

s w c o r e



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The Draft Regional Spatial Strategy (RSS) for the South West 2006 - 2026

Joint consultation response from the South West Chamber of Rural Enterprise (SW CoRE) and the South West Rural Affairs Forum.

Background

The South West Chamber of Rural Enterprise (SW CoRE) co-ordinates representation of the land-based sector across the South West region.

The South West Rural Affairs Forum (SWRAF) is DEFRA's advisory forum in the South West and has a broad membership concerned with the countryside and rural affairs across the South West.

This paper represents the consensual views of a meeting held on 9 August 2006 to which all members of SW CoRE were invited and at which the SWRAF was represented. It focuses on the main issues relating to rural areas in general and rural enterprise in particular.

A list of SW CoRE members can be viewed at www.swcore.co.uk and SWRAF members at <http://www.gosw.gov.uk/gosw/envrural/rrpolicy/swraf/>

1. Key points

A ***We propose that more work needs to be done to understand the implications of current rural change and a separate policy needs to be included in the strategy to cover rural areas.***

The economy of rural areas is facing deep rooted and fundamental change: among dynamic pressures have been the reform of the Common Agricultural Policy, which has dramatically changed the economics of farming; the development of broadband which has enabled new types of working in remote rural locations, the increasing awareness of the need to provide alternative energy sources and the continued attractiveness of rural areas to inward migration. Although there is some discussion of rural change in the draft strategy the policies are in general backward looking and do not provide a basis for handling these opportunities to build a more sustainable rural future. The planning of rural areas faces new challenges and the strategy must be able to support imaginative responses to handle these developments.

B ***We do not believe that the draft strategy provides adequate support for the creation of new business in rural areas.***

It is a central tenet of sustainability that people should work close to where they live. Hence we understand the emphasis on accommodating the net inward migration into the region in the Principal Urban Areas (PUAs). However, the experience of recent planning history is that by not providing sufficient economic development in rural areas (and in particular failing to replace jobs lost in traditional rural industries) we have encouraged increasing levels of commuting as people increasingly travel from rural areas to urban areas to work.

C ***We do not believe that the draft strategy provides sufficient support for innovative solutions to address the lack of affordable housing in rural areas.***

The loss of housing stock to inward migrants has reduced the availability and affordability of housing for the indigenous population making it hard for those brought up in rural areas to continue to live and work in those areas. The strategy needs to take account of the recommendations of the Goodman Report.

D ***We suggest that the strategy include a specific policy on rural transport.***

There is no guidance in the strategy on rural accessibility. The strategy does not properly consider the complexity of rural transport needs. The ability to continue to provide a sustainable transport infra structure is dependent on maintaining the economy of rural areas and balanced communities.

E ***The opportunities of rural areas to mitigate the ecological footprint should be acknowledged and supported.***

Rural areas provide opportunities for carbon reduction by the production and use of bio fuels for heating, transport and electricity production. In addition there are opportunities for decentralised power generation in rural areas using sustainable sources and sustainable construction using community heating to better utilise renewable resources.

2. A Sustainable Future for the South West - Section 1

2.1 The rural areas of the South West are fundamental to the sustainable future of the region. By giving an impression that the strategy does not support development in rural areas a huge opportunity could be missed. Some of the most rural counties in the South West have the highest rates of business start ups and the most protected landscape areas have excellent records in creating business. The most productive businesses of the future could well sit comfortably in rural areas and it is imperative that the Regional Spatial Strategy does not prevent this.

2.2 The rural economy is not homogenous across the region. Indeed the South West is the largest, most rural and most diverse of the English regions and its countryside and coastline is one of its major assets. There needs to be recognition that different solutions are required for different rural areas, related to their relative accessibility to urban areas and innate characteristics.

3. The Context for the Spatial Strategy – Section 2

3.1 The implications from the evidence base do not seem to follow through in the policies, in particular SD4 on Sustainable Communities and in 1.6.18. We would suggest further work on the rural economy, given the dramatic changes in the past twenty years. We note that the strategy's own sustainability appraisal is critical of the lack of a clear vision for creating sustainable rural areas.

4. The Spatial Strategy for the Scale and Location of Development – Section 3

4.1 The evidence of the Goodman Report and the Council for Rural Communities is that supply of housing at affordable prices for the indigenous rural population is already inadequate and barriers to creating workspace in rural areas are already considerable. We are concerned that in practice the policies proposed will not allow current trends to be reversed.

4.2 We do not believe that simply limiting the scale of development will create more sustainable communities. Most market towns will fall under "Development Policy C". This makes no allowance for the unpredictable changing requirements from rural areas over the twenty year period of the plan. However, areas outside market towns including those areas which the market towns serve and on which

market towns depend have no development policy at all. We believe that there should be a policy for rural areas.

- 4.3 The basis for focusing development on the largest settlements is that such areas are more self contained than smaller settlements and likely therefore to balance employment with housing thus minimising transport needs. This balance is not so evident in market towns which have strong relationships with their rural hinterland. It is important that the relationship with the economy of the rural hinterland is part of the consideration of development in market towns
- 4.4 We are concerned that in cities, particularly Exeter and Bristol, the plans for employment creation exceed the planned housing provision. The shortfall of housing is likely to increase urban demand for, and decrease the affordability of, the rural housing around those cities.

5. Regional Approach to Transport – Section 5

- 5.1 As it stands, the strategy does not contain policy or guidance on rural accessibility and lacks an understanding of transport needs for people in rural areas. Public transport is demand-led and if growth is not enabled in rural areas, the availability of public transport will continue to decline.
- 5.2 Information technology is changing peoples working patterns. The proportion of home working in the South West is the highest of any region.
- 5.3 Diversification following CAP reform will be necessary for many land-based businesses to survive. In practice an acknowledgement of previous levels of traffic to a farm unit is not being considered. When an alternative business is set up, it is normally seen to be causing 'new additional traffic', whereas it is actually reducing commuting distances and congestion in urban areas.

6. Harnessing the Benefits of Population Growth and Managing the Implications of Population Change - Section 6

- 6.1 We believe that the policies proposed to provide affordable housing, with an emphasis on exception sites and higher thresholds for affordable housing on market housing sites are inadequate. Higher thresholds will tend to undermine the delivery of market housing in rural districts, particularly on brown field sites with potential for alternative employment uses. Under provision of housing in some urban centres will also add to upward pressures on rural house prices.
- 6.2 The recommendations of the Goodman Report and in particular the need to provide affordable housing outside market towns needs to be reflected in the strategy.

7. Enhancing Distinctive Environments and Cultural Life – Section 7

- 7.1 There are many internationally important wildlife sites in close proximity to conurbations, for example, Poole, Bournemouth and Christchurch. There is good evidence that particular forms of recreational use are having a detrimental effect on wildlife. Any further development should be matched with additional "urban green space", so that new residents do not automatically end up using the special wildlife sites for all their recreational needs. This point should be made more clearly in this section.
- 7.2 We recommend clearer practical guidance to facilitate the development of renewable energy and the following should be incorporated in the RSS: -
- Support for the use of alternative energy sources, such as bio fuel for transport.
 - Sustainable construction including new developments using community heating to attain zero CO₂ emissions.
 - Support for the decentralisation of energy plants including a presumption in favour of the grant for planning permission for Combined Heat and Power plants and local energy production.

**8. Enhancing Economic Prosperity and Quality of Employment Opportunity
– Section 8**

8.1 Whilst we welcome the general support of economic development we are concerned as to how the detailed policies will be interpreted in practice. In particular we are concerned over the potential interpretation of the phrase 'sustainable locations'. We are concerned that this may be interpreted simply in terms of access to public transport and hence prevent the replacement of jobs on farms by creating employment space in redundant farm buildings?

8.2 Policies need to recognise the specific characteristics of land-based and other rural businesses to help them adapt to a rapidly changing market. Policies need to adjust to the needs of businesses working in new more sustainable ways, not only within market towns but also in their rural hinterland.

9. Addressing Deprivation and Disadvantage to Reduce Intra-Regional Inequalities – Section 9

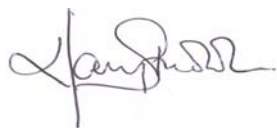
9.1 Support for the lagging rural areas is essential. The recognition of the existence of small pockets of "deprivation and disadvantage" in other areas is welcomed. However, care needs to be taken if small pockets of deprivation are identified in Local Development Documents. The issues they face may not always be spatial and it may not be helpful for small parts of rural districts to be stigmatised in this way.

10. Ensuring People are Treated Fairly and Can Participate in Society – Section 10

10.1 The proportion of people using rural services has declined in recent years and the maintenance of current service levels must be supported to enable sustainable viable communities.

10.2 We believe that policies should aim for a balanced age range in all communities. A consequence of the housing policies proposed is likely to be an increase in the number of older people living in rural areas as younger people and families are forced to move to find affordable housing in urban areas. This will exacerbate an existing problem, for example, in East Dorset the percentage of the population over the age of 65% is 30% and in West Somerset it is 31%.

We would urge the Examination Panel to acknowledge and reflect the views expressed in this response in the revised Regional Spatial Strategy.



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