

Rt Hon David Miliband MP  
Secretary of State for Environment, Food and Rural Affairs

9 June 2006

Dear Secretary of State

### **Draft Regional Spatial Strategy for the South West**

The South West Regional Assembly has recently published the draft Regional Spatial Strategy (RSS) which has been submitted to the Department for Communities and Local Government and is now open for public consultation. The Assembly is a partnership of Councillors from all local authorities in the region and representatives of various sectors with a role in the region's economic, social and environmental well-being. The Assembly is the Regional Planning Body, and as such has worked with a wide range of partners and stakeholders including all local authorities in the region over the last 2 years to prepare the Draft RSS.

You will know that the South West Region's population and economy have been growing at a significant rate throughout the 1990s and into this century. Our forecasts, embedded in both the Draft RSS and the Regional Economic Strategy (RES), suggest this will continue into the foreseeable future. Our attitude to growth is clear in the region's Sustainable Communities Plan submission, the Way Ahead, and in the number of places applying for Growth Centre status. The region through its Integrated Regional Strategy 'Just Connect', and particularly through the Draft RSS and RES, recognises the real benefits which can arise from growth, if it is managed properly.

The Regional Spatial Strategy will play a crucial role in the South West's economic, social and environmental wellbeing over the next twenty years and well into the future. There are a number of areas where the RSS, if delivered successfully, will contribute to the delivery of Defra's objectives. We have set these out in the appended document, which shows how we believe the RSS can help deliver Defra's objectives, as defined in Public Service Agreements, and where we think national policy could change to help deliver the RSS.

In developing these strategies we have been acutely aware of the essentially rural character of the South West and of the need to plan carefully for future interactions between rural and urban areas. The scale of growth being contemplated over the next twenty years means there is a need to concentrate new housing at the region's larger towns and cities where most jobs will arise. However, we believe our plans also make

sufficient provision across the rural parts of the South West to maintain the vitality of rural settlements with particular emphasis on the market towns.

We hope that you and your colleagues recognise the great progress which has been made in the South West in the last two years in developing challenging strategies which are well integrated and are positive about the future and about growth, and in addressing regional priorities through the Way Ahead and the Regional Funding Allocation (RFA) process. We have set out a number of items where the region needs help from Government if we are to deliver sustainable communities and meet Government's targets for emissions. We would welcome an opportunity to discuss with you and your colleagues any of the areas outlined below. We would be particularly delighted if that were able to happen in the Region.

Yours sincerely

**Jackie Longworth**  
**Chair, SWRA**

**Jill Shortland**  
**Deputy Chair, SWRA**

**Chanel Stevens**  
**Vice Chair, SWRA**

**Sir Simon Day**  
**Vice Chair, SWRA**

**Pat Ferguson**  
**Vice Chair, SWRA**

## **Department for the Environment, Food and Rural Affairs Public Service Agreements and the Draft Regional Spatial Strategy for the South West of England**

*1. To promote sustainable development across government and in the UK and internationally, as measured by:*

- the achievement of positive trends in the Government's headline indicators of sustainable development;*
- the UK's progress towards delivering the World Summit on Sustainable Development commitments, notably in the areas of sustainable consumption and production, chemicals, biodiversity, oceans, fisheries and agriculture; and*
- progress towards internationally agreed commitments to tackle climate change.*

The Draft RSS shows commitment to policy and action to make the region sustainable. It takes as its starting point the vision for the South West set out in the Regional Sustainable Development Framework, and the five headline aims of the Integrated Regional Strategy. It includes two major themes of a sustainable region and sustainable communities within it. The Draft Strategy has been greatly influenced and strengthened by the Strategic Sustainability Assessment - SSA - (incorporating the requirements of the Strategic Environmental Assessment) which was carried out as an integral part of the plan preparation, and tested the emerging spatial options and policies against a range of sustainability objectives. The SSA recognises that there is much to commend in sustainability terms in the Draft RSS, and highlights sustainability strengths and weaknesses. A particular strength is the focused approach to development. Key concerns are over the implications of climate change, particularly the potential increase in travel, reflecting the region's strong economic and population growth.

The Draft RSS recognises climate change as a cross cutting issue that requires measures to both adapt to and mitigate the effects of change by tackling the dispersal of development, promoting sustainable use of resources (and sustainable construction as the norm) and identifying areas and infrastructure vulnerable to change. It also seeks to respond positively to opportunities which might arise as the region's climate and environment change.

Section 1 of the draft RSS sets out four policies on sustainable development to guide the Spatial Strategy, which will help make the DEFRA targets above more achievable. In particular:

### Policy SD1 The Ecological Footprint

The region's Ecological Footprint will be stabilised and then reduced by:

- ensuring that development respects environmental limits;
- requiring the wise use of natural resources and reducing the consumption of key resources such as energy, water and minerals;
- building a sustainable, low carbon and low resource consuming economy which can be secured within environmental limits to bring prosperity and well-being to all parts of the region;

- requiring sustainable construction and design as the norm in all future development and when opportunities arise, improving the region's existing building stock in line with current best practice;
- minimising the need to travel by better alignment of jobs, homes and services, reducing the reliance on the private car by improved public transport and effective planning of future development, and a strong demand management regime applied in the region's main centres in particular;
- requiring a shift towards the more sustainable modes of transport; and
- meeting national and regional targets relating to renewable energy, resource consumption/extraction and waste production/recycling.

Local Authorities, regional agencies and others will include policies and proposals in their strategies, plans and programmes to assess how all new developments, regeneration areas and major refurbishments contribute to stabilising and reducing the region's ecological footprint.

### Policy SD2 Climate Change

The region's contribution to climate change will be reduced by:

- reducing greenhouse gas emissions at least in line with current national targets, ie by 30% by 2026 (compared to 1990 levels); and
- following the principles outlined in SD1.

The region will adapt to the anticipated changes in climate by:

- managing the impact of future climate change on the environment, economy and society;
- identifying the most vulnerable communities and ecosystems given current understanding of future climate change and provide measures to mitigate against these effects;
- avoiding the need for development in flood risk areas and incorporating measures in design and construction to reduce the effects of flooding
- recognising and putting in place policies and measures to develop and exploit those opportunities that climate change will bring;
- requiring 'future proofing' of development activity for its susceptibility to climate change; and
- improving the resilience and reliability of existing infrastructure to cope with changes in climate and in the light of future demand. It will be a priority for the places identified in Section 3 to determine potential future climate change impacts and plan ways in which key services and infrastructure needs to adapt.

All Local Authorities in their LDDs will need to demonstrate how they intend to contribute towards the required 60% cut in CO2 emissions by 2050 and how they intend to identify and respond to the potential impacts of climate change in their area.

### Policy SD3 The Environment and Natural Resources

The region's environment and natural resources will be protected and enhanced by:

- ensuring that development respects landscape and ecological thresholds of settlements;
- reducing the environmental impact of the economy, transport and development;

- positively planning to enhance natural environments through development, taking a holistic approach based on landscape or ecosystem scale planning;
- planning and design of development to reduce pollution and contamination and to maintain tranquillity;
- positive planning and design to set development within, and to enhance, local character (including setting development within the landscape of the historic environment), and bringing historic buildings back into viable economic use and supporting regeneration; and
- contributing to regional biodiversity targets through the restoration, creation, improvement and management of habitats.

#### Policy SD4 Sustainable Communities

Growth and development will be planned for and managed positively to create and maintain Sustainable Communities throughout the region by:

- realising the economic prosperity of the South West and reducing disparity;
- setting a clear vision and strategy to meet the diverse needs of all people in existing and future communities, based on the role and function of cities, towns and villages and their local character and distinctiveness;
- linking the provision of homes, jobs and services based on role and function so that cities, towns and villages and groups of places have the potential to become more self contained and the need to travel is reduced;
- promoting a step change in public transport, taking steps to manage demand for travel, and promoting public transport 'hubs' and access to them;
- encouraging business activity and particularly small businesses and their contribution to the region's prosperity, including through promoting regional sourcing;
- making adequate and affordable housing available for all residents, including the provision of a range and mixture of different housing types to accommodate the requirements of local communities;
- making the best use of existing infrastructure and ensuring that supporting infrastructure is delivered in step with development;
- investing in and upgrading cultural facilities, including their marketing and management;
- creating healthy, safe and secure places to live, for example by following Lifetime Homes and Secure by Design principles;
- providing homes which are adaptable to the changing needs of individuals and provide an opportunity for live/work space;
- delivering a step change in the quality of urban living;
- providing networks of accessible green space for people to enjoy; and
- supporting social and economic progress by enhancing education, skills development and training.

We believe we have a strategy which is in the best long term interests of the region and independent consultants who carried out the Strategic Sustainability Assessment tell us that it is a sustainable approach if it can be delivered; but, we are facing stiff challenges in terms of the effect of climate change on the region – rising sea levels could leave some key transport infrastructure highly vulnerable. There are of course severe limitations on what can be achieved within the powers of the planning system and the resources available to a region. On the latter point, we hope Ministers will

recognise that while the region has been contemplating the long term future through the RSS and RES it has also been addressing shorter term priorities to secure immediate growth through the Way Ahead and the recent Regional Funding Allocation process. In all of this work there are clear messages about the need for adequate resources to build the infrastructure and services which will underpin our future, as well as addressing the unwanted legacy of 'infrastructure deficits.' In particular, the region needs to secure the necessary investment in transport infrastructure to achieve transport objectives of increasing public transport and managing the demand for travel, in order to tackle greenhouse gas emissions. The Draft RSS contains a Regional Transport Strategy which provides a framework for new investment to bring about a 'step change' in public transport.

**Objective I:** Protect and improve the rural, urban, marine and global environment, and lead integration of these with other policies across government and internationally.

*2. To reduce greenhouse gas emissions to 12.5% below 1990 levels in line with our Kyoto commitment and move towards a 20% reduction in carbon dioxide emissions below 1990 levels by 2010, through measures including energy efficiency and renewables. (Joint with the Department of Trade and Industry and the Department for Transport).*

*3. Care for our natural heritage, make the countryside attractive and enjoyable for all and preserve biological diversity by:*

- reversing the long-term decline in the number of farmland birds by 2020, as measured annually against underlying trends; and*
- bringing into favourable condition, by 2010, 95% of all nationally important wildlife sites.*

The environment is the South West's prime asset, it is a 'driver' of economic activity and a major component of the quality of life of residents including those living in cities and towns. The region's cultural facilities, services and experiences also add to the cohesion and sustainability of communities. The draft RSS contains policies for cultural and environmental enhancement and protection, wise use of natural resources, which draw on the Regional Environment Strategy, Regional Waste Strategy and Regional Cultural Strategy. Through this, the draft RSS contains a wide range of policies to help ensure prudent use of natural resources, sensitive development and a sustainable countryside.

The sustainable development policies outlined above include a commitment to reduce CO2 emissions by 30% over the period of the plan as well as a range of sustainable construction policies.

**Objective II:** Enhance opportunity and tackle social exclusion in rural areas.

*4. Reduce the gap in productivity between the least well performing quartile of rural areas and the English median by 2008, demonstrating progress by 2006, and improve the accessibility of services for people in rural areas.*

The Draft RSS seeks to use development to support all communities in the region, recognising that encouraging some of the larger settlements to grow will assist service provision by achieving economies of scale and maximising accessibility. The

Draft RSS recognises that the South West has a great variety of towns and villages, with a large proportion of the population living in these smaller communities. The Strategy is positive about the future of these places, and makes provision for sufficient development to maintain the vitality of the large part of the region which is rural, focusing, in particular, on the role of market towns. The Draft RSS also seeks to ensure that, wherever development takes place in the region, services are planned in step with development. The overall development strategy of the Draft RSS is designed to ensure that development can play its full part in tackling inequality. Within this overall approach, particular attention is given to the role, needs and potential of rural settlements. In particular, the strategy in Development Policy B (Section 3) recognises the crucial role of market towns and the need to maintain their viability as service and employment hubs through further development. Development Policy C in Section 3 also recognises the importance of some development in small towns and villages to support economic vitality and the provision of services.

A major barrier to social mobility and improved productivity in rural areas is lack of affordable housing. Even though this region has been growing, we are increasingly beset by problems of housing affordability. The combination of relatively low average wages and relatively high costs of housing, together with pressures in some places from high demand and second homes, means that many communities and individuals are disadvantaged. The region is responding to the growth agenda and through the Draft RSS is planning to make provision across the region for housing at about 15% higher than current rates. However, in the South West, higher build rates of market housing are not necessarily the answer to affordability in all areas; particularly smaller rural communities. Our strategy is to focus new development at larger urban centres, not forgetting the needs of rural communities.

Our concern remains that in some parts of region, supply of market housing can generate demand, without necessarily resolving the root problem. The region has benefited from a major uplift in funding for social housing but recent evidence is showing that the South West now has the most acute region-wide problem of affordability. Government is requested in subsequent rounds of funding to take account of what the Draft RSS is trying to achieve in terms of distribution of market housing and to ensure sufficient resources are available to allow significant inroads to be made into the rural affordability problem, by adequate provision of social and shared equity housing.

It is our belief that sparsity is not sufficiently recognised in government funding formulae and that this significantly disadvantages the South West.

**Objective III:** Promote a sustainable, competitive and safe food supply chain which meets consumers' requirements.

**Objective IV:** Promote sustainable, diverse, modern and adaptable farming through domestic and international actions.

*5. Deliver more customer-focused, competitive and sustainable farming and food industries and secure further progress, via Common Agricultural Policy (CAP) and World Trade Organisation (WTO) negotiations, in reducing CAP trade-distorting support.*

The draft RSS contains policies which encourage more sustainable patterns of land management and also allows scope for economic opportunities arising from the intrinsic qualities of the local environment to be taken up and for appropriate economic diversification in response to major changes in the farming and land based industries.

In rural areas, reform of the Common Agricultural Policy (CAP) means that subsidies will no longer be so closely linked to farm production, and this should lead to more efficient farm businesses as a result. The expansion of the second 'pillar' of the CAP, the Rural Development Regulation, is likely to encourage greater diversification away from agricultural activity, and an increased desire on the part of farmers to diversify their capital assets, for example into workspace. Businesses in rural areas now and in the foreseeable future are likely to have little connection with the land based industries but should be supported where they secure jobs for local people and improve the viability of rural communities. The draft RSS provides a framework of encouragement for the development of small businesses in the 'market towns' and smaller settlements throughout the region.

**Objective V:** Promote sustainable management and prudent use of natural resources domestically and internationally.

*6. Enable at least 25% of household waste to be recycled or composted by 2005-06, with further improvements by 2008.*

*7. Eliminate fuel poverty in vulnerable households in England by 2010 in line with the Government's Fuel Poverty Strategy objective. (Joint with the Department for Trade and Industry).*

Managing waste is one of the greatest challenges facing the region over the period of the RSS. 'From Rubbish to Resource', the Regional Waste Strategy, was published after extensive consultation in 2004 and sets out in detail the regional approach to reducing and managing the region's waste. The South West's approach to waste is to "minimise the amount of waste produced in the region, and then to make a major shift away from current reliance on landfill of untreated waste, so that by 2020 less than 20% of waste produced in the region will be landfilled". The draft RSS contains strong guidelines on the provision of capacity to handle waste building in the proximity principle to ensure the transport of waste is minimised, however local government in the region needs the resources to ensure this is achieved.

Another main plank of sustainability in the draft RSS concerns our policies to require sustainable construction and high standards of insulation and on - site energy generation to become the norm. Making this aspect of the Draft RSS work in the South West will require a level playing field nationally. We believe Government should set a much higher national mandatory standard than 2006 part L for energy performance in new housing. This needs to be extended to all other building types and major renovation should be required to achieve the highest practicable energy standards and at least 50% improvement in energy efficiency. Requiring all new buildings to be carbon neutral (equivalent to level 5 of the draft Code for Sustainable Homes) is practicable and should be made standard. We appreciate that these proposals could have an effect on capital costs of new dwellings but taking a lifetime

view, they should result in much lower running costs in the context of escalating fuel prices, so helping to alleviate fuel poverty.

The draft RSS also includes renewable energy policies which set challenging targets for local authorities in terms of electricity generation, renewable heat and offshore technologies.

**Objective VI:** Protect the public's interest in relation to environmental impacts and health, and ensure high standards of animal health and welfare.

*8. Improve air quality by meeting the Air Quality Strategy targets for carbon monoxide, lead, nitrogen dioxide, particles, sulphur dioxide, benzene and 1,3 butadiene. Joint with the Department for Transport.*

*9. To improve the health and welfare of kept animals, and protect society from the impact of animal diseases, through sharing the management of risk with industry, including:*

- a reduction of 40% in the prevalence of scrapie infection (from 0.33% to 0.20%) by 2010;*
- a reduction in the number of cases of BSE detected by both passive and active surveillance to less than 60 in 2006, with the disease being eradicated by 2010; and*
- a reduction in the spread of Bovine TB to new parishes to below the incremental trend of 17.5 confirmed new incidents per annum by the end of 2008.*

The draft RSS aims to ensure that the impacts of development proposals on air quality are taken into account so that new development will not exacerbate air quality problems in existing and potential Air Quality Management Areas.

The achievement of a more sustainable region is highly conditional upon changes in individual behaviour and upon government policy. The Draft RSS can make only limited progress based on its effect on the scale and distribution of growth. Re-configuring the region so that a higher proportion of people live at the 21 identified Strategically Significant Cities and Towns in 2026 will have a major effect in sustainability terms especially if all local public services are of a consistently high quality. This could be overshadowed, however, by increased emissions from car, and particularly, air travel. Reducing the need to travel by car is at the core of the RSS and as already indicated, encouraging people out of their cars will need the 'carrot' of increased public transport attractiveness and availability (bus and rail) as well as the 'stick' of demand management and possible national traffic reduction targets. When assessing this Draft RSS, Government will need to consider carefully whether its strategy of providing for increased air travel is sustainable in the long term and whether the resourcing of public transport in the South West is adequate.

The region has demonstrated its willingness to embrace the growth agenda but has limited resources available 'to make things happen' and to deal with accumulated 'infrastructure deficits'. The region is looking carefully at a Regional Infrastructure Fund to enable forward funding of development and has identified the need for 'capacity building' in its RFA transport bid. In both cases, the Assembly seeks a

positive response from government, the necessary resources, and the freedom and flexibility to enable RFA funds to be used for capacity building.

The Assembly remains gravely concerned that the resources required to deliver the very substantial investments in social, health, educational and transport infrastructure will not be in place to facilitate the high levels of development envisaged in the Draft RSS. 'Making the cities and large towns work' is a recurring theme in the Draft RSS and in the Regional Funding Allocation submission. Crucial to this, as well as investment in the programme proposed, is sufficient revenue resources available to enable necessary transport modelling and other master planning work to be carried out and to support growth in public transport services.

**South West Regional Assembly  
June 2006**