

July 2008

South West Regional Spatial Strategy Proposed Changes

Sustainability Appraisal Non Technical Summary

Prepared for the
Secretary of State for Communities & Local Government
by
Land Use Consultants
in association with
Collingwood Environmental Planning
and
Levett-Therivel Sustainability Consultants



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REGIONAL SPATIAL STRATEGY
PROPOSED CHANGES**

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NON-TECHNICAL SUMMARY

What is the purpose of Sustainability Appraisal?

1. The preparation of the South West Regional Spatial Strategy (RSS) is required by law to be subject to Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment, with the aim of achieving the goal of sustainable development.

*“The goal of **sustainable development** is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. That goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible.”*

Securing the Future. The UK Sustainable Development Strategy. Cm 6467.

2. The purpose of the SA was to assist the preparation of the Proposed Changes to the Draft RSS by identifying the key sustainability issues facing the region, to determine what would be the likely effects of the Draft RSS on these issues, and put forward recommendations to improve it. The aim was to ensure that the Proposed Changes have as many positive effects as possible, and that any negative effects are avoided when the policies are turned into development on the ground.

How was the SA carried out?

3. The SA was undertaken independently by Land Use Consultants in association with Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants – the same team that carried out the appraisal of the Draft RSS. Appointed in November 2007, the SA consultants provided advice throughout the preparation of the Proposed Changes to the Secretary of State for Communities and Local Government, via officers at the Government Office for the South West of England GOSW.
4. The SA was an iterative process, with progressively updated versions of the Proposed Changes put before the SA team for appraisal. Each time the findings and recommendations of the SA were considered by officers preparing the Proposed Changes. Throughout, continuous reference was made to the findings and recommendations of the Panel Report of the Examination in Public of the Draft RSS.
5. We would like to thank the officers at GOSW responsible for preparing the Proposed Changes on behalf of the Secretary of State for their cooperation and good humour in responding to our findings and recommendations during the course of the work. Both the Proposed Changes and the SA have been undertaken to a very challenging timetable, and without the benefit of being able to consult without outside parties except where we needed factual information to carry out the SA. The consultation process will therefore offer the opportunity to test the findings of the

SA with other organisations and the wider public in order to ensure that the final adopted RSS properly takes into account its sustainability effects.

What are the key sustainability issues facing the South West?

6. We judged that the character and sustainability issues facing the South West has not changed significantly since publication of the original appraisal of the Draft RSS in March 2006. The South West offers a high quality of life for most people in the region. Its natural and built environment is generally very attractive, and its economy is strong particularly in the north and east of the region. The region has also been experiencing some very positive trends. For example, economic performance in Cornwall has improved markedly in recent years. The condition of nationally important wildlife sites has been getting better. The quality of rivers and coastal waters is now generally excellent. But some unsustainable trends, often not always very noticeable, continue to exist:
- People's incomes, educational qualifications and skills, and the wealth that the economy generates, all tend to reduce significantly as distances from London and the South East increase.
 - Levels of deprivation and social exclusion that affect certain communities in both rural and urban areas are proving very persistent, even in the more prosperous north and eastern parts of the region.
 - There are many people who cannot afford to buy a home on the open market, and there is a backlog of residents whose housing needs are not being met.
 - Traffic continues to increase as car ownership rises, and because people are using their cars to travel more frequently and often over longer distances.
 - The region continues to experience loss and fragmentation of habitats and species.
 - Some of the historic assets of the region are at risk, either from development or from a general lack of care and attention.
 - Parts of the region, particularly in the north and east, are becoming more urbanised in character, as a result of increased development, infrastructure, with an increase in noise and light pollution leading to a loss of tranquillity and dark skies.
 - The amount of materials consumed in the region continues to increase, as does the amount of waste, despite improvements in recycling.
 - The region's greenhouse gas emissions are too high, and climate change is likely to lead to a range of challenges, such as increased risk of flooding from rivers and along the coast, especially where sea level is rising, and there may be issues in some parts of the region over the amount of water available to meet the needs of homes, business and farming.

7. The SA team felt the above sustainability issues were still relevant to the South West, but that the following changes required additional comment:
- The issue of household growth has become even more acute, which coupled with the lack of affordable housing, has made it even more difficult for some people in the region, or wishing to live in the region, gaining access to the home of their wishes in the location where they would like to live.
 - The economy has been impacted by rising fuel and food prices, as well as more expensive commodities and materials. The economic outlook is markedly less positive, less settled and less predictable than it appeared when the Draft RSS was prepared, and even when the EiP took place.
 - The issue of climate change has become even more pressing. The high fuel prices have shown how increasingly dependent the UK is on foreign imports of energy, and stocks of oil are reducing. But even more important, the science of climate change suggests the need for rapid and radical cuts in human greenhouse gas emissions has become even more urgent. The South West, which in world terms is a relatively high producer of greenhouse gas emissions, needs to make a significant reduction in its own emissions.
8. The SA has taken all of these issues into account, both old and new, in the appraisal of the Proposed Changes.

SA objectives

9. The review of other policies, plans, strategies and programmes, and the identification of sustainability issues provided the basis for a set of sustainability objectives for use in the SA. The sustainability objectives provided the main tool for assessing the Proposed Changes. They comprised six headline objectives in the form of questions:

SA Headline Objectives

- 1) Will the RSS improve health?
- 2) Will the RSS support communities that meet people's needs?
- 3) Will the RSS develop the economy in ways that meet people's needs?
- 4) Will the RSS provide access to meet people's needs with least damage to the environment?
- 5) Will the RSS maintain and improve environmental quality and assets?
- 6) Will the RSS minimise consumption of natural resources?

10. Each headline objective was supported by a set of more detailed questions that were used to decide whether the Draft RSS would be likely to achieve the headline objective. The SA headline objectives and supporting criteria proved to be a very useful tool for determining the sustainability strengths and weaknesses of the Proposed Changes, and for making recommendations for improvement.

How did the SA influence what the Proposed Changes RSS says?

11. In addition to this formal SA Report, we have provided a number of draft SA reports, findings and recommendations to GOSW, along with regular dialogue between the GOSW officers and the SA team to discuss and revise recommendations.
12. Important SA recommendations that have been addressed in the Proposed Changes RSS are:
 - Increased emphasis on encouraging people out of their cars, especially at the Strategically Significant Cities and Towns (SSCTs) and their urban extensions.
 - Increased emphasis on development away from areas at risk of flooding within HMA policies.
 - Restoration of some (though far from all) passages of supporting text from the Draft RSS that had been deleted in early versions of the Proposed Changes, which we felt are necessary to give a full and fair picture of the gravity of the sustainability challenges facing the region and the barriers to overcoming them.
 - Recommendations that we made with respect to rural areas, in particular with respect to Policy ES1 Sustainable Economic Prosperity and its supporting text.
13. In addition, a number of changes were made in response to the Habitats Regulations Assessment which, although not arising directly from the SA, are welcomed in sustainability terms.
14. While the Proposed Changes RSS has attempted to address a number of the SA recommendations made during the various iterations of our appraisal, many recommendations on areas of significant concern remain outstanding in Sections 7 to 16.
15. Moreover, in several key areas, the Proposed Changes significantly weaken policies which we had originally praised as exemplary, and have not made any attempt to meet the concerns we repeatedly raised during the appraisal. In particular, we made a number of strong recommendations with respect to Development Policy G Sustainable Construction, Sustainable Development Policies SD1 and SD2 on The Ecological Footprint and Climate Change respectively, and Policy RE5 Decentralised Energy to Supply New Development.
16. We did not recommend any substantive changes to the overall Spatial Strategy included in the Proposed Changes, although we do question the reasoning underpinning some of the proposed locations for growth (e.g. Chippenham, Newton Abbot and Plymouth), and we have identified a number of locations where environmental constraints could potentially be an issue.

What alternatives to the Draft RSS were considered?

17. Where the Proposed Changes to the RSS are significantly different from the Draft RSS and have not accepted the Panel's recommendations set out in the Panel Report there are in effect three options that need to be appraised:

- (i) The Draft RSS (June 2007).
- (ii) The Panel's recommendations set out in the Panel Report (December 2007).
- (iii) The Proposed Changes RSS (July 2008).

18. We have attempted to appraise separate options for those policies that this applies to (e.g. the sub-regional policies HMA1, 4, 5 and 8). However, the recommendations in the Panel Report are difficult to comprehend as an 'alternative strategy' in their own right. Therefore, throughout our appraisal, we focussed on the effects of the Proposed Changes, and in particular the significant differences between the Proposed Changes and the Draft RSS. The Panel recommendations and discussion in the Panel Report also helped to inform our appraisal work and our conclusions and recommendations. Finally, where our SA findings identified that the Proposed Changes RSS is likely to give rise to significant problems, we suggested different alternatives that may need to be considered. For example, we believe the option of building one or more large new settlements should be specifically considered in an early review of the RSS given the substantial further increase in housing growth proposed.

What are the sustainability effects of the Proposed Changes RSS likely to be?

- 19. The Proposed Changes are significantly different from the Draft RSS. From a sustainability perspective, there is much still to be welcomed in the Proposed Changes, but there are also aspects that cause us significant concern.
- 20. The most obvious change is the significant increase in housing numbers planned for the region. With one or two exceptions, these have now been brought into line with the latest household projections. The Proposed Changes are positive for housing availability because they should provide at least one dwelling per household by 2026. The Proposed Changes also provide for both a higher proportion and a higher total number of affordable homes. The overall percentage of affordable homes (35% of all new dwellings in the Proposed Changes as opposed to 30% in the Draft RSS) is a challenging target, but one that could be achieved in light of the overall increase in housing numbers. This is to be welcomed.
- 21. The Proposed Changes also make a strong effort to achieve a better alignment between where jobs are likely to be created and where the majority of the homes will be built. This should help to create shorter journeys so long as people decide to live close to where they work. Both jobs and homes will need to be easily accessible by excellent public transport services for those who are unable or unwilling to walk or cycle. The Proposed Changes include good news on public transport, but they still propose increases in road capacity, which both assumes and will help ensure that traffic continues to increase. Another factor is high quality local public services, but the Proposed Changes remove policy on this. It is therefore overall not at all clear that the better jobs/homes alignment will achieve its desired results.
- 22. Nevertheless, the Proposed Changes do put forward a range of welcome strengthenings to the transport proposals. They aim to encourage people out of their cars, especially at the Strategically Significant Cities and Towns (SSCTs) and their urban extensions. These include demand management measures that will help

to make walking, cycling and public transport provision more attractive and use of the car less attractive. The deletion of the upgrading of the second strategic route to the South West (i.e. the A303/A358) is also welcome in this respect, but offset by the similar deletion of a number of specific public transport projects that appeared in the Draft RSS. Despite some of the welcome amendments to policies in the Proposed Changes, we think that they will only retard unsustainable trends, not reverse them. 'Less bad' is not the same as 'good'.





















23. The scale of additional development in the Proposed Changes and the pace of development also raises significant sustainability concerns. Under the Proposed Changes there will be 592,460 more dwellings in the region in 2026 compared to 2006, an increase in the total dwelling stock of 26%. This represents a 29% increase in the number of new dwellings than was proposed in the Draft RSS. The majority of the SSCTs will grow by more than 30% in 20 years. The greater the growth being accommodated in this way, the more that it will change the character of the settlements concerned and the more it will place strain on their services and infrastructure. This in turn will make it more difficult to achieve quality of life objectives and to deliver development within environmental limits.
24. In identifying Areas of Search for development, the Proposed Changes have sought to avoid the most environmentally sensitive locations. Nonetheless, there remains potential for some direct impacts, such as the loss of best and most versatile agricultural land. We have also highlighted concerns about indirect impacts on the environment. For example, several of the SSCTs are constrained due to their high quality landscape, biodiversity and historic interest. Indirect impacts could include the effects of development on the character and setting of natural and historic landscapes and assets, and impacts on biodiversity from recreation, and from noise, light and air pollution associated with increased population, new development and traffic.
25. In a number of locations flood risk is an issue, including coastal flood risk, flooding from rivers, and flash flooding from inadequate drainage systems. All of these flood risks are likely to increase as a result of climate change. The Proposed Changes seek to guide development to lower risk areas, but further detailed work at the local level is needed to ensure that any remaining risk is acceptable. The capacity of sewage treatment works and supply of water resources is also an issue in some locations due to the need to avoid adverse impacts on sites designated for their nature conservation interest.
26. We have consistently argued that the higher the level of growth in the region, the higher the quality of development will be need to be – particularly in terms of design, the efficiency in the use of materials to construct them, and the natural resources to service them, such as energy and water. This is particularly important if the region is to develop in line with the previously excellent but now significantly weakened Sustainable Development Policies (Policies SD1 to SD4).
27. It is also dismaying that several policies in the Draft RSS which would have played a valuable role in giving practical force to the aspirations of these policies – notably Policy G on Sustainable Construction and Policy RE5 on Renewable Energy – have

had their regionally distinctive policy content removed in the Proposed Changes. The replacements of these two policies just restate national policy.

28. We believe the combination of higher growth and weaker sustainability requirements increases both the potential problems of the current spatial strategy, and the potential benefits of one or more large new settlements. This alternative should therefore be systematically considered in an early review of the RSS.
29. We also have concerns about deliverability. There is a real danger that, in an effort to achieve the housing targets, even those policies on development quality and resource efficiency that remain in the Proposed Changes could be compromised. This risk has now increased in recent months given the downturn in the economy and the housebuilding sector in particular.
30. Likewise, planned job growth in the Proposed Changes is on the basis of 3.2% GVA growth per annum of average – the same as the Draft RSS. The Panel regarded this rate of growth as “*an effort to ensure economic development within the sub-regions is not inhibited in the shorter term*”, and concluded that, in this respect, the Draft RSS was reasonably aligned with the Regional Economic Strategy (Panel Report, para. 2.10).
31. We acknowledge this argument, but question whether this level of growth will be either achievable or environmentally sustainable. Whilst it is difficult to forecast economic growth over a 20 year period, the recent economic shocks since the EiP are likely to have an effect on the region’s economy. This suggests that the high levels of economic growth upon which the Proposed Changes RSS is based is now unlikely, especially in the early years.
32. We have also consistently argued that an economy based on increasing connectivity and vulnerability to external threats and disruptions is neither sustainable in the long-term nor consistent with the aim to increase the circulation of wealth in the region. The proposed expansion of the region’s airports is a good example of a policy that runs counter to these sustainability goals.
33. Table I provides a summary of the sustainability effects of the Proposed Changes RSS and how these compare with the Draft RSS. Overall, the Proposed Changes have some aspects that are to be welcomed in sustainability terms. But there are more which in our view significantly weaken a Draft RSS which acknowledged and in general made an admirable effort to respond to the most pressing sustainability challenges facing the region: challenges which have if anything become even more stark and urgent since it was drafted.

Table 1: Summary of effects of Proposed Changes RSS

Key:		
<u>Column 1</u>		
Questions from the SA Framework that were used to decide whether the RSS will have a positive or negative effect		
<u>Column 2</u>		
++	Significant positive effect	(Note: Where more than one symbol is given, this means mixed effects will occur)
+	Positive effect	
-	Negative effect	
--	Significant effect	
?	Uncertain effect	
<u>Column 3</u>		
☺	Proposed Changes more sustainable than the Draft RSS	
☹	Proposed Changes about the same sustainability as the Draft RSS	
☹	Proposed Changes less sustainable than the Draft RSS	
Detailed question: Will the Proposed Changes RSS...	Proposed Changes Overall Score	Change since Draft RSS
SA High Level Objective 1: Improve health		
Improve health?	++/-	☹
Reduce health inequalities?	+	☹
Promote healthy lifestyles, especially routine daily exercise?	+	☹
SA High Level Objective 2: Support communities that meet people's needs		
Help make suitable housing available and affordable for everyone?	++/?	☺
Give everyone access to learning, training, skills and knowledge?	+/-	☹
Reduce crime and fear of crime?	+/-	☹
Promote stronger more vibrant communities?	+/-	☹
Increase access to and participation in cultural activities?	+	☹
SA High Level Objective 3: Develop the economy in ways that meet people's needs		
Give everyone in the region access to satisfying work opportunities, paid or unpaid?	++/?	☹
Help everyone afford a comfortable standard of living?	+/-	☹
Reduce poverty and income inequality?	+/?	☺

Detailed question: Will the Proposed Changes RSS...	Proposed Changes Overall Score	Change since Draft RSS
Meet local needs locally?	+/--	
Increase the circulation of wealth within the region?	?	
Harness the economic potential of the coast in a sustainable way?	+/-	
Reduce vulnerability of the economy to climate change and harness opportunities arising?	+/-	
SA High Level Objective 4: Provide access to meet people's needs with least damage to communities and the environment		
Reduce the need/desire to travel by car?	++/--	
Reduce the need/desire to travel by air?	--	
Help everyone to access basic services easily, safely, and affordably?	+/-	
Make public transport, cycling and walking easier and more attractive?	++/-	
Encourage a switch from transporting freight by road to rail or water?	+/--	
SA High Level Objective 5: Maintain and improve environmental quality and assets		
Protect and enhance habitats and species (taking account of climate change)?	?	
Promote the conservation and wise use of land?	+/--	
Protect and enhance landscape and townscape?	++/--	
Value and protect diversity and local distinctiveness including rural ways of life?	+	
Maintain and enhance cultural and historical assets?	++/-	
Reduce vulnerability to flooding, sea level rise (taking account of climate change)?	?	
SA High Level Objective 6: Minimise consumption of natural resources		
Reduce non-renewable energy consumption and 'greenhouse' emissions?	+/--	
Keep water within local carrying capacity limits (taking account of climate change)?	+/--	
Minimise consumption and extraction of minerals?	+/-	
Reduce waste not put to any use?	+	
Minimise land, water, air, light, noise, and genetic pollution?	--/?	

What could be done to make the Proposed Changes RSS even more sustainable?

34. Throughout our report we put forward recommendations that we believe will address the most significant of our sustainability concerns. If implemented, these will help to ensure that the development delivered is much more sustainable than currently proposed.
35. We wish to highlight:
- Restoration of the original Draft RSS wording for Policies SD1 and SD2.
 - Restoration of specific, prescriptive, regionally distinctive policy content to Development Policy G and Policy RE5.
 - The need to ensure that housing numbers can be revised downwards as well as upwards in Policy HD1 if clear reasons emerge at the local level that mean that delivery of the numbers provided in the Proposed Changes will be unsustainable.
 - The need for specific and effective safeguards to ensure that 'corridor improvements' and 'unlocking of pinchpoints' do not in practice just mean providing extra capacity to accommodate motor traffic growth.
36. In addition, a number of recommendations from the original appraisal of the Draft RSS remain. These include:
- Aim to reduce traffic as a whole rather than just reducing the rate at which traffic is increasing.
 - Remove the support given to airport and related development. We are well aware that it is national policy to provide for air travel growth. However, this does not refute the clear evidence that this is not compatible with climate security.
 - Give clearer guidance on how those parts of the region that will be most affected by climate change should adapt (e.g. those coastal settlements that will be affected by sea level rise).
 - Consider whether and how the RSS could give clearer guidance on how to deliver more sustainable patterns of development and activity outside of the SSCTs.
37. We also included in our original appraisal recommendations to Government to ensure that the right policy and regulatory framework is provided across all departments to make development in the region more sustainable. These recommendations remain.

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