identifying key principles^{ix} for the UK Government as it prepares a new Planning Policy Statement on Climate Change. We commend these principles which should be at the core of the Yorkshire and Humber Strategy.

Climate Change and Environmental Resources

CCER1: Friends of the Earth strongly support the assertion that climate change needs to be tackled urgently and that growth needs to be within environmental limits.

This requires the setting of ambitious carbon reduction targets which must be supported by a robust model for delivery at the heart of the Regional Strategy. The existing RES/RSS targets are unlikely to be achieved as the policy measures have not been sufficiently modelled to ensure delivery.^x

The scientific evidence on climate change^{xi} states that in order to restrain climate change to within tolerable levels of 2°C increase in temperatures. This would require atmospheric carbon dioxide levels to be maintained below 450ppm. Significant research, including that of the Tyndall Centre for Climate Change^{xii} for Friends of the Earth, shows that this requires the UK to commit to early and rapid decarbonisation with targets set for a 42% decrease in emissions on 1990 levels by 2020. The research also shows that we must, at all costs, avoid making policy decisions which lock us in to further carbon emissions in later years.

Friends of the Earth welcomes the carbon budget mechanism established by the Climate Change Act but regard the interim target of a 34% reduction adopted by the Government to be one made on the basis of political expediency rather than on a scientific basis. We recommend that regional targets are set to reduce 1990 carbon emissions by at least 42% by 2020 in line with the Committee on Climate Change's intended target.

CCER2: The Regional Strategy can strongly influence regional emissions through:

- (i) Modelling and setting a sustainable assumed economic growth rate
- (ii) Prioritising development towards a low carbon economy
- (iii) Placing a greater emphasis on the location and scale of development

- (iv) Analysing housing policies and requirements, particularly revisiting the demand projections for the lifetime of the Regional Strategy
- (v) Developing a transport strategy explicitly focused on low carbon as the policy priority

CCER5: Energy security and reduced emissions from the energy sector is best achieved through the development of policies within the Regional Strategy to increase energy efficiency across the region wherever energy is used. This will include residential, commercial, industrial and public buildings and in transport.

This scale of reduction will require a rapid transformation in the region's energy mix. There is already a strong presumption in favour of renewable energy at a national level through Planning Policy Statement 22^{xiii} further supported by the Supplement to Planning Policy Statement 1^{xiv}. This is likely to further strengthen through the adoption of new planning policy on renewable energy and climate change.^{xv} Historically, the region has failed to meet its commitments on renewable energy as set out in the Regional Spatial Strategy and lags behind every other region apart from the South West and the North East in meeting its 2010 targets^{xvi}.

Friends of the Earth has a long history of intervening in planning applications and we support the rights of local residents to be heard; we also do not support renewable energy developments which do not meet our own strict criteria. However, if we are to make progress towards renewable targets, then consistent application of planning policy must be maintained which would then give a strong signal to developers of credible renewable energy projects that applications would be welcomed and would also give a degree of certainty to businesses in the supply chain.

The introduction of so called 'feed in tariffs' for microgeneration and community level renewable energy presents the region with an opportunity to reap massive benefits from its natural resources. As part of this there is considerable scope to develop small scale projects e.g. hydro, onshore wind etc that will generate an income for householders and communities for years to come. The Regional Strategy could, and should, put in place mechanisms that enable small-scale generators to add to the renewable mix by building the skills base and offering financial solutions e.g. low or zero interest loan agreements for microgeneration projects.

CCER6: Friends of the Earth support the work of the Yorkshire and Humber Regional Environment Forum and the work that has been carried out in recent years on assessing the region's Environmental Limits^{xvii} and recommending a response to these limits.

CCER7: The key sustainable consumption and production issues for the region include:

- How does the region support an energy and resource efficient economy which will ensure a high quality of life for residents maintained within environmental limits?

- How does the region go beyond the English Waste Strategy target for 50% of waste to be recycled or composted by 2020 towards the levels already achieved in other parts of Europe (e.g. Flanders at 70%)?
- How the region's minerals policy reflects the projections of a likely fall of between 25-56% for the price of coal between the present date and 2022? This is particularly important when assessing the policy towards opencast development and other forms of coal extraction.
- How the region supports innovation in reducing the environmental impact of products developed and manufactured in the region?
- How the region goes beyond this to ensure that policies are measured on their impact on emissions and biodiversity both within the region and further afield? How do we address the fundamental problem that the region's level of consumption is far in excess of sustainable levels so that we can move towards and achieve "one-planet living"?

Housing and Regeneration

Friends of the Earth has grave concerns over the feasibility of achieving the housing projections that have been generated in recent years and appear to be on an upward trajectory. Questions need to be raised over the drivers for this level of growth and we refer again to the need for robust modelling of different growth scenarios and, in this case, the effect this will have on population projections and the resulting inward migration levels.

We raised these concerns in our response in 2008 to the RSS Update on Housing^{xviii}. However, the recent evidence from Nevin Leather and Ecotec and the reports from LGYH to the Spatial Planning Board updates the evidence from that time.

Firstly, we need to analyse the extent to which an elevated economic growth rate assumption increases the assumed rate of in-migration. The vast majority of this migration is internal with a small element being international migration. This is, in part, a function of the regional economic growth rate increasing demand for relocation from other parts of the UK. This is a symptom of an elevated regional economic growth rate putting infrastructure pressure on the region.

The Regional Strategy development is being carried out in difficult economic times which have had a stark effect on the housing sector. The market dynamics which shaped the decade up to 2007/8 has been put in stark contrast by the rapid decline in house building rates across the region. This presents a number of major challenges which need to be addressed through the Regional Strategy.

- How long will the current conditions in the housing construction last for?
- How can the industry deliver on the projected rate when it is currently undersupplying by around 25%?

We have significant concerns over the proposed departure from Government policy implicitly recommended in the Ecotec presentation that sustainability criteria (particularly in relation to permitting development on Greenfield sites) should be waived to allow housing supply to increase. The region must recognise that such a land-grab for greenfield development will have a significant effect on sustainability in a variety of ways including the effect on greenspace and green infrastructure, increased demand for transport and a higher ecological footprint related to such residential areas as opposed to development on urban brownfield development.

Friends of the Earth recommends that the Regional Strategy needs to be informed by and reflect the following factors in developing the housing strategy for the region:

- The changes in demographics in the region across a range of economic models and the housing needs of particular household formations (including shifts in numbers of young adults, older people etc.) that will be generated by these models.
- Greenhouse gas emissions resulting from these housing needs and those from a range of greenfield, suburban/rural development and urban, city/town centre development.
- The need to re-balance the housing market through prioritising regeneration efforts in areas of weak demand in preference to a market-led strengthening of already strong areas of demand in the region.
- The potential to achieve high levels of energy efficiency and, consequently, overall housing affordability in the region's existing housing stock^{xx} and to ensure that new housing stock exceeds the Code for Sustainable Homes.
- The threats to sustainability of a return to a high-growth, market-led approach.

Spatial Planning

SP1: The area of spatial planning is absolutely critical to ensuring the future sustainability of activity within the Yorkshire and Humber region. We are faced with a looming regional sustainability crisis driven by high assumed levels of economic growth, the consequent projections on population growth and the requirement for infrastructure in the future.

A reassessment of the requirement for such high levels of GVA growth coupled with a modelling of the effects of alternative growth scenarios on infrastructure requirements will lead to a much more informed evidence base for decision-making.

The Regional Strategy also needs to reassess the balancing of growth and investment within the region. The need to address sub-regional inequality which earlier iterations of Regional Strategies had started to address before the 2008 Regional Spatial Strategy led to the concentration of economic development around the Leeds City Region growth pole. The extension of this into the Regional Strategy will exacerbate the infrastructure problems over large household growth in the Leeds City Region (over 40% growth between 2006-31 in Bradford, Leeds, York and Harrogate^{xx}). This is a consequence of the Barkerite approach which advocated the concentration of economic powerhouses regardless of the effects on other areas.

The Regional Strategy will need to address which is the most sustainable model for development, design policies which shape the region accordingly and ensure that partners at both the regional and sub-regional spatial levels work together on policy delivery.

SP2/3: The questions around the quantity and types of housing and employment land posed relies on robust modelling of alternative growth scenarios. We have addressed the issue of housing in the relevant section of this submission but we would summarise our concerns as:

- Housing projections are based on a high economic growth scenario to which alternative models should be made to ensure sustainability.
- Housing need should be assessed by type to reflect the future demographic structure of the region under these alternative scenarios.
- Employment land and housing allocations should be made to ensure that the need to travel is reduced as much as possible.
- Housing and employment distribution should be distributed to increase equality across the region and to reduce carbon emissions and maximise environmental sustainability.

SP5: We have already addressed the failure to meet the regional renewable targets as set out in the Regional Spatial Strategy. Further investment coupled with a supportive planning environment is required to promote suitably-sited renewable energy deployment across the region across a range of sectors particularly realising the potential of onshore and offshore wind and the development of maturing marine technologies such as wave and tidal.

The national framework to support small-scale generation of renewable energy has already been improved considerably through the introduction of feed-in tariffs. Friends of the Earth has advocated the adoption of the feed-in tariff system and welcomed its introduction in the 2008 Energy Act. Investment in the region could and should be directed towards enabling householders, particularly those on lower incomes, to benefit from the Energy Act through financial support and helpful planning policy.

SP6: The waste infrastructure in the region needs to support the waste hierarchy. Although there has been a 7% decrease in municipal waste arisings in the region^{xxi}, this is marginally lower than that seen across England & Wales. Evidence should be acquired as to how much of this improvement is attributable to recessionary factors and how much is due to policy interventions.

Similarly, both the municipal and household recycling rates are lagging behind the rest of the country and the regional strategy with only 35% being recycled or composted.

Policies should be included in the Regional Strategy which both drive down the amount of waste being produced and increased the percentage of waste being recycled/composted. Residual waste can and should be managed in a substantially more sustainable way^{xxii} than supporting incineration which has been seen to perform poorly in respect to whole lifecycle greenhouse gas emissions^{xxiii}.

Transport

Transport's share of UK carbon dioxide emissions has increased from 20.7% in 1990 to 25.3% in 2009^{xxiv} (not including international aviation and shipping). At a regional level, road transport alone accounted for 22.5% of emissions in 2007^{xxv}. It is vital, therefore, to tackle transport as a major part of the Regional Strategy.

Unfortunately, recent history has shown the region's response to be woefully inadequate. Despite evidence produced for the Yorkshire and Humber Assembly^{xxvi} which concluded that, even with the accelerated roll-out of interventions, transport was unlikely to meet its share of emissions reductions. Factoring in aviation into the report, emissions from transport in 2021 are still forecasted to be above 2001 levels. Even without aviation, the forecast for a

decrease in emissions of around 20% (on 2001 levels) means that transport is under-contributing to the need to cut total emissions by 40%.

The policy interventions seen so far have not been anywhere close to the interventions recommended in the 2008 report. This lack of response has been characterised by the Leeds City Region Transport Strategy.^{xxvii} We understand that this strategy aims to reduce emissions from transport by 8.75% by 2026, much of which will come from national measures. This is completely inadequate and reflects a distinct lack of leadership and ambition in tackling transport challenges.

Future investment in transport measures must have a significant reduction in carbon emissions at its heart. Too many schemes already within the Regional Funding Allocation programme will increase carbon emissions and are, instead, driven by the apparent and assumed need for unsustainable economic growth.

There needs to be a refocusing of policy direction towards measures that will:

- **Reduce the need to travel.** Again we refer to the need to remodel the economic growth scenarios as it is clear that the quantity and distribution of growth has a significant effect on transport demand within the region and further afield. Investment and future development which suppresses the need to travel will bring the benefits of decreased carbon emissions, reduced congestion and social cohesion.
- **Changing the way we travel.** A re-emphasis on more sustainable ways of travel such as walking, cycling and public transport will reduce emissions. Friends of the Earth notes the recent findings of the Smarter Travel Choices pilots^{xxviii} and supports the Committee on Climate Change's recommendations^{xxix} that these be rolled out across the UK. The region should adopt this advice and implement these measures across the region.
- **Improving the efficiency of the vehicle fleet.** Supporting the deployment of a low carbon vehicle fleet in the region through a mix of policy interventions (e.g. variable road user and parking charging) and investment in infrastructure (e.g. in electric vehicle charging points) will encourage the residual traffic to significantly reduce its carbon impact.

Quality of Life and Equalities

QLE1: There are significant threats to quality of life through the crisis that could hit the region if we continue an unsustainable trajectory. Many of the direct consequences of climate change are highlighted in the Yorkshire and Humber Regional Adaptation Study^{xxx}. These will be manifested in impacts on people's health, access to essential services and effects of extreme weather events. The Regional Strategy must address these issues in order to adapt to and mitigate these effects.

QLE2: The current model of economic growth and focus on GVA does not necessarily add to individual quality of life and in many ways accentuates inequalities across the region. We have already raised in the section on the Economy and Skills workstream the potential for improving quality of life through a lower level of economic growth. The region can learn lessons from elsewhere in the world where the principles of sustainable development have been at the heart of policy-making and people's quality of life has improved accordingly^{xxxi}.

QLE4: There is a huge opportunity to develop a high quality of life for all people through, for example:

- Engagement with employers to adopt flexible working practices to allow employees to move from time-poor resource-intensive consumption based fulfilment towards time-rich leisure activities.^{xxxii}
- Modelling the effect of greater homeworking for individuals and, if appropriate, engaging with employees to make this more accessible for employees and investing in the infrastructure (e.g. broadband provision) to maximise this potential.
- Redistributing investment and targeting regeneration across the region to ensure that places of employment are sited close to where people live in affordable housing.
- Increasing the health benefits from walking and cycling.
- Eradicating fuel poverty through the treatment of all homes in the region to increase energy efficiency and install renewable energy so that householders can capitalise on the benefits of feed-in tariffs and the Renewable Heat Incentive.

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