

CONSULTATION PAPER**THE FUTURE OF REGIONAL PLANNING GUIDANCE****COMMENTS FROM THE INSTITUTION OF ENVIRONMENTAL SCIENCES****Introduction**

1. This note contains the comments of the Institution of Environmental Sciences on the above Consultation Paper issued by the Department of Environment, Transport and the Regions (DETR) in January 1998.
2. We welcome the invitation to contribute on the issues raised by the proposals for regional planning and related matters. This is an important topic which will influence, and be influenced by, other proposals put forward by the Government in relation to matters such as transport and housing.
3. The structure of our note follows the ordering of the Consultation Paper. As relevant we have referred to the paragraph numbers in the Consultation Paper.

The New Regional Agenda

4. Paragraphs 2.2 and 2.3 outline the role of the Regional Development Agency. We are in agreement with this, but are concerned that no reference is made to the relationship with TECs. It would appear sensible if their role could be co-ordinated by the RDAs.

Regional Chambers

5. No comments.

Integrated transport

6. We provided comment on the consultation papers 'Developing an Integrated Transport Policy' and 'What role for trunk road in England', and copies of our response on these are attached. In relation to regional issues our concerns are that a National Transport Strategy, which we propose, needs to be compatible and co-ordinated at regional and sub-regional level, and needs to relate closely to regional and sub-regional desires and potential. In addition the option of transferring trunk roads to local authorities or regional bodies, or vice versa, should be a local/regional matter in discussion with Central Government. However, it is vital that such transfers are appropriately incorporated into the various regional guidance and structures in place or currently being considered.

Household Growth

7. The role of regional guidance is essential here.

London

8. No comments

European Policy

9. Strong regional co-ordination will help secure funds from the EU, particularly with an increasing regional focus of the Union. It is vital, therefore, that any regional guidance or representative body operates from such a recognition.

Existing Arrangements

10. We would endorse the main criticisms highlighted in paragraph 3.4 regarding existing Regional Planning Guidance, in particular those related to lack of targets, narrow land-use orientation, lack of environmental objectives and appraisal, production time, lack of commitment and insufficient transparency.

Future Arrangements - Options and Issues

11. In paragraph 4.3 it is suggested that RPG should not be the responsibility of RDAs. We would endorse this suggestion. Furthermore, in the absence of a directly elected regional assembly, we would agree that it is inappropriate for a statutory regional plan to be introduced either by the Secretary of State or otherwise.
12. Various short-term options are outlined regarding arrangements for regional 'responsibilities'. We would accept that Option (c), a 'hybrid' of existing arrangements and devolution of RPG preparation to regional planning conferences, is probably the most realistic option. This is provided it is a stepping stone to more accountable regional assemblies and that a clear indication of the timescale associated with the term 'short term' is specified.

Reforming the procedure for the production of RPG

13. The key stages and timetable for the production of RPGs under new arrangements is summarised in paragraph 5.1. This approach seems workable and sensible. However, it is unclear who will fund the technical/survey work outlined under 'Stage 2. Identifying the Options'. (Also, if the EA/SA of the initial proposals is to be mandatory then the funding arrangements for this need to be clarified).

Consultation and ownership

14. No comments

Legitimisation and transparency

15. We would support the idea of an independent review of the RPG. The Examination in Public model is probably the most relevant as it should ensure a cost-effective review that addresses key needs.

Environmental/sustainability appraisal

16. We fully endorse the proposal that the RPG must include an environmental appraisal. In addition, the RPG would appear to be an ideal scale at which to incorporate a Sustainability Appraisal. Assuming a research project is commissioned by DETR, the results of such a study would appear to be the most appropriate means of ensuring a suitable Sustainability Appraisal is carried out for each RPG in due course. However, such guidance needs to be made available in the near future, within 2 years at the most.

Setting a timetable

17. In addition to the issue of the timetable of production of the RPG, consideration needs to be given to monitoring and up-dating the RPG. We would suggest that as a guideline each RPG should be considered for review every 10 years. Whilst it is important to avoid being prescriptive and undertaking a review for the sake of it, a ten year cycle seems long enough for matters to be reviewed. However, as we discuss in paragraph 27, the concept of a 'trigger mechanism' for review may be more appropriate. In the absence of advice on this, however, we would propose the above.

Transitional arrangements

18. No comments.

Future scope and form of RPG

19. We support the notions raised about RPG that it should cover land use, transportation and environmental issues, as well as providing a context for the economic and regeneration programmes of the RDA. We would also suggest training and education matters as under TECs should be linked with RDAs.

The European dimension

20. No comments

Spatial strategy

21. No comments.

Format of RPG

22. No comments

Sub-regional strategies

23. We support the idea that there may be a need for sub-regional policies to be developed. This facility should be formally recognised so that regional forums are aware of this possibility. This will be a matter for the guidance issued by DETR.

Degree of location specificity

24. We support the use of a criteria based approach in assessing new development opportunities, whilst avoiding site specific recommendations. This will need to relate closely with the outputs from the EA, and any possible SA.
25. We also support the concept of the RPG developing policies and proposals that are beyond the scope of individual development plans. In particular the cited examples of transport investment and regeneration programmes are obvious candidates for coverage.

Monitoring and reviewing

26. We fully support the concept of the development of regional and sub-regional 'targets'. These need to be related to national targets as relevant, and need to be developed on a consistent and systematic basis. Whilst the measures to be included in such target setting should be determined at the regional level in general, we believe it would be useful for the DETR to give guidance as to which issues should form a core set for target setting. This may include, subject to the scope of Regional Guidance:

- housing
- traffic levels
- modal split
- pollution reduction
- land take
- in-town/out-of-town development
- aggregates
- waste
- recycling

27. Paragraphs 6.13 and 6.14 raise important issues about the monitoring and reviewing of the RPG. Avoidance of a fixed cycle review period is helpful, and the idea of 'trigger' mechanisms dependent upon the results of monitoring is worth exploring. However, there is an issue of funding such monitoring. For such monitoring to be effective adequate resources need to be allocated. Rather than place the burden entirely on regional planning conferences or forums, it may be helpful for there to be support from central government.

The content of RPG

Sustainable development and environmental understanding

28. The specific role of RPG in relation to sustainable development is important and welcomed. The particular form and consequences of this have been touched upon earlier in our submission.

Economic development and regeneration strategy

29. The potential for the RDAs and RPGs to co-ordinate 'strategic'/'greenfield' sites within a region is important. However, the Secretary of State will have the ultimate role as arbiter between proposals by the RDA and RPG until more accountable regional arrangements are put in place. There does need to be a channel of communication between the RPG and RDA, although local circumstances are likely to dictate this relationship.

Assessment of housing requirements and land availability

30. This role is one of the most central to the RPG. The link between assessing supply and demand to the Sustainability Appraisal is one we welcome. In terms of the issue of testing housing figures, probably the most useful role for the RPG is that it ensures compatibility between methodologies used to develop housing targets.

The interaction between development and transport

31. We have dealt with many of the issues raised under this heading earlier or in previous Consultation Papers. However, in relation to the specific issues raised our response is:
- Involving the Transport regulator as the statutory consultee in the production of the RPG should help involve the relevant public and private transport bodies.
 - The RPG could play a major role in relation to traffic management. By co-ordinating activity within a region the RPG could help avoid 'town jumping' on issues such as city centre parking and out-of-town development.

Countryside and coastal issues

32. This is a major topic, but the key role the RPG could play in this area is in providing a co-ordinated approach within a region and between regions. Such a role is valuable given the trans-boundary nature of many of the features in question.

A broad supply and demand framework for minerals, waste and water

33. The RPG will have a major role here, particularly in relation to helping to secure environmental objectives. Co-operation between the REWPs and RPG producers will be essential, and will help co-ordinate mineral issues, particularly in relation to other matters of relevance such as transport. Similarly, waste matters should fall within the remit of the RPG, particularly as such matters are often cross-county in nature.