

## CONSULTATION PAPER

### PLANNING POLICY GUIDANCE NOTE 11: REGIONAL PLANNING

#### COMMENTS FROM THE INSTITUTION OF ENVIRONMENTAL SCIENCES

This note contains the comments of the Institution of Environmental Sciences on the above public consultation paper issued by the Department of the Environment, Transport and the Regions (DETR) in February 1999. The structure of our comments follows the ordering of the public consultation paper. As relevant we have referred to the paragraph numbers in the public consultation paper.

**Chapter 1: Introduction.** We have no comments on this chapter.

**Chapter 2: new arrangements for the preparation of RPG.** Although the future functions of the Regional Chambers are uncertain, they are a pivotal grouping within the regional development process. Therefore the requirement that their views be fully considered in preparing RPGs is important. Equally, however, democratic accountability must be preserved, and so the issues outlined in paragraph 2.6 need to be strongly endorsed and enforced.

2.7. We agree that if the GO proposes a particular policy of draft text, that it should defend this position at the public examination.

2.8. The range and involvement of different stakeholders in the development of the RPG is important, and is recognised as such in paragraph 2.8.

2.11. We strongly support the proposal to produce a publicly available project plan for producing the RPG. The timetable of 31 months seems realistic and should be strongly encouraged by Government.

We would agree with the proposal that submissions to the SoS on the draft RPG should have proposed changes to national policy in a separate letter or report, and that this letter or report should be publicly available. We would also support the requirement that the RPG should not be dependent upon any of the implementation of the proposed changes to national policy contained in any such letter or report.

2.23 We strongly support the fact that the RPG must include a sustainability appraisal, and have commented on this topic in other responses.

2.26 We would support the emphasis of provision of employment sites that meet national and regional needs on previously-developed land and fully accessible. However, we are glad to see that recognition is made of pursuing such criteria "as far as possible", rather than being absolute requirements.

**Chapter 3: scope and format of RPG.** Must share a consistent vision.

3.4 The point made about policies or proposals in the RPG that cannot be delivered through the development plan system being clearly identified and means of delivery clarified, is important. We would endorse this proposal.

3.6 It will be important to develop sub-regional policies, notably for rural areas. We therefore support this issue.

3.8 It is clearly important that the RPG should not propose site specific policies or proposals, and emphasising this is helpful.

**Chapter 4: economic development.** We have no comments.

**Chapter 5: housing.** We would support the additional aspects that the RPG should be concerned with in terms of developing the overall housing requirement, namely sustainability, choice and quality.

5.5 In terms of the commitments identified under this paragraph, we see a potential conflict in over-emphasising bullet point 4 (extending existing urban areas....) at the expense of planned new town development. The debate on the relative merits of these two forms of development in satisfying sustainability criteria is still on-going and it might be premature to weight the argument too much one way at this point.

5.6 We assume last sentence should read: "However, where these criteria **cannot** be...."

**Chapter 6: transport.**

6.4 The links between RPG and Local Transport Plans will be critical to ensure the successful delivery of transport objectives.

6.8 We fully support the view expressed here that RPG need to take an integrated approach to transport policies.

6.11 Multi-modal studies will prove a valuable tool in identifying and assessing planning and transport options.

**Chapter 7: retail, hospitals, leisure and sports uses.** We have no comments.

**Chapter 8: rural development.** We have no major comments on this chapter, except to support the idea of sub-regional policy development within RPG to cover topics such as rural development.

**Chapter 9: biodiversity and nature conservation.** We have no major comments on this chapter, although it is useful to separately identify this topic.

**Chapter 10: The coast.** The integration of the coastline within a region to ensure an appropriate approach to protection and land-use is welcome.

**Chapter 11: Minerals.** The broad principles behind the Regional Aggregates Working Parties we would endorse, and particularly the relationship to the sustainability appraisal.

**Chapter 12: Waste.** We would endorse the points highlighted under 12.3, namely the setting of waste management capacity and disposal targets, setting monitorable indicators, and assessing the need for regionally significant facilities for management of waste.

We would also support the development of Regional Technical Advisory Bodies (RTBAs), paralleling the role of Regional Aggregates Working Parties, to guide ideas and development in this area.

**Chapter 13: Other topics.** We have no comments on this chapter.

**Chapter 14: Monitoring and review.** The overall thrust of this chapter is welcome, and effective monitoring and reviewing is vital. In that context, the point made in 14.1 regarding the systematic use of quantified regional and sub-regional targets we would support. Equally, however, it is important that such measurement is undertaken only as required to support policy, a point made in 14.4.