STRATEGIC SUSTAINABILITY ASSESSMENT (SSA) OF THE SOUTH WEST REGIONAL SPATIAL STRATEGY

Draft Final SSA Report

Prepared for
South West Regional Assembly

by
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Outstanding Work to Complete SSA Report

Please note that this draft SSA Report represents work in progress. Changes are still being made to the RSS and some aspects, in particular relating to the sub-regional components and housing distribution have yet to be finalised.

As changes to the RSS are still being made, this draft SSA Report is of Version 2.3 of the RSS (presented to the Assembly Meeting, 27 January 2006).

Outstanding work to complete the SSA Report includes:

- Comments on the first draft of the SSA Report from the latest SSASG need to be incorporated (this has been started but not completed).

- Chapters 1 to 4 of the SSA Report need to be completed and updated. In particular, some of the evidence base, including Table 4.1, which describes the characteristics of the main settlements needs to be completed.

- A description of how the SSA has influenced the RSS needs to be completed (Chapter 6 of the SSA Report).

- The SSA work relating to the JSAs needs to be thoroughly reviewed and incorporated into the main SSA Report (Chapter 10 of the SSA Report).

- The SSA of the overall housing distribution needs to be completed (Chapter 10 of the SSA Report).

- The SSA work to Section 6 of the RSS (Harnessing Population Growth) needs to be completed (Chapter 12 of the SSA Report)

- The SSA of Section 7 of the RSS (Enhancing Distinctive Environments) needs to be thoroughly reviewed (Chapter 13 of the SSA Report).

- Implementation and Monitoring Proposals need to be completed (Chapter 18 of the SSA Report)

- All appendices, including appraisal matrices, baseline information, review of other relevant plans and programmes, need to be updated, checked and completed.

- Update the SSA to ensure that it reflects the final version of the RSS to be submitted to the Secretary of State.

- Preparation of a Non-Technical Summary.

- Final cross-check against the requirements of the SEA Directive and ODPM Guidance to ensure that all work that needs to be done has been done.
1. INTRODUCTION

NOTE: blue highlighting = Q. to check with SWRA
Yellow highlighting = note to us to complete/cross-check etc.

1.1. Land Use Consultants, Collingwood Environmental Planning, and Levett-Therivel Sustainability Consultants were commissioned by the South West Regional Assembly (SW RA) in February 2004 to undertake the Strategic Sustainability Assessment of the emerging South West Regional Spatial Strategy (RSS).

1.2. The SW RA is intending to submit a draft RSS to the Deputy Prime Minister in March 2006. The RSS is required to be subject to a Sustainability Appraisal (SA) in accordance with Planning Policy Statement 11 (PPS11 Regional Planning), and a Strategic Environmental Assessment (SEA) in accordance with the European SEA Directive 2001/42/EC. The SW RA has decided to meet these two requirements within a single assessment referred to as a ‘Strategic Sustainability Assessment’ (SSA) that will also conform to the 2005 Office of the Deputy Prime Minister (ODPM) guidance on sustainability appraisal1 (‘ODPM SA Guidance’).

PURPOSE OF SUSTAINABILITY APPRAISAL

1.3. The purpose of sustainability appraisal is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans.

1.4. The objective of strategic environmental assessment, as defined in Article 1 of the SEA Directive is ‘to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development’.

1.5. The ODPM SA Guidance explains the difference between environmental assessments required under the SEA Directive and sustainability appraisal of development plans as required by the UK Government. There are many parallels but also some differences, and the guidance clearly shows how assessment to comply with the SEA Directive can be integrated with current practice on sustainability appraisal. Simply put, sustainability appraisal includes a wider range of considerations, extending to social and economic impacts of plans, whereas SEA is more focussed on environmental impacts. The SA guidance describes how it is possible to satisfy both requirements through a single appraisal process as the South West Regional Assembly has decided to do with the SSA of the Regional Spatial Strategy2.

1.6. A key output of the SA process is a Sustainability Appraisal Report (in this case the ‘SSA Report’) which describes what elements of the South West RSS have been appraised and how, and the likely significant sustainability effects of implementation of the RSS.

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2 From this point on, references to the Strategic Sustainability Assessment (SSA) shall be taken as meaning ‘the SA incorporating SEA’.
AIM AND STRUCTURE OF THE REPORT

1.7. This report constitutes the Strategic Sustainability Assessment (SSA) Report for the South West Regional Spatial Strategy\(^3\). It has been produced alongside the draft Regional Spatial Strategy, and is being published for consultation at the same time to provide the public and statutory bodies with an opportunity to express their opinions on the SSA Report and to use it as a reference point in commenting on the RSS.

1.8. As noted above, the SSA has sought to meet the requirements of both the Planning and Compulsory Purchase Act 2004 and the SEA Directive (European Directive 2001/42/EC). This SSA Report therefore includes the required elements of an ‘Environmental Report’ (the output required by the SEA Directive), and Table 1.1 sign-posts the relevant sections of the SSA Report that are considered to meet the SEA Directive requirements.

Table 1.1 Summary of the requirements of the SEA Directive and where these have been addressed in this SSA Report (after Figure 12, SA Guidance, ODPM 2005)

<table>
<thead>
<tr>
<th>SEA Directive Requirements</th>
<th>Where covered in SSA Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):</td>
<td></td>
</tr>
<tr>
<td>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;</td>
<td>Chapters 1, 3</td>
</tr>
<tr>
<td>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;</td>
<td>Chapter 4</td>
</tr>
<tr>
<td>c) The environmental characteristics of areas likely to be significantly affected;</td>
<td>Chapter 4, 10</td>
</tr>
<tr>
<td>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</td>
<td>Chapter 4</td>
</tr>
<tr>
<td>e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;</td>
<td>Chapter 5,</td>
</tr>
<tr>
<td>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</td>
<td>Chapters 7-17, Appendices X-X</td>
</tr>
<tr>
<td>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</td>
<td>Chapter 7-17, Appendices X-X</td>
</tr>
<tr>
<td>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of knowledge) encountered in compiling the required information;</td>
<td>Chapters 2, 6, 7-17</td>
</tr>
<tr>
<td>i) A description of measures envisaged concerning monitoring in accordance with Art. 10;</td>
<td>Chapter 18</td>
</tr>
<tr>
<td>j) A non-technical summary of the information provided under the above headings</td>
<td>Non-technical Summary</td>
</tr>
</tbody>
</table>

The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)

Consultation:
- authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)
- Consultation on this SSA Report

1.9. This SSA Report sets out the process and findings of the Strategic Sustainability Assessment of the RSS. In doing this, account has been taken of the previous work conducted as part of the earlier stages of the SSA, these are described in Chapter 3. Much of the contextual material in this SSA Report has been drawn from our earlier SSA Scoping Report\(^4\), SSA of the Possible Development Strategies Report\(^5\) and the consultation responses received on those reports.

1.10. This Introduction chapter provides the background to the SSA of the RSS, and an outline of the content and main objectives of the RSS. The remainder of this report is structured into the following chapters, (Chapters 7 to 17 follow the structure of the RSS):

**Chapter 2** - Appraisal Methodology, describes the approach used to the SSA process, the specific SSA tasks undertaken, the consultations and how comments have been addressed by the SSA.

**Chapter 3** - Sustainability Requirements of other Relevant Plans and Programmes and Baseline Information, discusses the RSS relationship with other relevant plans, policy guidance and strategies, and highlights the key sustainability objectives influencing the RSS.

**Chapter 4** - The Character and Sustainability Issues of the South West, characterises the South West in terms of sustainability issues relating to development, identified from the baseline information gathered.

**Chapter 5** - SSA Framework, describes the development of the SSA objectives for assessing the RSS.

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Chapter 6 - How SSA has influenced the RSS

Chapter 7 - Appraisal of RSS Section 1: A Sustainable Future for the South West.

Chapter 8 - Appraisal of RSS Section 2: The Context for the Spatial Strategy.

Chapter 9 - Appraisal of RSS Section 3: The Spatial Strategy and Guidance for the Scale and Location of Development.

Chapter 10 - Appraisal of RSS Section 4: Sub Regional Strategy Statements and Housing Distribution to Housing Market Areas and Districts.

Chapter 11 - Appraisal of RSS Section 5: Regional Approach to Transport.

Chapter 12 - Appraisal of RSS Section 6: Harnessing Population Growth, Managing Change and ensuring people can participate in society.

Chapter 13 - Appraisal of RSS Section 7: Enhancing Distinctive Environments and Cultural Life.

Chapter 14 - Appraisal of RSS Section 8: Enhancing Economic Prosperity and Quality of Employment Opportunity.

Chapter 15 - Appraisal of RSS Section 9: Addressing Deprivation and Disadvantage to reduce intra regional inequalities.

Chapter 16 - Appraisal of RSS Section 10: Ensuring People are Treated Fairly and can Participate in Society.

Chapter 17 - Overall Effects of the RSS, summarises the findings of the appraisal of all sections in the RSS, discusses the compatibility of RSS policies and cumulative effects.

Chapter 17 - Implementation and Monitoring proposals.

SW RSS BACKGROUND

1.11. A requirement of the SEA Directive is to include the contents and main objectives of the plan being assessed in the SSA Report. The overall aims of the RSS are discussed in Section 1 “A Sustainable Future for the South West”, and in particular, paragraphs 1.3.1-1.3.2 of the RSS state:

“The regional future this strategy is working towards can be summed up as one where:

- All communities enjoy the benefits of further development and where housing needs are satisfied;
- The economy continues to prosper;
- Rural parts of the region fulfil their economic potential with vibrant market towns at their core;
- Bristol becomes a major European city;
• Plymouth continues its renaissance and becomes the economic hub of the far South West;
• Swindon, Exeter, Cheltenham & Gloucester, Bournemouth & Poole, Weston and Taunton develop as important focal points for economic growth;
• Regeneration of the Cornwall towns, Forest of Dean and Torbay and other priority areas continues to have effect;
• Growth is supported by necessary infrastructure in step with development.

To achieve a more sustainable South West, continued prosperity and high quality of living the RSS will:

• Seek to reduce greenhouse gas emissions and better manage the future impacts of climate change on the environment, economy and society;
• Protect and enhance the region’s environmental and cultural assets;
• Minimise the need to travel by better alignment of jobs, homes and services, and minimise the need to travel by car, by demand management, improved public transport and effective planning of future development;
• Build a strong stable economy, addressing disparities and using resources wisely to reduce the ecological footprint of the region.

1.12. Section 1 of the RSS also discusses the challenges facing the South West region, referring to its role in responding to the “key challenges” set out in the Integrated Regional Strategy (IRS) “just connect!” that was adopted by the region in July 2004. The IRS is the overarching strategy for the South West, which sets out the broad objectives and priorities for the region that are relevant across sectors and provide the context for the other regional strategies. The RSS notes in paragraph 1.4.2 that the RSS is a key delivery mechanism for just connect!, and, at paragraph 1.5.1 that the IRS five Headline Aims provide a clear lead for spatial and development policy for the region. The RSS also notes that there are strong linkages between the IRS Headline Aims (shown in the box below) and different aspects of the RSS (shown in italics next to each aim):

**IRS Headline Aims for the South West**

**Aim 1** To harness the benefits of population growth and manage the implications of population change (RSS reference: Sections 3, 4 and 6)

**Aim 2** To enhance our distinctive environments and the quality and diversity of our cultural life (RSS reference: Sections 3 and 7)

**Aim 3** To enhance our economic prosperity and quality of employment opportunity (RSS reference: Sections 4 and 8)

**Aim 4** To address deprivation and disadvantage to reduce significant intra-regional inequalities (RSS reference: Sections 4 and 9)

6 The draft IRS “Just Connect” was considered by the SWRA on the 16th July 2004. It can be found at [www.southwest-ra.gov.uk/swra/ourwork/integratedregionalstrategy/index.shtml](http://www.southwest-ra.gov.uk/swra/ourwork/integratedregionalstrategy/index.shtml)
Aim 5 To make sure that people are treated fairly and can participate fully in society (RSS reference: Sections 4 and 10)

1.13. The RSS is set out in ten sections (as listed above in the structure of the SSA Report section). **List policies in each section** (plus explain how the Sub-regional section works, with Annex at the back, thematic sections etc.)
2. **SSA METHOD**

**APPROACH TO THE SSA**

2.1. Although the Strategic Sustainability Assessment is being carried out by independent consultants, it was recognised by the South West Regional Assembly that the aim is for the SSA to be an integral component in the preparation of the RSS from inception to adoption, with close working between those responsible for preparing the RSS and the SSA consultancy team throughout. To this end, in addition to the formal SSA reports produced there has been regular dialogue between the SW RA officers and the SSA team. The SSA team has also provided sustainability commentary throughout the development of the RSS in the form of background papers or presentations at key SW RA meetings of the RSS Steering Group, the Regional Spatial Planning and Transport Group, and the SSA Steering Group (SSASG).

2.2. The SSASG was set up by the SW RA to oversee the assessment process and comprises representatives of the four statutory SEA consultation bodies (English Nature, English Heritage, Environment Agency and Countryside Agency), plus representatives of wider environmental, social and economic interests (see Appendix X). **MORE EXPLANATION OF ROLE/INPUT**

2.3. The SSA has been undertaken in three broad stages:

- Stage 1 - SSA Scope, Context and RSS Sustainability Issues
- Stage 2 - SSA of RSS Possible Development Strategies
- Stage 3 - SSA of Draft RSS and Consultation on SSA Report

2.4. The relationship between these SSA stages for the South West RSS and the generic stages of SA for RSSs set out in the OPDM SA Guidance is shown in **Table 2.1**.
Table 2.1 Corresponding stages in ODPM SA Guidance and the three stages in the SSA of South West RSS

<table>
<thead>
<tr>
<th>Stages and tasks as set out in Figure 2 the ODPM SA Guidance, 2005</th>
<th>Corresponding stages in the SSA of the South West RSS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</td>
<td>Stage 1 – SSA Scope, Context and RSS Sustainability Issues</td>
</tr>
<tr>
<td>A1: Identifying other relevant plans, programmes, and sustainability objectives</td>
<td></td>
</tr>
<tr>
<td>A2: Collecting baseline information</td>
<td></td>
</tr>
<tr>
<td>A3: Identifying sustainability issues and problems</td>
<td>B1: Testing the RSS objectives against the SA Framework</td>
</tr>
<tr>
<td>A4: Developing the SA Framework</td>
<td>B2: Developing the RSS options</td>
</tr>
<tr>
<td>A5: Consulting on the scope of the SA</td>
<td>B3: Predicting the effects of the RSS</td>
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<td></td>
<td>B4: Evaluating the effects of the RSS</td>
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<tr>
<td></td>
<td>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</td>
</tr>
<tr>
<td></td>
<td>B6: Proposing measures to monitor the significant effects of implementing the RSS</td>
</tr>
<tr>
<td>Stage B: Develop options and policies, taking account of assessed effects and developing the draft RSS</td>
<td>Stage 2 – SSA of RSS Possible Development Strategies</td>
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<tr>
<td></td>
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</tr>
<tr>
<td>Stage C: Preparing the SA Report</td>
<td>Stage 3 – SSA of Draft RSS and Consultation on SSA Report</td>
</tr>
<tr>
<td>C1: Preparing the SA Report</td>
<td></td>
</tr>
<tr>
<td>Stage D: Consulting on the draft RSS and the SA Report</td>
<td></td>
</tr>
<tr>
<td>D1: Consulting on the draft RSS and the SA Report</td>
<td></td>
</tr>
</tbody>
</table>

STAGE 1 - SSA SCOPE, CONTEXT AND RSS SUSTAINABILITY ISSUES

2.5. Stage 1 (Scoping) of the SSA comprised the following work:

(i) Review of the objectives in the Regional Sustainable Development Framework.

(ii) Review of other strategies, plans and programmes relevant to the South West.

(iii) Development of the SSA Framework.

(iv) Review of baseline information.

(v) Identification of the Key Characteristics and Sustainability Issues facing the South West.

2.6. Stage 1 of the SSA was partially completed and documented in a number of versions culminating in the Stage 1 Scoping Final Report\(^7\) produced in June 2004. The June

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\(^7\) Strategic Sustainability Assessment of the South West Regional Spatial Strategy. Stage 1 Scoping - Final Report. Prepared for South West Regional Assembly by Land Use Consultants with Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants, June 2004.
2004 Scoping Report was updated in September 2004, to meet SEA requirements that were identified during the first SEA compliance check. It was then published for consultation with the statutory bodies with environmental, social and economic responsibilities to ensure the SSA would be comprehensive and robust enough to support the RSS development.

2.7. As noted in the Introduction, much of the contextual information developed during Stage 1 is repeated in this SSA Report.

**SSA Guidance for Joint Study Areas**

2.8. In addition to the preparation of the Scoping Report, the SSA team provided guidance in June 2004 on how the development of the evidence base for the Joint Study Areas (JSAs - formerly referred to as the City-Region Studies) should be undertaken and recorded to allow the SSA of the Regional Spatial Strategy (RSS) to be carried out. This guidance included a checklist to ensure the work undertaken by the JSAs was capable of assimilation into the SSA of the emerging RSS at the regional level, and in particular that the requirements of the SEA Directive would be met.

**STAGE 2 – SSA OF RSS POSSIBLE DEVELOPMENT STRATEGIES**

2.9. The purpose of this stage was to set out the sustainability implications of each of the spatial development strategies and housing growth scenarios (the ‘options’ described in the ODPM SA Guidance) that were considered by those preparing the RSS. In order to meet the requirements of the SEA Directive, the possible development strategies considered needed to include the ‘do-nothing/business as usual’ option(s).

2.10. The SSA team provided commentary throughout the development of the RSS Possible Development Strategies, which included advice on the types of options being considered, recommendations for which options should be appraised as part of the SSA, and for the options to be clearly defined and differentiated from one another when put to public consultation.

2.11. The SWRA decided that the public should be consulted on three Possible Development Strategies for the Region:

(i) Possible Development Strategy 1: ‘No change’ – Continue with RPG10 focussed on 11 Principal Urban Areas (PUAs) and other centres for growth.

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9 This task was undertaken in June 2004 by Professor Riki Therivel of Oxford Brookes University and Levett-Therivel Sustainability Consultants to ensure that the requirements of the SEA Directive (EC Directive 2001/42/EC on ‘the assessment of the effects of certain plans and programmes on the environment’) have been met by the SSA work.

(ii) Possible Development Strategy 2: Variation on RPG 10 based on strengthening RPG10 / concentrate more growth on a smaller number of urban centres to maximise economies of scale.

(iii) Possible Development Strategy 3: Differential Approach recognising the role of strategically and functionally important settlements in different parts of the region.

2.12. In the process of developing the three Possible Development Strategies, SW RA also considered three additional development strategies but felt that these were not suitable to be put forward as RSS Possible Development Strategies following a simple level of testing against the criteria set out in the Draft RSS Options Report\textsuperscript{11}. The three additional development strategies were:

(iv) Options including one or more substantial freestanding new towns.

(v) Going with past development trends (previously referred to as ‘Going with past markets’).

(vi) A strategy based on low growth/low net migration scenarios.

2.13. The SSA team recommended that both different growth scenarios (v) and (vi) and the new settlement option (iv) be assessed as part of the SSA, and reported upon during the public consultation on the RSS Possible Development Strategies, which was agreed by SW RA. These additional development strategies were therefore also reported upon in the Stage 2 SSA Report\textsuperscript{12}, although the detail underpinning the three additional development strategies had not been worked to the same extent as the three Possible Development Strategies that were put forward for public consultation. In addition to the Stage 2 SSA Report, it was agreed with the SW RA that the Public Consultation Report\textsuperscript{13} should include a summary of the findings of the SSA, rather than the SSA remaining purely as a stand-alone document.

The Approach to the Appraisal of the Possible Development Strategies

2.14. Early drafts of the RSS Possible Development Strategies Public Consultation Report combined different spatial development strategies with different growth scenarios, but for the purposes of the SSA it was decided to differentiate between the two to cover firstly spatial development strategies, and secondly housing growth scenarios\textsuperscript{14}. This is because, in theory, any of the spatial development strategies could conceivably deliver the same levels of housing growth. It was felt necessary therefore, for the SSA to distinguish between those effects that could be ascribed to spatial locations, and those that could be ascribed to the numbers of dwellings being delivered. This helped to provide a consistent basis for assessment.

\textsuperscript{11} At this stage in the SSA process, the term ‘options’ was being used to describe the possible development strategies.


\textsuperscript{14} The final version of the Consultation Paper presents only possible spatial strategies, not growth options.
The Spatial Development Strategies

Possible Development Strategy 1: ‘No change’ – Continue with RPG10 focussed on 11 Principal Urban Areas (PUA’s) and other centres for growth.

Possible Development Strategy 2: Variation on RPG 10 based on strengthening RPG10 / concentrate more growth on a smaller number of urban centres to maximise economies of scale.

Possible Development Strategy 3: Differential Approach recognising the role of strategically and functionally important settlements in different parts of the region.

Additional Development Strategy 4: Options including one or more substantial freestanding new towns.

Additional Development Strategy 5: Going with past development trends (previously referred to as ‘Going with past markets’).

2.15. Each of these development strategies was appraised separately, although it should be noted that Possible Development Strategies 1 to 3 were variations on the existing RPG10 and the ones put forward for public consultation. Additional Development Strategy 4, which could be combined with any of the other spatial development strategies (i.e. it is not a stand-alone development strategy in its own right), and Additional Development Strategy 5 were not consulted upon, but were subject to assessment under the SSA process.

The Growth Scenarios

A. Growth lower than planned for in RPG10 (c. 25% below current RPG10 Growth Rates i.e. 15,000 net new dwellings per annum).

B. Growth as planned for in RPG10 (20,000 net new dwellings per annum).

C. Growth higher than planned for in RPG10 (c. 25% above current RPG10 Growth Rates i.e. 25,000 net new dwellings per annum).

D. Growth substantially higher than planned for in RPG10 (c. 50% above current RPG10 Growth Rates i.e. 30,000 net new dwellings per annum).

2.16. For the purposes of the Growth Scenarios, it was decided that a comparative assessment should be undertaken using one assessment matrix, with Scenario A (low growth) at one end of a continuum and Scenario D (high growth) at the other. The relative performance against sustainability objectives could then be compared more easily.

2.17. The SSA of the Development Strategies was carried out using the SSA Framework developed during Stage 1. This comprises a series of questions to be asked of the RSS, under six broad ‘headline’ sustainability objectives, based primarily on the South West Regional Sustainable Development Framework – A Sustainable Future for the South West, 2001:

- Improve health.
• Support communities that meet people’s needs.
• Develop the economy in ways that meet people’s needs.
• Provide access to meet people’s needs with least damage to communities and the environment.
• Maintain and improve environmental quality and assets.
• Minimise consumption of natural resources.

2.18. A summary of the sustainability strengths and weaknesses (developed from the detailed appraisals against the SSA Framework) of the RSS Possible Development Strategies and Growth Scenarios is presented in Table 2.2.

MENTION THE PREFERRED STRATEGY USED IN THE RSS?

STAGE 3 – SSA OF DRAFT RSS AND CONSULTATION ON SSA REPORT

SSA Advice to the Joint Study Areas

2.19. In order to facilitate a consistent and timely input to the regional SSA from the JSAs, it was proposed by the SW RA in September 2004 to review progress on the SSAs in each JSA, the approaches being adopted and the compatibility with the regional approach to SSA and the outputs required. In addition to the SSA guidance provided to the JSAs in June 2004, supplementary guidance15 on baseline data collection was provided to the individual JSA contacts in October 2004.

2.20. Meetings or telephone discussions were held with all the JSAs in October and November 2004. Aspects covered in the discussions included:

• Update of progress on the JSA, by way of context.
• Progress on the SSA of the JSA.
• The SSA approach being adopted.
• Any difficulties encountered / anticipated.
• Any additional support needed.

2.21. Key issues that were raised during meetings / conversations with the JSAs as part of the review of their SSAs were provided to the SW RA. Need to note outcome of this – Ric?

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More likely to provide opportunities to deliver jobs and sufficient numbers of the right types of housing for economic growth, resources, less waste, less investment, thus less environmental impact on congestion. Rural opportunity to develop a sustainable community from scratch using sustainable transport solutions, and facilities. There could be less pressure on already stretched services and facilities. Potential increased circulation of wealth, and less travel.

Table 2.2 Sustainability Strengths and Weaknesses of RSS Strategies and Scenarios

<table>
<thead>
<tr>
<th>Sustainability strengths</th>
<th>Sustainability weaknesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>High density urban living is relatively resource efficient (land, waste, water, etc.) and offers opportunities for investing in environmental improvements (e.g. country parks). Likely to encourage economic activity to be concentrated in PUAs. Should increase opportunities for easy access to services (e.g. health) and jobs.</td>
<td>Could lead to pressure on habitats and landscapes close to PUAs. Quality of life in PUAs decreased, unless ‘vivacity’ is addressed. Given increasingly urban lifestyles in rural locations, danger that rural services could be lost. Affordable housing is less likely to be delivered in smaller rural communities. Deprived areas outside PUAs will not benefit from economic activity.</td>
</tr>
<tr>
<td>Likely to lead to Highest densities, therefore most resource efficient, and greatest opportunities for investing in environmental improvements, and sustainable transport. Economic activity even more concentrated in fewer PUAs, which could provide for increased jobs and improved health in these locations.</td>
<td>More pressure on habitats and landscapes close to the PUAs, which are already environmentally constrained. More pressure on quality of life within PUAs. More likelihood of loss of rural services, and reduced economic activity in deprived areas outside PUAs, leading to more isolation of those areas. Existing trends in health inequalities between the north east and south west of the region could be increased.</td>
</tr>
<tr>
<td>Recognises the differences within the region and provides for local distinctiveness and services. More likely to lead to economic activity that matches local market strengths and delivers affordable housing and jobs in rural locations. Should spread the impact of development and reduce pressure on habitats, landscapes, historic environments in some areas. This may help to reduce existing health inequalities between the North East and South West of the region.</td>
<td>Loss of more greenfield land and less efficient use of resources. Environmental impacts would be more widespread, but less concentrated. Increased light pollution in rural areas. Could be some disbenefits of scale and effect on competitiveness. Traffic could increase at a higher rate if greater self-containment of settlements is not achieved.</td>
</tr>
<tr>
<td>Opportunity to develop a sustainable community from scratch using sustainable construction, design and transport solutions, encouraging healthy lifestyles. Could provide a long-term response to climate change (by avoiding flood risk when locating new town). Could lead to differential economic performance, dependent on attracting investment to new town.</td>
<td>Increased pressure on greenfield land habitats and landscapes in location of new town, possibly fundamentally changing its character. May lead to creation of a ‘dormitory’ town and would take time to build community spirit and vibrancy. May divert economic investment from elsewhere in the region. Unless this option is combined with one of the other options, it would require a new city to provide the scale of growth needed (i.e. 100,000+).</td>
</tr>
<tr>
<td>Likely to lead to greatest economic growth, particularly in north and east. Less environmental impact on more peripheral and remote settlements.</td>
<td>Unplanned development would lead to increasingly urbanised character, greater environmental impact and increased demand for resources, reduced quality of life. Health inequalities could increase. Past development trends have not provided affordable housing, and urban regeneration within PUAs would be harder to achieve. Could undermine self-containment of settlements. Community vibrancy may be lost. Increases in traffic and congestion likely.</td>
</tr>
<tr>
<td>Towards Scenario A: Lower housing growth</td>
<td>Towards Scenario D: Higher housing growth</td>
</tr>
<tr>
<td>Less demand for resources, less waste, less congestion. Rural landscapes, habitats, greenfield land likely to benefit from reduced pressure from development. There could be less pressure on already stretched services and facilities.</td>
<td>More likely to provide opportunities to deliver jobs and sufficient numbers of the right types of housing for those who need it most. Increased investment, thus opportunity to deliver sustainable design, public transport, and environmental improvements. Investment could also provide sufficient community infrastructure and services.</td>
</tr>
</tbody>
</table>
Ongoing SSA input to development of RSS

2.22. Since the production of the SSA Report for the RSS Possible Development Strategies in August 2004, close working and communication between the SSA team and the SW RA has continued. Either by email, reports for Meeting Papers, or attendance and presentation at SW RA meetings (RSPTG, PO G, SSA SG, Assembly), the SSA team has provided (see Table 2.3):

- SSA Reviews of SW RA’s sustainability appraisal of emerging thematic sections. The SW RA used the SSA Framework to appraise the emerging policies. The SSA provided comments on the findings of the SW RA appraisal, further comments on the sustainability of the policies, and recommendations for improving the policies and further appraisal work required for the final SSA Report.

- Guidance to the SW RA on the consideration of ‘reasonable alternatives’ for the development of the Regional Transport Strategy. This came out of the SSA Review of the emerging transport section.

- SSA Commentaries of earlier draft versions of the RSS, setting out sustainability strengths and weaknesses and recommendations for improving the sustainability of RSS.

- Key questions about the development of the RSS, to understand the baseline considered, and try to answer or obtain evidence/information when attempting to predict and assess the likely sustainability effects of the RSS.

Table 2.3 SSA input to RSS development

<table>
<thead>
<tr>
<th>Date</th>
<th>SSA Input</th>
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</thead>
<tbody>
<tr>
<td>February 2005</td>
<td>SSA Reviews of SW RA’s SA of emerging thematic policies (Transport, Waste)</td>
</tr>
<tr>
<td>March 2005</td>
<td>Guidance on Alternatives for the Regional Transport Strategy</td>
</tr>
<tr>
<td>May 2005</td>
<td>SSA Review of SW RA’s SA of emerging thematic policies (Energy)</td>
</tr>
<tr>
<td>June 2005</td>
<td>SSA Commentary on Strategy Document (Version 5.3)</td>
</tr>
<tr>
<td>July 2005</td>
<td>SSA Commentary on Strategy Document (Version 6.3)</td>
</tr>
<tr>
<td>July 2005</td>
<td>SSA Commentary on Sub-Regional Assessments</td>
</tr>
<tr>
<td>September 2005</td>
<td>Initial Comments on the Emerging RSS</td>
</tr>
<tr>
<td>November 2005</td>
<td>Summary of Initial SSA Findings of Emerging RSS</td>
</tr>
<tr>
<td>December 2005</td>
<td>Key Questions SSA is asking of the RSS</td>
</tr>
<tr>
<td>January 2006</td>
<td>Update of Initial SSA Findings of Emerging RSS</td>
</tr>
</tbody>
</table>
The Approach to the Appraisal of the Draft RSS

2.23. **To be completed**
3. REVIEW OF OTHER PLANS AND PROGRAMMES AND BASELINE INFORMATION

3.1. The RSDF provides the primary reference point for developing the SSA Framework (see Chapter 5). However, the SEA Directive requires the relationship of the RSS with other plans and programmes and 'the environmental protection objectives established at the international, EC or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation' to be set out. This in itself is a useful task for checking to make sure that the SSA Framework covers all the objectives that it needs to cover, and also to identify any targets and baseline information that will be relevant to the SSA process.

3.2. Table A2.1 in Appendix 2 lists the strategies, plans and programmes that have been reviewed as part of this process, including the overall aim and purpose of each of the documents. The information generated in this table has been cross-checked against the SSA Framework (see 5th column in Table 5.1), and will be used as a reference point for the on-going appraisal work. However, it cannot necessarily be assumed that all other strategies, plans and programmes, will move the South West in a more sustainable direction, since very few have been subject to SA to test their compatibility with sustainability objectives. The SSA Framework therefore identifies which other strategies, plans and programmes are relevant to the SSA objective, for future reference.

3.3. The review includes the national planning policy guidance (PPGs/PPSs) considered to be most relevant to the SSA of the RSS (PPG1, PPS1, PPG2, PPG3, PPG9, PPG10, PPG13, PPG15, PPG17, PPG20, PPG 21, PPG25).

3.4. The review meets the requirement of the SEA Directive (Annex 1 e)) to include ‘the environmental protection objectives established at international, European Community (EC) or national level which are relevant to the RSS’ (see the Contents List of Appendix 2 documents 27-39, 49-58, 63-65).

3.5. Key environmental protection objectives established at the EC level include those contained in the Directive on the Conservation of Wild Birds (The Birds Directive, 79/409/EEC – Document 29 in Appendix 2) and the Directive on the Conservation of Natural Habitats and Wild Flora and Fauna (The Habitats Directive, 92/42/EEC – Document 30 in Appendix 2), which together establish a legislative framework for protecting and conserving Europe’s wildlife and habitats. The Directives implement in Community law the international requirements of the Bonn Convention on the Conservation of Migratory Species (Document 28 in Appendix 2) and the Bern Convention on the Conservation of European Wildlife and Natural Habitats (Document 26 in Appendix 2). However, our review of environmental protection objectives goes beyond those specifically mentioned in the SEA Directive, to include other international objectives (e.g. Kyoto Protocol to the UN Convention on...
Climate Change, 1992), other EU Directives (e.g. Water Framework Directive 2000/60/EC), national objectives (e.g. Planning Policy Statement 9 Nature Conservation), and regional policy objectives (e.g. Our Environment Our Future - The Regional Strategy for the South West Environment 2004 - 2014).

REVIEW OF BASELINE INFORMATION

3.6. The purpose of the review of baseline information is to provide the basis for prediction and monitoring of the likely effects of the RSS - i.e. the reference point for each of the objectives and detailed questions in the SSA Framework. Table A3.1 in Appendix 3 of the Revised Scoping Report (September 2004) provided a description of the preliminary baseline information gathered under each of the high level objectives and detailed questions. It also suggested potential sources of information and indicators that have been ranked in order of importance for use in the SSA. Obvious gaps in available data where known are highlighted. Table A3.2 in Appendix 3 of the Revised Scoping Report (September 2004) presented a second iteration of baseline gathered by the SWRA during Stage 2 of the SSA, for use in the appraisal of the Possible Development Strategies. The data was presented in terms of key positive/negative issues/trends for each SSA objective, and where in the region the issue/trend is evident.

3.7. The review of baseline information has helped to identify key sustainability issues, the current situation, and trends (i.e. whether the situation is getting better or worse, and/or whether it is near any known thresholds). In this way, it provides the background for the economic, environmental and social ‘character’ or condition of the region described in Chapter 4, and meets the requirement under Annex 1(b), (c) and (d) of the SEA Directive to describe: “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; the environmental characteristics of areas likely to be significantly affected; any existing environmental problems which are relevant to the plan or programme, in particular those relating to any areas of a particular environmental importance”.

3.8. The review of other relevant strategies, plans and programmes provided much of the detailed baseline information required for the SSA. This information has also been used to cross-check and underpin the SSA Framework, and has been used to help predict the effects of the RSS during the course of its preparation. However, since the work done in Stage 1, other sources have proved useful, particularly the technical reports of research commissioned by SW RA or other bodies that have informed the RSS (Insert reference list of technical reports referred to). Rather than update the previous tables of baseline information, the data and reports have been referenced throughout the appraisal matrices and findings of the SSA in Chapters 7 to 17.
4. THE CHARACTER AND SUSTAINABILITY ISSUES OF THE SOUTH WEST

4.1. The review of baseline information, plans and programmes, and consultation with stakeholders during the early stages of work on the SSA, highlighted a number of key characteristics of the South West that set the context for the RSS and the SSA. Objectives from relevant plans and programmes dealing with some of these sustainability issues have been included in this section, as well as existing national and regional indicators. The indicators help to present a picture of the baseline situation in the South West, against which to assess potential effects of the RSS possible development strategies, detailed policies and proposals. Much of the information in this section has been taken from the State of the South West 200416, published by the South West Observatory.

4.2. The South West region had just under 5 million residents in mid-2002, which is one of the smallest regional populations in England; however, its land area is large. Consequently, it is the least densely populated region overall, although densities vary considerable across the region, see Figure 4.1.

Figure 4.1 Population density by ward: April 2001, persons per square kilometre (from State of the South West 2004)

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**DIVERSE REGION**

4.3. The character of the region is very diverse and in particular changes markedly from east to west. However, there are many subtleties of differences that are not usually captured in the baseline data sources. For example, a recent report for SW RA\(^{17}\) shows that while rural/urban regional differentiation is relatively common, this is usually used to present a picture of the ‘rural South West’. Yet there is clearly no single rural South West in a functional sense. Nor do rural areas in the region stand apart from urban areas – there are interconnections.

**North and South-East parts of the region**

4.4. The north and south-east parts of the region are heavily influenced by, and share many similarities with, London and the South East. Here, economic productivity and skills levels are relatively high, there is a strong knowledge sector, and several large urban areas. These parts of the region are relatively well connected to other parts of England and continental Europe by land and sea. They are also becoming increasingly urbanised, leading to ever more pressure on resources and infrastructure.

**Peninsula part of the region**

4.5. The western part of the region, on the other hand, is relatively remote in line with its peninsula geography, has few cities, with large expanses of countryside, smaller market towns and villages, areas of ‘wildness’ and tranquillity (e.g. Dartmoor and Exmoor), and a long coastline. It is remote from the main economic markets of the UK, and in general has relatively low productivity and skills levels.

**CHARACTERISTICS AND ISSUES**

4.6. The principal cities and towns in the region are Bristol, Swindon, Plymouth, Exeter, Bournemouth, Poole, Gloucester, Cheltenham, Bath, Weston-super-Mare, Taunton, Torbay, Camborne and Redruth. In addition, there are over 200 smaller towns, which act as economic and service delivery hubs for their surrounding rural areas, some of which are known colloquially as ‘market towns’.

**High Population Growth and In-Migration**

4.7. The South West is generally seen as a high quality place to live, which has led to it experiencing high levels of population growth and in-migration – it is the fastest growing region in terms of residents in the UK. The regional population grew by 12.6% between 1982 and 2002, compared to an average growth of 5.9%\(^{18}\). A further half a million people are expected to live in the region by 2015.

4.8. The age structure of the region is being altered by those coming to settle, with a large number of retired and middle aged people arriving that has led to the South West having the oldest population of any region.

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\(^{17}\) Better planning of rural areas in the South West. Prepared for the South West Regional Assembly by Land Use Consultants, June 2004.

\(^{18}\) ONS data – Regional Trends 38 (RT381401)
Key Indicators

- State of the South West (SofSW) 2004 – The number of people living in the South West increased steadily between mid-1981 and mid-2002, with most of the increase occurring in rural, rather than urban areas.

- SofSW 2004 – The South West was the only region in England to grow solely due to migration between mid-1992 and mid-2002.

Spatial differences

- Over half (54%) of South West's population lives in a rural area (SofSW 2004), but 66% work in the urban areas (SW RA19, 2003).

- The fastest growing areas from mid-1981 to mid-2002 were North Dorset, Teignbridge and North Cornwall. South Gloucestershire recorded the fourth largest absolute increase in population of all the local authority areas in England (1981-2002) and along with Poole and Bournemouth, is projected to be the fastest growing area within the region (SofSW 2004).

- City of Bristol and Plymouth were the only areas within the region to lose population (SofSW 2004).

Likely evolution without implementation of the RSS

- Based on past trends, the SofSW 2004 states that South West is likely to continue to experience fast rates of population growth, attributable mainly to inward migration from South East and London. It is estimated that total regional population will increase by 5.4% between 2000 and 2010.

- The population in rural areas is likely to continue to increase, with rural areas becoming more urbanised.

- The Office of National Statistics (ONS) expects the trend of an ageing population structure to continue nationally until at least 2021, and in the South West, the already aged population is expected to see a significant increase in the proportion of residents over retirement age.

The issue of **High Population Growth and In-Migration** is linked to SSA High Level Objective:

2: Support communities that meet people’s needs.

Diverse Economy

4.9. As with other aspects of the region, the economic performance of the South West is diverse, but overall, it experiences high levels of employment growth with a strong labour market, however this is characterised by low wage and low skill jobs. Higher

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value added jobs and wages tend to be found in the north and east of the region, with higher levels of unemployment in the west.

4.10. The SW Regional Economic Strategy\textsuperscript{20} (RES) sets out three Strategic Objectives to achieve its mission to ‘increase sustainable prosperity and productivity for the region and all our people’:

- RES Strategic Objective 1 – To raise business productivity, allowing them to become more competitive and therefore more profitable;
- RES Strategic Objective 2 – To increase economic inclusion, so that all parts of the region - including those currently most deprived - can benefit from increased prosperity;
- RES Strategic Objective 3 – To improve regional communications and partnership.

4.11. The SW Framework For Regional Employment and Skills\textsuperscript{21} (FRESA) was developed within the context of the Regional Economic Strategy as an integral part of the strategy. The SW FRESA sets out a vision for the future of the labour market in the region and identifies a set of strategic objectives and actions required to realise that vision and complement the strategic objectives in the RES. The strategic objectives in the FRESA are:

- FRESA Strategic Objective 1 – To increase employers’ participation in skills development in the SW;
- FRESA Strategic Objective 2 – To raise individuals’ aspirations and skills for working in the SW;
- FRESA Strategic Objective 3 – To develop the efficient and inclusive working of the SW labour market.

Key Indicators

- National Headline Indicator H3 Employment (SW Regional Version)\textsuperscript{22} – 78.8% of working age people were in work in 2003, the third highest employment rate in English regions. (The England average was 75%).
- SofSW 2004 – Approximately 47,900 SW residents (1.6%) were claiming unemployment related benefits during March 2004, (the England rate is 2.5%) and typically SW residents experience shorter spells of unemployment.
- SofSW 2004 – Total household income per person in the SW (£15,323) was slightly below that for England as a whole (£15,948) but was substantially above that for England excluding London and the SE (£14,270).

\textsuperscript{22} Regional quality of life counts: 2003 regional versions of the national Headline Indicators of sustainable development. www.sustainable-development.gov.uk/indicators/regional/2003/03southwest.htm
• SW RES 2003 –
  • The SW generates 9% of the total output in England, and was the fourth fastest growing economy in England between 1996-1999.
  • An additional 155,000 jobs were created in the SW between 1995-2000, a rise of over 8%.

Spatial differences
• Self-employment is particularly high in rural areas of the far SW (e.g. Cornwall, Torbay and Devon) and lower in the larger urban areas (especially in Plymouth and the City of Bristol) (SofSW 2004).
• There is a higher percentage of managerial and professional employment in the north and east of region, with a lower percentage in the south and west (SofSW 2004).
• The highest rates of long-term unemployment within the SW are in Torbay, Torridge, North Cornwall and Gloucester (SofSW 2004).
• There is a large variation in personal incomes across the region, from 71% to 122% of the national benchmark. Incomes that are 75% or less of the national benchmark in Torbay, Kerrier, North Cornwall, North Devon and Torridge (Inland Revenue23).

Likely evolution without implementation of the RSS
• The SofSW 2004 states that output per person is falling relative to the national figure, due to low levels of productivity in the more rural and peripheral parts of the region, and the ageing of the population is likely to perpetuate this trend.
• Variations in economic output, employment levels and personal incomes between the urban and rural areas are likely to continue.

The issue of a Diverse Economy is linked to SSA High Level Objective:
4: Develop the economy in ways that meet people’s needs.

Deprivation
4.12. Overall, the South West has a lower proportion of its residents living in deprived areas than the England average. However, there are pockets of deprivation throughout the region often concentrated in certain wards in urban areas, but also including ‘hidden’ rural locations. Deprivation is particularly concentrated among low-income households, with some evidence suggesting that older people, women, people from black and minority ethnic communities, and disabled people experience social exclusion. More deprived communities are less likely to enjoy good health, afford suitable housing, and have access to a range of services.

23 Mean total income of taxpayer by LA area, £/year. Inland Revenue, 2001/02.
4.13. The South West section of the Government’s Sustainable Communities Plan\textsuperscript{24} sets out four strategic challenges for the region, one of which is “Renewing communities and reducing inequalities”, and presents proposals for implementing the Communities Plan in the South West. The Government Office for the South West is working with regional and local partners to build on the proposals, link them with relevant programmes, and implement the policies.

4.14. The challenges set out in the South West section for renewing communities and reducing inequalities are:

- To reduce the gap in the economic fortunes of different parts of the region. The north and east of the region enjoy a diverse economic structure, a better qualified workforce and GDP per head above the national average, while the more rural west of the region has low income, lower qualification levels and includes some of the poorest parts of the UK.

- To ensure the continued viability of rural communities, and to strengthen market towns to serve as economic and service hubs for their surrounding rural areas.

- To close the gap between better off and deprived areas so that no one is disadvantaged by virtue of where they live. While the South West overall is not one of the most deprived regions, it does contain four of the 88 most deprived districts in England - Bristol, Plymouth, Penwith and Kerrier. Deprivation is concentrated in urban centres, declining Victorian seaside resorts and rural areas where pockets of deprivation can be small, highly dispersed and difficult to identify (see map below).

- To reduce crime and the fear of crime. People should be able to go about their daily lives in the knowledge that they will be safe.

- To reduce health inequalities within the region. Although the overall health status of the South West is good, this masks substantial health problems at a local level.

- To ensure that people feel fully engaged in the renewal of their communities and to equip them with the know-how to contribute effectively.

- To ensure the South West is a region where diversity is valued and celebrated.

4.15. The South West Regional Housing Strategy\textsuperscript{25} has a vision ‘to provide everyone in the SW with the opportunity of a decent home’. The strategy identifies a series of action points to meet its aims to:

- Make existing homes decent and improve the design and quality of new homes.

- Build sufficient new homes, and in particular affordable homes, to meet current and future needs.


\textsuperscript{25} South West Regional Housing Strategy 2002-2005. South West Regional Housing Forum (undated).
• Contribute to the social, economic and environmental well being of the region.

4.16. The Association of Higher Education Institutes in the SW (HERDA) Strategic Plan\textsuperscript{26} contains a vision ‘to be an effective and proactive association of Universities and Colleges which work together and individually to make a significant contribution to the academic, economic, social and cultural development of the South West’. The Plan sets objectives to achieve in five areas of work: Teaching and Learning; Research; Widening Participation; Knowledge Transfer; and Organisational Development.

**Key Indicators**

- National Headline Indicator H4 Poverty and social exclusion (SW Regional Version) -
  - 9\% of working age people in the SW were in workless households and 10.9\% were with qualifications in spring 2003 (both below the English averages of 11.2\% and 14.8\% respectively).
  - 17\% of children lived in households with relatively low income before housing costs and 25\% after housing costs in the period 2002-3 (both less than the England averages of 20\% and 29\% respectively).
  - Fuel poverty levels for the SW have fallen since 1996; 9.8\% of households experienced fuel poverty in 2001, which is worse than the England average of 8.4\%.

- SofSW 2004 - The South West has a significantly lower proportion of its population (3\%) living in deprived Super Output Areas (SOAs)\textsuperscript{27} than the England average (10\%).

- National Headline Indicator H7 Housing (SW Regional Version) - 33.9\% of dwellings failed to meet the ‘Decent Homes’ standard in 2001 (England average was 33.1\%).

- SofSW 2004 - The rate at which additional dwellings are being completed in the SW has not met the housing targets outlined in RPG10, with a shortfall of approximately 4,600 dwellings over the plan period so far. Only 10\% of the new homes are for social housing and the proportion of new homes is generally falling. Similarly, the trend in affordable housing completions is decreasing and access to affordable housing is more difficult in the SW than any other region except London.

\textsuperscript{26} HERDA-SW Strategic Plan August 2003 – July 2006. The Association of Higher Education Institutions in the South West.

\textsuperscript{27} Super Output Areas (SOAs) were designed to improve the reporting of small area statistics. SOAs are areas of consistent size and whose boundaries do not change, built from groups of 2001 Census Output Areas. The Index of Multiple Deprivation is an area-based measure of deprivation in terms of income, employment, health, education, barriers to services and housing, crime and environment. It uses 37 indicators to describe separate ‘domains’ of deprivation and then ranks Super Output Areas according to their scores for the individual domains as well as bringing together all of the domains to produce single, composite index of multiple deprivation for the SOA. There are 32,482 SOAs in England. The SW has 98 SOAs that rank within the most deprived 10\% in England according to the Index of Multiple Deprivation 2004.
• National Headline Indicator H5 Education (SW Regional Version) - 78% of 19 year-olds had level 2 qualifications in spring 2003, higher than the England average of 76%.

• SofSW 2004 – The SW generally performs well in school provision and education attainment levels in comparison to other English regions and national averages. However, the averages mask large geographical variations that are linked to economic and socio-economic disparities.

• National Headline Indicator H6 Health (SW Regional Version) – Life expectancy at birth was 77.1 years for males in the SW and 81.7 years for females in the period 2000-2002, higher than the England figures of 76.0 and 80.6 years respectively.

• SofSW 2004 – There is a strong correlation between inequalities in health and inequalities in income in the region, with health related behaviour and lifestyle such as smoking, teenage pregnancy and poor diet generally higher in lower socio-economic classes.

Spatial differences

• Most people who live in a deprived SOA in the SW live in an urban area. Bristol has 41 of the 98 most-deprived SOAs in the region, Plymouth has 19, Swindon 7, Weston-super-Mare 6, Bournemouth 4, and Gloucester 4. These deprived urban SOAs contain about 2.7% of the region's population. Ten of the 98 most-deprived SOA are in the generally rural districts of Kerrier (4), North Devon (2), Penwith, Restormel, Sedgemoor and Taunton Deane, although they occur within towns in these districts (SofSW 2004).

• Deprivation exists in inner cities, especially the largest urban centres, which show poor health, poor incomes, housing and employment. Many rural areas show deprivation in distance from services, but rural deprivation as a whole is most pronounced in the west of the region, where incomes and employment are also lower (SofSW 2004).

• The level of attainment of 5 or more A* to C grades at GCSE decreases in the SW region from north east to south west (SofSW 2004). However there are considerable variations in the adult qualification profile and the level of adult participation in learning, with lower % attainment in Plymouth but higher participation, and lower % attainment and lower participation in Torbay, Bournemouth and Poole than surrounding local authorities (SofSW 2004).

• There is also a general trend of decreasing health from north east to south west in the region (SofSW 2004).

Likely evolution without implementation of the RSS

• Trends in the SofSW 2004 suggest that the inequalities in health correlated with socio-economic deprivation are widening, however, life expectancy for males and females is increasing.
• The South West’s relatively low overall level of deprivation should continue, however, the pockets of deprivation in rural areas in the west of the region, and inner city urban areas may increase.

• The level of school education attainment is high overall in the SW, and the National headline indicators for the SW show that it is increasing slightly.

<table>
<thead>
<tr>
<th>The issue of <strong>Deprivation</strong> is linked to SSA High Level Objectives:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1: Improve Health</td>
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<tr>
<td>2: Support communities that meet people’s needs</td>
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<tr>
<td>3: Develop the economy in ways that meet people’s needs</td>
</tr>
<tr>
<td>4: Provide access to meet people’s needs with least damage to communities and the environment.</td>
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</table>

**Diverse Man-Made and Natural Environment**

4.17. The region has a rich and diverse man-made and natural environment. Sixty percent of the nation’s protected coastline is in the South West. It has one third of the land nationally designated for its landscape quality. Its historic environment is unrivalled in England, ranging from the World Heritage Sites of Stonehenge and Bath, to the relict industrial landscapes of Cornwall. This rich environment is not only important for quality of life; it also provides recreational, cultural and educational opportunities that attract a large number of visitors to the region.

4.18. The South West Regional Environment Strategy\(^{28}\) and SofSW 2004 provide detail of the following environmental assets in the region:

- 7% of the region is designated as nationally or internationally important wildlife sites.
- There are 46 National Nature Reserves and 79 Local Nature Reserves, many of which are located in urban areas.
- Almost a fifth of England’s Sites of Special Scientific Interest (SSSIs) are in the SW.
- The SW supports around 25 species that are globally important, over 700 species that are of national conservation concern, and 34 species endemic to the UK, 11 of which are only found in the South West.
- There are two National Parks wholly within the SW, Dartmoor and Exmoor, covering around 7% of the region. The western part of the New Forest National Park is also in the South West.

• The SW has 12 Areas of Outstanding Natural Beauty (AONBs) and parts of two others, which extend to 30% of the region. This is twice the proportion covered by AONBs in England as a whole.

• Three of England’s 15 World Heritage Sites are in the South West: Stonehenge and Avebury, the City of Bath and the Jurassic Coast.

• The SW has 638 km of designated Heritage Coast, which accounts for 61.3% of the total Heritage Coast in England and also includes the Jurassic Coast World Heritage Site.

• Although the region accounts for just over 18% of the total land area of England it has 36% (6903) of the country’s scheduled ancient monuments, 24% (88,865) of the listed buildings and 17% (1,509) of all conservation areas.

4.19. However, the South West Regional Environment Strategy recognises that the environment in the South West is also under pressure. This is reflected for example, in the loss of habitats and green spaces, declines in wildlife, in the damage to landscapes and historic sites, increasing demands for natural resources such as water and energy, and poor local environmental quality such as graffiti, litter, and loss of tranquillity.

4.20. The SW Regional Environment Strategy has a vision for a region where people benefit from an excellent environment to live in and work in, now and for the future. This will contribute to the wider vision for the South West, as set out in the Regional Sustainable Development Framework. The Regional Environment Strategy’s main aims for pursuing that vision are set out under headings covering the principal environmental assets:

**Landscape and Historic Environment**

• Conserve and enhance the landscape and historic environment as assets for everyone to value and enjoy.

• Safeguard and manage the elements of the environment that underpin local distinctiveness.

**Natural Resources**

• Use natural resources efficiently and wisely.

• Manage waste better, by minimising the amount of waste produced.

• Protect and improve the quality of our air, soils and water.

• Develop a low carbon economy.

**Nature Conservation**

• Protect and enhance biodiversity and geological features across urban, rural, coastal and marine environments.
• Maintain and restore ecosystems so that they function in a way that will support the region's wildlife.

• Sensitively manage existing habitats.

• Increase the area of existing habitats and reestablish links between fragmented sites.

People and Their Environment
• Improve the quality of people's living environments.

• Manage flood risk to land and property.

• Improve sustainable access for everyone to a thriving and enhanced environment.

• Increase people's sense of responsibility towards the environment through greater understanding and enjoyment of it.

4.21. The Regional Environment Strategy analyses the key environmental assets in the region and the pressures operating on them, and identifies six key issues with objectives for the environment of the SW: Food, Farming & Forestry, Tourism & Leisure, Spatial Planning, Transport, Climate Change and Wise Use of Natural Resources. For each objective, the Strategy lists regional priorities and targets, with indicators for measuring their achievement.

Key Indicators
• National Headline Indicator H13 Wildlife (SW Regional Version) -
  • The population index for woodland bird species for the SW has increased by 3% since 1994, based on 25 species (England showed a 6% decline, based on 33 species).
  • The population index for farmland bird species for the SW has declined by 9% since 1994, based on 14 species (England showed a 5% decline, based on 19 species).
  • SofSW 2004 – The condition of SSSIs has improved significantly in recent years, with over half in favourable condition, compared to 44% in 2002. The proportion in unfavourable condition has fallen to under a quarter.
  • English Nature\(^\text{29}\) – 1% of SSSIs are in unfavourable condition as a result of construction and development issues.
  • SofSW 2004 – The number of whale, dolphin and porpoise strandings in Cornwall and Devon has increased since 1970, due to being caught in fishing nets.
  • English Heritage\(^\text{30}\) – There has been an increasing pressure in the SW to develop on the protected historic environment, shown by an increase in the number of

\(^\text{29}\) SSSIs Reports and Statistics. \text{www.english-nature.org.uk}

\(^\text{30}\)
applications to undertake works that will impact on scheduled ancient monument sites (11% increase in number of applications in 2002/03 compared to previous year). Nearly 2% of archaeological sites were in imminent danger of damage and decay in 2003, 13% of monuments in the SW were lost since 1945, and over 2% of Grade I and II* buildings are at risk.

- National Headline Indicator H12 River water quality (SW Regional Version) -
  - 82% of river lengths were good chemical quality and 97% were good or fair in 2002 (England averages were 65% and 94% respectively).
  - 87% of river lengths were good biological quality and 99% were good or fair in 2002 (England averages were 68% and 95% respectively).

- SofSW 2004 - Confirms that water quality in rivers and coastal waters is generally excellent in the region - the Environment Agency has found significant improvements in the biological and chemical quality of its rivers since 1990. This is largely due to a reduction in the impact of individual sewage treatment works and industry discharges, rigorous enforcement of discharge consents and more focus on pollution prevention.

- SofSW 2004 - Poor soil structure is evident in the SW, particularly on the sandy and silty soils in Somerset, Dorset, Wiltshire, and combined with the region's high rainfall and steep slopes results in increasing problems with water pollution and runoff.

- Woodland cover has increased from just over 5% of the the region in 1900 to 9% in 2000. The SW contains 20% of England’s ancient woodland resource.

Spatial differences

- The SW Biodiversity Implementation Plan recognises that biodiversity is widespread in the SW, and there is a lot of detailed information available about designated sites, non-statutory sites, species and habitats. The SW Regional Biodiversity Partnership (SW RBP) has developed a strategic regional Nature Map (see Figure 4.2) to assist with the focus of strategic nature conservation effort and to identify where pressures from development might be felt.

- Many of the PUAs identified in RPG10 are close to Areas of Outstanding Natural Beauty. Plymouth, and Bournemouth and Poole are also close to National Parks. Some PUAs are close to identified priority habitats, for example Bournemouth and Poole are adjacent to Special Areas of Conservation, Special Protection Areas, a Ramsar site and heathland.

Likely evolution without implementation of the RSS

- According to the SofSW 2004, the condition of SSSIs is improving in the region.

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30 Heritage Counts 2003, English Heritage.
• The National headline indicators for the SW show that river water quality is improving.

• However, there is increasing pressure from development on the protected historic environment. There has been a slight decreasing trend in the number of listed buildings at risk over the past few years (2.3% in 1999, 2.0% in 2002 and 2.2% in 2003). However, this pattern cannot be guaranteed in the future. Pressure on historic town centres is likely to rise as settlements and associated demand for service provision grow.

The issue of **Diverse Man-Made and Natural Environment** is linked to SSA High Level Objectives:

5: Maintain and improve environmental quality and assets

6: Minimise consumption of natural resources.

**Figure 4.2 South West Regional Nature Map (SWRBP)**

**Urbanisation of Rural Areas**

4.22. Although the South West is seen as being one of the most rural regions, most of its residents live in urban areas, ranging from small market towns to major national cities. The quality of, and access to, services, job opportunities, and local environments often vary markedly between and within towns and cities. In the rural areas, many people are increasingly choosing to live a more urban lifestyle, with local shops and services often unable to compete. However, communities in rural areas, and the farming sector in particular, have an important role to play in conserving the rich variety of countryside landscapes and habitats that the South West enjoys.
Key Indicators

- **Countryside Quality Counts National Indicator of Change**\(^{31}\) - Between 1990 and 1998, 32% of the South West's landscapes underwent "marked change inconsistent with their character" and 26% underwent "some change inconsistent with their character". The remaining 42% of the South West's landscapes show some change which was consistent with their character or no change at all. Change is measured in terms of those features that make the landscape distinct and therefore most valued. The indicator comprises an assessment of key landscape features such as woodland pattern, agriculture, boundary features and settlement and development features.

- **CPRE**\(^{32}\) - It is estimated that tranquil areas in England have reduced by 21% since the early 1960s, with half of the country now disturbed by development, roads and traffic. This is evident in some parts of the South West along the M5 corridor and road networks.

- **CPRE** - Although the SW is one of the least light-polluted regions, light pollution increased by almost 20% between 1993 and 2000.

Spatial differences

- There is a heavy concentration of countryside character areas that underwent "marked change inconsistent with their character" in the Central-East of the region. Virtually all the character areas east of the Blackdowns and the Vale of Taunton & Quantock Fringes underwent either "marked change" or "some change" inconsistent with their character with the exception of the Cotswolds and South Purbeck (Countryside Agency).

- Light pollution increased by 25% in Wiltshire. Devon remains one of the largest expanses of dark skies in the whole country, predominantly in Exmoor and Dartmoor (SoFSW 2004).

Likely evolution without implementation of the RSS

- According to the Countryside Quality Counts National Indicator of Change, and CPRE's data on tranquil areas and light pollution, it is likely that the urbanisation of rural areas will continue to occur.

<table>
<thead>
<tr>
<th>The issue of <strong>Urbanisation of Rural Areas</strong> is linked to SSA High Level Objectives:</th>
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<tbody>
<tr>
<td>2: Support communities that meet people’s needs</td>
</tr>
<tr>
<td>5: Maintain and improve environmental quality and assets.</td>
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</tbody>
</table>

\(^{31}\) [www.countryside-quality-counts.org.uk](http://www.countryside-quality-counts.org.uk)

WIDER CHALLENGES FACING SOUTH WEST

4.23. In addition to the above issues, the South West experiences some important challenges that are not specific to the region, but which will also need to be borne in mind when using the SSA Framework.

Increased consumption of resources

4.24. Society in general continues to exhibit increased consumption of resources – we use ever more energy, water and other natural resources, and produce more waste. Our lives are becoming more resource intensive.

4.25. The SWRA recognises the strong connections between waste, energy and minerals policy, and has established a Waste Energy and Minerals Group of Assembly members that take an overview of the development of policy in these areas. Waste policies are contained in the regional Waste Strategy, some of which will be translated into policies for the RSS. Minerals policies are included in RPG10 and are currently being reviewed for inclusion in the RSS. A target for renewable energy is also included in RPG10. It is likely that a Regional Sustainable Energy Strategy will be developed in parallel with development of policies for the RSS.

4.26. The South West Waste Strategy was launched in October 2004. Its Vision says: “The South West will become a minimum waste region by 2030, with households and businesses maximising opportunities for reuse and recycling.” The Waste Strategy aims to ensure that by the year 2020 over 45% of waste is recycled and reused and less than 20% of waste produced in the region will be landfilled.

Key indicators

- National Headline Indicator H15 Waste (SW Regional Version) -
  - The amount of household waste produced per person in the SW in 2002/03 rose 7% from 1998/99 (529 kg per person, England average was 521 kg per person).
  - However, the amount of waste recycled or composted per person in the SW in 2002/03 rose 47% from 1998/99 (99 kg per person compared to the England average of 76 kg per person).
- National Headline Indicator H14 Land use (SW Regional Version) – Between 1992 and 2002 an average of 45% of new houses in SW were built on previously developed land. (England average was 59%)
- SofSW 2004 – In 2003, an average of 52% of total housing commitments in the SW were on previously developed (brownfield land), below the national target of 60% new housing development on brownfield land, but meeting the regional target of 50%.
• SW RA\textsuperscript{33} - The majority of SW District/Unitary Authorities only achieved 15-40% brownfield land development between 1998-2001, with slightly more in the counties of Devon, Cornwall and Somerset, and the Unitary Authorities of South Gloucestershire, North Somerset, Bath and North East Somerset, than the North East and South East counties.

• SofSW 2004 – Although the mining and quarrying sector is small in employment terms (in 2001, 0.3\% of SW residents worked in the industry compared to 0.2\% for England as a whole, however, 1.3\% of the resident population of Cornwall work in the minerals industry), the industry also has significant impacts on both the natural and historic environment.

• Environment Agency 2001\textsuperscript{34} – The abstraction of water has increased by 10\% between 1990-1998 due to demands by business and domestic users. There is no summer surface water available for extraction in the SW and no groundwater resources available for further large-scale development of the major aquifers. There are some areas of the SW, mostly in the east of the region, where there are unsustainable or unacceptable abstraction regimes in winter and summer.

**Likely evolution without implementation of the RSS**

• Production of waste, and pressure on land and water is likely to continue to increase.

The issue of Increased consumption of resources is linked to SSA High Level Objective:

6: Minimise consumption of natural resources.

**Continuing increases in road traffic**

4.27. There is a continuing rise in car ownership and use nationally. In the SW, car use and ownership is relatively high, while use of public transport is low, reflecting the large distances between the major centres of the region, its dispersed population and settlement pattern and a degraded public transport network.

4.28. Road transport is a major contributor to carbon emissions that reduce air quality and contribute to climate change. Major motorways and road networks have been established in the SW for 30 years, but significant upgrades and improvements to many to increase their capacity (e.g. A303), has contributed to urbanisation of the countryside. The traffic also creates noise affecting adjacent communities and sensitive environments.

**Key indicators**

• National Headline Indicator H11 Road traffic (SW Regional Version) – Traffic increased by 20\% in the South West between 1993 and 2002; 46 billion vehicle

\textsuperscript{33} Total housing commitments on previously developed land recorded on 31\textsuperscript{a} March 2003, SW RA, 2003.

kilometres were covered by motor vehicles in 2002. This represented the third highest increase of the regions.

- SofSW 2004 – Two thirds of all journeys made by SW residents during the period 1999-2001 were made by car, and SW residents are more likely to make their journeys by car, and less likely to travel by public transport, than the average for England. The use of public transport is largely concentrated in the urban areas. 78% of the region’s employed residents travel to work by car or motorcycle, 6% by public transport and 15% either walking or cycling. These patterns are similar to other regions except for London.

- SofSW 2004 – People in the SW have one of the least accessible bus services in England, with only 78% living within a 13 minute walk of an hourly service, compared with 89% in the country as a whole.

- National Headline Indicator H10 Air quality (SW Regional Version) – Number of days in 2003 when air pollution was moderate or higher: Bristol Centre 48, Plymouth Centre 35, Somerton (rural) 68, Yarner Wood (rural) 75. (The England average was 51 days in urban areas and 68 days in rural areas).

Likely evolution without implementation of the RSS

- The National headline indicators for road traffic in the SW show that levels of traffic are increasing, however, there is not enough data available from the headline indicators to present trends in air quality for the SW.

- While the SofSW 2004 reports that bus passenger numbers are falling, use of rail in the region is increasing. Air travel is also growing in line with national growth.

The issue of **Continuing increases in road traffic** is linked to SSA High Level Objectives:

4: Provide access to meet people’s needs with least damage to communities and the environment

6: Minimise consumption of natural resources.

Consumption versus happiness

4.29. There is a growing debate about the relationship between consumption versus happiness. The recent report of the UK Sustainable Development Commission (SDC)\(^{35}\), for example, calls for economic growth that supports social progress, high employment levels, and protection of the environment and prudent use of natural resources (and discourage the kinds of economic growth that do not), and therefore also for smarter targets than those that focus primarily on GDP / GVA growth to guide an economic path that actually improves quality of life.

Key Indicators

- There are no indicators for measuring happiness in the Government’s set of 15 Headline Indicators, and the SDC report suggests that the Government needs to bring forward a new, better set of headline indicators, that include a different approach to measuring economic progress. While the UK is above the European average for GDP, this is accompanied by much greater inequality in income, and a long hours, high pressure employment culture. There is no evidence that the UK pattern of economic development is making people happier or giving them a better quality of life.

- The SDC report also recommends that the Government’s fourth sustainable development objective “Maintenance of high and stable levels of economic growth and employment” be re-formulated so that high employment is linked with the goal of social progress and well-being, rather than with economic growth, since having satisfactory work is a fundamental part of social and personal security and identity.

Likely evolution without implementation of the RSS

- Without indicators for measuring happiness it is too difficult to predict future trends in the SW region.

The issue of **Consumption versus happiness** is linked to SSA High Level Objectives:

1: Improve health

2: Support communities that meet people’s needs

3: Develop the economy in ways that meet people’s needs.

Climate change

4.30. Climate change is likely to bring higher temperatures placing greater strain on the region’s water resources and altering natural habitats, and more extreme weather, including more frequent flooding and storm events. There is a need to maximise local resilience, to minimise exposure to extreme weather and global resource uncertainties, design buildings to protect against heat as well as cold, reduce water and energy demand. The SW Regional Environment Strategy also notes that climate change is likely to bring opportunities that the SW region should capitalise on. For example, warmer temperatures and longer growing seasons could lead to increased productivity and present opportunities farmers and growers to grow new crops. New business opportunities may arise for the leisure and tourism industry.

Key Indicators

- National Headline Indicator H9 Climate change (SW Regional Version) - Total emissions of carbon dioxide were 8 million tonnes carbon, or 1,500 kg carbon per head in 2001 with earlier comparable data not available (England emissions were 114 million tonnes and 2,300 kg carbon per person).
- SofSW 2004 – The amount of carbon dioxide in the atmosphere has increased by more than 30% since pre-industrial times and is still increasing at an unprecedented average rate of 0.4% per year, mainly due to the combustion of fossil fuels and deforestation.

- SofSW 2004 – The number of properties that have been flooded in the SW has steadily increased since 1996/97. Areas at particular risk of flooding in the SW are the Somerset Levels and Moors, Bristol, Taunton, Bridgwater, Exeter, Blandford and Bodmin.

### Likely evolution without implementation of the RSS

- There are no comparable data available for the National headline indicator for climate change in the SW, thus it is difficult to predict future trends in carbon dioxide. However, the SofSW 2004 states that the amount of carbon dioxide in the atmosphere has increased since pre-industrial times.

- Flooding of properties is also likely to increase as a result of climate change.

<table>
<thead>
<tr>
<th>The issue of Climate change is linked to SSA High Level Objectives:</th>
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<tbody>
<tr>
<td>3: Develop the economy in ways that meet people’s needs</td>
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<td>4: Provide access to meet people’s needs with least damage to communities and the environment</td>
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<tr>
<td>5: Maintain and improve environmental quality and assets</td>
</tr>
<tr>
<td>6: Minimise consumption of natural resources.</td>
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### CHARACTERISTICS OF AREAS LIKELY TO BE SIGNIFICANTLY AFFECTED BY IMPLEMENTATION OF THE RSS

4.31. A requirement of the SEA Directive (Annex 1 c)) is to describe “the environmental characteristics of areas likely to be significantly affected”. In the South West, the areas likely to be significantly affected are set out in the Possible Development Strategies proposed for the RSS. The Possible Development Strategies propose building on the core strategy of the current RPG10, by concentrating development in different proportions at the eleven largest towns and cities in the region (the Principal Urban Areas (PUAs)): **NEEDS UPDATING TO REFER TO CURRENT RSS POLICIES/SUB-REGIONS**

- Bath
- Bournemouth/Poole
- Bristol
- Cheltenham
In addition, eight Joint Study Areas (JSAs) have been identified for studies being undertaken by the planning authorities in the area, which will inform the development of the RSS. The JSA studies will develop a strategic vision for each study area, considering alternative future scenarios and spatial development options, which will link strategic sub-regional policy and implementation. The JSAs cover all of the PUAs:

- Bournemouth & Poole
- Cheltenham & Gloucester
- Exeter
- Plymouth
- Swindon
- Taunton
- Torbay
- West of England (covers Bristol, Bath and Weston-super-Mare)

Table 4.1 is a preliminary description of the key sustainability characteristics and issues for each of the PUAs and JSAs that potentially could be significantly affected. Results and data from the JSA studies (due to be completed in March 2005) will also inform this requirement of the SEA Directive, thus, this table will be updated during the SSA process and a final version included in the SSA Report.
### Table 4.1 Characteristics of areas likely to be significantly affected by implementation of the RSS

<table>
<thead>
<tr>
<th>PUA/JSA</th>
<th>Urban Area Population 2001</th>
<th>Sustainability characteristics/issues likely to be significantly affected by RSS</th>
</tr>
</thead>
</table>
| Bournemouth & Poole     | Bournemouth (inc. Poole) 383,713 | • Population: One of the fastest growing urban areas in the country for many years, primarily due to in-migration.  
• Economy: Diverse based on tourism, high technology engineering, financial services and education.  
• Employment and services: Major centre in the south east of the region for employment, services, shopping, cultural and education facilities.  
• Deprivation: Pockets exist in parts of the urban area (4 of the 98 most deprived SOAs in the region). Men have lower life expectancy than England as a whole.   
• Transport and access: Links to the east are relatively good but to other parts of the South West are poor. Poole is an international freight/passenger port, but with poor links to national road network. Bournemouth has a growing passenger international airport.  
• Biodiversity: Proximity to Special Areas of Conservation, Special Protection Areas and Ramsar Sites. River Avon to east particularly sensitive.  
• Landscape: Proximity to New Forest National Park, Dorset AONB, Purbeck Heritage Coast.  
• Flood risk: Significant areas subject to risk of fluvial and coastal flooding.  
• Water supply and quality: status to be confirmed with Environment Agency. |
| Cheltenham & Gloucester | Cheltenham 110,320; Gloucester 136,203 | • Economy: Tourism and retail are significant employers.  
• Employment and services: Important economic, social, cultural and service centres with many links between the two settlements.  
• Deprivation: Pockets exist in Gloucester (4 of the 98 most deprived SOAs in the region). Men in Gloucester have lower life expectancy than England as a whole.  
• Transport and access: Relatively good transport links to most parts of the country, although road/rail links are close to capacity.  
• Cultural heritage: Cheltenham contains areas of high architectural quality. Gloucester is a cathedral city with a strong industrial heritage.  
• Landscape: Cheltenham is constrained by Cotswold AONB.  
• Flood risk: Gloucester is constrained by the River Severn floodplain.  
• Water supply and quality: Waste water treatment facilities are near capacity status to be confirmed with Environment Agency. |

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Office for National Statistics Census 2001: Key Statistics for Urban Areas in England and Wales
<table>
<thead>
<tr>
<th>PUA/JSA</th>
<th>Urban Area Population 2001</th>
<th>Sustainability characteristics/issues likely to be significantly affected by RSS confirmed with Environment Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exeter</td>
<td>106,772</td>
<td>• Economy: Strong service and tourism based economy, distribution.</td>
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<tr>
<td></td>
<td></td>
<td>• Employment and services: Administrative and regional service centre for Devon.</td>
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<td></td>
<td></td>
<td>• Transport and access: Linked to London by both First Great Western (via Bristol) and South West Trains. Exeter airport;</td>
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<tr>
<td></td>
<td></td>
<td>• Biodiversity: Special Protection Area and Ramsar site to south (Exe estuary). Special Protection Area and Special Area of Conservation to the east.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Cultural heritage: Important historic core and cathedral city.</td>
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<td></td>
<td></td>
<td>• Landscape: Proximity to Dartmoor National Park to the west of the city, East Devon AONB to the east.</td>
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<tr>
<td></td>
<td></td>
<td>• Flood risk: The city is in an area at particular risk of flooding.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Water supply and quality: <strong>status to be confirmed with Environment Agency</strong></td>
</tr>
<tr>
<td>Plymouth</td>
<td>243,795</td>
<td>• Economy: Major employment and defence centre with a long tradition as a naval and commercial port. Marine technology. Some tourism.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Employment and services: Major service and retail centre in west Devon also serving Cornwall.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Deprivation: Significant concentration of deprivation (19 of the 98 most deprived SOAs in the region). Men and women in Bristol have lower life expectancy than England as a whole. Significant low wage economy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Transport and access: On First Great Western Inter-City line. Connected to M5 by A38. Plymouth also has an airport.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Biodiversity: Tamar valley/estuary is significant wildlife resource, designated as Special Area of Conservation, and Special Protection Area.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Cultural heritage: Important historic naval dockyard.</td>
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<td></td>
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<td>• Landscape: Just to south of Plymouth is South Devon and Rame Head AONBs and Heritage Coasts. To the north is Tamar Valley AONB.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Flood risk: Some areas are at risk of fluvial and/or coastal flooding.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Water supply and quality: <strong>status to be confirmed with Environment Agency</strong></td>
</tr>
<tr>
<td>Swindon</td>
<td>Swindon 155,432</td>
<td>• Population: Major growth centre for the region.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Economy: Significant financial and business services sector. Environmental industries.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Employment and services: Retail, cultural and educational facilities not commensurate with size of</td>
</tr>
<tr>
<td>PUA/JSA</td>
<td>Urban Area Population 2001&lt;sup&gt;26&lt;/sup&gt;</td>
<td>Sustainability characteristics/issues likely to be significantly affected by RSS</td>
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<tr>
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<tr>
<td></td>
<td></td>
<td>town,</td>
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<tr>
<td></td>
<td></td>
<td>• Deprivation: Significant pockets exist (7 of the 98 most deprived SOAs in the region). Women and women in Bristol have lower life expectancy than England as a whole.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Transport and access: Good connections including First Great Western mainline and M4. Congestion experienced in the town.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Landscape: Proximity to North Wessex Downs to the south.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Water supply and quality: Water resource supply issues. Waste water treatment facilities are near capacity status to be confirmed with Environment Agency</td>
</tr>
<tr>
<td>Taunton</td>
<td>58,241</td>
<td>• Economy: Significant service sector.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Employment and services: It’s central location and administrative centre means that it is an important employment and service hub for this part of the region, although its cultural facilities are poor.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Transport and access: Good national connections via First Great Western inter-city to London, South East, and the West Midlands and to other SW regional centres such as Bristol, Exeter and Plymouth. Also via the M5. The town suffers from congestion.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Landscape: Proximity to the Quantock Hills AONB to the north and the South Blackdown Hills AONB to the south.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Water supply and quality: status to be confirmed with Environment Agency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Flood risk: The town is in an area at particular risk of fluvial flooding.</td>
</tr>
<tr>
<td>Torbay</td>
<td>110,366</td>
<td>• Economy: Major tourist resort, conference centre and fishing port (Brixham).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Employment and services: Sub-regional service centre.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Deprivation: Some significant pockets of deprivation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Transport and access: Poorly connected to other centres in the region, and suffers from congestion.</td>
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<tr>
<td></td>
<td></td>
<td>• Biodiversity: Proximity to Special Area of Conservation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Landscape: Proximity of South Devon AONB to the south plus Heritage Coast.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Water supply and quality: status to be confirmed with Environment Agency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Flood risk: status to be confirmed with Environment Agency</td>
</tr>
<tr>
<td>West of England</td>
<td>Bristol 551,066; Bath 90,144; Weston-super-Mare 80,076</td>
<td>• Population: Bristol is the largest urban area in the region.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Economy: Bristol is a major town centre service and retail centre, plus significant employment area adjoining the M4/M5 motorways to north. Its role as a port has much reduced. Bath is an important regional centre, with a vibrant economy including tourism and business services. Weston-super-</td>
</tr>
<tr>
<td>PUA/JSA</td>
<td>Urban Area Population 2001&lt;sup&gt;36&lt;/sup&gt;</td>
<td>Sustainability characteristics/issues likely to be significantly affected by RSS</td>
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<tr>
<td>Mare</td>
<td></td>
<td>• Mare is a major coastal resort.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Employment and services: Bristol is a major focus for regional services, shopping, cultural activities, education and tourism. Bath is an important cultural and shopping centre retaining its own identity despite its proximity to Bristol. Weston-super-Mare experiences high levels of commuting to Bristol.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Deprivation: Significant pockets of deprivation (Bristol has 19 of the 98 most deprived SOAs in the region; Weston-super-Mare 6). Men and women in Bristol have lower life expectancy than England as a whole. Bath is an important cultural and retail centre.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Transport and access: Bristol is at a key nodal point on First Great Western rail network (connecting London and the South East with South Wales, and cities/towns to Cornwall). Similar road connections via M4 and M5 but also to West Midlands conurbation and the North. Bristol suffers from traffic congestion, both in city centre and on surrounding road network. Bath is well connected to the national rail network, but is less well served by road. Weston-super-Mare is not on the national rail network, but is a short distance from the M5.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Biodiversity: All three urban areas are close to designated wildlife sites.</td>
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<tr>
<td></td>
<td></td>
<td>• Cultural heritage: Bristol has a significant history associated with its port, cathedral and university. Bath is designated as a World Heritage Site.</td>
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<td></td>
<td></td>
<td>• Landscape: To the east of Bristol lies the southern end of the Cotswolds AONB. The Cotswold AONB abuts the northern and eastern boundaries of the Bath urban area. Weston-super-Mare is in close proximity to the Mendip Hills AONB.</td>
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<tr>
<td></td>
<td></td>
<td>• Soils: Proximity to high grade agricultural land.</td>
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<td></td>
<td></td>
<td>• Water supply and quality: <strong>status to be confirmed with Environment Agency</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Flood risk: Bristol is in an area at particular risk of coastal flooding.</td>
</tr>
</tbody>
</table>
5. **SSA FRAMEWORK**

**REVIEW OF THE RSDF AND DEVELOPMENT OF SSA OBJECTIVES**

5.1. The review of the Regional Sustainable Development Framework (The RSDF - A Sustainable Future for the South West, South West Regional Assembly, and Sustainability South West, 2001) provides the basic framework for undertaking the SSA. The RSDF reflects both national policies and specific regional issues and concerns, drew on a wide range of expertise and extensive consultation, and was endorsed by key regional organisations including the Regional Assembly. The SSA team have selected and adapted material from the RSDF to work best as appraisal objectives in the following ways:

- Avoiding repetition.
- Emphasising issues which an RSS can potentially influence.
- Meeting the requirements, in terms of topic coverage, of the SEA Directive.
- Using a two tier structure with broad ‘high level objectives’ amplified and explained by more specific ‘detailed questions’: other appraisals have found this helps make the results clear and allows the appraisal to be carried out at different levels of detail as appropriate.
- Seeking a middle way between having so many objectives that appraisal becomes unmanageable and no patterns can be seen, and having so few that important issues are missed or each objective becomes too broad to provide a meaningful test.
- Reflecting recent policy developments, notably the concern over (un)healthy lifestyles, increasing acknowledgement of the seriousness of climate change, and the ‘happiness debate’ - that is, the growing interest in which kinds of economic development and activity increase human wellbeing.
- Specifying outcomes (ends) rather than inputs or outputs (means).

5.2. The SSA Framework underpins all the work undertaken on the SSA. The SSA Framework is set out in **Table 5.1** and comprises six ‘high level objectives’, which are adapted from the principles and objectives set out in the RSDF and were discussed and agreed with SSASG members in early 2004.

**Outcome objectives**

5.3. Readers may be surprised not to see in the list familiar objectives such as building on brownfield land, developing renewable energy, increasing recycling or economic growth. They are not included because they are means rather than ends. The RSS is likely to include all these objectives, and policies to
promote them. But that does not mean they should also be appraisal objectives. The job of appraisal is to test that the policies and objectives in the RSS really will help achieve the results that they are intended (or assumed) to. To achieve this, objectives are framed (so far as possible) in terms of outcomes. This means there will not necessarily be an objective corresponding to each theme or policy of the RSS.

5.4. For example, the point of building housing on ‘brownfield’ rather than ‘greenfield’ land is to clean up and regenerate derelict or degraded environments, to save soils, landscape and wildlife from being lost to development, and to encourage development within urban areas (where amenities are accessible with less travel). The SA should therefore ask not how much development is being delivered on brownfield land, but whether those objectives are being achieved. Appraisal objectives 2.4, 5.2, 5.3, and 6.5 in Table 5.1 are all relevant to this.

5.5. Likewise, renewable energy is one means to reduce greenhouse gas emissions - energy efficiency is another. Recycling is one means to reduce waste - avoiding it at source, reuse and composting are others. Economic growth is a means to provide people with a better lifestyle - but reducing what people need to spend, and encouraging unpaid services and benefits, are others. In all these cases, the SSA can test whether policies are delivering what is wanted - and prompt the RSS to consider additional or alternative ways. This helps fulfil an important requirement of SEA, which is to consider alternatives to the plan under consideration.

**Getting the best overall result: the role of substitution**

5.6. As the focus on outcome objectives implies, sustainability appraisal is concerned with getting the best possible overall result. In some cases this requires protection of unique individual assets. For example, damage to the special urban character of Bath, Totnes or Truro, or the special character of Dartmoor or the Somerset Levels, would be a loss that nothing else could make up for. But many negative impacts could be offset by positive impacts of the same kind. For example, an increase in potable water demand due to new housing development could be offset by any action that reduced demand within the same catchment, including measures off site such as retrofitting water efficiency measures in other houses or businesses in the same catchment.

5.7. Likewise, development that deprived people of recreational open space could in principle be substituted by opening up another area for recreational use - provided it was equally accessible to the people who lost out, and was at least as suitable for their recreational uses. As these two examples show, the kind and location of a genuine like-for-like substitution of a benefit will vary with the nature of the benefit. For social or community amenities, substitution must be at least as accessible to users as the asset lost or damaged. In contrast, greenhouse gas emissions can in principle be substituted anywhere in the world.
5.8. The SSA will welcome and encourage this kind of strategic substitution of benefits as a valuable way to reconcile potentially conflicting objectives by building offsetting actions into the development ‘package’. Planning obligations (‘section 106 agreements’) can sometimes be used to secure this kind of substitution of benefits. The Quality of Life Assessment process developed and endorsed by the Countryside Agency, Environment Agency, English Heritage and English Nature, offers a transparent and systematic way to identify the benefits that matter and define conditions, including like-for-like substitution, under which they can be maintained. The SSA process will welcome use of methods like these in the RSS.

The role of appraisal

5.9. Outcome objectives derived from sustainability principles may test and challenge policies in some areas, for example transport. This is right and proper. SA is not just a test of consistency with current Government policies: it should aim to help the RSS work towards sustainability. According to the internationally accepted ‘classic’ definitions, sustainable development is about reconciling a human aspiration – ‘meeting the needs of the present’, or ‘improving the quality of life’ – with a constraint: ‘not compromising the ability of future generations to meet their own needs’, or ‘living within the carrying capacity of supporting ecosystems.’ Appraisal needs to identify points where promoting one of these aims threatens another.

5.10. It should also always be remembered that SA is only a tool. It does not make decisions. Inclusion of an appraisal criterion (for example on reducing air or road transport) does not instantly veto all road or air travel expansion. All it does is ensure that the full range of sustainability consequences of options or choices are made clear so that ultimately political choices about policies can take these into account.

5.11. Table 5.1 has five columns. The first gives the six high level objectives for the appraisal, the second a total of 31 more detailed questions applying these objectives. The third column gives further explanation of the question, or the reason for asking it (where these are not obvious), and the fourth suggests the sorts of things the appraisal will be looking for in RSS and city-region strategies, policies and proposals to answer the detailed question. It must be stressed these are only indicative examples. They are not the only or necessarily the best ways to achieve the results, will not be appropriate or even possible in all circumstances, often need actions that go beyond the scope of a RSS, and may be limited or sacrificed for the sake of other policy objectives. The fifth column lists the relevant plans, programmes and strategies that have been reviewed in relation to the high level objectives (discussed in the following section and set out in Appendix 2).

5.12. The numbers before each objective or question are for convenience referring to them in this appraisal. The numbers in brackets after them refer to the RSDF. PX means principle X in the list under 2.2 of the RSDF; Y means theme number Y under 2.3 in the RSDF; Y.Z means objective number Z under theme Y.
Coverage of SEA topics by SSA Framework

5.13. The SEA Directive requires a number of issues (SEA topics) to be covered when assessing the likely significant effects on the environment (Annex 1 f). The SEA compliance check of the Stage 1 Scoping Final Report (undertaken in June 2004 by Professor Riki Therivel of Oxford Brookes University and Levett-Therivel Sustainability Consultants), confirmed that the SEA topics have been covered by the objectives in the SSA Framework set out in Table 5.1, as follows (numbers = SSA objectives relevant to the SEA topic):

- Biodiversity 5.1
- Population 2.1, 2.4, 3.1-3.3, 5.4
- Human health 1.1-1.3, 2.1, 2.3, 4.5
- Fauna 5.1
- Flora 5.1
- Soil 5.2, 6.5
- Water 6.5
- Air 4.1-4.5, 6.5
- Climate 3.6, 4.1-4.5, 5.6, 6.1
- Material assets 3.2, 3.4, 5.6, 6.1-6.4
- Cultural heritage 2.5, 5.4, 5.5
- Landscape 5.3, 5.4
**Table 5.1: SSA Framework**

<table>
<thead>
<tr>
<th>High level objective</th>
<th>Detailed questions: does the policy / proposal . . .</th>
<th>Explanation of the detailed question (where not obvious)</th>
<th>What appraisal will look for</th>
<th>Relevant Plans, Programmes and Strategies reviewed (see Appendix 2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1: Improve health (1)</td>
<td>1.1 Improve health (P7, 1.1)</td>
<td>Access to sickness treatment services contributes, but health is more than this.</td>
<td>Development that contributes to positive wellbeing, through (eg) pleasant surroundings and living conditions, freedom from noise and pollution, and enabling lifestyles free from stress, anxiety and exhaustion.</td>
<td>Various at South West Public Health Observatory (<a href="http://www.swpho.org.uk">www.swpho.org.uk</a>)</td>
</tr>
<tr>
<td></td>
<td>1.2 Reduce health inequalities (1.2)</td>
<td>Lower income (or other disadvantage) should not increase exposure to health risks or reduce access to a healthy lifestyle</td>
<td>Development that avoids exposing poorer people to (eg) more pollution or noise, and that give all access to leisure and recreation.</td>
<td></td>
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<tr>
<td></td>
<td>1.3 Promote healthy lifestyles, especially routine daily exercise</td>
<td>Sedentary lifestyles and lack of routine basic exercise are one of the main threats to health</td>
<td>Patterns of development that make walking and cycling easy and attractive as routine methods of transport.</td>
<td></td>
</tr>
<tr>
<td>2: Support communities that meet people’s needs (P6)</td>
<td>2.1 Help make suitable housing available and affordable for everyone (6.2, 4.4)</td>
<td>Match of housing to households; cost of appropriate housing relative to disposable incomes especially for less well off people; whether people are forced to move away from their chosen communities or workplaces to afford housing.</td>
<td>1. Sustaining Success – Sustainability Education in the South West</td>
<td></td>
</tr>
<tr>
<td>High level objective</td>
<td>Detailed questions: does the policy / proposal...</td>
<td>Explanation of the detailed question (where not obvious)</td>
<td>What appraisal will look for</td>
<td>Relevant Plans, Programmes and Strategies reviewed (see Appendix 2)</td>
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</tr>
<tr>
<td>2.2 Give everyone access to learning, training, skills and knowledge (P5)</td>
<td>Important both to equip people for economic success and for personal development. The skills levels of the South West is lower than the national average, particularly in the western part of the region, which can hold back people from accessing satisfying work opportunities. The shortage of affordable housing in rural areas can affect supply of rural skills, for example in farming and food workforce, building and essential services.</td>
<td>Quality and accessibility of schools, colleges, libraries. Encouragement for a diversity of choice of employment, particularly in the more deprived parts of the region, and educational and other service provision (e.g. Centres of Excellence for Skills) as part of regeneration efforts. Affordable housing for key workers.</td>
<td>West</td>
<td>4. Sustainable Communities in the South West – Building for the Future</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7. Local Sustainability Group for the South West (2000). Promoting Sustainable Tourism in the South West, A discussion paper by the local sustainability group for the South West</td>
</tr>
<tr>
<td>2.3 Reduce crime and fear of crime (4.2, 6.3)</td>
<td></td>
<td>Development that designs crime out, eg by providing passive surveillance, avoiding ‘dead’ spaces and times.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.4 Promote stronger more vibrant communities (2.4, 6.1)</td>
<td>For example by fostering mutual trust, self help and reducing the amount people need to travel away from home to meet needs. Community involvement in local economies (2.4)</td>
<td>Patterns of development that allow people to meet more needs within local communities and reduce the need to travel. Support for local trading schemes.</td>
<td></td>
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</tr>
<tr>
<td>2.5 Increase access to and participation in cultural activities (12.1, 12.3, 14.3)</td>
<td></td>
<td>Cultural facilities integral with development. Development of ‘environment-based’ visitor attractions, that do not damage the resource they are based upon.</td>
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</tr>
<tr>
<td>High level objective</td>
<td>Detailed questions: does the policy/proposal...</td>
<td>Explanation of the detailed question (where not obvious)</td>
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<td>Relevant Plans, Programmes and Strategies reviewed (see Appendix 2)</td>
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<tr>
<td>3. Develop the economy in ways that meet people's needs (P2, 5)</td>
<td>3.1. Give everyone in the region access to satisfying work opportunities, paid or unpaid (P2, 5.2, 11.1, 14.2, 14.3)</td>
<td>Work should provide satisfaction as well as income - consider whether jobs are ones people will WANT to do - rather than HAVE to do because there's nothing else.</td>
<td>Availability of employment that people find attractive; whether people can make a sufficient income without having to do unattractive work; whether people who want to work outside the cash economy can do so. Promotion of more sustainable year-round tourism, particularly in coastal and market towns.</td>
<td>1. Regional Economic Strategy for the South West of England 2003-2012</td>
</tr>
<tr>
<td></td>
<td>3.2. Help everyone afford a comfortable standard of living</td>
<td>Can be improved by reducing cash costs - eg need to travel, high fares, high housing costs, or by fostering community self help to meet needs - as well as by increasing income.</td>
<td>Whether lower incomes are enough to buy a reasonable standard of living - taking account of (eg) housing and travel costs. Avoidance of kinds of economic development that (eg) raise housing costs or make people on lower incomes have to spend more on (eg) car travel or buying services commercially that used to be public or mutual.</td>
<td>2. South West Framework for Regional Employment and Skills Action (FRESA).</td>
</tr>
<tr>
<td></td>
<td>3.3. Reduce poverty (1.3) and income inequality (11.3)</td>
<td>Levelling up cash incomes helps; so does reducing the disadvantage caused by (eg) not being able to afford a car or pay for commercialised services.</td>
<td>Maintenance and enhancement of businesses meeting local needs. Encouragement for farmers' markets and farm shops.</td>
<td>3. South West England (2004). Towards 2015 - Shaping tomorrow's tourism (a consultation draft)</td>
</tr>
<tr>
<td></td>
<td>3.4. Meet local needs locally (P3, 11.2, 13.1, 13.4, 13.4)</td>
<td>Contributes to resilience and community strength as well as reducing the transport and energy intensity of the economy</td>
<td>Promotion of local and regional markets in goods and services. Development of greater integration within key economic sectors of the region. Encouragement to local businesses, especially micro and SMEs that adopt sustainable practices.</td>
<td></td>
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<tr>
<td></td>
<td>3.5. Increase the circulation of wealth within the region (2.1, 2.2, 11.2)</td>
<td>If businesses spend more of their income on goods and services within the region, this increases the benefits of business activities to the region and its economic security</td>
<td></td>
<td></td>
</tr>
<tr>
<td>High level objective</td>
<td>Detailed questions: does the policy / proposal ...</td>
<td>Explanation of the detailed question (where not obvious)</td>
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<tr>
<td>3.6 Harness the economic potential of the coast in a sustainable way (15.3)</td>
<td>The coastline of the South West is one of the region’s greatest, but most vulnerable, assets, particularly in the light of climate change.</td>
<td>Integrated approaches to coastal management that provide for climate change to take its natural course where possible, careful planning of port and coastal town development, that delivers jobs that feed off but do not damage the environment, and by keeping the ‘wild’ stretches ‘wild’.</td>
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<tr>
<td>3.7 Reduce vulnerability of the economy to climate change and harness opportunities arising (3.3)</td>
<td>Extreme weather, crop failures, water shortages at home or abroad may disrupt trade, long distance transport and availability of energy and other resources, and increase insurance liabilities. South West may become more attractive to visitors and business.</td>
<td>Economic patterns that avoid unnecessary dependence on long distance trade and travel. Visitor and recreation developments that will encourage people to stay/visit the South West rather than go further afield.</td>
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<tr>
<td>4: Provide access to meet people’s needs with least damage to communities and the environment (9)</td>
<td>4.1 Reduce the need/desire to travel by car (2.3, 9.1, 14.1)</td>
<td>Road traffic is the only major terrestrial source of greenhouse emissions still increasing, the main source of local air pollution, and identified in countless surveys as one of the main threats to local quality of life through danger, noise, vibration and community severance. Car dependence deepens social exclusion and adds to pressures for unsustainable land use patterns.</td>
<td>Development patterns that reduce the need to travel, such as ensuring that people can live closer to their work. Avoid developments that generate further road traffic. Improvement of alternatives to the car. Promotion of ‘non car’ options for tourism. Policies that progressively reduce parking provision and road space. Policies that encourage more efficient use of car travel (e.g. car sharing, fuel efficient cars, etc.).</td>
<td>1. Developing the Regional Transport Strategy in the South West, Consultation Draft South West Area Multi Modal Study, SWARMMS Final Report 2. Development of an Air Transport (2003) Strategy for the Far South West of England, A Report for the South West Regional Development Agency, South West Regional Assembly Government Office South West and Department for Transport.</td>
</tr>
<tr>
<td>High level objective</td>
<td>Detailed questions: does the policy / proposal . . .</td>
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<tr>
<td>4.2 Reduce the need/desire to travel by air (9.1)</td>
<td>Air travel is more damaging in terms of climate change even than driving the same distance. Projected increases in air travel threaten to undo the UK’s ‘Kyoto’ achievements. This has led organisations including the Royal Commission on Environmental Pollution and the Sustainable Development Commission to advocate demand management. Increasing air travel is unsustainable.</td>
<td>Develop alternatives, especially fast rail links and direct sea links to Eire, France and Spain. Any extra air capacity in the South West should be offset by reductions elsewhere eg Heathrow. Avoidance of development that encourages air travel.</td>
<td>3. Regional Transport Statistics 2003 (<a href="http://www.dft.gsi.gov.uk">www.dft.gsi.gov.uk</a>)</td>
<td></td>
</tr>
<tr>
<td>4.3 Help everyone access basic services easily, safely and affordably (P6, 2.3, 4.2, 5.3)</td>
<td>Enabling people to get access to what they want in life with less travel is a ‘win-win’, reducing costs and effort as well as environmental damage.</td>
<td>Distance to, and ease of accessing schools, shops, places of work and recreation. Quality of local services: having a school within walking distance of housing is less use if all families who can, send their children elsewhere. Encourage greater use of ICT.</td>
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<tr>
<td>4.4 Make public transport, cycling and walking easier and more attractive (2.3, 9.2, 9.4)</td>
<td>Provision of bus routes and stops, and safe, attractive and direct routes for cyclists and walkers. Patterns of development that support their use, eg short distances to local services, concentration of amenities in town centres served by radial bus routes. Improvement of urban, inter-urban and rural public transport services.</td>
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<td>4.5 Encourage a switch from transporting freight by road to rail or water (9.2)</td>
<td>Encouragement of local goods and services. Provision of improved port and rail facilities, including inland waterways, and interchanges that will lead to reduced road freight traffic, not more.</td>
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<tr>
<td>High level objective</td>
<td>Detailed questions: does the policy / proposal . . .</td>
<td>Explanation of the detailed question (where not obvious)</td>
<td>What appraisal will look for</td>
<td>Relevant Plans, Programmes and Strategies reviewed (see Appendix 2)</td>
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<tr>
<td>5. Maintain and improve environmental quality and assets (P10)</td>
<td>5.1 Protect and enhance habitats and species (taking account of climate change) (7.1)</td>
<td>Protection not only of designated areas, but of wildlife interest everywhere. Especially strengthening of links between ‘wild’ areas to increase adaptation to climate change</td>
<td></td>
<td>1. Local Sustainability Group for the South West (2000). Promoting Sustainable Tourism in the South West, A discussion paper by the local sustainability group for the South West.</td>
</tr>
<tr>
<td></td>
<td>5.2 Promote the conservation and wise use of land (4.1)</td>
<td>Soils are a non-renewable resource. They should be conserved where possible and appropriate to do so for future generations. Much of the region’s valuable cultural and natural resources are a product of a rural way of life and require rural skills and farming/stewardship to maintain them.</td>
<td>Avoiding development that leads to the permanent loss of bio-productive soils, taking into account their contribution to sustainable food production, biodiversity, flood storage, groundwater recharge, etc. Encourage development that strengthens links between urban and rural lives, and supports farmers’ sustainable stewardship of rural land.</td>
<td>2. South West Regional Assembly and South West Regional Environmental Network (2003). Our Environment: Our Future Towards the Regional Strategy for the South West Environment, Draft for Consultation.</td>
</tr>
<tr>
<td></td>
<td>5.3 Protect and enhance landscape and townscape (7.3, 13.5)</td>
<td>The diversity of the region is one of its major strengths, perhaps best expressed in its landscapes and townscales, although much new build pays little respect to this (e.g. modern housing estates)</td>
<td>Location and design of development to respect and improve character and settlement setting.</td>
<td>3. English Heritage (undated). English Heritage in the South West 2003-005</td>
</tr>
<tr>
<td></td>
<td>5.4 Value and protect diversity and local distinctiveness including rural ways of life (P13, 4.3)</td>
<td>The South West’s diversity, cultural as well as environmental, is a good in itself and increases resilience to external change.</td>
<td>Policies should avoid ‘suburbanising’ the countryside. Farmers and other land workers should be enabled to live in the countryside.</td>
<td>4. Defra (2003). Draft, The First Soil Action Plan For England 2004-06</td>
</tr>
<tr>
<td></td>
<td>5.5 Maintain and enhance cultural and historical assets (12.2)</td>
<td></td>
<td>Protection of culturally and historically significant assets and qualities. Not just designated sites and buildings, but also non-designated such as locally valued features and landmarks</td>
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<td></td>
<td>5.6 Reduce vulnerability to flooding, sea level rise (taking account of climate change) (3.3, 4.5)</td>
<td>Existing settlements need to plan for increased risk.</td>
<td>New development and infrastructure should not be built in areas at risk. Relocation and managed retreat may be the best option.</td>
<td></td>
</tr>
<tr>
<td>High level objective</td>
<td>Detailed questions: does the policy / proposal . . .</td>
<td>Explanation of the detailed question (where not obvious)</td>
<td>What appraisal will look for</td>
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<tr>
<td>6: Minimise consumption of natural resources (P9, 10.2)</td>
<td>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions (3.1, 3.2)</td>
<td>Renewable energy production and energy efficient technologies help. Best of all, look for ways to design out the need to use energy</td>
<td>Designing buildings to use natural lighting, ventilation and capture the sun’s heat. Use of renewable energy where appropriate.</td>
<td>1. Regional Renewable Energy Strategy for the South West of England 2003-2010</td>
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<td></td>
<td>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</td>
<td></td>
<td>Minimise water consumption, maximise use of rainwater / grey water.</td>
<td>2. Revision 2010: Empowering the Region – Renewable Energy Targets for the South West.</td>
</tr>
<tr>
<td></td>
<td>6.3 Minimise consumption and extraction of minerals (10.2)</td>
<td></td>
<td>Greatest possible reuse of old material in new construction; provision for reuse and recycling.</td>
<td>3. A Vision for Sustainable Waste Management in the South West.</td>
</tr>
<tr>
<td></td>
<td>6.4 Reduce waste not put to any use (P11, 10.3)</td>
<td>The best way - top of the waste hierarchy - is to avoid creating waste at source. Reuse, recycling, digestion and composting are better than disposal.</td>
<td>Provision for composting, digestion, recycling in new development.</td>
<td>4. From Rubbish to Resource. The Regional Waste Strategy for the South West Consultation Document.</td>
</tr>
</tbody>
</table>
6. How the SSA has Influenced the RSS

6.1. Chapter 2 of this SSA Report outlined the ongoing input the SSA has had to the development of the RSS, since the SSA began in February 2004. The SSA team has attended a number of SWRA meetings and workshops regarding the RSS development, often contributing papers and/or presenting SSA comments, guidance, findings and recommendations. In addition to formal input into the process, there has been frequent and regular communication between the SWRA officers preparing the RSS and the SSA team, and the SSA SG, to debate issues and challenges as they arose (e.g. alternatives to be considered), share baseline information (e.g. maps) and discuss background to policy formation (e.g. housing distribution numbers).

6.2. This chapter sets out in more detail the type of input the SSA has made, and how recommendations have been taken on board by the SWRA and influenced the development of the RSS.

SSA Guidance

6.3. The SSA guidance for the JSA studies set out a methodology so that authorities responsible for undertaking the JSA studies would be able to undertake their own SSA of the strategies developed for each JSA. The guidance encouraged them to consider alternative strategies wherever possible.

6.4. Using the SSA guidance and further advice provided by the SSA team in October-November 2004, the JSA studies each approached their SSAs in individual ways, some providing detailed JSA SSA Reports and others not. The SSA team has reviewed the JSA SSA Reports (where available), providing commentary on the JSA SSA findings (e.g. whether some effects have been underplayed) and further recommendations for improving the sustainability of the sub-regional strategies in the RSS (developed from the JSA studies). Chapter 10 of this SSA Report provides a summary of the review of the JSA SSA Reports, and the detailed findings are in Appendix XX.

Guidance on Alternatives (March 2005)

6.5. The SSA team undertook an initial review (17 February 2005) of the emerging Regional Transport Strategy (RTS) to be incorporated into the RSS. The review noted that it was not clear what alternatives had been considered, but that it was likely that in developing the approach and policies, choices would have been made. The review therefore recommended that, where such choices arose, the options considered be documented and appraised, so that the sustainability advantages/disadvantages are clearly set out for decision-makers. The SWRA then requested more guidance about what sort of alternatives they should be considering when preparing the RTS.

6.6. In March 2005, the SSA team prepared a paper for the SW RA ‘Guidance on Alternatives’ setting out recommendations for considering alternatives at the strategic
level, policy level and when prioritising policies and investment in the RTS. Need input from SW RA re: consideration of this guidance...

SSA INPUT TO RSS POSSIBLE DEVELOPMENT STRATEGIES

Two SSA Commentaries on the emerging Possible Development Strategies (June-July 2004)

6.7. Before preparation of the Stage 2 SSA Report on the Possible Development Strategies, the SSA team reviewed the emerging Possible Development Strategies (then called options) and provided commentaries to the SW RA. The main recommendations were that the:

- RSS should consider a range of housing and/or economic growth alternatives (four scenarios)... EA used in their water resource work...

- SSA would appraise the discounted spatial development options as well as the three being put forward for public consultation. The discounted options were ‘going with past development trends’ and the creation of one or more freestanding, new towns.

- Options be ‘sharpened up’, more clearly defined and differentiated from one another.

Stage 2 SSA Report of Possible Development Strategies 25th August 2004

6.8. The SW RA did sharpen up the definitions of the three Possible Development Strategies in their consultation document Possible Development Strategies for the Region. As described in Chapter 2 of this report, the Stage 2 SSA Report appraised the Possible Development Strategies and two discounted options, as well as the four housing growth scenarios, against the SSA Framework. The SSA findings generally showed the Possible Development Strategy 3 to provide the most sustainability benefits. The SSA recommended that:

- Possible Development Strategy 3 was “strictly applied” and developed to strengthen form and function of each settlement concerned.

6.9. Since the consultation on the Possible Development Strategies, the SW RA has built on the preferred spatial development strategy (‘Possible Development Strategy 3’, the ‘Differential’ approach) to more clearly express the different sub-regional emphases in the RSS. A number of technical background studies were commissioned by the SW RA to identify for example, which towns and cities are strategically significant, describe the form and function of settlements and travel to work patterns in the region.
SSA REVIEWS OF EMERGING THEMATIC POLICIES

SSA Reviews of SWRA’s SA of thematic policies (February-May 2005)

6.10. The SSA team reviewed SW RA’s sustainability appraisals of early drafts of the thematic sections for transport, waste and energy. The SW RA had undertaken SAs using the SSA Framework and the SSA team commented on the findings of the SAs and the development of the policies. The SSA reviews included some recommendations for improvements to the policies and supporting text, and some recommendations for the SSA.

6.11. Some of the SSA recommendations have been taken on board by the SW RA although not necessarily in the same way recommended, as the structure of the whole RSS has gone through several iterations since the SSA review were undertaken, and additional more overarching policies have been developed. For example, the SSA review of the emerging energy policies suggested that sustainable design in the round - i.e. a whole systems approach to energy - including consideration of orientation, topography, design and technology should be included in the supporting text of the energy policies. While this is not included in the energy section of the RSS, Section 3 of the RSS does include specific policies on sustainable design (Development Policy E) and sustainable construction (Development Policy G). In addition, Section 7.3.2 of the RSS now states “A move toward more sustainable construction advocated in Section 3 will help address this issue (energy efficiency in buildings) in relation to new development.”

SSA COMMENTARIES

6.12. An initial SSA commentary was provided for Version 5.3 of the Strategy Document. Some of the SSA comments were taken on board in the revised Version 6.3 Strategy Document. However, the SSA commentary provided for Version 6.3 of the Strategy Document reiterated many of the earlier points made, in particular where it was considered sustainability issues had still not been sufficiently addressed. The SSA commentary followed the structure of the Strategy Document, providing comments under each of the Section headings used in the Strategy Document. Many of the key messages from these earlier commentaries have been repeated throughout the development of the RSS, and some are repeated in this SSA Report. For example, the July 2005 SSA commentary noted in relation to the transport strategy and policies:

“The aim of the proposed strategy to deliver the capacity and services to encourage a switch to rail from road is commended from a sustainability point of view. However, this could easily be undermined by, firstly, the difficulty in securing the funding to deliver the improvements to rail required and the speed with which this can take place, and secondly, the upgrading of the A303/A358, which will provide a “more attractive” alternative. We recommend that SW RA needs to reconsider how it can achieve the aim of improving quality

37 SSA Commentary on Strategy Document (Version 5.3) provided on 20th June to SW RA for discussion at RSPTG Meeting 21st June 2005.
38 SSA Commentary on Strategy Document (Version 6.3) provided to SW RA for discussion at SSASG Meeting 7th July 2005.
of life and access to opportunities in the region with less travel. In particular, the assumption that providing a second motorway-standard road link deep into the Peninsula is essential to the future wellbeing of the region needs to be examined more critically.”

6.13. An SSA commentary on the Sub-Regional Assessments was also prepared in July 2005, which followed the structure of the Sub Regional Assessments Discussion Paper. These were preliminary comments, and it was noted that further work incorporating the findings of the SSAs being undertaken as part of the JSA studies would be needed. The SSA commentary dealt with each Sub Region and JSA on its own merits, and found that there was much to commend in the approaches being proposed. It highlighted potential sustainability issues that needed to be taken into account in delivering the proposed strategies, and which could enhance their sustainability performance where appropriate. The SSA Commentary concluded that

“The true test of sustainability will be how each of the proposed strategies relate to one another in practice, and what the changes to the region as a whole will be. Key questions that need to be considered include:

• How will the success of the proposed strategy in one JSA impact on the chances of success in another, given that there will be an element of competition between them, and scarce resources to ensure successful implementation?

• Will the envisaged rewards of economic growth actually benefit those who most need them, particularly in the most deprived parts of the region?

• What will be the cumulative impacts of development as a whole, given the scale of overall development proposed, in terms of issues such as changes in character to the unique qualities of the South West, resource use, habitat fragmentation and disturbance, tranquillity, travel demand, contributions to climate change, etc., and how can potential adverse impacts be fully off-set?”

6.14. The SW RA considered the conclusions and recommendations from each SSA commentary in the iterations of the RSS and modified policies and text where it considered appropriate... Need input from SW RA...

6.15. The SSA team presented Initial Comments on the Emerging RSS to the SSASG on 27th September 2005 and the RSPTG on 4th October 2005, setting out the good points and ‘sustainability concerns’ for each section of the RSS. The overall comments noted that there was much in the emerging RSS that is very good in sustainability terms and that many of the SSA comments have been taken on board. However there were still some issues that conflict with sustainability principles. Parts of the RSS that the SSA noted were good or had improved were:

• Recognition that GVA not only measure of economic well-being

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39 SSA Commentary on Sub-Regional Assessments provided to SW RA for discussion at SSASG Meeting 7th July 2005.
Dealing with housing need and affordability
• Greater emphasis on climate change
• Aim to reduce the region’s footprint
• Acknowledgement of environmental limits
• Need for environmental infrastructure
• Different solutions for different places
• Importance of settlement form and function
• Quality of development as key ingredient for success

6.16. Areas where there were still sustainability concerns were:
• Overall levels of growth likely to lead to increased consumption and impacts
• Transport – unlikely to lead to reductions in traffic
• Airports – acceptance of major growth
• ‘One size fits all’ assumption that competitiveness, productivity and GVA growth are beneficial
• How environmental limits have influenced the strategy
• Need for greater emphasis on efficiency than sustainable supplies

6.17. There has been ongoing debate on these issues and they are discussed further in the relevant RSS Section appraisals (Chapters 7 to 16) of this SSA Report, and the concluding chapters (17 to 19).

6.18. In addition, throughout the development of the RSS, the SSA has asked questions of the RSS which the SW RA has needed to answer... to be completed with input from SWRA...

Summary of Initial SSA Findings of Emerging RSS, November 2005

Key questions for consideration during the consultation workshops
• Will the proposed housing levels and distribution in the Draft RSS deliver quality of life benefits, particularly for the most disadvantaged?
• Is the proposed level and distribution of development within environmental limits, which vary across the region?
• Could the RSS do more to reduce the demand for travel especially by car?
• What more could the RSS do to reduce the region’s ecological footprint, (e.g. reduce energy use, reduce the use of materials, reduce the amount of waste the region produces)?
RSPTG 19th November 2005

Include table showing traffic light of RSS effects on SSA objectives? Compare with the overall effects summary in Chapter 17?

Key Questions SSA is asking of the RSS 9th December 2005

6.19. How have employment numbers been taken into account when deciding on the distributions and level of housing provision?

- Are there proposals for new housing in areas that will meet existing imbalances of jobs over homes (i.e. where there are too many jobs and not enough homes)?
- Are there proposals for new housing in areas where there is an excess of homes already?
- Where is housing proposed to match future jobs to be created 2006-2026?

Alternatives:

a) Where is the market likely to deliver jobs?

b) Where will planning intervention (RSS/RES/Objective 1) create jobs?

6.20. How does the distribution and level of housing relate to urban capacity, and are there any implications for the delivery of non-residential development?

6.21. How does the distribution and level of housing relate to the form and function of settlements?

6.22. How does the distribution and level of housing provision reflect the actual housing need?

6.23. How have all of the likely effects of the distribution and level of development on traffic and transport been evaluated?

6.24. How have environmental limits been taken into account when deciding on the distributions and level of development?
7. SECTION 1 OF THE RSS: A SUSTAINABLE FUTURE FOR THE SOUTH WEST

INTRODUCTION

7.1. This Section of the RSS sets out the background for its preparation and the Sustainability Principles that will be applied in delivering the RSS. It starts with a description of the South West Region today (Section 1.1), describes the relationship between the RSS and Regional Planning Guidance 10 (RPG10) (Section 1.2), and the sort of Region that the strategy is to work towards (Section 1.3). It then goes on to describe the major challenges facing the South West (Section 1.4), and the linkages between the Integrated Regional Strategy (IRS) aims and the RSS (Section 1.5). The final part of this Section of the RSS sets out the Sustainability-Principles (Section 1.6), which provide the focus for the SSA.

What does the RSS section say?

7.2. In response to the challenges identified for the Region, four cross-cutting Sustainability Principles are presented in the RSS:

- Policy SD1: The Ecological Footprint
- Policy SD2: Climate Change
- Policy SD3: The Environment and Resources
- Policy SD4: Sustainable Communities

7.3. These policies set the ‘tone’ for the RSS, aiming to make the future development and lifestyle choices in the region more sustainable. For example, they aim to reduce or reverse some of the key adverse trends that have been affecting the region over many years, such as constantly rising traffic, increased consumption of natural resources, and increased greenhouse gas emissions, and incremental erosion and fragmentation of the region’s environmental assets.

What are the likely effects on the SSA headline objectives?

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
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<tbody>
<tr>
<td>Improve health</td>
<td>None identified.</td>
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<tr>
<td>All four policies are likely to improve health of the</td>
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<td>population of the region. The main reasons for this are</td>
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<td>their emphasis on:</td>
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<td>• Reducing the need to travel.</td>
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<td>• Reducing economic disparity.</td>
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<td>• Avoiding development at risk of adverse impacts</td>
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<td>from climate change, such as flood risk.</td>
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<tr>
<td>• Reducing pollution.</td>
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<td>• Improvements to green space and urban environments.</td>
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<tr>
<td>Positive effects</td>
<td>Negative effects</td>
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</table>
| • Strengthening community identity and distinctiveness.  
• Improving access to training, education and health facilities.  
Most of these positive effects will be indirect, long-term and region-wide. | None identified. |

Support communities that meet people’s needs

SD4 is particularly significant in helping to achieve this objective, as it emphasises the need to strengthen the role and function of cities, towns and villages, their local character and distinctiveness, and promote self-containment. It also promotes adequate and affordable housing, healthy, safe and secure places to live, enhancing education, skills, development training and a range of other similar objectives. Climate proofing of development (SD2) and concentrating adaptation to the impacts of climate change on the most vulnerable communities should support this objective, such as in areas at risk of flooding. SD1 and SD3 are also likely to provide some positive benefits, but these are not as significant as SD4 in particular. The majority of these positive effects will be indirect, long-term, and region-wide, although they may be more easily deliverable in urban areas as opposed to smaller towns and villages.

Develop the economy in ways that meet people’s needs

The policies will help to ensure that the economy develops in ways that ‘meet people’s needs’ in three ways: (i) reducing the environmental damage that threatens human comfort and potentially survival (ii) reducing vulnerability to environment related threats and risks such as energy shortages and prices rises, transport disruption, etc (iii) encouraging a more local and resilient economy. The most positive effects are likely to arise from SD4, which aims to support business activity and in particular small businesses, and due to its emphasis on role and function of settlements and self-containment could help to increase wealth circulating in the region. This could potentially be offset by job opportunities foregone from economic sectors that are less regionally specific, and by the text supporting SD1 which emphasises the need for ‘wider connectivity’. SD3 aims to make economic development and activity more resilient to climate change, and to harness opportunities arising from climate change. This is likely to benefit sectors such as environmental technologies, engineering and tourism (especially in coastal locations). The effects of SD4 are likely to be significant, long-term and region-wide.

Provide access to meet people’s needs with least damage to the environment

SD4 is particularly strong in meeting this objective, because of its emphasis on linking the provision of | None identified. |
### Positive effects

<table>
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<th>Positive effects</th>
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<tr>
<td>homes, jobs and services and on self-containment, plus its promotion of a step-change in public transport and taking steps to manage demand for travel and promote public transport hubs, a theme that is also supported by SD2. SD1 would have scored similarly but its potential for delivering positive benefits is diluted by the supporting text reference to ‘wider connectivity’, which could be taken to imply more and longer travel. The effects are likely to be positive, deliverable in the medium to longer-term, and be region-wide, although most easily deliverable in larger settlements.</td>
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### Negative effects

<table>
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<th>Negative effects</th>
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<td>None identified.</td>
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### Maintain and improve environmental quality and assets

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<tr>
<td>This is the main thrust of SD3, which is likely to bring a wide range of positive effects, for example with respect to habitats and biodiversity, soils, landscape and the historic environment. SD3 is strongly supported by SD4, which should help to protect and enhance cultural identity, assets, distinctiveness, etc., within settlements, and reduce the need to travel elsewhere. This could take some pressure off environmental assets outside of the main built-up areas. It also aims to provide networks of green space that should help to support biodiversity. The positive effects are likely to be significant, long-term, and region-wide.</td>
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### Minimise consumption of natural resources

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<th>Minimise consumption of natural resources</th>
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<tr>
<td>SD1 aims to reduce the region’s ecological footprint, and therefore is generally very supportive of this SA objective. SD3 aims to keep development within environmental limits, reduce the environmental impact of the economy, transport and development, and reduce pollution and contamination. SD2 aims to reduce the region’s contribution to greenhouse gas emissions. The positive effects are likely to be significant, long-term and region-wide.</td>
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| The positive score of SD1 is potentially undermined by reference in the policy text to ‘building a strong, stable and sustainable economy realising the economic potential of the South West’. The supporting text refers to the need to adopt a low carbon approach, but other aspects of the text might undermine this objective. This needs to be clarified. |

### What improvements (e.g. mitigation, enhancement) could be made?

#### Policy SD1: The Ecological Footprint

7.4. Policy SD1 aims to stabilise the region’s Ecological Footprint, and then reduce it. In sustainability terms this is to be strongly welcomed. However, the policy and some of the supporting text includes elements that could potentially conflict with this aim, most notably with respect to the way it deals with the economy (in the policy wording) and connectivity (in the supporting text). This conflict is very difficult to resolve. Its resolution would be made easier if:
• The second and third bullets were replaced by ‘Building a strong, stable and sustainable economy which can be secured within environmental limits to bring prosperity and well being to all parts of the region’.

• Attention were to be focused on ‘increasing the circulation of wealth within the region’ rather than on connectivity.

Policy SD2: Climate Change

7.5. SD2 is a fundamental precondition to delivering all the other benefits that the RSS aims to deliver. It is absolutely essential that the region significantly reduces its contribution to greenhouse gas emissions for sustainability in the long-term, and the latest science suggests that even the targets that are in place may not be enough. It is therefore also essential that other policies in the RSS support and do not undermine the achievement of this policy objective.

7.6. SD2 also identifies opportunities to derive benefits, such as with respect to economic activity. Aspects relating to climate change that the policy could in addition explicitly address include:

• Impacts on soils (e.g. from erosion), and subsidence.

• Impacts of climate change on the historic environment.

• Implications for water resources, looking beyond the plan period.

Policy SD3: The Environment and Resources

7.7. This is a strong policy that focuses on the environmental dimension of sustainability, but makes the links with economic and health benefits. It will be a challenge to achieve given current trends and the scale of development, so the key will be the weight given to this policy in the face of development pressure. However, no further improvements are recommended.

Policy SD4: Sustainable Communities

7.8. SD4 includes many of the ingredients of sustainability and scores positively across all headline SA objectives. It is more likely to be achieved in the urban areas, where services and facilities are more viable (the tendency for funding to be available for centralised services and facilities may well undermine the objectives of parts of this policy in smaller towns and villages, except where they are more isolated from major settlements).

• Greater emphasis could be placed on low-environmental impact business activity, including economic activity that requires and supports a high quality environment.

• Reference to making the best use of existing infrastructure before new build could be mentioned.
Conclusions and recommendations

7.9. Policies SD1 to SD4 provide a sound and strong basis for putting the South West on a more sustainable path. In sustainability terms, their inclusion as the key principles underpinning the RSS are to be welcomed. However, the main challenge will be their deliverability. The policies set down some tough challenges, which will be difficult to achieve given the scale of development proposed over the plan period, and the stubborn unsustainable trends, particularly with respect to resource consumption which have led to the region's ecological footprint being unsustainable on current trends. For example, policy SD2 recognises the importance of climate change as the greatest threat facing life in the South West, but evidence suggests that the region will be unlikely to achieve the targets set in the policy, without massive intervention (e.g. draconian restraint on the use of the car, wide-scale retro-fitting of existing development to reduce emissions, closing down major greenhouse gas related industry, etc.).

7.10. Some of these tensions are hinted at in Policy SD1, and its supporting text, where the aspiration for a ‘strong and stable’ economy (which would certainly help deliver sustainability benefits) somehow needs to be reconciled with a ‘sustainable’ economy. Similarly, the objective of ‘keeping development within environmental limits’ will be difficult to achieve, given the development proposed elsewhere in the RSS, and the uncertainties surrounding our understanding of how to measure such ‘environmental limits’.

7.11. However, it is important that the RSS plays its part in breaking into the currently unsustainable patterns of development and human activity and lifestyles. Unless this is done, then development will not be sustainable. Policies SD1 to SD4 therefore set down the basic prerequisite that should be applied when implementing all other policies in the RSS.

7.12. The objective of the RSS is to achieve a pattern of development and human activity that supports rather than conflicts with policies SD1 to SD4. However, it is highly likely that there will be occasions when the pressure to deliver development, particularly to meet economic and social objectives, will come into conflict with these policies. When this happens, there is no indication as to how much weight should be applied to these policies.

7.13. The RSS should therefore could include a ‘decision-making’ framework (e.g. in the Implementation Plan) to help guide those using it to take decisions that meet all policy objectives, but also to show them how to approach decision-making when potential conflicts and tensions are apparent, in order that the best interests of the South West as a whole are met. For example, the decision-making framework could set out the condition that, in order to be sustainable, policies and proposals that conflict with Policies SD1 to SD4 should not be permitted, and that where conflicts are apparent, alternative ways of achieving the policy or proposal objective should be sought that are consistent with Policies SD1 to SD4.
8. SECTION 2 OF THE RSS: THE CONTEXT FOR THE SPATIAL STRATEGY

INTRODUCTION

8.1. Section 2 sets the context for the RSS. It describes the underlying character of the region, in environmental, economic and social terms, and the trends that the region is experiencing. It sets down forecasts of how the region is expected to grow in the future, and the approach that the RSS adopts in order to manage this growth. It is divided into the following components:

- The spatial context for the South West.
- The quality of environmental and cultural assets.
- Providing for expected economic and population change.
- Resources and infrastructure availability.
- The role and function of places.

8.2. It does not include policies, but does include bold statements emphasising the strategic approach that applies throughout the remainder of the RSS.

What does the RSS section say?

8.3. The Section is premised on the following factors:

- The importance of inter-regional linkages, particularly to the economy of the region.
- The intrinsic quality of environmental and cultural assets as a distinctive strength of the region, and the important role that these play in supporting sustainable economic activity.
- The need to realise the economic potential of the region, and in particular intervene to stimulate economic development and support community regeneration in those areas that are ‘underperforming’.
- That 80% of the region’s jobs will be created in just 22 settlements.
- The recognition that the South West is the fastest growing region in population terms, and that it has an older than average population.
- That in most parts of the South West the gap between earnings and house prices is such that many households cannot now afford to own their own home.
- That there are ‘serious infrastructure deficits’ in many parts of the region.
• The need to ensure that in future the need to travel, particularly by car, is reduced.

• That different parts of the region, and different settlements, have different roles and functions, and that these are not necessarily dependent upon settlement size.

8.4. The section responds by stating that the RSS needs to plan for:

• Average annual economic growth towards the higher end of the range 2.4% and 3.2%, which translates into making provision for 365,000 and 465,000 growth in jobs over the plan period, which translates into a population growth of 750,000 with around 25,000 dwellings per year needed.

• Continued support for the economic well-being of areas of concentrated disadvantaged in both urban and rural areas.

• Accelerate the provision of housing to provide an adequate choice and mix of housing of all tenures, and to address the issues of affordable housing across the region.

• Considerable investment in transport infrastructure, including inter-regional transport links, and local transport (especially public transport).

• Considerable investment in social and community infrastructure, recognising the need to respond to an ageing population and the importance of providing opportunities for younger people, more deprived communities, and ethnic minorities.

• A better balance between homes and jobs in both urban and rural locations, supported by a functional approach to settlements.

• Protection of high quality environmental assets, and realise opportunities to enhance environmental and cultural assets as development occurs.

**What are the likely effects on the SSA headline objectives?**

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve health</td>
<td>Rapid change in itself can be unsettling. Development will often cause stress, anxiety and unhappiness if people feel it is (i) intrusive (ii) damaging to places they know and care about (iii) benefiting others, not them and/or (4) outside their control and influence. Major transport infrastructure can often be all four.</td>
</tr>
<tr>
<td>Health is influenced by many factors, including level of prosperity, employment, the quality of environment, standard of housing, access to easy opportunities to take exercise, as well as by other factors outside the scope of the RSS, such as age, smoking and diet. The issues raised in this section, and the way that the RSS intends to grapple with them, should generally be beneficial to health and help to reduce health inequalities. This depends, though, on the ability of the region to deliver the benefits that the RSS aims to deliver – growth at the same time as environmental improvements, and reducing social inclusion, which will be a considerable challenge. Acknowledgement in the text of the need to cater for an ageing population is</td>
<td></td>
</tr>
<tr>
<td>Positive effects</td>
<td>Negative effects</td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------------</td>
</tr>
<tr>
<td><strong>Important.</strong> The effects, if they prove to be positive, will be largely indirect, and are likely to become increasingly noticeable over the lifetime of the plan, and will be region-wide.</td>
<td><strong>The scale of change in some locations may cause some tensions and resentment, if existing residents fear or do not want change.</strong></td>
</tr>
<tr>
<td><strong>Support communities that meet people’s needs</strong></td>
<td></td>
</tr>
<tr>
<td>One of the main objectives of the RSS is to ‘increase and accelerate the provision of housing over the lifetime of the RSS to provide an adequate choice mix of housing of all tenures’. The emphasis on environmental quality, settlement function, and addressing disadvantage should also bring a range of other benefits to help make many communities more vibrant. For making suitable housing available the effects are likely to be significant, direct and arise in the short to long-term, region-wide. Other effects are likely to be indirect, over the same time period and region-wide.</td>
<td>The scale of change in some locations may cause some tensions and resentment, if existing residents fear or do not want change.</td>
</tr>
<tr>
<td><strong>Develop the economy in ways that meet people’s needs</strong></td>
<td></td>
</tr>
<tr>
<td>The key driver of development in the RSS is revealed by the statement of the ‘need to plan for economic growth at or above the current rate... making provision for between 365,000 and 465,000 growth in jobs between 2006 and 2026 [which] translates into a population growth of over 750,000 over the 20 year period’. The RSS aims to adopt a differential approach to economic development to address disadvantage and intra-regional disparity. This should help towards giving everyone in the region access to satisfying work opportunities, but will be dependent upon the market delivering. The effects are likely to be direct, long-term, and region-wide.</td>
<td>The emphasis on ‘connectivity’ and access to London and Heathrow conflicts with the sustainability aims of meeting local needs locally and increasing the circulation of wealth within the region. Similarly, it is by no means certain that economic growth will benefit those most in need, or that ‘connectivity’ will boost peripheral economies rather than ‘suck’ economic activity out.</td>
</tr>
<tr>
<td><strong>Provide access to meet people’s needs with least damage to the environment</strong></td>
<td></td>
</tr>
<tr>
<td>There is acknowledgement of the desire for a step change towards more sustainable transport, and a reduction in the need to travel by achieving a better balance between homes and jobs. The need to invest in rail is emphasised, and the focus in general is on maintaining reliability and resilience of transport links. Longer distance commuting on the region’s trunk roads and motorways is also acknowledged as a growing trend, which needs to be addressed.</td>
<td>The emphasis on ‘competitive’ and ‘knowledge based’ businesses may not always be appropriate to meeting local needs, and does not necessarily draw on the natural strengths and skills that characterise different parts of the region. They can also be more reliant on connections to London, and to Europe and beyond (from regional ports and airports in the South West as well as from Heathrow). This is likely to increase travel by both car and air, although the RSS aims to improve public transport connections.</td>
</tr>
</tbody>
</table>

Reconciling the tension between connectivity and access to markets and reducing the need to travel suggests that both positive and negative effects will arise, and these will be
### Positive effects

- Significant, affecting the whole region, in the short to long-term.

### Negative effects

- Significantly affecting the whole region, in the short to long-term.

#### Maintain and improve environmental quality and assets

Section 2 recognises that the 'quality and diversity of environmental and cultural assets is a key strength of the South West'. It also acknowledges that 'current policies have had limited success in areas of significant growth and change' and that the 'impacts are undeniable'. It is therefore appropriate to question whether the new policies in draft RSS will be able to make a significant difference, especially given that the levels of development proposed are even higher than in RPG10. There are important policy safeguards in the RSS, such as the sustainability principles in SD1 to SD4, and the environmental policies in Section 7 of the RSS. It should often be possible to locate, design and deliver development to be compatible with these policies. But the planning system does not currently have the powers or mechanisms to ensure and require that all development meets them. It is therefore highly probable that the scale of development envisaged will result in significant damage to environmental quality and assets despite the RSS's attempts to avoid this, unless much stronger means of enforcement are made available to regional and local planning authorities than are currently available.

#### Minimise consumption of natural resources

Studies undertaken by the Environment Agency suggest that the development contained within the RSS can be accommodated with respect to water resources, although this is dependent upon water efficiency measures and water infrastructure investment most immediately in the Severn and South West Oxfordshire Resource Zones, where otherwise deficits could arise as from 2009/10 (dependent also upon growth proposals in neighbouring regions).

The assessment of the effects of Section 2 on this SA objective are similar to those for the SA objective on environmental quality and assets. Current trends (globally, nationally, and regionally) suggest that increased development and growth tend to be associated with increased consumption of resources (and is often dependent upon such consumption). It would be technically possible to break the link between growth and consumption but the planning system does not have the powers to achieve it. Although Section 1 of the RSS makes reference to 'the efficient use of resources by businesses and individuals, adopting a low carbon approach', this is not followed through into Section 2, where a high rate of economic growth is to be planned for, without a proper understanding or analysis of the effects that such growth will have on resource consumption. The need to raise 'productivity' is mentioned, but this is presumably in reference to GVA per capita, rather than natural resources. Otherwise, the effects on this SA objective are uncertain.

### What improvements (e.g. mitigation, enhancement) could be made?

8.5. Section 2 provides a combination of contextual material and broad statements of how the strategy of the RSS has been formulated to respond to current trends and future forecasts. In terms of aspiration, it should lead to many positive benefits, but in terms of delivery, a number of uncertainties arise, particularly in relation to reconciling the scale of growth (economic, population) with environmental objectives. It is also by no means certain that the benefits of economic growth will reach those who are in most need, such as deprived communities in both urban and rural areas, although the need to focus intervention on such communities is given strong emphasis. There are particular tensions relating to 'reducing the need to travel'
where the focus on closer alignment of homes and jobs, and on the role and function of settlements, and investments in public transport, are likely to be undermined by the potentially conflicting statements relating to inter-regional connectivity and air travel.

8.6. Aspects that could help to improve this Section 2 in sustainability terms include:

- Promote more strongly alternative approaches to achieving economic and social objectives that are not so reliant on access to London, the South East and overseas markets. In particular, place less emphasis on air travel. Continue to push for investment in rail travel rather than road, so rail becomes the mode of choice for long-distance journeys, rather than road or air.

- The parts of Section 2 dealing with ‘Providing for Expected Economic and Population Change’, Resources and Infrastructure Availability’ and ‘The Role and Function of places’ all have text in bold setting out in clear terms what the RSS aims to achieve. This is missing for the part on ‘The Quality of Environmental and Cultural Assets’. A clear statement is required on the stance that the RSS takes to environmental quality and assets in the light of the growth proposed. Whilst the RSS aims to achieve growth and environmental protection and enhancement, the RSS should make it clear which are to be given priority when conflicts occur.

- Given the policies throughout the RSS, it is recommended that a quantitative analysis of the effects on resource consumption is undertaken. The analysis should determine whether, given the economic growth being planned for, the types of economic sectors likely to grow, the pattern of development (which aims to realign jobs, services, and homes closer together), and the transport investment and policies, the policies that aim to minimise or reduce resource consumption will be deliverable.

Conclusions and recommendations

8.7. Section 2 is absolutely fundamental to the remainder of the RSS because it sets out the amount of growth that the region is expected to accommodate over the lifetime of the plan. In setting out this level of growth it assumes that this growth is (i) desirable, particularly for quality of life (ii) will lead to the benefits predicted, particularly for those in the most deprived communities (iii) can take place whilst also meeting the Sustainability Principles set out in Section 1 of the RSS, and (iv) be deliverable.

8.8. If all these assumptions are met, then the RSS will indeed be sustainable. However, these are big assumptions that deserve further exploration.

8.9. Firstly, with respect to the levels of growth it is important to understand the scale being planned for. This is illustrated by Table X.X:

**Table X.X: Scale of growth planned for in the RSS 2006-2026**

<table>
<thead>
<tr>
<th>Type of growth</th>
<th>Estimated number as at 2006</th>
<th>Additional planned for in RSS 2006-2026</th>
<th>Percentage increase over 2006</th>
</tr>
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<tbody>
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<td></td>
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</tbody>
</table>
### Table: Estimated Growth and Additional Planned for in RSS 2006-2026

<table>
<thead>
<tr>
<th>Type of growth</th>
<th>Estimated number as at 2006</th>
<th>Additional planned for in RSS 2006-2026</th>
<th>Percentage increase over 2006</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>5,000,000</td>
<td>750,000</td>
<td>15%</td>
</tr>
<tr>
<td>Dwellings</td>
<td>2,280,000</td>
<td>500,000</td>
<td>22%</td>
</tr>
<tr>
<td>Jobs</td>
<td>2,200,000</td>
<td>365,000 to 465,000</td>
<td>17% to 21%</td>
</tr>
</tbody>
</table>

Sources: Need to check data

8.10. Taking dwellings as an example, a 500,000 increase in the number of dwellings in the South West is equivalent to another Devon (including Plymouth), or another two Cornwalls, spread across the region as a whole. Together with associated development for economic uses, transport, and social and community infrastructure, this represents a possibly unprecedented level of growth for the region. It will place considerable pressure on both the environment and infrastructure of the region.

8.11. What is difficult to understand from the RSS is whether this level of growth is being planned for because it is what the region needs in order to deliver the quality of life benefits that it wishes to pursue, or whether it is being planned for because it is likely to happen anyway. This raises a critical question:

- **On what basis has the level of economic, employment, and population (and hence housing) growth been determined?**

8.12. The level of growth has been primarily determined by:

- Forecasts of economic growth for the region derived from research undertaken to inform the RES.
- Likely increases in population arising from net in-migration.
- Changes in household size, arising from a general trend towards smaller households.
- The need to improve affordability of housing, and to respond to unmet housing need.

8.13. The GVA growth scenario is directly translated into job growth over the period of the RSS (365,000 to 465,000 additional jobs) and population growth (an increase of over 750,000 people resident in the region). What this implies is that, in order to deliver the GVA growth scenario, more jobs are needed, and more people are needed to take up these jobs. Each is dependent on the other. In effect, a circular relationship exists:
8.14. Whilst this is a simplification of a complex relationship between economic, job, and population growth, it does question what the high level of GVA growth is for. Is it to help those people currently out of a job back into work, and to generate more rewarding jobs for those in more deprived areas, and or is to generate the wealth needed to provide good ‘standards of living’ for the additional 750,000 population?

8.15. This is an important question, since it has a direct bearing on the amount of housing, employment development, and related infrastructure required by the region to accommodate the GVA growth. This in turn, has implications for the amount of resources that the South West consumes (and hence its ecological footprint), and the impacts on the environmental assets that Section 2 states are such a valuable feature of the region. Which raises a critical second question:

- Can this level of growth be accommodated in the region, whilst also adhering to the Sustainability Principles in Section 1 of the RSS? In other words, at what point does this ‘circular’ approach to growth change from being good for sustainability to bad for sustainability?

8.16. During the issues and options stage of the RSS, the SSA found that, in general terms, the higher the level of growth, the greater the likelihood of delivering jobs and housing to those who most need it, but also the greater the pressure on environmental assets and resources (although it may also allow for some investment to improve environments too). These findings follow through into the SSA of the RSS, which has found that, despite its good intentions, there is considerable uncertainty whether the growth proposed in the RSS can be delivered without having significant impacts on environmental quality and consumption of resources.

8.17. In this respect the findings of the Strategic Environmental Assessment undertaken of the draft RES are of note. This concluded that “the highest growth option would appear to favour, or least present, an enhanced opportunity to favour a more sustainable growth path”\(^{42}\). However, when looking at the detailed effects on different aspects of sustainability, despite likely positive effects on health and well-being and economic development of implementing the RES, the SEA found that there

are likely to be mixed or neutral effects on many other aspects of sustainability. This appears to be consistent with the findings of the SSA of the RSS.

8.18. The view of SW RA and SW RDA is that growth is inevitable, and that the key objective therefore should be to ensure that this growth is planned for positively, so that the region as a whole benefits from it. It is further argued that, to not plan for such growth could lead to a more unsustainable outcome.

8.19. We acknowledge that the RSS aims to deliver growth in a sustainable way, but clear guidance is required when this does not appear possible. This reinforces the need for some form of ‘decision-making’ tool to help the region prioritise those aspects of the RSS where conflicts between growth and sustainability principles are likely. This would help to decide whether the growth should be accepted in the form being considered, whether there are alternative ways of delivering the benefits that the growth aims to deliver, and what conditions should apply in order to make the growth sustainable.

8.20. As distinct from our comments on the level of growth proposed in the RSS, the strategy for directing and managing the growth is in line with the SA headline objectives. Particularly strong aspects include:

- Its emphasis on supporting those communities that are not benefiting from the strong economy of the region as a whole, or who have difficulty accessing a range and type of housing.

- The adoption of a differential approach across the region, and between settlements in order to support role and function, and self-containment.

- The aim of aligning more closely jobs, homes and services in order to reduce the need to travel.

8.21. Finally, the RSS acknowledges that there are many uncertainties surrounding its forecasts, and many of these are related to national and international factors, such as the price of fuel and other natural resources, the vulnerability of foreign trade and long distance travel to geopolitical turmoil, terrorism, natural and human caused disasters, the growth of far eastern economies, etc. Given these uncertainties outside of the control and influence of the South West, we believe a reasonable alternative to the RSS that should be explored in detail is an approach to development and activity in the region that is less dependent upon its national and international links in order to help reduce its exposure to external factors. This could make it more resilient to outside shocks and at the same time reduce its ecological footprint.

**Introduction**

9.1. This Section of the RSS sets out the overall spatial strategy for the period covered by the RSS. It is divided into the following components:

- Spatial strategy statement.
- The scale and location of development.
- Development at the Strategically Significant Cities and Towns (SSCTs).
- Development at other towns.
- Accommodating development in small towns and villages.
- Delivering development in accessible places, improving accessibility and providing key infrastructure to realise the spatial strategy.
- Creating sustainable high quality living and working environments.
- Implementation.
- Strategic priorities for investment in transport and other facilities to support the spatial strategy.

**What does the RSS section say?**

9.2. The overall approach to the spatial strategy is summed up in the Spatial Strategy Statement. The principle underlying the spatial strategy is that different parts of the region have different needs and potential for change, and that different settlements have different roles and functions. The most significant change is anticipated to take place at 22 Strategically Significant Cities and Towns (SSCTs), in order to support their economic and service role and regeneration, and that smaller scale change outside of the SSCTs will aim to achieve more self contained, balanced communities and a better local environment.

9.3. There are different emphases (realising economic and other potential; stimulating economic activity and development; managing growth within identified environmental limits) to reflect the diversity of different settlements and the characteristics of different parts of the region.

9.4. At least 17,000 of the annual provision of 25,000 dwellings are to be delivered in the SSCTs (plus XXXX jobs) (Development Policy A), with development at other towns (Development Policy B), small towns and villages (Development Policy B) dependent upon their meeting certain criteria, largely related to promoting self-containment. The approach to Green Belt boundaries is also addressed.
9.5. The Section includes the approach to the provision of infrastructure (transport, community services, green infrastructure) (Development Policy D) together with a statement on the region's priorities for investment. It provides guidance on how to make development of a higher quality and more sustainable (Development Policies E to G). A brownfield target of 50% of new development to built on previously developed land including conversion of existing buildings is provided (Development Policy H). Co-ordinated implementation and joint working for certain settlements is encouraged (Development Policy I).

What are the likely effects on the SSA headline objectives?

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Improve health</strong></td>
<td>The scale of development, and the construction of large-scale infrastructure could be stressful for those most affected.</td>
</tr>
<tr>
<td>The Development Policies generally should be good for health, and could help to reduce health inequalities, given the emphasis on regeneration and addressing deprivation. Development Policy A and policies E to G should be particularly beneficial. The positive effects are likely to be both direct and indirect, arise mainly in the SSCTs, and be short to long-term.</td>
<td></td>
</tr>
<tr>
<td><strong>Support communities that meet people's needs</strong></td>
<td>The effects outside the SSCTs are more difficult to ascertain. There is less emphasis in Development Policies B and C on role and function, than in supporting text, and there are some uncertainty about the ability to meet the needs of more rural communities. Major transport infrastructure could lead to some disruption to communities.</td>
</tr>
<tr>
<td>The Development Policies should have positive effects on this SA objective. These are likely to be significant in the case of the SSCTs and possibly some of the settlements meeting the criteria set under Development Policy B. The thrust of the policies is to deliver better quality development and environments, particularly in the SSCTs, and to align homes better with jobs, supported by much improved public transport. Similarly, there is strong emphasis on the provision of health, education, culture, sport, recreation, amenity and green infrastructure and services. Development Policies E to G are particularly positive. The positive effects are likely to be most marked in the SSCTs, and be delivered in the short to medium term.</td>
<td></td>
</tr>
<tr>
<td><strong>Develop the economy in ways that meet people’s needs</strong></td>
<td>Given that over half the population lives in rural communities, there is some uncertainty whether the economic and employment needs of these communities will be met. (appropriate to their rural location, and helping to reduce the need to travel)</td>
</tr>
<tr>
<td>The Development Policies generally should bring positive effects. The aim to achieve regeneration and reduce disparities is particularly important. The great majority of new jobs (need number) are forecast to be created in the SSCTs, so directing the majority of new housing to these settlements should help bring the two in line. Development Policies F and H should support this approach through mixed use development and re-using brownfield land and buildings. Care will be needed to ensure that ‘realising the economic and other potential’ supports and does not undermine ‘stimulating economic activity’ in the western part of the peninsula and Forest of Dean. The (sustainable) economic potential of the coast and opportunities arising out of climate change are not specifically mentioned.</td>
<td></td>
</tr>
<tr>
<td>Positive effects</td>
<td>Negative effects</td>
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<tr>
<td>------------------</td>
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</tr>
<tr>
<td>Positive effects are likely to be a mix of direct and indirect, arise particularly in the SSCTs but also settlements meeting the criteria of Development Policy B. Provide access to meet people’s needs with least damage to the environment. Through strengthening the role and function of the 22 SSCTs, and achieving more self contained, balanced communities elsewhere, there will be a reduced need to travel by car. Investment in economic activity, services and housing in accordance with this approach should help to achieve this. Development Policy B aims not to exacerbate the role of dormitory settlements. Development Policies F and H should also help. The majority of the infrastructure listed in Development Policy D is likely to support this objective. The positive benefits could be undermined by improvements in road transport. For example, the improvements to the A303/A358 have been calculated to lead to an increase of up to 75% in traffic at Exeter by 2026.</td>
<td></td>
</tr>
<tr>
<td>Positive benefits could be undermined by improvements in road transport. For example, the improvements to the A303/A358 have been calculated to lead to an increase of up to 75% in traffic at Exeter by 2026.</td>
<td></td>
</tr>
<tr>
<td>Maintain and improve environmental quality and assets</td>
<td>The improvement of the second strategic route into the South West (i.e. A303/A358) is likely to have significant adverse environmental effects, when indirect effects are taken into account.</td>
</tr>
<tr>
<td>The emphasis on green infrastructure is likely to be beneficial to biodiversity, landscapes and townscapes, so long as this not at the expense of loss of existing assets. Development Policy E sets down high standards of design, including urban form. Sustainable drainage solutions are included in Development Policy G. Environmental limits are specifically mentioned with respect to the south east of the region, but there are many other limits elsewhere. The text supporting Development Policy A aims specifically to improve the quality of the urban environment. Text supporting Development Policy C refers to certain economic activity that maintains and enhances the quality of the environment and distinctive quality of the landscape. The positive effects are likely to be direct in the short to long-term. Given the scale of development, there will be a need for significant greenfield landtake, particularly in the vicinity of the SSCTs. The effects of development on landscapes and townscapes is difficult to judge, given the scale of development, and the fact that this is best determined on a site-by-site basis. The historic environment is not given much emphasis.</td>
<td></td>
</tr>
<tr>
<td>The improvement of the second strategic route into the South West (i.e. A303/A358) is likely to have significant adverse environmental effects, when indirect effects are taken into account.</td>
<td></td>
</tr>
<tr>
<td>Minimise consumption of natural resources</td>
<td>Road infrastructure improvements are likely to generate more traffic and hence greenhouse gas emissions. The consumption and extraction of minerals could be minimised by obviating the need for new infrastructure in the first place.</td>
</tr>
<tr>
<td>Development Policy G in particular should strongly support the achievement of this objective (the inclusion of refurbished buildings is particularly positive). The effects are likely to be both global (e.g. greenhouse gas emissions) and region-wide (resource use), short to long-term, and direct. The better alignment of homes and jobs may help to reduce greenhouse gas emissions from transport if people actually travel less in response. The Environment Agency has indicated that the proposed level of development can be accommodated, so long as efficiency and new resource measures are put in place, with particular urgency in Severn and South West Oxfordshire Water Resource Zones. Development Policy A aims to reduce pollution and</td>
<td></td>
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<tr>
<td>Road infrastructure improvements are likely to generate more traffic and hence greenhouse gas emissions. The consumption and extraction of minerals could be minimised by obviating the need for new infrastructure in the first place.</td>
<td></td>
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<tr>
<td>Positive effects</td>
<td>Negative effects</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>blight, but this is not mentioned in any of the other policies.</td>
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</tbody>
</table>

What improvements (e.g. mitigation, enhancement) could be made?

The Spatial Strategy Statement

9.6. The overall Spatial Strategy has many sustainability advantages, particularly its emphasis on the diversity of the region, and the recognition that different settlements have different roles and functions that are not necessarily dependent upon their size. The emphasis on self containment and reducing disparities are also likely to lead to significant sustainability benefits. The division of the region into three broad sub-regional areas is largely consistent with the findings of the report ‘Better Planning of Rural Areas in the South West’ (Land Use Consultants, July 2004), which sought to recognise the diversity in character and functional relationships of rural areas as well as urban areas, and the relationship between the two, and how these vary across the South West.

9.7. However, the difference in the RSS between ‘realising economic and other potential’ and ‘stimulating economic activity and development’ is not clear, and it is uncertain whether the former is likely to support or undermine the latter. It should be borne in mind that, in order to reduce inequalities, underperforming areas need to increase their performance faster than areas that are already performing well. Reference to ‘environmental limitations’ is in accordance with sustainability principles. Whilst the particular limitations of the south eastern part of the region are specifically mentioned, there are significant limitations elsewhere. The statement would be enhanced if it were to:

- Give clear guidance that growth should be managed within environmental limits throughout the region, and that opportunities for environmental improvements should be sought through development in general and regeneration in particular.
- Be explicit that ‘environmental limitations’ includes resource use as well as environmental assets.

Development Policies A (including text on Green Belts), B & C (linked policies) plus Development Policy I

9.8. The Functional Analysis of Settlements report (Roger Tym & Partners, April 2005), concluded that, in addition to the PUAs listed in RPG10 (Bristol, Bath, Swindon, Exeter, Plymouth, Gloucester, Cheltenham, Bournemouth-Poole, Taunton, W eston-super-Mare, and Torbay), the settlements of W eymouth, Salisbury, Yeovil, Dorchester, Barnstaple, the Cornish towns of Truro, Camborne/Redruth, Falmouth and St. Austell should be named in emerging RSS as being places where a strategic element of growth is located. Development Policy A is broadly in line with these findings, although it omits St. Austell, and adds Chippenham. The reasons for this need to be explained.
9.9. The Functional Analysis of Settlements report also gives recommendations regarding a number of settlements, such as those that perform a complementary or classic dormitory role, or where there are groups of settlements, which although individually are relatively small in population and employment terms, operate as a tight, local network of settlements. Development Policies A and B requires that, where dormitory relationships exist, these should not be exacerbated by development proposals in LDDs.

9.10. It is less clear how groups of settlements acting as tight networks are dealt with, and whether they are addressed by Development Policy B (being seen as effectively as ‘one’ settlement) or Development Policy C (as groups of communities). This could be made clearer. Both Policies B and C could be much more explicit about using an analysis of role and function to understand the strengths of settlements and networks of settlements caught by these policies in order to identify new development (both location and type) that would increase the sustainability of these roles and functions (in line with the supporting text). Affordable housing is often likely to be as important as economic development in many smaller towns and villages. Over half the region’s population live outside the SSCTs, and in net terms around 87% of economically active residents outside the SSCTs do not work in the SSCTs (from analysis of ONS 2001 data undertaken by LUC). Some of the smaller towns are more self contained than some of the larger settlements, and have some distinct sustainability advantages.

9.11. It is therefore essential that the RSS is as clear about how to plan for the rural parts of the region, recognising that their characteristics vary across the region, as it already is for the SSCTs. This is not to say that the focus of development should not be on the SSCTs. It is absolutely essential that the SSCTs are made more attractive places in which to live and work as they offer significant potential for some major sustainability wins. But settlements outside the SSCTs also require clear guidance based on form and function and their own sustainability strengths. This is largely in the supporting text, but is less clear in the wording of Development Policies B and C themselves. This should not, however, be seen as an excuse for unsustainable forms of development. Any development permitted outside of the SSCTs should be in accordance with the sustainability principles set out in Policies SD1 to SD4, as should development within the SSCTs.

9.12. 160,000 (32%) of the total dwellings over the RSS period are planned to be delivered outside of the SSCTs (i.e. in settlements identified under Development Policies B and C). This should allow some opportunities for the role and function of such settlements to be strengthened. It may also offer some scope for such settlements to accommodate some of the in-migration, without undermining the overall aim of the RSS to accommodate the vast majority of the total increase in the SSCTs. The difficulty here is matching where the RSS would like new people arriving in the region to live (i.e. primarily the SSCTs) and where they want to live (since many people are likely to be moving to the South West to seek the small town and rural village lifestyle that characterises much of the region).

April 2004 to 31 March 2016 within the 22 SSCTs (excluding Camborne/Redruth, Taunton, and Torbay, for which information was not provided) of which 61,875 dwellings (81%) was identified as brownfield land. The identified urban capacity for the region as a whole (greenfield and brownfield), for those authorities where data were provided) was for 182,177 dwellings. Less than half (42%) of the identified capacity is within the 22 named settlements (excluding those for which data were not provided). The RSS, however, is planning for 340,000 (68%) of additional dwellings to be delivered at the 22 named SSCTs.

9.14. This suggests that well over half of development to be delivered at the SSCTs (it is difficult to be precise given the data available) will need to be delivered by a combination of increasing densities on known sites, and by identifying new sites. It is highly likely that many of these sites will be greenfield. This is not to say that development of greenfield sites is worse for sustainability than brownfield, since this is highly dependent upon individual site characteristics. Not all brownfield sites are in sustainable locations, and some will have their own wildlife, recreational and amenity value, which should be recognised and protected or substituted for through development. However, the development of greenfield land will mean a permanent change of use. This means ensuring that development is very carefully thought-through so that the benefits that they currently (or potentially) provide (for biodiversity, recreation, amenity, landscape character, as gathering grounds for water resources, flood storage, etc.) continued to be provided as part of the development package.

9.15. With respect to Green Belts, the ‘Strategic Green Belt Review’ study (Colin Buchanan & Partners, January 2006) concluded that “across all three Green Belts there are limited numbers of locations where urban expansion could be achieved without significantly and adversely affecting the purpose of the Green Belts”. However, the report notes that “there is a need for more careful analysis of the areas of search in order to assess capacity in relation to quality of landscape and general issues of sustainability” and that “the reviews of Green Belt undertaken will probably not be able to provide for the period beyond the time horizon of the emerging RSS”. It goes on to state that “for the reviews to have endured for longer, all potential developments would need to have been considered, including more radical, and possibly, more sustainable strategic options”. For this reason, it is difficult to draw conclusions on the sustainability advantages and disadvantages of the text in the RSS on Green Belts.

9.16. Aspects where Development Policies A to C could be improved include:

- Consider a more supportive approach for Development Policy C, based on role and function, for small towns and villages, to strengthen the emphasis on self-containment (e.g. where it strengthens local communities, local service markets, local economies, and helps to secure or support essential village services such as schools). The link between housing development necessary to support employment locally needs to be backed up by mechanisms to ensure that housing is used for this purpose.
• Development Policies B and C could include specific reference to supporting
development that is linked to sustainable management of the land and
environmental assets.

• Re-word the criterion in Development Policy C to ‘reduce’ traffic on local roads
as part of the overall aim of promoting self-containment.

• Development Policy I primarily focuses on the SSCTs. The needs and aspirations
of smaller settlements within the influence of the SSCTs should be included
within this. There will be a need for similar coordination outside of the SSCTs,
for example where there are networks of small towns and villages.

**Development Policy D**

9.17. The effects of Development Policy D on sustainability objectives are likely to be
mixed. The region maintains that it has an ‘infrastructure deficit’ that needs to be
addressed if it is to deliver the development proposals in the RSS. This implies that
the region is being unfairly disadvantaged, although many, and possibly all, other
regions are making similar cases. The starting point for analysis of infrastructure need
should be to identify where there is an excess of demand over current capacity.
Where this is proven, they need to be brought back into line. This should involve a
combination of reducing need and increasingly supply: in transport, energy, water,
sewerage, waste, etc. Reducing demand is generally more sustainable than increasing
capacity. It is less damaging to local interests and amenities, less prone to raising
induced demand (e.g. as happens when new roads are built or roads improved), and
is often cheaper to deliver. With respect to green infrastructure, there is a clear
need to enhance many townscapes and landscapes of the region, and rebuild the
biodiversity resource, but this should not be at the expense of losing what it is
already there. Similarly, with respect to health infrastructure, it is more sustainable
and probably cheaper to reduce demand for expensive health infrastructure by
enabling people to live healthier lifestyles.

9.18. The main kinds of development where ‘deficits’ are most likely are education, culture,
sport and recreation. The positive benefits of the provision of such infrastructure are
highlighted in the assessment. But even here, it would be better to make better use
of existing facilities, before building more. For example, multiple use of sports
centres, schools, theatres, playing fields, etc., should be the norm.

9.19. The ‘second strategic route’ raises a number of significant sustainability issues, as do
improvements in ‘connectivity’ in general, if the RSS is to reduce the need/desire to
travel by car and in particular achieve its greenhouse gas emissions targets. The
promotion of the ‘second strategic route’ is on the premise that the relative
‘peripherality’ of the South West is a problem to be tackled, rather than an asset to
be maintained. It also runs the risk of exposing the more peripheral parts of the
region to businesses in other parts of the country that are already highly competitive.
It could lead to increased house prices exacerbating the existing affordability problem
for local people, and increased traffic in general on local roads many of which are ill-
equipped to cope (without further improvements, etc.). Whether this will be of
benefit is questionable. An alternative approach would be to concentrate on a higher
degree of self-sufficiency in the more peripheral parts of the region that is founded on
the distinctive strengths and qualities that this part of the region has to offer. This may not necessarily be as productive in GVA terms, but it could offer a different type of economic activity and lifestyle that may be attractive to many, would increase resilience to external shocks, and reduce the demand for travel.

9.20. The proposals in the RSS could therefore be improved by:

- Investigating ways of reducing the need for new infrastructure by reducing demand in the first place.
- Introducing a requirement for all new, replacement and renovated public buildings to be multiple-use.
- Considering linking contributions to infrastructure funds to the demand development places on infrastructure so that more sustainable developments will be rewarded with smaller payments to the fund.
- Investigating alternatives to achieving overall RSS objectives that rely less on improving connectivity. If the need for improved connectivity is proven, focus attention on significantly improving rail links rather than the road network. Rail links will bring their own landscape and biodiversity implications, but overall are likely to prove less environmentally damaging than road improvements.

**Development Policies E, F, G and H**

9.21. Development Policies E to H are generally excellent for sustainability, recording significant positive benefits across a number of SA objectives and criteria. No significant adverse effects have been identified. If development is delivered in accordance with these policies, then significant progress towards sustainability will have been made. As with other aspects of the RSS, the challenge will be in delivering on these policies given the scale of development, the speed with which it will be delivered, and difficulties with enforcement.

9.22. Aspects that could even further improve these policies are as follows:

**Development Policy F:**

- Increase the dwelling densities under Policy F to a minimum of 50 and an average of at least 60 dwellings per hectare, and even higher within urban areas, and close to public transport nodes.

**Development Policy G:**

- When the Code for Sustainable Buildings is published, the RSS should aim to achieve higher level standards in the Code.

**Development Policy H:**

- For brownfield land, introduce criteria to ensure that any existing value that this might have (e.g. wildlife, recreation or amenity) is recognised and protected/substituted (a similar approach should apply to greenfield land).
Conclusions and recommendations

9.23. There is much to commend in sustainability terms in the over spatial strategy included in the RSS. A key theme of the RSS is the emphasis on “significant change at 22 Strategically Significant Cities and Towns in order to support their economic and service role and regeneration” coupled with an approach that aims to recognise the diversity of the region.

9.24. The majority of new development will take place at the SSCTs, where there is a focus on improving the quality of the urban environment, access to jobs and services, providing for economic opportunities, tackling congestion, and assisting regeneration.

9.25. This has many positive benefits for sustainability, since:

- The SSCTs are forecast to be where the majority of new jobs (need number and percentage) are likely to be created over the period of the RSS.
- It will help to better align the delivery of new dwellings with these new jobs, and in so doing help to reduce the need to travel by car.
- Urban areas offer many opportunities to live more sustainable lifestyles – the density of urban development can make it easier to deliver viable public transport, enable people to walk and cycle to where they need to get to, provide for greater local access to services for a greater number of people, introduce low and zero carbon technologies such as Combined Heat & Power, and reduce the amount of land needed for development.

9.26. Many of these sustainability benefits may also arise in some of the smaller towns that fall under Development Policy B.

9.27. To achieve these sustainability outcomes is highly dependent upon people wishing to live and work in the urban areas, which is in itself dependent upon the diversity and quality of the jobs on offer, the attractiveness of dwellings available to them and the environments in which they are set, and the quality of community services (e.g. education, health, etc.) and greenspace. This is particularly important given the perceived qualities that more rural areas have to offer (often premised on having access to a car), and that many people arriving in the South West may be seeking to live in more rural locations or smaller towns. It is essential, therefore, that the urban areas offer at least as an attractive live-work option as some of the more rural parts of the region.

9.28. However, over half the region’s population currently live outside of the SSCTs, and it is important that these are positively planned for too so that their own sustainability advantages can be realised. The report ‘Better Planning of Rural Areas in the South West’ (Land Use Consultants, July 2004), warned against “over-simplistic approaches to rural planning”. The report stated that:

“For decades planning for rural communities has been based on ideas of how they are hoped to function, rather than how they actually function – seriously diluting policy effectiveness.”
“The RSS’s regional vision has to recognise that rural communities across the region are very different. Visions for them will share common elements, such as maximising localisation of service use and employment, and reducing car dependency, but this will mean different things in different places.

“Where towns are found to be the functional hubs of local rural life this role should be encouraged, but where this is not the case planning should address functional rural communities, which may mean needing to acknowledge the influence of urban neighbours, or networks of towns. In those towns close to urban areas it may be appropriate to discourage growth, whereas in remoter areas it may be encouraged. The same is true for villages - their future planning should be based on their current function and thus their potential future contributions to sustainable functional communities”.

9.29. The RSS does aim to take on board the above approach, but it could be questioned whether the advice contained within it gives as clear a strategic direction for communities outside the SSCTs as it does for the SSCTs. It is essential that the approach to more rural communities supports the approach to SSCTs, and does not undermine it. For example, the ‘Better Planning of Rural Areas in the South West’ report states that the RSS should not add development to towns and villages where it would foster increased car use, or where it would detract from urban regeneration. Instead it argues that a more sub-regional and local approach to rural planning based on sound evidence of the function of different settlements in different parts of the region (including the relationship between different settlements, and in some parts of the region with larger urban neighbours), and how these can be strengthened in order to achieve sustainability outcomes.

9.30. Development Policies E, F, G and H are generally very positive for sustainability. The successful application of these policies will be important if the Sustainable Development Policies SD1 to SD4 are to be achieved.

9.31. Development Policy D has both sustainability strengths and weaknesses. Its support for investment in community services, such as education, health, culture, sport and green infrastructure should bring a range of positive effects. Investment in transport infrastructure will not always bring positive benefits, with some road-based schemes in particular potentially leading to negative effects (e.g. impacts on landscape and biodiversity, and accommodating increased traffic flows and hence greenhouse gas emissions). Investment in public transport, walking and cycling will be more positive. In general terms, the most sustainable approach would be to reduce the need for such infrastructure in the first place.
10. **SECTION 4 OF THE RSS: SUB REGIONAL STRATEGY STATEMENTS AND HOUSING DISTRIBUTION**

**SUB REGIONAL STRATEGY STATEMENTS**

*To be inserted*

**HOUSING DISTRIBUTION**

**Introduction**

10.1. This part of Section 4 of the RSS summarises the distribution of additional dwellings throughout the region for the period 2006-2026. It includes phasing of dwelling provision split between 2006-2016 and 2016-2026.

**What does the RSS section say?**

10.2. The RSS aims to deliver on average 25,000 dwellings per annum for the period covered by the RSS, totalling 500,000 additional dwellings over 20 years. Around 17,000 dwellings (70%) of these are to be at the 22 SSTCs, where 80% of the new jobs within the SSTC travel to work areas (TTW As) are anticipated to be created. The remainder of dwellings, being around 8,000 per annum (30%) and totalling 160,000 of the period of the RSS are to be distributed across the rest of the region.

10.3. The dwelling distribution is divided into two main components:

- Dwelling distribution by Housing Market Area and by Unitary Authority and District (Table 1 in the RSS).
- Dwelling distribution by Joint Study Area and Named Settlements (Table 2 in the RSS).

10.4. A map is presented in the RSS showing the South West Housing Market Areas.

**What are the likely effects on the SSA headline objectives?**

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve health</td>
<td>To be completed.</td>
</tr>
<tr>
<td>To be completed.</td>
<td>To be completed.</td>
</tr>
<tr>
<td>Support communities that meet people’s needs</td>
<td>To be completed.</td>
</tr>
<tr>
<td>To be completed.</td>
<td>To be completed.</td>
</tr>
<tr>
<td>Develop the economy in ways that meet people’s needs</td>
<td>To be completed.</td>
</tr>
</tbody>
</table>
10.5. Determining the effects of the housing distribution figures is difficult based on simple numbers. The SSA therefore attempts to gain an understanding by looking at the following issues:

- The scale of change for different parts of the South West and for the region as a whole.
- The current relationship between jobs and homes, and travel to work patterns, and the extent to which future housing development proposed in the RSS is likely to lead to a closer alignment of homes and jobs (essential if reducing the need to travel by car is to be achieved).
- The location and sensitivity to development of environmental assets and resources within the region.

**The scale of change**

10.6. The scale of change relating to housing development for each District in the South West is presented in Table X.X. This shows the current estimated stock of dwellings for each District, the proposed additional dwellings to be delivered between 2006 and 2026, and the percentage increase in the total number of dwellings using the 2006 estimated numbers of dwellings as a baseline. The results of this analysis have also been mapped and are shown in Figure X.X.
10.7. For the purpose of this analysis, the Districts have been classified into urban, accessible rural, and remote rural, using the Countryside Agency District and Unitary Authority Classification. The classification is based on an amalgamation of:

- The National Council for Voluntary Organisations (NCVO) definitions, which are primarily based on population density.
- The Office for National Statistics, which grouped local and health authorities into six families (including rural) using 37 socio-economic variables from the 1991 Census.
- The Department of the Environment (DoE), which used a list of rural authorities for the 1995 Rural White Paper.

10.8. The classification of Districts is a crude measure, and uses data that is now quite old. However, it does provide an indication of the character of each District, which generally is likely to still hold true.

10.9. A further complication in the analysis is that settlement boundaries, particularly for the larger urban areas, do not necessarily coincide with District boundaries. For example, the number of dwellings in South Gloucestershire is high partly because a significant proportion of the urban conurbation of Bristol falls within South Gloucestershire District.

Table X.X: Ranking of Districts by percentage increase in dwellings 2006-2026 and by District classification

<table>
<thead>
<tr>
<th>District by Countryside Agency classification</th>
<th>Estimated Dwellings 2006</th>
<th>Proposed additional dwellings 2006-2026</th>
<th>Percentage increase in total number of dwellings 2006-2026</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Urban</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Swindon</td>
<td>82,440</td>
<td>35,000</td>
<td>42.5%</td>
</tr>
<tr>
<td>North Somerset</td>
<td>86,396</td>
<td>26,300</td>
<td>30.4%</td>
</tr>
<tr>
<td>Exeter</td>
<td>50,305</td>
<td>12,000</td>
<td>23.8%</td>
</tr>
<tr>
<td>Bournemouth</td>
<td>76,759</td>
<td>17,600</td>
<td>22.9%</td>
</tr>
<tr>
<td>Plymouth</td>
<td>109,403</td>
<td>25,000</td>
<td>22.9%</td>
</tr>
<tr>
<td>Bath and North East Somerset</td>
<td>74,003</td>
<td>16,900</td>
<td>22.8%</td>
</tr>
<tr>
<td>Gloucester</td>
<td>49,377</td>
<td>11,200</td>
<td>22.7%</td>
</tr>
<tr>
<td>South Gloucestershire</td>
<td>107,103</td>
<td>23,100</td>
<td>21.6%</td>
</tr>
<tr>
<td>Bristol</td>
<td>174,118</td>
<td>33,700</td>
<td>19.4%</td>
</tr>
<tr>
<td>Weymouth &amp; Portland</td>
<td>29,739</td>
<td>5,600</td>
<td>18.8%</td>
</tr>
<tr>
<td>Poole</td>
<td>61,432</td>
<td>10,900</td>
<td>17.7%</td>
</tr>
<tr>
<td>Christchurch</td>
<td>21,969</td>
<td>3,800</td>
<td>17.3%</td>
</tr>
<tr>
<td>Cheltenham</td>
<td>50,547</td>
<td>8,400</td>
<td>16.6%</td>
</tr>
<tr>
<td>Torbay</td>
<td>62,851</td>
<td>10,000</td>
<td>15.9%</td>
</tr>
<tr>
<td><strong>Sub-Total</strong></td>
<td><strong>1,036,642</strong></td>
<td><strong>239,500</strong></td>
<td><strong>23.1%</strong></td>
</tr>
<tr>
<td><strong>Accessible Rural</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tewkesbury</td>
<td>35,734</td>
<td>14,400</td>
<td>40.3%</td>
</tr>
<tr>
<td>Taunton Deane</td>
<td>47,883</td>
<td>17,300</td>
<td>36.1%</td>
</tr>
<tr>
<td>West Wiltshire</td>
<td>55,360</td>
<td>10,500</td>
<td>19.0%</td>
</tr>
<tr>
<td>Salisbury</td>
<td>51,120</td>
<td>9,200</td>
<td>18.0%</td>
</tr>
</tbody>
</table>
### District by Countryside Agency classification

<table>
<thead>
<tr>
<th>District</th>
<th>Estimated Dwellings 2006</th>
<th>Proposed additional dwellings 2006-2026</th>
<th>Percentage increase in total number of dwellings 2006-2026</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sedgemoor</td>
<td>48,317</td>
<td>8,600</td>
<td>17.8%</td>
</tr>
<tr>
<td>North Wiltshire</td>
<td>55,210</td>
<td>9,000</td>
<td>16.3%</td>
</tr>
<tr>
<td>Mendip</td>
<td>45,565</td>
<td>7,200</td>
<td>15.8%</td>
</tr>
<tr>
<td>Forest of Dean</td>
<td>34,386</td>
<td>5,400</td>
<td>15.7%</td>
</tr>
<tr>
<td>Kennet</td>
<td>33,020</td>
<td>5,200</td>
<td>15.7%</td>
</tr>
<tr>
<td>Cotswold</td>
<td>37,920</td>
<td>5,600</td>
<td>14.8%</td>
</tr>
<tr>
<td>Stroud</td>
<td>47,496</td>
<td>6,700</td>
<td>14.1%</td>
</tr>
<tr>
<td><strong>Sub-Total</strong></td>
<td><strong>492,011</strong></td>
<td><strong>99,100</strong></td>
<td><strong>20.1%</strong></td>
</tr>
<tr>
<td>Remote Rural</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Hams</td>
<td>41,166</td>
<td>10,700</td>
<td>26.0%</td>
</tr>
<tr>
<td>Carrick</td>
<td>43,105</td>
<td>10,200</td>
<td>23.7%</td>
</tr>
<tr>
<td>North Devon</td>
<td>42,551</td>
<td>8,800</td>
<td>20.7%</td>
</tr>
<tr>
<td>East Devon</td>
<td>60,301</td>
<td>12,200</td>
<td>20.2%</td>
</tr>
<tr>
<td>Kerrier</td>
<td>44,347</td>
<td>9,100</td>
<td>20.1%</td>
</tr>
<tr>
<td>South Somerset</td>
<td>68,866</td>
<td>13,600</td>
<td>19.7%</td>
</tr>
<tr>
<td>Mid Devon</td>
<td>32,723</td>
<td>6,200</td>
<td>18.9%</td>
</tr>
<tr>
<td>Restormel</td>
<td>46,117</td>
<td>8,600</td>
<td>18.6%</td>
</tr>
<tr>
<td>West Devon</td>
<td>22,857</td>
<td>4,200</td>
<td>18.4%</td>
</tr>
<tr>
<td>North Cornwall</td>
<td>42,055</td>
<td>7,600</td>
<td>18.1%</td>
</tr>
<tr>
<td>West Dorset</td>
<td>46,198</td>
<td>8,200</td>
<td>17.7%</td>
</tr>
<tr>
<td>Torridge</td>
<td>28,897</td>
<td>5,000</td>
<td>17.3%</td>
</tr>
<tr>
<td>Teignbridge</td>
<td>56,225</td>
<td>8,900</td>
<td>15.8%</td>
</tr>
<tr>
<td>Caradon</td>
<td>38,275</td>
<td>6,000</td>
<td>15.7%</td>
</tr>
<tr>
<td>North Dorset</td>
<td>28,689</td>
<td>4,500</td>
<td>15.7%</td>
</tr>
<tr>
<td>Penwith</td>
<td>32,025</td>
<td>5,000</td>
<td>15.6%</td>
</tr>
<tr>
<td>East Dorset</td>
<td>38,227</td>
<td>5,400</td>
<td>14.1%</td>
</tr>
<tr>
<td>West Somerset</td>
<td>16,679</td>
<td>2,200</td>
<td>13.2%</td>
</tr>
<tr>
<td>Purbeck</td>
<td>21,466</td>
<td>2,400</td>
<td>11.2%</td>
</tr>
<tr>
<td>Scilly Isles</td>
<td>1,285</td>
<td>100</td>
<td>7.8%</td>
</tr>
<tr>
<td><strong>Sub-Total</strong></td>
<td><strong>752,054</strong></td>
<td><strong>138,900</strong></td>
<td><strong>18.5%</strong></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2,280,707</strong></td>
<td><strong>477,500</strong></td>
<td><strong>20.1%</strong></td>
</tr>
</tbody>
</table>

Source: SWRA for dwellings data; Countryside Agency for District classification

**Note:** Need to check why total additional dwellings is less than 500,000

10.10. The Spatial Strategy of the RSS aims to focus the majority of housing development (70%) at the SSTCs. Table X.X shows that the percentage increase over the existing number of dwellings is generally higher for the urban classified Districts (23.1% increase compared to 20.1% increase for accessible rural Districts and 18.5% increase in remote rural Districts).

10.11. The overall averages mask some notable findings for individual Districts. Three Districts (North Somerset, Swindon, Taunton Deane, and Tewkesbury) will experience over a 30% increase in the total number of dwellings over the period of the RSS, with Swindon and Tewkesbury experiencing over a 40% increase. This is a very high level of growth and will be a challenge to deliver.
10.12. Some of the more remote rural Districts are to increase in terms of numbers of dwellings significantly over the RSS period. Excluding the Isles of Scilly, all remote rural Districts will increase by at least 10% and 16 out of 19 of these Districts by over 15%. This in itself is a significant increase over a 20 period, which suggests that many of the rural areas, despite the focus on directing most development to the SSCTS in the RSS, will themselves receive significant development and opportunities to strengthen their roles and functions. The figures for South Hams is particularly high because of its proximity to Plymouth and the planned new settlement in the north of the District.

10.13. In order to further inform the analysis of scale of change, the SSA has calculated the scale of change for each of the named settlements in Table 2 of the RSS. This is helpful since it provides a more accurate picture of the scale of growth for each named settlement, irrespective of District boundaries. The analysis is shown in Table X.X.

Note: Analysis to be completed when data on estimated number of dwellings for each named settlement has been received.

Table X.X: Percentage increase in dwellings by Joint Study Areas and Named Settlements

<table>
<thead>
<tr>
<th>JSA/Named Settlement</th>
<th>Estimated Dwellings 2006</th>
<th>Proposed additional dwellings 2006-2026</th>
<th>Percentage increase in total number of dwellings 2006-2026</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barnstaple</td>
<td></td>
<td>4,600</td>
<td></td>
</tr>
<tr>
<td>Bath</td>
<td></td>
<td>7,500</td>
<td></td>
</tr>
<tr>
<td>Bournemouth/Poole/Christchurch JSA</td>
<td></td>
<td>37,500</td>
<td></td>
</tr>
<tr>
<td>Bristol</td>
<td></td>
<td>54,500</td>
<td></td>
</tr>
<tr>
<td>Camborne/Redruth</td>
<td></td>
<td>6,000</td>
<td></td>
</tr>
<tr>
<td>Cheltenham &amp; Gloucester JSA</td>
<td></td>
<td>31,500</td>
<td></td>
</tr>
<tr>
<td>Chippenham</td>
<td></td>
<td>4,500</td>
<td></td>
</tr>
<tr>
<td>Dorchester</td>
<td></td>
<td>4,000</td>
<td></td>
</tr>
<tr>
<td>Exeter JSA</td>
<td></td>
<td>18,500</td>
<td></td>
</tr>
<tr>
<td>Falmouth/Penryn</td>
<td></td>
<td>2,800</td>
<td></td>
</tr>
<tr>
<td>Plymouth JSA</td>
<td></td>
<td>31,500</td>
<td></td>
</tr>
<tr>
<td>Salisbury (C City)</td>
<td></td>
<td>5,000</td>
<td></td>
</tr>
<tr>
<td>Swindon JSA</td>
<td></td>
<td>35,000</td>
<td></td>
</tr>
<tr>
<td>Taunton/Bridgewater/W ellington JSA</td>
<td></td>
<td>22,000</td>
<td></td>
</tr>
<tr>
<td>Torbay &amp; South Devon Sub Region JSA</td>
<td></td>
<td>21,000</td>
<td></td>
</tr>
<tr>
<td>Trowbridge</td>
<td></td>
<td>5,000</td>
<td></td>
</tr>
<tr>
<td>Truro</td>
<td></td>
<td>5,000</td>
<td></td>
</tr>
<tr>
<td>Weston-super-Mare</td>
<td></td>
<td>11,500</td>
<td></td>
</tr>
<tr>
<td>Weymouth (Functional urban area)</td>
<td></td>
<td>5,000</td>
<td></td>
</tr>
<tr>
<td>Yeovil</td>
<td></td>
<td>6,400</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>318,800</strong></td>
<td></td>
</tr>
</tbody>
</table>

Source: SW RA for dwellings data
The relationship between homes and jobs

10.14. The pattern in terms of scale of growth partially mirrors the jobs density pattern of the region (i.e. the ratio of total jobs to working-age population as shown in Figure X.X using data presented in Table X.X).

Note: Need to do a correlation analysis between percentage increase in homes and jobs density ratios.

Table X.X: Ranking of Districts by job density

<table>
<thead>
<tr>
<th>District</th>
<th>Numbers of jobs</th>
<th>Jobs/Working-age population ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exeter</td>
<td>85,000</td>
<td>1.15</td>
</tr>
<tr>
<td>Christchurch</td>
<td>25,000</td>
<td>1.08</td>
</tr>
<tr>
<td>Gloucester</td>
<td>71,000</td>
<td>1.06</td>
</tr>
<tr>
<td>Cheltenham</td>
<td>72,000</td>
<td>1.05</td>
</tr>
<tr>
<td>Cheltenham</td>
<td>54,000</td>
<td>1.03</td>
</tr>
<tr>
<td>Swindon</td>
<td>118,000</td>
<td>1.03</td>
</tr>
<tr>
<td>Bristol</td>
<td>261,000</td>
<td>1.02</td>
</tr>
<tr>
<td>Salisbury</td>
<td>68,000</td>
<td>0.98</td>
</tr>
<tr>
<td>Taunton Deane</td>
<td>59,000</td>
<td>0.95</td>
</tr>
<tr>
<td>Poole</td>
<td>76,000</td>
<td>0.94</td>
</tr>
<tr>
<td>Bath and North East Somerset</td>
<td>98,000</td>
<td>0.93</td>
</tr>
<tr>
<td>Cotswold</td>
<td>44,000</td>
<td>0.92</td>
</tr>
<tr>
<td>South Gloucestershire</td>
<td>141,000</td>
<td>0.92</td>
</tr>
<tr>
<td>South Hams</td>
<td>44,000</td>
<td>0.92</td>
</tr>
<tr>
<td>Scilly Isles</td>
<td>1,000</td>
<td>0.91</td>
</tr>
<tr>
<td>West Dorset</td>
<td>46,000</td>
<td>0.90</td>
</tr>
<tr>
<td>Bournemouth</td>
<td>89,000</td>
<td>0.89</td>
</tr>
<tr>
<td>North Cornwall</td>
<td>42,000</td>
<td>0.89</td>
</tr>
<tr>
<td>South Somerset</td>
<td>79,000</td>
<td>0.89</td>
</tr>
<tr>
<td>Purbeck</td>
<td>23,000</td>
<td>0.88</td>
</tr>
<tr>
<td>Tewkesbury</td>
<td>40,000</td>
<td>0.87</td>
</tr>
<tr>
<td>West Wiltshire</td>
<td>64,000</td>
<td>0.87</td>
</tr>
<tr>
<td>North Devon</td>
<td>44,000</td>
<td>0.86</td>
</tr>
<tr>
<td>Kennet</td>
<td>39,000</td>
<td>0.84</td>
</tr>
<tr>
<td>North Dorset</td>
<td>31,000</td>
<td>0.83</td>
</tr>
<tr>
<td>Plymouth</td>
<td>124,000</td>
<td>0.82</td>
</tr>
<tr>
<td>Stroud</td>
<td>52,000</td>
<td>0.81</td>
</tr>
<tr>
<td>Mid Devon</td>
<td>32,000</td>
<td>0.77</td>
</tr>
<tr>
<td>North Wiltshire</td>
<td>60,000</td>
<td>0.77</td>
</tr>
<tr>
<td>Restormel</td>
<td>45,000</td>
<td>0.77</td>
</tr>
<tr>
<td>Torbay</td>
<td>57,000</td>
<td>0.77</td>
</tr>
<tr>
<td>Penwith</td>
<td>28,000</td>
<td>0.76</td>
</tr>
<tr>
<td>Sedgemoor</td>
<td>47,000</td>
<td>0.75</td>
</tr>
<tr>
<td>East Dorset</td>
<td>34,000</td>
<td>0.74</td>
</tr>
<tr>
<td>Mendip</td>
<td>46,000</td>
<td>0.74</td>
</tr>
<tr>
<td>Teignbridge</td>
<td>52,000</td>
<td>0.74</td>
</tr>
<tr>
<td>East Devon</td>
<td>50,000</td>
<td>0.73</td>
</tr>
<tr>
<td>North Somerset</td>
<td>82,000</td>
<td>0.73</td>
</tr>
<tr>
<td>West Devon</td>
<td>21,000</td>
<td>0.73</td>
</tr>
<tr>
<td>Caradon</td>
<td>33,000</td>
<td>0.69</td>
</tr>
<tr>
<td>Torridge</td>
<td>24,000</td>
<td>0.68</td>
</tr>
<tr>
<td>Kerrier</td>
<td>37,000</td>
<td>0.65</td>
</tr>
<tr>
<td>West Somerset</td>
<td>12,000</td>
<td>0.65</td>
</tr>
<tr>
<td>District</td>
<td>Numbers of jobs</td>
<td>Jobs/Working-age population ratio</td>
</tr>
<tr>
<td>-----------------------</td>
<td>-----------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>Forest of Dean</td>
<td>31,000</td>
<td>0.64</td>
</tr>
<tr>
<td>Weymouth &amp; Portland</td>
<td>21,000</td>
<td>0.55</td>
</tr>
</tbody>
</table>
10.15. Both the RSS and the SSA has identified that addressing the issue of traffic in the South West is essential if the region is to move towards a more sustainable future. People make journeys by car for many reasons, including travelling to or whilst at work, to shop, to take children school, etc. One of the most significant reasons (in terms of length of journey) is for leisure (check source for this).

10.16. However, the only systematic and comprehensive data that are available on travel patterns is for travel to work. One of the key themes in the RSS is on achieving a better alignment between homes and jobs.

10.17. The SSA includes an analysis of the relationship between the existing numbers of jobs by District and by JSA/named settlement, similar to that for housing. The aim is to determine whether the proposed distribution of housing development is likely to redress current imbalances between homes and jobs and match future job creation with dwelling provision.

Note: Analysis of jobs/homes balance to be completed once data received from SW RA and SW RDA.

10.18. However, the jobs/homes balance is only part of the equation. In order to be sustainable, residents need to take up the opportunity of working in the same settlement in which they live, or move to live in the settlement in which they work. This would achieve a higher level of self-containment, increase the opportunity to walk, cycle and use public transport to get to work, and reduce the desire (as well as the need) to travel by car.

10.19. The existing travel to work pattern in the South West is complex. This is illustrated by Table X.X, which shows the total trips originating in each of the SSTCs and the total trips ending in each of the SSTCs. Some of the SSTCs, such as Bath, Bristol, Exeter, Swindon and Truro, are all exhibit net in-commuting. On the other hand, Bournemouth, Chippenham, Torbay and Weymouth, all exhibit net out-commuting.

10.20. Table X.X also shows that, in net terms, 87% of economically active people living outside the SSCTs, work outside the SSCTs. This will be due to a combination of people in the SSTCs commuting to work outside the SSTCs, people in living outside the SSTCs also working outside the SSTCs (but not necessarily within the settlement in which they live), off-set by some people living in outside the SSTCs but commuting to them to work.

10.21. The complexity of the relationship between homes and jobs shows that providing the opportunity to live close to work will often not be taken up by people. This suggests that this can only be achieved over time, and that:

- It is essential that the SSTCs become more attractive places in which to live.
- That quality local services are provided so that people do not feel the need to travel outside of their community.
- That those SSTCs that are net out-commuting settlements do not have this characteristic reinforced.
• That driving by car is made much less attractive, particularly compared to other more sustainable modes.

Note: Further analysis is required to calculate (i) self-containment i.e. trips originating and ending in the same settlement (ii) the ratio of total number of people in each settlement against total number of people working there to show the extent to which they are net in-commuting settlements.

Table X.X: Travel to Work Trips for SSTCs

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Total Trips Originating From Settlement</th>
<th>Total Trips Ending In Settlement</th>
<th>Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barnstaple</td>
<td>12,650</td>
<td>16,080</td>
<td>3,430</td>
</tr>
<tr>
<td>Bath</td>
<td>42,504</td>
<td>53,003</td>
<td>10,499</td>
</tr>
<tr>
<td>Bournemouth</td>
<td>74,680</td>
<td>72,189</td>
<td>-2,491</td>
</tr>
<tr>
<td>Bristol Urban Area</td>
<td>267,470</td>
<td>317,148</td>
<td>49,678</td>
</tr>
<tr>
<td>Camborne / Pool / Redruth</td>
<td>15,820</td>
<td>18,061</td>
<td>2,241</td>
</tr>
<tr>
<td>Cheltenham / Charlton Kings</td>
<td>54,147</td>
<td>60,951</td>
<td>6,804</td>
</tr>
<tr>
<td>Chippenham</td>
<td>15,403</td>
<td>13,779</td>
<td>-1,624</td>
</tr>
<tr>
<td>Dorchester</td>
<td>6,627</td>
<td>10,598</td>
<td>3,971</td>
</tr>
<tr>
<td>Exeter</td>
<td>50,290</td>
<td>70,062</td>
<td>19,772</td>
</tr>
<tr>
<td>Falmouth / Penryn</td>
<td>11,714</td>
<td>11,848</td>
<td>134</td>
</tr>
<tr>
<td>Gloucester Urban Area</td>
<td>66,716</td>
<td>70,794</td>
<td>4,078</td>
</tr>
<tr>
<td>Plymouth</td>
<td>108,598</td>
<td>117,447</td>
<td>8,849</td>
</tr>
<tr>
<td>Poole</td>
<td>67,345</td>
<td>69,334</td>
<td>1,989</td>
</tr>
<tr>
<td>Salisbury</td>
<td>18,225</td>
<td>20,352</td>
<td>2,127</td>
</tr>
<tr>
<td>Swindon</td>
<td>80,844</td>
<td>91,708</td>
<td>10,864</td>
</tr>
<tr>
<td>Taunton</td>
<td>27,803</td>
<td>35,440</td>
<td>7,637</td>
</tr>
<tr>
<td>Torbay</td>
<td>53,627</td>
<td>53,033</td>
<td>-594</td>
</tr>
<tr>
<td>Trowbridge</td>
<td>15,794</td>
<td>16,820</td>
<td>1,026</td>
</tr>
<tr>
<td>Truro</td>
<td>9,177</td>
<td>21,019</td>
<td>11,842</td>
</tr>
<tr>
<td>Weston-Super-Mare Urban Area</td>
<td>35,917</td>
<td>29,956</td>
<td>-5,961</td>
</tr>
<tr>
<td>Weymouth</td>
<td>23,213</td>
<td>19,978</td>
<td>-3,235</td>
</tr>
<tr>
<td>Yeovil</td>
<td>18,170</td>
<td>22,167</td>
<td>3,997</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>1,076,734</strong></td>
<td><strong>1,211,767</strong></td>
<td><strong>135,033</strong></td>
</tr>
<tr>
<td>Non-SSCT South West</td>
<td><strong>1,243,560</strong></td>
<td><strong>1,079,358</strong></td>
<td><strong>-164,202</strong></td>
</tr>
<tr>
<td>South West Region</td>
<td><strong>2,320,294</strong></td>
<td><strong>2,291,125</strong></td>
<td><strong>-29,169</strong></td>
</tr>
</tbody>
</table>

Source: LUC using 2001 Census data

Sensitivity to development of environmental assets and resources

10.22. Analysis still to be completed. Key issues likely to include:
• The scale of greenfield landtake – assuming 50% of the 500,000 additional dwellings will be built on greenfield land, and that the average density of housing development will be 50 dwellings per hectare, 5,000 of greenfield land (net) will be needed for housing development. If it is assumed that infrastructure, community facilities, employment uses, greenspace as part of the development, take an area equivalent to the area that is used by the housing, 10,000 hectares of greenfield land will be developed, although this will include greenspace and private gardens. 10,000 hectares is equivalent to 100 square kilometres. To put this into perspective, the larger urban areas in the South West as defined by Ordnance Survey (which includes more than the SSTCs) cover 971 square kilometres. All built up areas in the South West comprise 1,829 square kilometres.

• A comparison of distribution of development with ‘unconstrained’ land (see Figures X.X and X.X below).
What improvements (e.g. mitigation, enhancement) could be made?

10.23. To be completed.

Conclusions and recommendations

10.24. To be completed.
11. SECTION 5 OF THE RSS: REGIONAL APPROACH TO TRANSPORT

Introduction

11.1. Section 5 of the RSS sets out the general approach to transport policy in the region, which is to assist in the achievement of the spatial strategy and the success of the regional economy by increasing connectivity (reducing congestion and unreliable journey times). The core set of transport policies in Section 5 will lead to the priorities for investment on major strategic transport issues and help frame the content of Local Transport Plans and programmes at the local level. The specific transport policies for the SSCTs are presented in the sub-regional proposals in Section 4 of the RSS.

What does the RSS section say?

11.2. The introduction to Section 5 discusses the role that transport planning can play to assist in achieving the three strategy emphases of the RSS: stimulating economic activity in the west of the peninsula; realising the potential of the SSCTs in the centre and north of the region; and allowing carefully managed growth to occur in the south east of the region. It states that “congestion and unreliable journey time can prejudice the success of the regional economy, whilst the growth in private transport and reduction in public transport can leave some sections of the population marginalised.”

11.3. Section 5 divides the transport policies into those relating to the SSCTs (TR1 - Demand Management), policies for inter-regional transport (road and rail, TR2-5), intra-regional transport (road and rail - TR8 and TR9), freight transport (road and rail - TR10 and TR11), ports and airports (TR6 and TR7), and a discussion about setting parking standards and setting regional priorities for investment in transport schemes.

11.4. A key theme is to improve connectivity with London and the South East, with the focus is on improving the ‘reliability and resilience’ of the transport network, including the creation of a second ‘strategic’ route utilising the A303/A358. This proposal has been subject to its own appraisal and decision making process, outside of the RSS development, and been approved by Government.

43 The London to South West and South Wales Multi Modal Study (SW ARMMS) study was started early in 2000, and reported to the SW RA in May 2002 (Prepared by Halcrow Group Limited for the Government Office for the South West). The primary purpose was to determine whether or not there were any alternatives to major road building on the major transport corridors where there appeared to be a rail alternative. The SW RA submitted comments on the study to the Secretary of State recommending both routing improvement options (A303/30 and A358) be implemented. The Department for Transport Ministers announced in December 2002 that they accepted the overall recommendations of SW ARMMS, that the A303 be improved to form a second major road corridor into the South West, but they did not accept the SW RA’s recommendation and asked the Highways Agency to carry out further technical work on the A303/A358 route choice. The Highways Agency produced a report of that work in February 2004 concluding that while the A303/A30 route had greater transport economic benefits, the A358 route would have less environmental...
11.5. The priority outcomes relating to the Regional Funding Allocations (RFA) transport bid will be included in this section. Most of the schemes included in the RFA programme are road-based. These have not been subject to the SSA, but have been appraised internally by SW RA as part of the RFA process. (need to check whether (and how) the SSA needs to appraise individual schemes)

**What are the likely effects on the SSA headline objectives?**

11.6. The SSA of the transport policies appraised the policies in groups according to the mode of transport being addressed (except for the cluster of policies relating to movement of freight, TR6, TR10 and TR11).

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve health</td>
<td></td>
</tr>
<tr>
<td>TR1 aims to reduce travel by car in the SSC Ts through demand management and a step change in public transport provision, which in the longer term should help to reduce air pollution and reduce traffic accidents, so may help to improve health, and encourage more routine daily exercise if pedestrian and cycle access to the public transport was made attractive.</td>
<td>TR2-4 and TR8 aim to improve the road network, which will continue to facilitate and encourage car use, and is likely to discourage walking and cycling.</td>
</tr>
<tr>
<td></td>
<td>The positive effects are likely to be indirect, concentrated in the SSCTs, and longer term.</td>
</tr>
<tr>
<td>Policies TR5 and TR9 could help to promote daily exercise if accessibility to rail stations by cyclists and pedestrians is achieved. However, better cycle parking at stations will have limited effect if cyclists can only get to stations along car-dominated roads, or have to make inconvenient detours to use cycle routes, which are unattractive and poorly maintained. The same is true of pedestrian access to stations.</td>
<td>The negative effects are likely to be direct in the medium to long term and region wide.</td>
</tr>
<tr>
<td>Support communities that meet people’s needs</td>
<td></td>
</tr>
<tr>
<td>Improvements to intra-regional public transport (TR9) should improve accessibility to learning, training and cultural activities for those who do not own a car or are unable to drive.</td>
<td>The creation or improvement of parkway stations (TR5) is likely to draw office and retail development outside town centres (e.g. the office based development on the northern fringes of Bristol), reducing the opportunity to create more vibrant town centres and communities.</td>
</tr>
<tr>
<td>The positive effects are likely to be direct in the medium to long term and region wide.</td>
<td>The negative effects are likely to be direct in the medium to long term and felt most in town centres.</td>
</tr>
<tr>
<td>Improving the road network in the South West (TR2-4 and TR8) may increase accessibility to learning, training and cultural activities for some, but will reduce accessibility for those who do not own a car or are unable to drive.</td>
<td></td>
</tr>
<tr>
<td>Develop the economy in ways that meet people’s needs</td>
<td></td>
</tr>
<tr>
<td>Policies TR5 and TR9 should help to improve accessibility to work opportunities</td>
<td>Improving the road network and creating a second high quality route between the South</td>
</tr>
<tr>
<td><strong>impacts and a better cost to benefit ratio. The A303/A358 route has now been confirmed and is included in the RSS.</strong></td>
<td></td>
</tr>
<tr>
<td>Positive effects</td>
<td>Negative effects</td>
</tr>
<tr>
<td>------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>and reduce the cost of travel, helping to reduce poverty and income inequality (but only if the cost of public transport is made lower than car travel).</td>
<td>West and London and the South East (TR2-4 and TR8), will result in increased car travel by encouraging more people to commute long distances within and out of the region, and CO₂ emissions are likely to increase (e.g. SW ARMMS study (Highways Agency, February 2004) concluded that the A358/M5 route would lead to an additional 4,400 tonnes of CO₂ emissions).</td>
</tr>
<tr>
<td>Policy TR6 encourages development of facilities and services at local ports to support more sustainable distribution, recreation, tourism, local fishing activities and local regeneration. This should help to harness the economic potential of the coast, and aid the use of local supply chains.</td>
<td>Those people without access to a car may become more disadvantaged and unable to afford a comfortable standard of living.</td>
</tr>
<tr>
<td>The positive effects are likely to be indirect, experienced around the region, and in particular at ports for TR6, and in the longer term.</td>
<td>Reducing the vulnerability of the economy to climate change relies on economic patterns that avoid long distance trade and travel. However, the Regional Freight Map (TR10) supports the long distance movement of freight by heavy goods vehicles along national and regional roads.</td>
</tr>
<tr>
<td><strong>Provide access to meet people’s needs with least damage to the environment</strong></td>
<td>Ports, and some parts of the rail network may be at risk from rising sea level or the impact of extreme climatic events (e.g. on the Dawlish coast). They may also contain sensitive landscapes, habitats and species.</td>
</tr>
<tr>
<td>Policies TR5 and TR9 should help to reduce the need/desire to travel by car (and air for inter-regional journeys), if the public transport improvements are achieved.</td>
<td>The negative effects are likely to be both direct and indirect, experienced around the region, and in particular at ports TR6, and in the longer term.</td>
</tr>
<tr>
<td>Policy TR6 encourages development of facilities and services at local ports to support more sustainable recreation, tourism and local regeneration, which should contribute (along with Policies TR5 and TR9) to making public transport more attractive.</td>
<td>While car owners may have improved access to basic services, those without a car or unable to use a car may be further isolated from basic services.</td>
</tr>
<tr>
<td>Policies TR6 and TR11 should significantly contribute to encouraging the switch from</td>
<td>The creation or improvement of parkway stations (TR5) could increase some car</td>
</tr>
<tr>
<td>Positive effects</td>
<td>Negative effects</td>
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</tr>
<tr>
<td>transporting freight by road to rail or water. The positive effects are likely to be indirect, experienced around the region, and in particular at ports for TR6, and in the longer term.</td>
<td>travel as it is likely to encourage more car journeys to stations, and more long distance commuters from rural areas. Policy TR10 will also increase road transport as it supports and encourages the long distance movement of freight by heavy goods vehicles along national and regional roads. The negative effects are likely to be both direct and indirect, experienced around the region in the longer term.</td>
</tr>
</tbody>
</table>

Maintain and improve environmental quality and assets

<p>| The aim to address congestion in SSTCs through demand management and a step change in public transport provision (TR1) is likely to help improve townscapes and the public realm. It should also help to reduce damage to historic and natural assets from pollution associated with traffic. | The creation of a second strategic route into the region is likely to have a significant adverse effect, particularly on biodiversity and the landscape. The SWARMMS study (Highways Agency, February 2004) found that the A358 option would be less environmentally damaging to biodiversity and landscape than the A303/A30 option, with slight adverse effects on landscape and heritage and moderate adverse effects on biodiversity. However, the assessment of the impacts was very localised, and did not seem to take into account the cumulative impacts of improvements to this route resulting from increased traffic and induced development elsewhere. The overall aim behind improving inter-regional connectivity (TR2-5) (i.e. facilitating long distance movement of people and goods between the South West and London and the South East and extending the influence of London’s economy) may reduce the diversity and local distinctiveness of the South West. The negative effects are likely to be both direct and indirect, experienced along the second strategic route and around the region, and longer term. Policies TR5, TR6, TR8 and TR11 could help to conserve land and reduce impact on habitats, landscape and townscape if improved use of public transport and rail and shipping for freight distribution resulted in less new roads being built. However, other policies in Section 5 (TR2-TR4, TR8 and TR10) provide for the increased use of, improvements to, and creation of roads. Minimise consumption of natural resources TR1 could, if it achieved a reduction in car travel, help to conserve land and reduce impact on habitats, landscape and townscape. Increased travel by car resulting from |</p>
<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>traffic, reduce emissions in STCs.</td>
<td>improved inter- and intra-regional road networks (TR2-4, TR8) will continue to increase CO₂ emissions. Noise, light, water and air pollution from increased traffic on motorways would not be reduced.</td>
</tr>
<tr>
<td></td>
<td>Distribution of china clay and stone constitutes a major part of rail freight flows currently, thus Policy TR11 will contribute to the continued extraction of some minerals.</td>
</tr>
<tr>
<td></td>
<td>The negative effects are likely to be both direct and indirect, experienced around the region in the longer term.</td>
</tr>
</tbody>
</table>

Policies TR5, TR6, TR9 and TR11 could help to reduce greenhouse gas emissions, use of aggregate for roads waste, noise, light and air pollution, if improved public transport and more use of rail and shipping for freight distribution resulted in less new roads being built. Overall noise, light and air pollution may be less from railways than motorways, but there will still be some localised noise and vibration impacts along the rail network. However, Policy TR10 supports freight distribution by heavy good vehicles along roads and TR5 is likely to encourage more car journeys to stations. Road building and maintenance are likely to require aggregate extraction, unless recycled and secondary aggregates are used (which could contribute to the reuse of aggregates from construction and demolition waste).

**What improvements (e.g. mitigation, enhancement) could be made?**

**Policy TR1: Demand Management in the STCs**

11.7. The overall thrust of Policy TR1 and its supporting text has a number of excellent sustainability benefits resulting from the aim to reduce the need to travel by car (improved accessibility, reduced emissions, reduced pollution, more efficient use of resources). However, it is not certain that the ‘progressive introduction of demand management measures’ (listed in para. 5.1.4 of the supporting text) will actually achieve a reduction in travel by car. Many of the measures are ‘carrots’ rather than ‘sticks’, thus they will be dependent on public attitude and behaviour.

11.8. Policy TR1 could be strengthened by:

- Including a clear objective in Policy TR1 to ‘reduce traffic’, and not just to ‘reduce congestion’, or ‘the rate of increase in emissions’;
- Being more assertive about road user charging (not only congestion charging) and parking space reduction (not just ‘parking strategies’);
- Including (and strengthening) some of the measures for achieving a modal shift in transport (from para. 5.1.3) more explicitly.
Policies TR2-TR4 and TR8: The M4 and M5; Second Strategic Route; Remainder of the Trunk Road Network and Regional Connectivity

11.9. Improving the road network and creating a second high quality route between the South West and London and the South East, will result in increased need/desire to travel by car by encouraging more people to commute long distances within and out of the region. As a result, CO₂ emissions will increase. Road improvements will continue to make public transport, cycling and walking less attractive modes and for freight to be more easily transported by road.

11.10. The ‘second strategic route’ raises a number of significant sustainability issues, as do improvements in ‘connectivity’ in general, if the RSS is to reduce the need/desire to travel by car and in particular achieve its greenhouse gas emissions targets. Whilst it is recognised that a decision has been made on this route, as it is part of the RSS the SSA is required to comment on the likely effects arising. The promotion of the ‘second strategic route’ is on the premise that the relative ‘peripherality’ of the South West is a problem to be tackled, rather than an asset to be maintained. It also runs the risk of exposing the more peripheral parts of the region to businesses in other parts of the country that are already highly competitive, and reducing the diversity and local distinctiveness of the South West.

11.11. Policy TR5 and others in the RSS (e.g. Section 4 sub-regional policies, TC2, TO2) do encourage public transport, walking and cycling, which provides some mitigation to these policies. However, Policies TR2-TR4 and TR8 will ensure that car travel continues to dominate. The proposals could therefore be improved by:

- More emphasis and investment should be put on improving the rail network and making public transport more integrated and attractive than travel by car.

- The creation of the second ‘strategic’ route not being included in the RSS until there is an improved Waterloo-Exeter-Plymouth fully dualled and electric rail line in place, should the case for improved connectivity with London be proven in sustainability terms.

- Policy TR8 stating more explicitly what ‘corridor management’ means, i.e. what measures will be used to ensure that total vehicle traffic and greenhouse emissions from travel on the corridors go down over time (without causing increases elsewhere).

Policies TR5 and TR9: Inter-regional Rail Network and Intra-regional Public Transport

11.12. Policies TR5 and TR9 should help to reduce the need/desire to travel by car, if the public transport improvements are achieved. However, better cycle parking at stations will have limited effect if cyclists can only get to stations along car-dominated roads, or have to make inconvenient detours to use cycle routes, which are unattractive and poorly maintained. The same is true of pedestrian access to stations. In addition, the creation or improvement of parkway stations (TR5) will discourage cyclists and pedestrians due to their distance from town centres, and is likely to encourage more car journeys to stations, and more long distance commuters from rural areas.
11.13. If improved use of public transport resulted in less new roads being built Policies TR5 and TR9 could help to conserve land and reduce impact on habitats, landscape and townscape. However, other policies in Section 5 (TR2-TR4 and TR8) provide for improvements to and creation of roads.

11.14. TR5 and TR9 could be improved by:

- Introducing safe and attractive pedestrian and cycle routes to stations.
- Avoiding the creation or improvement of parkway stations, and focussing instead on improvements to city and town centre stations.

Policies TR6, TR10 and TR11: Ports; Regional Freight Map and Rail Freight Interchange Facilities

11.15. Policies TR6 and TR11 should significantly encourage the switch from transporting freight by road to rail or water. However, Policy TR10 supports and encourages the long distance movement of freight by heavy goods vehicles along national and regional roads. While TR6 and TR11 should therefore contribute to supporting more sustainable distribution, recreation, tourism, local fishing activities and local regeneration, ports, and some parts of the rail network may be at risk from rising sea level or the impact of extreme climatic events. Reducing the vulnerability of the economy to climate change relies on economic patterns that avoid long distance trade and travel. However, the Regional Freight Map (TR10) supports the long distance movement of freight by heavy goods vehicles along national and regional roads. Sensitive landscapes, habitats and biodiversity associated with coastal locations could be affected by port development (need to check). Recommendations for improvements to the policies include:

- Policy TR6 could further support sustainable tourism (both into and out of the region) by ensuring that port, ferry and rail operators work together to integrate and link rail and sea travel, and make it easier and attractive for cyclists to journey long distances by rail and ferry as well.
- Policy TR6 should take into account the vulnerability of coastal landscapes, habitats and biodiversity to port activity and development.
- Policy TR10 should include the reference to encouraging ‘local supply chains to minimise the need for long distance freight movement’ currently in para. 5.5.4 of the supporting text. In addition, Policy TR11 could include the phrase “developments which generate high volumes of freight movements should be located close to appropriate rail or water freight facilities to support more sustainable distribution in the South West” currently in para. 5.54 of the supporting text.
- TR11 should seek to work harder at improving the scope and viability of rail freight (as discussed in paras 5.5.5-5.5.7 of the supporting text) and more emphasis should be placed on improving the use of rail and shipping to transport freight than road.
**Policy TR7: Airports**

11.16. Policy TR7 seeks to meet an increasing proportion of regional demand for air travel to reduce ‘leakage’ to other regions and London airports, with the implied advantage of reducing the environmental damage of people travelling to airports in the South East of England. This is misleading for two reasons. First, the climate change impacts of surface transport per passenger kilometre are lower than air travel, so for climate change it is better for people to do as much of their journey by surface as possible before flying. Second, Government policy is not to displace flights from the South East to other regions, but to increase capacity both inside and outside the South East. Therefore increases in the South West will not displace flights from the South East, but will create space for further overall expansion.

- The RSS should explicitly resist airport expansion, because it would undermine all the efforts within other sections of the RSS to reduce greenhouse gas emissions.

**Conclusions and recommendations**

11.17. Section 5 contains a number of aims and measures that strongly support sustainable transport modes. However, many of these are contained in the supporting text, but not made explicit in the policies, for example, the modal shift measures listed in para. 5.1.3. are not reiterated in Policy TR1. In addition a number of the measures for demand management are not tough enough, for example, reference to ‘parking strategies’ in para. 5.1.4. The RSS needs to be more assertive and explicit about stricter demand management measures such as road user charging and parking space reduction. There is no policy for parking included in Section 5, only a discussion about it not being practical or desirable to apply a uniform set of parking standards in the South West region. Reduced standards should be applied wherever practicable, and local planning authorities should avoid seeking competitive advantage from laxer parking standards than circumstances would allow and neighbouring authorities are achieving.

11.18. The reliance on improving connectivity to achieve the objectives of the RSS needs to be proven. To be more sustainable, improving connectivity should focus attention on significantly improving rail links rather than the road network, as currently the policies in Section 5 will result in increased car use and greenhouse gas emissions. Improved rail links will bring their own landscape and biodiversity implications, but overall are likely to prove less environmentally damaging than road improvements, in particular because they should reduce the need and desire to travel by car, and therefore reduce greenhouse gas emissions.

11.19. The references to ‘step change’ in the use of public transport are welcome (para. 5.1.6). However, a step change will not be achieved by incremental improvements to current better practice. ‘Step change’ means a flip to (for example) neighbourhoods where driving is something people only do exceptionally, e.g. when infirm relatives visit or heavy furniture needs to be moved. This is not the same as making the bus services a little bit better so people use them a bit more often. A step change in the use of public transport would be achieved by integrated transport planning of whole neighbourhoods or corridors including fully frequent and reliable public transport,
plus re-concentration of amenities in centres that are easy to walk to and restrictions on car use. These measures would each make the others effective and viable.

11.20. Paragraph 5.0.3 refers to initial findings from the SSA and correctly reports that the SSA questioned the extent to which the regional approach to transport could lead to a reduction in traffic in the absence of greater national and regional intervention such as road user charging and increased fuel prices. However, earlier SSA commentaries did not argue, as the paragraph states, that the region needs road improvements supported by economic intervention to stimulate business and employment in the far west of the region. Earlier SSA concerns, which still remain, are that the road capacity should not be increased until other measures are actually in place and working, to ensure that road capacity increases do not induce more traffic and car dependence, resulting in increased greenhouse gas emissions.

11.21. In addition, paragraph 5.0.2 still refers to “reducing rate of increase of emissions, as outlined in Section 1”. However, Paragraph 1.6.8 of the RSS and Policy SD2 state the regional approach, which is the need to reduce emissions, and not the rate of increase.

(May need to consider the implications, and say more, regarding rural parts of the region)

11.22. Finally, the ability of the South West to achieve a ‘step change’ towards more sustainable travel behaviour in the future, is highly dependent upon the support of central Government. Car travel is significantly cheaper than rail travel, and air travel is often cheaper than rail too – this situation could be reversed by fiscal policy. Investment in road improvements is often easier to secure than for rail. Support for bus services is also limited. Road user charging (as opposed to congestion charging) is also down to Government, as it is the inter-urban trips by car that are often as significant as commuting from rural areas into urban. Also, traffic movements do not recognise administrative or regional boundaries and so to address them requires a co-ordinated approach that central Government is best placed to take.

As discussed in Chapter 2, since the publication of the Scoping Report and SSA Report of the Possible Development Strategies in 2004, the SSA team has provided SSA commentaries and presentations to the SW RA on early versions of the RSS and subsequent iterations throughout 2005.
12. **SECTION 6 OF THE RSS: HARNESSING POPULATION GROWTH, MANAGING CHANGE AND ENSURING PEOPLE CAN PARTICIPATE IN SOCIETY**

Note: The Assessment of this Section of the RSS is still to be completed. The most significant issues that are likely to be discussed will be with respect to affordable housing:

- The RSS recognises the tension between policies which push for high density development in sustainable communities and consumer preferences (6.1.3) but the RSS is short on real guidance. It seems to say that LDDs have got to solve the conflict - but is not crystal clear that the strategic approach must be adhered to. Could an LDD go for lower density development because that is what local preferences dictate?

- The importance of setting sufficiently low thresholds (para 6.1.5) is justifiable in sustainability terms, but it could be questioned why is this more important in rural areas. Urban areas with a strong need for AH and a profile of sites which are generally small may also need to look to set very low thresholds. From a deliverability viewpoint - thresholds should be dictated by local circumstances not by type of location.

- Para 6.1.6 is not clear - is it a way of deep rural areas upping their housing numbers to help job/housing balance at the local level?

- Para. 6.1.7 - The affordable housing benchmark is 30% with 60% where need is greatest. There are two problems with the 60% - financially how will it be delivered and what levels of public subsidy does this entail? 60% could well be an unrealistically high % without grant unless it means some form of low cost home ownership with a very limited discount off market values. 60% of schemes of social rent without grant will almost invariably be non-starters (and some local authorities would struggle at 30%).

- The second issue is whether 60% affordable housing in mixed tenure schemes provides for mixed communities which are socially/economically sustainable. It depends on what the make-up of the 60% is but this figure is very high and the implications for new housing need to be thought through. It is not clear why getting a higher percentage of affordable housing on sites pushes up the build rate. What puts pressure on overall build rates is if a local authority fails to get a sufficiently high % of affordable housing on individual sites and so then has to turn to more mixed tenure schemes so it has more opportunity to deliver affordable housing to meet local need.

- So the main issue is in terms of delivery i.e. in tying in delivery of affordable housing with funding and economics of development. Aspirations are high but it
is not clear whether there is the public funding in the right places to deliver and/or what can be achieved without grant.

The issue of densities is discussed elsewhere in the SSA Report.

**Introduction**

12.1. **To be completed.**

**What does the RSS section say?**

12.2. **To be completed.**

**What are the likely effects on the SSA headline objectives?**

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
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<tbody>
<tr>
<td>Improve health</td>
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<td>To be completed.</td>
<td>To be completed.</td>
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<tr>
<td>Support communities that meet people's needs</td>
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<tr>
<td>Develop the economy in ways that meet people's needs</td>
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<td>To be completed.</td>
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<tr>
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<td>To be completed.</td>
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<td></td>
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<tr>
<td>Maintain and improve environmental quality and assets</td>
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<td>To be completed.</td>
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<td></td>
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<tr>
<td>Minimise consumption of natural resources</td>
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<td>To be completed.</td>
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</table>
What improvements (e.g. mitigation, enhancement) could be made?

12.3.
13. SECTION 7 OF THE RSS: ENHANCING DISTINCTIVE ENVIRONMENTS AND CULTURAL LIFE

Note: this Section is still be to subject to detailed QA review

Introduction
13.1. Section 7 presents a series of policies intended to improve quality of life in the region through the sustainable planning and management of environmental, cultural and natural resources. It describes the opportunities and pressures posed by increased growth and development in the region. The policies within this section aim to contribute to the creation of a sustainable region and sustainable communities, through means such as wise resource use and the protection and enhancement of the region's distinctive natural and cultural heritage. Some policies in this section take the form of proposed mitigation for spatial development policies elsewhere in the RSS, while others aim to ensure development is directed to locations where negative impacts on the environment will be minimised. Together, the policies within Section 7 provide a means by which the spatial strategy can harness the opportunities presented by the region's assets, and at the same time protect and enhance them. Section 7 is divided into the following components:

- Enhancing Cultural Activity and Developing the Regional Cultural Infrastructure.
- Protecting and Enhancing Our Distinctive Environments: Conserving and Enhancing the South West’s Environmental Assets.
- Wiser Use of Natural Resources.
- Waste Management.

What does the RSS section say?

Enhancing Cultural Activity and Developing the Regional Cultural Infrastructure

13.2. Section 7 recognises the importance of the region’s nationally and internationally significant cultural assets, and aims to present cultural activity and infrastructure development as a key tool to support the Spatial Strategy, in terms of encouraging more people to live and work in the SSCTs, and helping to ‘shape sustainable communities’ through greater participation and improved quality of life. These intentions are expressed through Policy C 1.

Protecting and Enhancing Our Distinctive Environments: Conserving and Enhancing the South West’s Environmental Assets

13.3. The Section recognises the role of the natural environment in shaping the character and distinctiveness of the South West. The region’s natural assets are seen to be ‘at the heart of the strategic approach to managing growth contained in the spatial
strategy’. The environment as an ‘economic driver’ is seen as an important tool in attracting investment and developing the economy, drawing links with the RSDF and RES. Development is to be used in a positive way to enhance assets and harness opportunities for biodiversity. Policy ENV 1 sets out the priority for the protection of environmental assets and presents a sequential approach for local authorities to apply.

13.4. The importance of landscape character in shaping the identity of the South West is evident through Policies ENV 2 – 3. There is strong support in this section for existing landscape management tools such as Landscape Character Assessment, and respect for statutory instruments such as protected landscape designations. The social and economic value of landscape is promoted throughout the section.

13.5. The approach to nature conservation, as outlined in Policy ENV 4 and supporting text is strongly linked to the UK and South West Biodiversity Action Plans (BAPs). Maintenance, restoration, and recreation are integral to the approach, to be implemented through LDDs.

13.6. ENV 5 outlines the role of local authorities in identifying, assessing and ensuring the sensitive management of historical assets. Recognising the importance of both the protected and unprotected historic environment, the section emphasises both protection and opportunity. The historic environment is also part of the ‘environment driver’ approach taken. The opportunities posed by these assets are to be exploited for economic gain (through tourism and heritage based regeneration), and also to improve quality of life.

13.7. CO 1 and supporting text outlines the importance of the region’s coast from an environmental, social, and economic perspective. It outlines the challenges the coast faces considering climate change, and refers to the importance of a cross boundary/partnership approach to defining and protecting the coastal zone.

**Wiser Use of Natural Resources**

13.8. Policy F1 and supporting text recognises the threats posed by climate change, and the need to adapt and defend accordingly. The section recognises the opportunities for exploiting the benefits of natural flooding for biodiversity and nature conservation, and presents the approach for guiding investment and land use planning decisions to reduce flood risk. The role of Local Development Documents is outlined, including the location of development and role of management plans in minimising vulnerability to flooding.

13.9. Energy policies RE 1- RE 5 aim to minimise the negative impacts of the increase in consumption as a result of growing demand for the built environment. The section presents renewable energy targets for the region based on the 2003 Energy White Paper and the Revision 2010 project (RE 1). The approach to coastal zones and offshore energy opportunities are addressed through RE 2, and the opportunities for renewable heat in the region are addressed through RE 3. RE 4 considers the role of local planning authorities and the development control process to ensure maximum social and economic benefits and minimum negative impact on the environment. RE 5 presents the ‘energy hierarchy’ and the role of sustainable construction and design,
and outlines renewable requirements for new development. It is assumed that the strategy for implementing renewables with existing housing and development stock will be addressed through the (forthcoming) regional sustainable energy strategy.

13.10. RE 6 provides a means by which a number of water management strategies can be brought together to form a strategic approach to water management in the South West. The policy and text recognise the key pressures on water management in the region: climate change; and growth. The policy presents a positive approach to minimising pressure, through e.g. sustainable construction and ensuring growth does not exceed resource capacity, as well as impact mitigation through co-operation between local authorities and bodies such as the Environment Agency.

13.11. Land management objectives are integrated at the local level but reflect regional objectives, and to ensure best and most versatile (BMV) land is considered when deciding between sites. It aims to provide some level of certainty in the light of agricultural reform. It provides overall guidance for the RSS to ensure that at the development plan level, land and associated resources are considered holistically and efficiently for the most appropriate outcome.

13.12. The South West contains 20% of woodland and 20% of all Ancient Woodland in England. Section 7 aims to ensure local authorities take account of the Regional Woodland and Forestry Framework (RWFF). The policy contains criteria for the maintenance of woodland at 2005 levels, consistent with the RWFF. The value of the region’s woodland and forests is put in the context of the rest of the RSS, making significant links to the provision of green infrastructure and the role of sustainable tourism and construction. The importance of woodlands and forests as a local resource in rural areas is emphasised. The policy has significant implications for the protection and enhancement of woodland habitats and species.

13.13. RE 8 aims to both reduce pollution and encourage sustainable developments with minimal negative air quality impacts. The policy focuses on the 12 local authority areas where national Air Quality Objectives are not likely to be achieved. The policy represents an example of mitigation for policies elsewhere in the RSS that support growth.

13.14. Minerals and aggregates extraction are major sources of employment in the South West. These policies provide an approach for the location, management and type of mineral and aggregates extraction. The policies provide means by which the siting of facilities causes minimum impact to the environment and landscape, as well as an approach to minimising the consumption and extraction of minerals and aggregates. The application of the proximity principle and the approach to transport is particularly important.

**Waste Management**

13.15. Waste management represents one of the greatest challenges facing the region in light of growth proposed in the RSS, and the timescale of the plan’s implementation. Policies W 1-4 provide guidance for the approach to location, management and type of new waste facilities and technologies. The local as well as regional and national
implications are considered, from sustainable construction and design to the application of the proximity principle. The waste hierarchy underpins the policies.

**What are the likely effects on the SSA headline objectives?**

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
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<tbody>
<tr>
<td><strong>Improve health</strong></td>
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<tr>
<td>Section 7 policies have the potential to improve health in the region in a number of ways:</td>
<td></td>
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<tr>
<td>Wellbeing and quality of life may be improved through enhancing people’s surroundings. This may be done by improving cultural activity and infrastructure (C1), and the protection and enhancement of environmental assets (ENV 1 and 5).</td>
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<td>Improvements to health can be achieved through the promotion of physical exercise and outdoor recreation in an enhanced and accessible environment (ENV 2, 3 &amp; 4, CO 1, and RE 7).</td>
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<tr>
<td>Improvements to, and minimisation of, the factors which present physical risk or contribute to ill-health may be achieved through Section 7 policies by:</td>
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<tr>
<td>• Minimising flood risk (F1);</td>
<td>None specifically identified.</td>
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<tr>
<td>• Reducing greenhouse gas emissions and improving air quality (RE 1-5 and RE 8); and the</td>
<td></td>
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<tr>
<td>• Adequate provision of safe drinking water (RE 6).</td>
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<tr>
<td>Positive impacts to health as a result of Section 7 policies are mainly indirect, but are likely to be region-wide and permanent.</td>
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<td><strong>Support communities that meet people’s needs</strong></td>
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<td>The policies outlined in Section 7 would support communities which meet people’s needs primarily through providing the means by which people can participate in society and through encouraging inclusive, vibrant communities which are capable of self-sufficiency (e.g. with respect to energy and waste).</td>
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<td>Improving access to and enhancing cultural and heritage based assets in the South West presents a major part of this (C1 and ENV 5).</td>
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<td>Recognising and fulfilling the opportunities posed by the region’s assets for economic gain, can also have social benefits (C1, ENV 4, ENV 5).</td>
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<td>Improvements to the efficiency of resource use (RE 5, RE 6) may help to reduce living costs in new and adapted developments.</td>
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<tr>
<td>Measures to mitigate or avoid damage or harm to communities and the environment in the long term can often have short term negative implications. For example, Policy F1 could lead to the displacement of people from their chosen location/community.</td>
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</tr>
<tr>
<td>The short-term negative impacts can also be economic. RE 5 could have a short-term impact on housing affordability, as possible increased cost to developers could be passed on to buyers.</td>
<td></td>
</tr>
</tbody>
</table>
Positive effects

Develop the economy in ways that meet people’s needs

The ‘environment driver’ concept appears to underpin much of the approach taken to the protection and enhancement of environmental assets through Section 7.

The economic potential of environmental assets is to be harnessed through tourism and heritage-based regeneration (ENV 1, ENV 4, ENV 5, CO 1, and RE 7).

Policies aim to build on existing skills bases to improve employment (W 1-4, RE 1-5).

The promotion of self-sufficiency and recognition of the impacts of climate change are likely to improve communities’ independence as well as reinforce their ability to adapt to the impacts of climate change (CO 1, F1, RES 6, RE 1-5 and RE 7).

This headline objective is integral to the statement on sustainable land management.

Provide access to meet people’s needs with least damage to the environment

The proximity principle and reducing the need to travel by road are key features of some of the Section 7 policies (RE 8, W 1-4).

Reducing the need to travel, freight transportation by sustainable modes, and the proximity principle for waste should all contribute to minimising damage to the environment (RE 8, W 2).

The focus on protection of the environment as an ‘economic driver’ in (ENV 1), has the potential to encourage car based trips e.g. through the visitor economy.

The positive effect of RE 8 will only apply if the policy is implemented at the local level. Economic/infrastructure development may take precedence over those which support sustainable transport modes, e.g. the expansion/development of airports/strategic road routes.

Maintain and improve environmental quality and assets

Maintaining and improving environmental quality and assets is outlined in the RSS as a key intention of Section 7. It is not surprising that the policies have the potential to provide positive contribution to this headline objective in a number of ways.

Many of the policies will have a positive impact on habitats and species by both directly protecting them from damage by development (ENV 1-4, RE 7), and improving and enhancing the environment/elements on which they depend (CO 1, F1, RE 1-5, RE 6, RE 8).

None specifically identified.

Negative effects

It is necessary to ensure that a balance has been struck between development and protection.

One of the main disadvantages of the ‘environment driver’ approach is the possibility that improvements may increase visitor numbers. This has positive implications for the economy but could cause damage to the assets themselves through visitor pressure (ENV 4 & 5, CO 1, RE 7). One of the strengths of parts of the South West are their remoteness and tranquillity.

None specifically identified.
### Positive effects

Diversity and distinctiveness are supported throughout the Section; in ENV 1-5 and RE 7 through recognition of the natural features which contribute to local distinctiveness and means by which this can be protected and opportunities harnessed.

The importance of adaptability to climate change is recognised through much of the Section. This includes reducing vulnerability of at risk areas through location of development (C 1 and F1), enhancing resilience of species and habitats (ENV 4), and harnessing opportunities posed by the impacts of climate change such as flooding (CO 1, and F1).

Policies in this Section recognise the importance of landscapes and townscapes and their potential as economic and social assets. CI, ENV 1 and 5 aim to do this directly, while indirect advantages for landscape and townscape protection should result from policies F1 (protection from flooding), RE 6 (through ensuring an adequate supply of suitable water resources), W 1-4 (through sensitive siting and integrated design), and RE 8 through a reduction in acid rain and associated erosion.

### Minimise consumption of natural resources

There are several ways in which Section 7 policies aim to minimise the consumption of natural resources. Impacts are generally long-term; impacts are mainly direct, region-wide and permanent.

Policies contribute to the headline objective by:
- Aiming to reduce consumption of virgin/finite resources (RE 1-5, RE 6, RE 9-11, W 1-4 (Directly through recycling, and indirectly though minimising the extraction of virgin resources)); and
- Aiming to increase efficiency of existing and new development and communities (ENV 4, RE 1-5, RES 6, RE 8, W 1-4).

### Negative effects

None specifically identified.

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**What improvements (e.g. mitigation, enhancement) could be made?**

**Enhancing Cultural Activity and Developing the Regional Cultural Infrastructure**

13.16. The inclusion in Section 7 of the role of cultural infrastructure presents these assets as part of the ‘environment driver’ approach. Recognition of these assets and the opportunities posed by them for the region, in terms of regeneration, visitor economy, and participation in cultural life represents a sound acknowledgment of...
these assets. It is important to ensure that the exploitation of these assets does not ultimately lead to damage, loss or erosion. Opportunities (e.g. the Olympic Games) should be harnessed, but the negative implications of increased visitor numbers (i.e. pressures on transport/resources/the assets themselves such as sensitive coastal environments) must be considered when developing proposals.

Protecting and Enhancing Our Distinctive Environments: Conserving and Enhancing the South West’s Environmental Assets

13.17. ENV 1 suggests that environmental assets are ‘at the heart of strategic approach to managing growth’ (7.2.1). The policy should have clear sustainability benefits and contribute the fulfilment of many of the conservation sustainability objectives. However, there is a strong focus on the importance of environmental assets in the region as ‘economic drivers’. While the role of the environment as an economic driver in the RES is clear, and the RSS is to be consistent with this, there is less mention of the intrinsic and social value of the region’s environmental assets, or the implications for emissions and pressure on the environment as a result of attracting visitors and investment. The approach should be two-way – using the quality of the environment to attract investment, and using the investment to protect and enhance the environment.

13.18. ENV1 also includes a sequential approach to development that aims to protect, mitigate and compensate for loss of environmental assets from development. It is suggested that, where loss of environmental assets might take place, the need for development should be questioned. If it can be proven that there is an over-riding need for the development, then alternative forms and locations should be considered that provide similar benefits, before resorting to mitigation and compensation.

13.19. ENV2, ENV3 and ENV4 are good policies for sustainability. ENV3 could mention Heritage Coasts as well as National Parks and AONBs.

13.20. The text of ENV 4 states that where development increases the urban footprint, proposals to create new habitats are included in master plans. Some clarification of whether this is as mitigation, suggesting development has priority, or an additional nature conservation tool may be useful. Some clarification of the status of this policy in relation to those in Sections 3 & 4 may be necessary, as the English Nature ‘nature map’ shows wildlife-rich habitats in close proximity to SSCTs.

13.21. It is necessary to ensure the level and location of proposed development in CO 1 is sustainable – ‘presumptions against development’ go some way to ensuring this. These could be made part of the actual highlighted policy text. The first criterion could be replaced with ‘contributes to the unspoilt character and appearance of the coast’.

13.22. Flood policy (F1) could be improved by including more emphasis on reducing the causes of flooding rather than simply adaptation. The policy and supporting text mentions a number of plans and strategies, but there is no specific mention of River Basin Management Plans, as required under the Water Framework Directive to make the link with water quality and water resources. More explicit definition of what is classified at ‘vital social or economic assets’ may be appropriate.
13.23. The Environment Agency has produced a map of the increased frequency of severe tidal flooding in the 2080s on the coast of the South West, which estimates that the whole of the South West coast will have between a 2.3-12.5% chance of flooding in one year. Predicted frequencies are particularly high on the Cornish and North Devon coasts. Development in the SSCTs in the high risk areas and throughout the South West must account for these medium term predictions in order to reduce vulnerability.

13.24. The Environment Agency/English Nature are producing a flood risk review to assist the SW RA in their review of the findings of the JSAs in relation to flood risk and the Habitats Directive.\(^45\) This details the settlements at risk from flooding (e.g. Taunton), and the areas where consultation regarding flood risk would need to be sought from English Nature (e.g. The River Avon). The review also outlines areas where low risk sites are available (e.g. Throop). Policy F1 and/or supporting text should include some reference to the flood risk review as an aid to guiding development in the region, and the findings should be reflected in the sub-regional components of Section 4 of the RSS.

**Wiser Use of Natural Resources**

13.25. Energy policies at the local level need to ensure requirements of RE 5 do not affect affordability; this is especially important in the most deprived areas. Reduction in fuel poverty as set out in the UK Fuel Poverty Strategy, and reiterated in the 2003 Energy White Paper aims to end fuel poverty in vulnerable households in England and Northern Ireland by 2010\(^46\). While improving income has been one of the major means by which to minimise fuel poverty so far, the role of producing affordable renewable energy in affordable energy efficient homes should be referred to in the RSS as a means to contribute to meeting the UK’s 2010 targets. The policies must be consistent with targets and figures from the emerging Energy Review.

13.26. While 7.3.9 considers landscape and visual impact in general, it may be appropriate to ensure within RE 4 that non-statutory areas may also be sensitive. There is a need to ensure the dti energy review (2006 consultation) is taken into account the next draft RSS.

13.27. Policy on water resources successfully brings together a number of strategies, recognising key pressures on the region in the light of proposed growth. The policies aim to both minimise pressure on resources and mitigate inevitable impacts. Links could be made to flood risk policy. Impacts of changes in development patterns in neighbouring regions must be recognised in the RSS, such as the pressure on supply to Wessex Water’s North, South and East zones; Bournemouth and West Hampshire Water’s Bournemouth zone and Thames Water’s SWOX zone (Environment Agency Supplementary Report on Water Resources, January 2006). The policy recognises the need for consistency with catchment abstraction strategies, but it may be necessary to specifically ensure that local authorities through their LDDs have taken account of the findings of the report and the implications for the scale and location of development in the region.

\(^45\) SW RSS JSA Flood Risk Review (Notes of Meeting) January 2006.
One of the major issues highlighted in the Environment Agency supplementary report is that modelled household growth in the catchments of the Severn and South West Oxfordshire (SWOX) ‘resource zones’ is substantially higher than the Agency’s March 2005 report. While majority of the zone lies outside the South West, the smaller proportions of these zones that lie in the SW region contain major population centres of Gloucester and Cheltenham in the Severn zone and Swindon in the SWOX zone, which in the RSS are classified as SSCTs. These zones could be in deficit by 2009/10 without significant intervention (e.g. water efficiency, leakage control, etc.). The RSS must consider the consequences of growth outside the region’s boundaries alongside the South West region to confirm that water supply will be available across the whole zone.

The Environment Agency report ‘RSS SW (RSS 10) Waste water treatment and disposal: A Summary of the Environmental Issues Affecting the Main Settlements’ (V3 Feb 2006) considers the likely implications of increasing the population served by these facilities by 25% and suggests where tight environmental and treatment constraints indicate that careful review of the growth plans for these settlements is necessary. Four settlements are highlighted as causing concern: Swindon, Cheltenham, Falmouth/Truro and Salisbury. Swindon’s water treatment issues were raised by RPG 10, and detailed studies are underway to develop a plan for the long-term management of waste water for Swindon. These issues must be considered through the RSS.

The approach taken to sustainable land management is an important tool in ensuring the sustainability of the RSS. At the moment the statement is quite general, and could be clearer by listing specific criteria that should be taken into account (many of which are mentioned in the supporting text).

Policy on woodlands and forests (RE 7) provides good links with other parts of the RSS. The focus on the advantages for rural areas and new development links well to other sustainability objectives. It may be useful to provide further guidance for local authorities where replacement for ‘appropriate woodland on at least the same scale’ is required. It could be suggested that local authorities include guidelines within LDDs. The policy refers to ‘unavoidable loss’. A definition of this may be appropriate in the supporting text to give the statement added weight, as it is likely that there will be few instances where woodland loss cannot be avoided. The possible negative implications of encouraging tourism, such as the use of unsustainable modes of travel and pressures on the woodland and forest habitats themselves must be taken into account in local strategies. The policy wording of ‘sustainable tourism’ is encouraging. Some expansion of the requirements for LPAs to include requirements for replacement woodlands may make contributions easier to apply at the local level.

Air quality policy plays an important role in both reducing pollution and encouraging sustainable developments with minimal negative air quality impacts. The policy focuses on the 12 local authority areas where national Air Quality Objectives are not likely to be achieved. The policy represents an example of mitigation for policies elsewhere in the RSS. It provides welcome support to minimise the ‘ecological footprint’ of growth proposed elsewhere in the RSS.
13.33. Minerals and aggregates extraction are major sources of employment in the South West. The Section 7 policies provide an approach for the location, management and type of mineral and aggregates extraction. The policies generally scored well against the objectives. Where negatives were noted, this is often because of the existing negative impacts of unavoidable extraction. The ‘Technical and Strategic Assessment of Aggregate Supply Options in the South West Region’ report by Capita Symonds Ltd for SWRA (June 2005) considers alternative scenarios for aggregates in the region, and places particular emphasis on environmental protection, especially within designated areas. The report concludes that these issues need to be properly balanced against other environmental factors (such as those relating to aggregates transportation) and considered alongside the various social and economic implications involved within the overall context of sustainability. Further work is required by the SSA to determine whether this has been achieved.

Waste Management

13.34. Waste policies in Section 7 seem to focus on management and mitigation of the impact of waste. More emphasis on reducing the production of waste in the first instance (e.g. by reducing consumption) would put waste management into the sustainability context of the RSS as a whole. The sustainability of the policies is likely to be good as they are based strongly on the Regional Waste Strategy which underwent ‘Best Practicable Environmental Option’ (BPEO) screening in 2003\(^{47}\). The policies would be enhanced with recognition of the importance of community-based waste management initiatives used to raise awareness of waste management options. These are supported in the Regional Waste Strategy (2003).

Conclusions and recommendations

13.35. As suggested above, Section 7 appears to act as both mitigation for policies elsewhere in the RSS, and a means by which the South West can contribute to wider national and international sustainability targets, as well as those set within the region itself. The contents of the policies appear to directly address some of the sustainability objectives, such as minimising the consumption of resources.

13.36. In addition, it is clear that earlier comments arising from the SSA have been taken on board, for example with respect to the energy and waste policies.

13.37. The policies within this section appear to have a sound evidence base, and successfully link a number of strategies in the region, evident particularly in waste and water resource policies. The implications of this inclusion for the sustainability objectives is positive as strategies are likely to have gone through their own screening and/ or consultation process and localised analysis.

13.38. The section recognises the way in which the region’s assets and distinctiveness can be used for economic and social advantage. However, the focus on the ‘environment driver’ approach has positive implications for the economy but could have negative

implications for the environment through the possibility of increased visitor pressure on the environment and encouraging travel by unsustainable modes.

13.39. While Section 7 policies provide a means by which damage to the environment caused by growth may be mitigated, it is unclear the extent to which policies elsewhere in the RSS, such as transport policies, will contradict these intentions to the extent that regional and national targets will not be met for the South West.

13.40. Analysis of research on water resources highlighted the need to recognise the influence of changes in development patterns outside the boundaries of the South West, and the implications of this for development in the region. The Severn and South West Oxfordshire water resource zones are particularly vulnerable in the short-term in this respect.

13.41. The RSS could be more explicit with ensuring development proposed in Sections 3 & 4 is within global, national, regional and local environmental capacity. This could be helped by using the opportunity this chapter presents to explain what is meant in a South West context by the phrase ‘environmental limits’ that is included in Policy SD3. Because the chapter does not do this, it is unclear the extent to which development policies have precedence over environmental protection and enhancement policies. The ‘decision-making framework’ proposed in Section 1 of this SSA, would be a useful tool for determining this.

13.42. Similarly, stronger links could be made between this Section of the RSS and Policy SD4 ‘Sustainable Communities’.

13.43. Some of the policies present a general approach to the location of development that local planning authorities are to take into account when preparing Local Development Documents. When these apply to the development control process, it may be useful to have a list of criteria (e.g. for the land management statement) or quantifiable targets wherever possible, to aid the development control process.

13.44. Overall, the policies within Section 7 appear to achieve a good balance between improving the efficiency of existing development, and ensuring future development is sustainable. The policies represent a key tool in ensuring the sustainability of the RSS, but their success depends on their implementation at the local level. This may be difficult in some cases, as the objectives of the policies often conflict with the ability to achieve rapid ‘growth’.
14. **SECTION 8 OF THE RSS: ENHANCING ECONOMIC PROSPERITY AND QUALITY OF EMPLOYMENT OPPORTUNITY**

**Introduction**

14.1. Section 8 of the RSS discusses the relationship of the RSS to the Regional Economic Strategy (RES) and how the spatial strategy and sub regional emphases in Section 3 of the RSS aim to enable economic development where needed, principally in the Strategically Significant Cities and Towns (SSCTs) identified in Development Policy A of the RSS and the other towns described in Development Policy B. The RSS supports the RES vision and Section 8 provides specific policies that enable the RES vision to be realised in spatial terms.

**What does the RSS section say?**

14.2. Section 8 refers to the pronounced east to west gradient of productivity in the South West region, and links its purpose to the spatial priorities for interventions set out in Section 3 to enable economic development to tackle the deeper seated regeneration needs of the Western Peninsula and to realise the economic potential of the SSCTs in the Centre and North of the region. The purpose of Section 8 is to set out specific principles and policies to enable that change to happen on the ground. It identifies a need to build on existing business success and further raise business productivity.

14.3. Section 8 draws on the State of the Region Report and evidence base from the RES to outline some of the key economic sectors in the South West. It notes that education and training are essential to support and develop business, and emphasises the need for growth of small businesses in rural areas, and that accessibility to broadband and future ICT communication technologies will reduce remoteness in rural areas.

14.4. Section 8 states that the principal role of the RSS in supporting competitive business is to ensure there is a ready supply of suitable sites and locations. Therefore, Policies E1 to E4 address the provision of employment sites, along with the need for regular review of the need for employment development sites. Policy E1 emphasises the use of the sequential test from PPG 4 when identifying sites for employment such that urban locations are considered in preference to outside urban areas.

14.5. Policies TC1 and TC2 address the provision of services and accessibility of town centres. They seek to enhance the vitality and viability of traditional town centres, and not to disadvantage them against out-of-town retail centres. The employment and town centre policies follow the overall spatial strategy concentrating development in the main urban areas of the South West, by enabling provision of

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employment sites and retail, cultural, leisure and office sites in the SSCTs and other towns.

14.6. Section 8 also seeks to improve the quality and sustainability of tourism in the South West (one of the key economic sectors identified in the RES), and Policies TO1 and TO2 encourage investment in provision, or improvement, of tourism facilities that leads to a more sustainable tourism industry, and seeks to reduce pressure on areas already under greatest pressure from the tourism market.

14.7. Finally, the question of whether regional and large casinos could serve to support and further develop the region’s tourism “product” is discussed in Section 8.6, but no policies are included. The RSS states that casinos could offer a high profile visitor experience and may offer significant opportunities to assist regeneration in appropriate locations. This Section of the RSS recognises that there are both positive and negative impacts of casinos. Section 8 does not include a policy for casinos, but it states that several local authorities are likely to “bid” for a large casino, and provides criteria in the text for consideration of the location of any Regional Casinos if one were to be allocated to the South West.

What are the likely effects on the SSA headline objectives?

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Improve health</strong></td>
<td></td>
</tr>
<tr>
<td>Policies E1-E4 may provide some opportunities for improving health through job creation, and reference to health and reducing economic disparity in the region.</td>
<td>None identified.</td>
</tr>
<tr>
<td>Policies TC1 and TC2 and TO1 and TO2 should contribute to improving health and health inequalities by improving access to services, leisure, recreation and culture for everyone in the region.</td>
<td></td>
</tr>
<tr>
<td>Policies TC2 and TO2 also seek to improve the accessibility of town centres, other significant retail centres and tourism attractions by public transport, cycling and walking, which may help to promote healthy lifestyles.</td>
<td></td>
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<tr>
<td>The effects are likely to be indirect, region-wide, and permanent.</td>
<td></td>
</tr>
<tr>
<td><strong>Support communities that meet people’s needs</strong></td>
<td></td>
</tr>
<tr>
<td>Identification and provision of a range of employment sites (Policies E1-E4), culture, leisure (Policy TC1) and tourism facilities (Policy TO1) should help to significantly improve access to learning, training, skills and knowledge, increase access to and participation in cultural activities and promote more vibrant communities. A strong, stable and sustainable economy, reduced inequalities, and vibrant town centres should help to reduce the incentive to carry out crime.</td>
<td>None identified.</td>
</tr>
<tr>
<td>Positive effects</td>
<td>Negative effects</td>
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<tr>
<td>------------------</td>
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</tr>
<tr>
<td><strong>Most effects are likely to be indirect (except for increasing access to and participation in cultural activities), region-wide, and permanent.</strong></td>
<td><strong>Minimising the need to travel is not mentioned specifically in the policies E1-E4, which could undermine meeting local needs locally if people still travel long distances for services, employment and retail facilities.</strong></td>
</tr>
<tr>
<td><strong>Develop the economy in ways that meet people's needs</strong></td>
<td><strong>The emphasis on time/distance to London could decrease the circulation of wealth in the region.</strong></td>
</tr>
<tr>
<td><strong>Policies E1-E4 should help to improve access to satisfying work opportunities, help more people to afford a comfortable standard of living, reduce income disparity. The policies should also contribute to a better alignment of jobs, homes and services (a key guiding principle for the RSS in Policies SD1, SD2 and SD4), which should in turn help to minimise the need to travel.</strong></td>
<td><strong>Economic activity and development specifically relating to the needs of an ageing and retired population are clearly addressed.</strong></td>
</tr>
<tr>
<td><strong>Policy TC1 should contribute to meeting local needs locally and increasing the circulation of wealth within the region, provided the types of business and retail facilities are based on the up-to-date understanding of needs and function of the town centres required in the supporting text for TC1. Improving the accessibility of town centres by public transport, cycling and walking (TC2) should also help to reduce costs of travel and enable those who can not afford a car to access services, which may in turn contribute to reducing poverty and income inequality. Improvements to the retail, cultural and leisure provision of SSCTs and Other Towns in the South West may encourage people to stay in/visit the South West for holidays rather than go further afield, helping to reduce the vulnerability of the economy to climate change (by minimising the need to travel by car and air).</strong></td>
<td><strong>Some economic opportunities in more rural locations may be ruled out.</strong></td>
</tr>
<tr>
<td><strong>Policies TO1 and TO2 seek investment in sustainable tourism and to improve the quality of its overall “offer” and should therefore help to increase access to satisfying work opportunities and also to increase the circulation of wealth within the region, particularly if it encourages more people to holiday in the South West.</strong></td>
<td><strong>Economic activity and development specifically relating to the needs of an ageing and retired population are clearly addressed.</strong></td>
</tr>
<tr>
<td><strong>The effects are likely to be direct, region-wide, and permanent.</strong></td>
<td><strong>Economic activity and development specifically relating to the needs of an ageing and retired population are clearly addressed.</strong></td>
</tr>
<tr>
<td><strong>E4 aims to safeguard waterside sites for social and economic uses that require a waterside location, giving priority to maritime industries, thus the economic potential of the coast should be harnessed. However, the policy does not refer to the potential impacts of these uses and industries on the marine environment or their potential vulnerability to flooding due to climate change. Six of the SSCTs and a number of the Other Towns are on the coast. It is uncertain whether the provision of retail, office, cultural and leisure development in these towns will impact positively or negatively on the coast. It is also uncertain whether the tourism improvements delivered under TO1 will impact positively or negatively on the coast given that the region’s Heritage Coast, beaches of Cornwall, Devon and Bournemouth and many coastal towns are major tourism attractions.</strong></td>
<td><strong>Provide access to meet people’s needs with least damage to the environment</strong></td>
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<tr>
<td>Positive effects</td>
<td>Negative effects</td>
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<tr>
<td>Policies E1-E4 do not refer to sustainable modes of transport as a consideration when identifying employment sites, thus it is uncertain whether provision of employment sites will reduce the need/desire to travel by car or help everyone access basic services. The supporting text refers to delivering the economic benefits listed in para. 8.3.5, which include the role of airports and ports as key economic drivers. It is not clear whether this will encourage a switch in freight transport to rail or water, and promoting airport related economic development is unsustainable.</td>
<td>None identified.</td>
</tr>
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</table>

Maintain and improve environmental quality and assets

Policies E1-E4 should significantly benefit the conservation and wise use of land.

The effects of town centre development on habitats, landscapes and townscapes is difficult to judge, given the fact that this is best determined on a site-by-site basis. However, concentrating retail, cultural, leisure and office provision in the SSCTs and Other Towns should help to avoid potential impacts outside of these centres. Policies TC1 and TC2 should help to maintain and enhance cultural assets, and may help to protect diversity and local distinctiveness by requiring Local Authorities to use up-to-date and robust assessments of needs, vitality and viability and functional roles of town centres when deciding on rates and types of retail, cultural, leisure and office provision.

Some of the region’s recognised tourism destinations and attractions include environmental assets such as landscapes and the coast as well as cultural and historic assets (e.g. AONBs, Heritage Coast and beaches, Stonehenge, Bath, Country Houses etc). Polices TO1 and TO2 do seek to protect and enhance these assets, but the effects of improvements to tourism facilities on habitats, landscapes and townscapes is difficult to judge.

The effects are likely to be indirect, region-wide, and permanent.

Minimise consumption of natural resources

Policy TC1 provides for employment/retail/cultural/leisure development within SSCTs and Other Towns

These policies do not address consumption of natural
<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
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<tbody>
<tr>
<td>from Policies A and B. Work undertaken by the Environment Agency suggests that development within these cities and towns can be served with water within local carrying capacity limits, although subject to investment in new resources and improved conservation.</td>
<td>resources with the exception of the supporting text for the tourism policies which lists sustainable use of resources as one of the measures for lessening the impacts of tourism related development. The whole of this Section is premised on the basis of high levels of economic growth. There is one reference to climate change, but overall the strategy will almost certainly lead to an increase in greenhouse gas emissions.</td>
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</table>

**What improvements (e.g. mitigation, enhancement) could be made?**

**Policies E1-E4: provision of employment sites**

14.8. Policies E1 to E4 seek to ensure a ready supply of sites and buildings for employment uses in the South West in suitable locations, by prioritising land within the SSCTs in Policy A, then the other towns in Policy B. Therefore, the policies should contribute to a better balance between jobs, homes and services in the region, providing more employment opportunities, access to learning and training, and helping to minimise the need to travel. Local Authorities are encouraged to use the sequential test (from Annex D of the ODPM Employment Land Review guidance) when identifying sites, thus urban sites and previously developed land should be prioritised contributing to the conservation and wise use of land.

14.9. Environmental impacts of employment development and use of natural resources are not addressed specifically in the policies. These issues are covered by the environmental policies in Section 7 of the RSS.

14.10. Access to employment sites by sustainable modes of transport (rail, bus, bike and foot) should be made an explicit consideration when identifying employment sites, including the strategic employment sites discussed in paragraph 8.3.6. The supporting text for Policies E1-E4 makes reference in para. 8.3.4 to Annex D of the ODPM Employment Land Review guidance, and Policy E1 refers to the sequential test from the guidance, but it could also refer to Annex E of the guidance, which lists the types of site appraisal criteria that should be considered when identifying employment land. The criteria include ‘proximity to rail, sea and air freight’ and ‘access by public transport’.

14.11. Policy E4 aims to safeguard waterside sites for social and economic uses which require a waterside location, giving priority to maritime industries, thus the economic potential of the coast should be harnessed. However, the policy does not refer to the potential impacts of these uses and industries on the marine environment or their potential vulnerability to flooding due to climate change. It is considered that flood
risk, coastal impacts and climate change are adequately addressed elsewhere in the RSS.

14.12. Policy E1 is linked to Development Policies A, B and C, but otherwise there is little sense in the wording of the policies that make them South West specific. They offer a traditional approach to economic development based on the identification and review of employment sites. Given the emphasis within the RSS on the different roles and functions of settlements in the region, the different emphases for the three broad sub-regions identified in the Spatial Strategy Statement, it could be considered that there is a missed opportunity to reinforce this approach to economic activity in the policy wording itself, rather than in the supporting text.

14.13. There is reference to “promoting good/best practice and opportunities for business relating to the region’s unique cultural and environmental assets, including sustainable construction, climate change, resource efficiency and environmental technologies”. Given the need to reduce greenhouse gas emissions, and the commitment in the RSS to reducing the region’s ecological footprint in the long-term, there is a missed opportunity to have such an approach as central to the Section. The emphasis on high economic growth, access to competitive markets especially London, and airports as key economic drivers, are all likely to increase consumption of resources and greenhouse gas emissions.

14.14. There also needs to be recognition that high wage/high productivity/high skill occupations may not always be the solution. In parts of the region, such as the more rural western areas the inherent strengths are their remoteness, rurality, coastal proximity etc., which lend themselves to different types of economic activity. In addition, there are many essential jobs that do not need high skill levels, and which may not necessarily be highly productive in GVA terms. The key thing is to ensure that all jobs are valued and rewarding, and that all people have access to the essential requirements of quality of life, including a decent home, attractive living and working environments, and good quality community services.

14.15. Improvements to this Section include:

- Base the ‘keynote’ economic policies around strengthening the role and function of settlements as they relate to different parts of the region in line with the overall Spatial Strategy.
- Emphasise the importance of rewarding employment over and above high GVA jobs.
- Make stronger links between harnessing the economic benefits of the South West’s natural and cultural heritage, and supporting economic activity that helps to safeguard and maintain these assets.
- In rural areas, economic development that is compatible with a rural location, and that will secure or promote jobs for local people, could be encouraged where this can be shown to support the vitality and viability of rural communities, and reduce traffic including commuting.
• Economic development that is likely to generate significant increases in traffic should not be permitted.

• Make access to employment sites by sustainable modes of transport (rail, bus, bike and foot) a consideration when identifying employment sites, including the strategic employment sites.

• Encourage economic development that results in local supply chains, or a switch to freight by rail or water rather than road.

• Remove the reference to airports as air travel is particularly unsustainable.

• Economic development, including small-scale community-based schemes, that is in close proximity to more deprived neighbourhoods should be explicitly encouraged.

• Provide clearer guidance on the types, form and location and form of economic activity and development that is needed to cater for, and realise opportunities related to, an ageing and retired population.

• Place much greater emphasis on delivering economic activity that is integrated with other land uses, including mix-use, and in particular to small-scale business.

• Offer greater support to low carbon economic activity.

• In general, give greater encouragement to low environmental impact economic activity across all sectors.

Policies TC1 and TC2: City and Town Centres; Accessibility to Town Centres

14.16 The retail, leisure and office needs will differ widely between the SSCTs and other towns within the region. Effective delivery of these policies and the benefits they may bring of meeting local needs locally, increasing the circulation of wealth within the region, improving accessibility to services and reducing the need to travel by car, will be very much dependent on the use of up-to-date evidence base of the needs and function of the town centres as required in Policy TC1 and support for local-based business. The role and function of places in the South West is discussed in Section 2 of the RSS, and Policies TC1 and TC2 sit within the overall spatial strategy set out in Sections 3 and 4, which attempt to address the diversity of towns and villages in the urban and rural areas of the region. The supporting text mentions the need to retain local retail, post office and other community services in rural villages, but this does not come through positively in Policy TC2. Improvements to Policy TC1 include:

• Encourage greater living in city and town centres, which would help to make more efficient use of land (e.g. living over the shop) and promote vibrancy and vitality out of normal shopping/office hours, and would help to reduce the need to travel.

• Include specifically in the policy the need to ensure that town centre development enhances the feeling of safety.
• Where smaller towns and villages (or networks of them) provide an alternative and more sustainable mix to meet the needs of local more rural populations, consider providing greater support where this is consistent with reducing the need to travel by car.

• Include specifically in the policy the need to ensure that town centre development enhances the quality of the townscapes.

14.17. While the aim of TC2 is to improve the accessibility of town centres and other significant out-of-town retail centres by public transport, cycling and walking is to be commended, in order to reduce the desire to travel by car out-of-town centres and avoid disadvantaging traditional town centres, the experience and ease of access of town centres must be at least as good as the out-of-town centres. Improvements to Policy TC2 therefore include:

• Ensure that the attractiveness of alternative modes of travel to the car more than offset traffic demand management measures in order to encourage continued use of town centre access.

• Introduce parking charges are at least as high in out-of-town shopping centres as at any neighbouring town centre.

Policies TO1 and TO2: Investment in Sustainable Tourism; Development of Major New High Quality, High Profile Attractions

14.18. Policies TO1 and TO2 should contribute to improving health by improving access to recreation, leisure and cultural facilities for everyone in the region and contributing to regeneration/urban renaissance, which may help to improve local environments. Improving the accessibility of tourism attractions by public transport, cycling and walking, should also help to promote healthy lifestyles. However, achieving sustainable accessibility and reducing the need to travel are the last two measures for lessening the impact of tourism related development listed in para. 8.5.5. despite being the most important for sustainability.

14.19. Investing in sustainable tourism and improving the quality of its overall “offer” as discussed in para. 8.5.3 of the supporting text should help to promote stronger more vibrant communities and increase access to and participation in cultural activities, and satisfying work opportunities. Circulation of wealth within the region should be increased, particularly if improved tourism attractions encourage more people to holiday in the South West. The improvements to tourism in the South West could encourage more local residents to holiday in the region. The accessibility of these facilities by public transport needs to be improved and integrated with wider, intra- and inter-regional public transport routes, the need and desire to travel by car and air may not be reduced.

14.20. Some of the region’s recognised tourism destinations and attractions include environmental assets such as landscapes and the coast as well as cultural and historic assets (e.g. AONBs, Heritage Coast and beaches, Stonehenge, Bath, Country Houses etc). Policies TO1 and TO2 do seek to protect and enhance these assets, but the effects of improvements to tourism facilities on habitats, landscapes and townscapes
is difficult to judge. However, environmental effects are addressed by policies in Sections 1 and 7 of the RSS. There is no specific reference to wise use of land, flood risk or sea level rise, but these issues are also addressed in Sections 1 and 7 of the RSS. If the measures listed in para. 8.5.5 are heeded, to ensure impacts from tourism related development are lessened, then the policies should have the potential to positively benefit the economic potential of the coast.

14.21. Non-renewable energy consumption and 'greenhouse' emissions are not specifically mentioned. Unless the accessibility of tourism facilities by public transport is improved and integrated with wider, intra- and inter-regional public transport routes, the need and desire to travel by car and air may not be reduced, thus neither will greenhouse emissions. Water, minerals, waste and pollution are not mentioned in these policies. However, they are covered in Section 7 of the RSS, and the supporting text to Policies TO1 and TO2 includes sustainable use of resources and construction techniques as measures to lessen the impacts from tourism related development (although this should apply to all types of development in the region).

14.22. Improvements to these policies include:

- Consider the impacts and opportunities that climate change will have on the South West, and plan to minimise adverse effects and harness the benefits.

- Sustainable accessibility and reducing tourism related travel should be put first or incorporated into Policy TO1, and transport policy TR6 in Section 5, by:
  - promoting fewer, longer visits, rather than frequent, short breaks.
  - promoting closer markets (i.e. appealing to the local resident market).
  - coming by sustainable transport modes (i.e. sea, rail and cycle/pedestrian travel needs to be more 'joined up').
  - travelling while in the SW by rail, bus, bike and on foot.

- Policy TO1 seeks improvements to regeneration/urban renaissance in coastal resorts, market towns and larger urban areas, but could be widened to include investment from tourism in enhancing the natural and cultural assets of the South West, encouraging eco-tourism, and use of local products.

- Ensure that development relating to the Olympics does not cause adverse environmental impacts, and that the benefits are long-term, well beyond the two-week period of the Olympics.

Conclusions and recommendations

14.23. Policies in Section 8 cannot be viewed in isolation. They fit within the Sustainable Development Policies SD1 to SD4 in Section 1, the overall spatial strategy and the Development Policies in Section 3, which promote sustainable development through planned mixed and balanced communities, the use of sustainable construction techniques and previously developed land, and the strategic direction for the main town centres given in Section 4. The delivery of the employment sites, town centre and tourism development sought in Section 8 should also be in line with the
sustainable development principles set out in Section 1 and the environmental policies in Section 7.

14.24. In many instances, the employment, town centre and tourism policies should result in some positive sustainability benefits for the South West by contributing to a better alignment of jobs, homes and services (a key guiding principle for the RSS in Policies SD1, SD2 and SD4) within the more significant cities and towns in the region. For more rural communities, the benefits are less clear.

14.25. However, the economic policies within the RSS, which follows the Regional Economic Strategy vision, still assumes that GVA growth is an indicator of wellbeing, and that the lower productivity in the western peninsula and peripherality are a problem to be overcome. Section 8.2 discusses the need for businesses to ‘compete’ (in particular with London and the South East) rather than to meet local people’s needs. This approach is likely to increase consumption, greenhouse gases, air travel, and traffic. Planning for the impacts and opportunities relating to climate change is hardly mentioned.

14.26. Whilst the supporting text describes the characteristics of the South West economy, there is little sense in the policy wording, especially in Policies E1 to E3 (which are essentially about providing and managing land for employment uses), of how the economic development and activity relates to the overall Spatial Strategy and the Sustainable Development Principles that underpin the RSS. There needs to be more recognition that different parts of the region have different potential (e.g. the growth of ICT and creative industries around the ‘West of England’, Bournemouth/Poole and Plymouth sub-regions49, versus the small-scale tourism-led economy in Cornwall). Similarly, it may not be necessary to upskill the whole of the region’s workforce to work in the knowledge economy when such skills may not be appropriate to all jobs in all locations.

14.27. We therefore suggest that the policies on this Section, particularly those relating to Employment Land Provision, are based more around the (sustainable) themes in the supporting text, grounded in the overall Spatial Strategy, focus on strengthening the role and function of settlements in a sustainable way, draw on and enhance the unique strengths of the South West’s assets (human, natural, cultural), recognising that these vary across the region, and look for ways of making the South West economy more resilient to change and outside influences, for example by increasing the circulation of wealth in the region (an objective of the IRS).

14.28. The transport implications of the employment, town centre and tourism policies have been discussed in the previous section. The key recommendation in order to try and help to reduce the need and desire to travel by air or car, is for public transport systems from outside the region and within the region to be more integrated, and attractive to cyclists and pedestrians. In this way, visitors to the South West whether on holiday or business, should be able to arrive and travel around by sea, rail, bus, on cycle or by foot more easily. Reference to broadband and ICT technologies is

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welcomed as these represent more sustainable (and efficient) means of communication.

14.29. Finally, the inclusion of a section on regional casinos, which enables their development in locations where they support and extend attractions in existing major regional SSCT tourism destinations or assist regeneration measures, could be questioned in sustainability terms as there is not enough data to suggest positive benefits outweigh the negative effects for health and wellbeing of gambling addiction. The sustainability advantages and disadvantages of casinos should be carefully compared to more benign forms of economic development activity in order to ensure that the South West’s economy is placed on a more sustainable footing in the long-term.
15. SECTION 9 OF THE RSS: ADDRESSING DEPRIVATION AND DISADVANTAGE TO REDUCE INTRA-REGIONAL INEQUALITIES

Introduction
15.1. This Section of the RSS aims to provide focus, and identify spatial priorities for, addressing deprivation and disadvantage in the South West. This set in the context of the review of European cohesion policy, and impending EU enlargement. The Section is divided into the following components:

- Addressing Intra-regional Disparities.
- Supporting Strong and Inclusive Communities and Identifying Spatial Priority Areas for Concerted Investment and Action.

What does the RSS section say?
15.2. While quality of life in the South West is generally high, it is recognised that clusters of deprivation exist in the region. The section identifies a notable ‘gradient’ from the North and East of the region towards the South and West in terms of generally lower productivity and earnings and increasing levels of multiple deprivation.

15.3. Section 9.1 describes intra-regional disparities and discusses the approach the RSS will take to tackling them. Section 9.2 identifies means of supporting strong and inclusive communities and presents the approach to identifying spatial priority areas for ‘concerted investment and action’. The final part of this Section of the RSS sets out the ’Statement of Priorities for Addressing Deprivation and Disadvantage in the South West’.

1.3. The statement of priorities supports the Spatial Strategy and aims to tackle the above by focusing economic development on the larger cities and towns, while ensuring links/connections are such that benefits are widespread. Rural renaissance in the rural priority districts is to address need arising from problems with accessibility to jobs and services and affordability of housing.

What are the likely effects on the SSA headline objectives?
15.4. The section does not contain a policy, but a statement of priorities. This section of the RSS has been considered below and in the appraisal matrices as a whole (highlighted statement and supporting text).

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve health</td>
<td>None specifically identified.</td>
</tr>
<tr>
<td>It is likely that the statement will have an indirect positive effect on improving health. Addressing deprivation should result in long term health benefits throughout the region, and possibly reduce health inequalities if opportunities are improved in the most</td>
<td></td>
</tr>
<tr>
<td><strong>Positive effects</strong></td>
<td><strong>Negative effects</strong></td>
</tr>
<tr>
<td>---------------------</td>
<td>---------------------</td>
</tr>
<tr>
<td>deprived parts of the region.</td>
<td></td>
</tr>
<tr>
<td><strong>Support communities that meet people’s needs</strong></td>
<td></td>
</tr>
<tr>
<td>Housing affordability is noted as one of the key rural renaissance objectives in the statement. Affordable housing should be a key part of the urban economic development, regeneration and neighbourhood renewal approach. A long term indirect effect of improvements may be the promotion of stronger and more vibrant communities. This may be reinforced by improved employment levels, accessibility, and links between settlements. The supporting text suggests that educational attainment, skills and training are key factors of deprivation which the statement is intending to tackle.</td>
<td>None specifically identified.</td>
</tr>
<tr>
<td><strong>Develop the economy in ways that meet people’s needs</strong></td>
<td>None specifically indentified.</td>
</tr>
<tr>
<td>Improved access to satisfying work opportunities is a possible long term indirect effect, but cannot be guaranteed at this scale. This is more likely when considered alongside Section 10. The policy aims to improve income inequality and reduce poverty. This depends significantly on the quality and integration of the links between areas where economic activity and regeneration is to be focussed, and the deprived areas. The effects are likely to be direct and arise in the short to long-term.</td>
<td></td>
</tr>
<tr>
<td><strong>Provide access to meet people’s needs with least damage to the environment</strong></td>
<td></td>
</tr>
<tr>
<td>Improved connectivity, economic stimulation, and employment opportunities may reduce the need to travel to work as a long term indirect effect in some areas currently experiencing high numbers of long travel to work journeys. However, there is no guarantee that this would result in a reduction in car travel.</td>
<td>Improving connectivity between prosperous urban and some of the deprived rural areas could make rural areas even more attractive to commuters.</td>
</tr>
<tr>
<td><strong>Maintain and improve environmental quality and assets</strong></td>
<td></td>
</tr>
<tr>
<td>It is likely that a short term, but permanent direct impact of urban renaissance initiatives would include townscape improvements.</td>
<td>The possibility of making deprived rural areas more attractive to commuters may have the potential to negatively impact local distinctiveness and rural ways of life. This may not be the case if rural renaissance was built on the existing strengths of deprived areas (such as cultural and historical or landscape assets).</td>
</tr>
<tr>
<td><strong>Minimise consumption of natural resources</strong></td>
<td></td>
</tr>
<tr>
<td>None specifically indentified.</td>
<td>The proposed level of new development is likely to have a direct impact on the consumption of resources.</td>
</tr>
</tbody>
</table>
What improvements (e.g. mitigation, enhancement) could be made?

15.5. The statement assumes that linking successful areas with less successful ones will ensure that deprived communities benefit from wider economic prosperity. For this to be successful from a sustainability perspective, the ‘connectivity’ will need to boost peripheral economies rather than ‘suck’ economic activity out, and should not lead to additional movement of people. The importance of tackling multiple deprivation at the neighbourhood level should not be underestimated, as this is most likely to be an approach which ensures economic growth is consistent with local needs. Section 10 includes emphasis on the importance of quality of life factors and addressing social as well as economic needs. This could also be included in Section 9.

15.6. Proposals for development have implications for increased resource consumption, and increasing the ‘ecological footprint’ of the region. It is essential that these implications are mitigated by policies elsewhere in the RSS (for example through those in Section 7).

15.7. Aspects that could be improved include the following:

- Affordable housing should also be a key part of the urban economic development, regeneration and neighbourhood renewal approach.

- In rural areas, emphasise the importance of creating jobs that are most relevant to the rural economy.

- Make specific reference to promoting access to jobs and services locally, and without the need to use a car (e.g. through walking, cycling, public transport).

Conclusions and recommendations

15.8. Highlighting the need to reduce deprivation and inequalities in the region is a fundamental principle of sustainability, and therefore is to be welcomed. The emphasis on economic growth and improved competitiveness should bring some sustainability benefits. However, GVA per capita is only one measure of deprivation and does not necessarily equate to well-being. Most important is access to rewarding employment, which may not necessarily be highly productive. Local access to good services, high quality living, working and recreational environments, and housing that people can afford are also essential ingredients in tackling deprivation. The emphasis on increasing incomes may have some benefits in affording a comfortable standard of living. On the other hand, increased disposable incomes can also lead to knock-on effects, such as increases in house prices and rising traffic as ownership of cars increases. This can disadvantage those who are not in employment (including the retired reliant on state pensions), or have access to a car.

15.9. The creation of jobs that are local, and relevant to the strengths of different parts of the region, may be of most help. There will always be a need for a wide variety of employment opportunities, not all of which will be high-skilled but nonetheless
important to the successful local economic and social vitality. One of the key aspects, therefore, is to ensure that all jobs are appropriately valued and rewarded, according to their contribution to sustainable communities. The RES has a particularly important role to play in this respect, but this also should be acknowledged in the RSS.

15.10. Overall, the emphasis in the statement on joint-working and recognition that deprivation should be tackled at a number of levels is to be commended. It is important to ensure that means of tackling deprivation do not focus too much on economic competitiveness at the expense of improving grassroots quality of life factors.
16. SECTION 10 OF THE RSS: ENSURING PEOPLE ARE TREATED FAIRLY AND CAN PARTICIPATE IN SOCIETY

Introduction

16.1. Section 10 of the RSS aims to ensure that RSS policies are representative of all of the region's communities and to facilitate a strategy from which all can benefit.

What does the RSS section say?

16.2. The Section introduces the issues of social exclusion, poverty and deprivation in the region and the consequences this has for potential growth and the opportunity for all to share in its success.

16.3. Section 10.1 presents the idea that effectively delivering equality of opportunity for all sectors of the community is essential to the long term success of the region. It also suggests the approach local authorities can take towards ensuring this, and is summarised in Policy SI 1.

16.4. Section 10.2 outlines the approach the RSS will take to gypsies and travellers under the draft Circular Planning for Gypsy and Traveller Sites, defined in the (incomplete) Policy SI 2. Section 10.3 outlines the consultation approach taken throughout the drafting of the RSS, and calls for an active, inclusive and creative approach to consultation on policy and delivery to be pursued by all regional partners.

What are the likely effects on the SSA headline objectives?

16.5. Policy SI 1 is considered below in detail. Policy SI 2 is incomplete as the figures have not yet been added. Appraisal of the supporting text for SI 2 is also considered below.

<table>
<thead>
<tr>
<th>Positive effects</th>
<th>Negative effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve health</td>
<td>None specifically identified.</td>
</tr>
<tr>
<td>Recognition of the health needs of disadvantaged groups is a likely indirect medium-long term effect of the policy. This may go some way to reducing health inequalities. SI 2 should facilitate healthier living conditions for gypsies and travellers.</td>
<td></td>
</tr>
<tr>
<td>Support communities that meet people's needs</td>
<td></td>
</tr>
<tr>
<td>Access to appropriate housing for disadvantaged groups may be improved by SI 1. Provision for gypsies and travellers (SI 2) includes identification of the need for residential pitches – a direct, positive effect.</td>
<td></td>
</tr>
<tr>
<td>Improved access to learning, training and knowledge may be an indirect impact of the policies, as communities learn about the participation process, and are given the means with which to ‘participate in society’.</td>
<td></td>
</tr>
<tr>
<td>Positive effects</td>
<td>Negative effects</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Increasing feelings of ownership and participation could, in the long term indirectly contribute to stronger and more vibrant communities.</td>
<td></td>
</tr>
<tr>
<td><strong>Develop the economy in ways that meet people’s needs</strong></td>
<td></td>
</tr>
<tr>
<td>SI 1 aims to ensure all members of society benefit from growing prosperity. If implemented successfully at the local level, these have the potential to improve standards of living, reduce poverty and increase the circulation of wealth within the region in a way which is consistent with local needs.</td>
<td>None specifically identified.</td>
</tr>
<tr>
<td>A commitment to wider participation is likely to promote the representation of local needs, and improve the likelihood of skill development to enable these needs to be met within the local community itself.</td>
<td></td>
</tr>
<tr>
<td><strong>Provide access to meet people’s needs with least damage to the environment</strong></td>
<td></td>
</tr>
<tr>
<td>Access to basic services may be improved for those currently suffering from social exclusion.</td>
<td>None specifically identified.</td>
</tr>
<tr>
<td><strong>Maintain and improve environmental quality and assets</strong></td>
<td></td>
</tr>
<tr>
<td>The commitment to ensure the needs of all groups in society are met is likely to be beneficial in the long term for more isolated rural communities. It also suggests recognition of the value of diversity in the region.</td>
<td>None specifically identified.</td>
</tr>
<tr>
<td><strong>Minimise consumption of natural resources</strong></td>
<td></td>
</tr>
<tr>
<td>None specifically identified.</td>
<td>None specifically identified.</td>
</tr>
</tbody>
</table>

**What improvements (e.g. mitigation, enhancement) could be made?**

16.6. The objectives of Section 10 and the role of engagement in the drafting of the RSS are consistent with ensuring the sustainability of the RSS. The engagement process must be thoroughly implemented at the local level to ensure all members of society have the opportunity to participate:

- An additional policy specifically about consultation may help to reinforce the importance of engaging with local people in planning their future of their own communities.

16.7. Policy SI 2 and supporting text concerning gypsies and travellers may be more usefully included in Section 6, alongside other residential policies.

**Conclusions and recommendations**

16.8. The effects of the policy are predominantly positive in relation to the sustainability objectives. The promotion of widespread consultation and engagement in the planning process should have an overall positive impact on the sustainability of all policies and development in the region. The policy text outlines practical means for implementation, which will be a crucial determinant of success in delivering the sustainability benefits identified. This section is a fundamental element of Sustainable
Communities (Policy SD4) as the principles intended should underpin the RSS as a whole.
17. OVERALL EFFECTS OF THE RSS

INTRODUCTION

17.1. Chapters 7 to 16 of the SSA Report have set out the detailed findings of the SSA as they relate to each of the individual sections of the RSS. This Chapter draws together these findings into an overall summary of the effects of the RSS on the SSA objectives.

17.2. In summarising the overall effects, there is likely to be a difference between what the RSS aspires to achieve, and what it is actually able to achieve based on past experience and the planning controls, mechanisms and resources available to planning authorities.

17.3. For example, the RSS includes four very strong sustainability principles (Policies SD1 to SD4) to guide the spatial strategy. If these are applied so that all development is in accordance with these principles, and that any development that conflicts with these principles is not permitted, then the RSS will have made a major contribution to sustainable development, and the SSA would have recorded significant positive effects throughout.

17.4. However, the scale and pace of growth that is proposed in the RSS, as well as some of the other policies that are included in the RSS, suggest that it will be difficult to deliver development that is in accordance with the principles set out in Policies SD1 to SD4. This is not to say that the principles will not have an effect in improving the sustainability performance of the region. They are important principles and statements of intent, and if applied with rigour they should make a significant difference. But it is unlikely that, on their own, they will be able to decouple the link between growth and impacts.

17.5. The summary of the effects of the RSS has been prepared on the basis of what is considered to be the likely effects of its implementation. It is difficult to be precise about what the effects will be. The assessment is therefore on the basis of a combination of professional judgement, experience of past, current and likely future trends, and recognition of what the RSS aims to achieve.

Cumulative Effects

17.6. The SEA Directive requires that secondary, cumulative, and synergistic effects (collectively referred to as 'cumulative' effects) be considered as part of the assessment process. This overall summary is based on the effects of the RSS as a whole, taking into account existing trends in the region. It effectively looks at how the policies of the RSS are likely to interact with one another during implementation. It therefore provides a cumulative assessment of the RSS policies.

Note: If time/resources allows, a more systematic assessment of cumulative effects will be undertaken.
OVERALL EFFECTS OF THE RSS

17.7. The overall effects of the RSS are summarised in Table 17.1 under the SSA Framework Headline Objectives and Questions.

Table 17.1: Summary of Overall Effects of the RSS

<table>
<thead>
<tr>
<th>Detailed question: Will the RSS . . .</th>
<th>Overall Score</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>SSA High Level Objective 1: Improve health</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improve health?</td>
<td>+</td>
<td>The emphasis within the RSS on improving the quality of development, particularly in urban areas, and investment in health care facilities should bring positive benefits. One of the primary determinants of health is employment - as the RSS aims to deliver the opportunities for the creation of jobs, this will also be of benefit. The reduction of congestion in the SSTCs should help to reduce pollution in the urban areas. There may be some adverse effects for those who are most affected by the impact of development during construction. The effects on more rural communities is uncertain.</td>
</tr>
<tr>
<td>Reduce health inequalities?</td>
<td>+</td>
<td>There is considerable emphasis in the RSS on addressing deprivation and disadvantage, which are often associated with poor health. The RSS requires that health care facilities should be accessible by public transport, foot and bike, which should help those without access to a car. However, this may be difficult to achieve in more deprived rural communities.</td>
</tr>
<tr>
<td>Promote healthy lifestyles, especially routine daily exercise?</td>
<td>+</td>
<td>Healthy lifestyles should be encouraged by the emphasis on providing sport and green infrastructure, which should enable both formal and informal recreation to take place. Encouragement is given to walking and cycling, rather than use of the car, which should also help, and public transport to a lesser extent.</td>
</tr>
<tr>
<td>SSA High Level Objective 2: Support communities that meet people’s needs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Help make suitable housing available and affordable for everyone?</td>
<td>++</td>
<td>This is a major theme within the RSS, and is supported not only by the scale of housing provision (25,000 dwellings per annum), but also by the emphasis on affordable housing. The extent to which ‘everyone’ will have access to suitable and affordable housing is difficult to assess. This is as dependent upon a number of factors beyond just the provision of housing (e.g. incomes of prospective buyers), but the RSS aims to make significant in-roads into bringing the balance between housing supply and demand more into line. One of the challenges will be deliverability, particularly where the target for the provision of affordable housing is 60% of total housing.</td>
</tr>
<tr>
<td>Give everyone access to learning, training, skills and knowledge?</td>
<td>+</td>
<td>The RSS includes a number of policies that aim to improve access to education and skills training. This is most likely to benefit those living in (or with access to public transport) the SSTCs and towns falling under</td>
</tr>
<tr>
<td>Detailed question: Will the RSS...</td>
<td>Overall Score</td>
<td>Comments</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>---------------</td>
<td>----------</td>
</tr>
<tr>
<td>Development Policy B. Access in more rural communities is less certain.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reduce crime and fear of crime?</td>
<td>?</td>
<td>The effects depend on the success of other policies that aim to build ‘sustainable communities’. The amount of change, including in-migration, that will happen could cause some issues regarding social cohesion, which crime could feed off. Designing-out crime does not feature strongly in the RSS.</td>
</tr>
<tr>
<td>Promote stronger more vibrant communities?</td>
<td>+/-</td>
<td>Mixed effects are likely to occur. There is considerable emphasis on building sustainable communities, particularly with respect to the SSTCs, and more deprived communities. However, the scale of change may lead to some problems with social cohesion, and the focus on the SSTCs may mean that some rural communities continue to lose facilities and services, although Development Policies B and C try to address this issue.</td>
</tr>
<tr>
<td>Increase access to and participation in cultural activities?</td>
<td>+</td>
<td>Improved provision and access to cultural facilities is a theme in a number of policies in the RSS, and is the specific focus of Policy LC F1. Deliverability will be the challenge given competing priorities on funds generated through development.</td>
</tr>
<tr>
<td>SSA High Level Objective 3: Develop the economy in ways that meet people’s needs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Give everyone in the region access to satisfying work opportunities, paid or unpaid?</td>
<td>+/-</td>
<td>The RSS aims to provide the spatial conditions that will enable the creation of between 365,000 and 465,000 jobs in the South West 2006-2026, although the implication of the population growth (750,000 over the same period) is that many of these jobs will go to new arrivals to the region. There is considerable emphasis on skills development, business productivity, prosperity and competitiveness, which could benefit a large number of people in the region. It is not clear how those people in the region who are interested in pursuing work that is not so linked to the competitive economy agenda, but offer different rewards in terms of job satisfaction, will be catered for. Whilst there is considerable emphasis on developing the skills and general capacity of low wage/low productivity/low skill occupations in both urban and rural locations, the extent to which this will be realised in practice is difficult to determine, given the overall growth in the labour supply arising from net in-migration. The majority of jobs are forecast to be created in the SSCTs, but the majority of people currently live outside the SSCTs, which could raise issues regarding local access to jobs in more rural areas and continued commuting. The RSS aims to create a better balance between jobs and homes, which means a focus of development on the SSTCs.</td>
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<tr>
<td>Help everyone afford</td>
<td>+/-</td>
<td>This may be achieved if higher productivity leads to</td>
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<td>a comfortable standard of living?</td>
<td>higher incomes. However, this in turn could lead to increases in the price of some goods and services (e.g. housing) as a result of greater purchasing power. Those who are not able to, or do not wish to, participate in the high productivity, high competitiveness economy, may become more disadvantaged as a result.</td>
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<tr>
<td>Reduce poverty and income inequality?</td>
<td>The RSS includes a range of policy guidance to deal with the issue of reducing poverty and income equality. A key component in the approach is to aim to deliver wider benefits of the growth strategy, including linking successful areas with less successful ones, and connecting cities and towns with their surrounding areas so that more people can contribute to and benefit from the region's economic prosperity. Given that there are often quite distinct social and sometimes physical barriers between communities of different backgrounds, and that patterns of deprivation in the region are quite entrenched, this will be a challenge to achieve. Part of the solution in the RSS is to help provide the conditions that will 'upskill' more deprived and less competitive communities in the South West, and improve access to housing, better environments, and jobs, especially in the SSTCs. Outside the SSTCs, especially where attractive, reliable, and frequent public transport is difficult to provide, this may be a challenge to achieve without greater emphasis on more local, community-based solutions.</td>
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<tr>
<td>Meet local needs locally?</td>
<td>Mixed effects are likely to result from the RSS. The emphasis on 'sustainable communities', and the provision of affordable housing, education, health, culture, sport and green infrastructure, as well as walking, cycling and public transport are all likely to create the conditions that mean that more needs can be met locally. However, these benefits are most likely to accrue to the SSCTs, and the importance on improving the 'reliability and resilience' of strategic transport links are likely to encourage car use, undermining the achievement of this objective.</td>
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<tr>
<td>Increase the circulation of wealth within the region?</td>
<td>It is difficult to tell from the RSS whether it will lead to increased circulation of wealth within the region. The emphasis on competing in global markets and connectivity to London and the South East could run counter to this. On the other hand, the approach based on the role and function of settlements could strengthen internal linkages within the region's economy.</td>
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<tr>
<td>Harness the economic potential of the coast in a sustainable way?</td>
<td>The coast is directly dealt with in Policy CO1, but there are a number of other policies that relate to the coast, including flood risk (Policy F1), Ports (TR6), and sustainable tourism (TO1). In addition, a number of the settlements in the sub-regional section of the RSS are on...</td>
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### Detailed question: Will the RSS...

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<td>or close to the coast. However, how the economic potential of their coastal locations will be developed in a sustainable way is not always obvious. Some, such as Bournemouth, Poole and Christchurch, make clear references to the need to ‘manage economic opportunities against strong environmental assets’. For Weymouth, on the other hand, reference is made to the opportunities arising from the Olympics and Paralympics sailing events. Although links are made with the Jurassic Coast, quality of life, marine industries, and providing a legacy of infrastructure and communities, it is not clear how these can all be brought together in a sustainable way. The need to adapt to the effects of climate change on the coast in the sub-regional section is rarely mentioned. It is therefore difficult to judge whether the economic potential of the coast will be harnessed in a sustainable way.</td>
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<tr>
<td>Reduce vulnerability of the economy to climate change and harness opportunities arising?</td>
<td>Policy SD2 addresses directly the need to adapt to climate change, but it is not clear how this is reflected elsewhere in the RSS. It receives only one mention in Section 8 on the economy. The vulnerability of the economy to climate change could be increased given the emphasis on competing in global markets, connectivity, etc.</td>
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<tr>
<td>SSA High Level Objective 4: Provide access to meet people’s needs with least damage to communities and the environment</td>
<td>There is considerable emphasis in the RSS on achieving modal shift from cars to public transport, cycling and walking, through a combination of significant investment in such modes, networks, and services, coupled with the encouragement of demand management measures. This is supported by the overall theme in the RSS of achieving a better alignment between jobs, homes and services. This approach is particularly focused on the SSCTs, and should provide considerable opportunities to reduce both the need and the desire to travel by car, at least in these locations. However, this could be offset by a number of road improvements in the sub-regional sections of the RSS, and references to Park &amp; Ride. Elsewhere, the emphasis is on improving the ‘reliability and resilience’ of the strategic transport network (both road and rail) to support intra and inter-regional connectivity. Where these relate to road improvements, the most significant of which is the achievement of a dual carriageway standard second strategic route into the South West (A303/A358), this is likely to make travel by car more attractive. This could partially be offset by the proposed improvements to the inter-regional rail network, although the capacity of this network to cope with additional demand is limited, even after such investments. In more rural locations, Development</td>
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<td>Policies B and C aim to guide development to locations that will maintain and develop sustainable transport modes, or where they do not significantly increase traffic on local roads. There is little mention of sustainable transport and access issues in more rural areas within Section 5 (Transport) of the RSS. Overall, the policies are unlikely to lead to a reduction in car traffic. As a result, there are likely to be both significant positive and significant negative effects.</td>
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<td>Reduce the need/desire to travel by air?</td>
<td>--</td>
<td>The context for the development and expansion of airports is set by central Government through the Aviation White Paper. This anticipates, and aims to accommodate, significant growth in air travel. The policies in the RSS reflect this. Firstly, they aim to secure a switch to the use of airports in the South West for air travel that would otherwise be from/to airports outside the region, particularly Heathrow. Secondly, airports are seen as an important economic driver for the region, and therefore development associated with the airports is encouraged. The combination of these factors means that air travel will increase significantly.</td>
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<tr>
<td>Help everyone to access basic services easily, safely, and affordably?</td>
<td>++/-</td>
<td>There is considerable emphasis on the provision of basic services, and access to them by sustainable modes, particularly in the SSCTs (followed through in the sub-regional section of the RSS), but also to a lesser extent within settlements that meet the criteria set out in Development Policies B and C. For policy C, there is also reference to outreach delivery of services. However, given the emphasis on the SSCTs, it may be difficult to stem the loss of services in some smaller rural settlements.</td>
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<tr>
<td>Make public transport, cycling and walking easier and more attractive?</td>
<td>++/-</td>
<td>The RSS aims to achieve modal shift. Given the policies in the RSS, and the ‘critical mass’ of population, this is most likely to be achieved in the SSCTs. Rail and potentially bus/coach services are also likely to become more attractive for some longer journeys. They will have to compete with the continuing attractiveness of using the car arising from improvements to the strategic road network and capacity barriers on the rail network. There may be an improvement in the attractiveness of public transport, walking and cycling in towns falling under Development Policy B, but this is less certain. In other locations, it is unlikely that there will be an improvement significant enough to make a major difference.</td>
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<tr>
<td>Encourage a switch from transporting freight by road to rail or water?</td>
<td>+/-</td>
<td>Policies TR6 and TR11 encourage the use of ports and rail freight interchange facilities, but overall the RSS is unlikely to achieve a significant switch from road to rail or water. TR10 aims to promote the strategic network for heavy goods vehicles (HGVs) rather than local roads,</td>
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<td>but the supporting text does refer to the development of local supply chains and locating developments that generate high volumes of freight movements close to rail or water freight facilities.</td>
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**SSA High Level Objective 5: Maintain and improve environmental quality and assets**

Protect and enhance habitats and species (taking account of climate change)?  

Certain habitats and species are ‘protected’ through international and national legislation. PPS9 ‘Biodiversity & Geological Conservation’ provides further national policy guidance. The RSS provides the regional policy context through policies ENV1 and ENV4 supported by Policies SD3, SD4 and GI 1. Taken together these represent a strong statement on the need to protect and enhance the biodiversity of the region. However, past evidence suggests that development and associated infrastructure has led to increasingly fragmented habitats even though designated habitats may not be so directly affected. As a result the overall biodiversity resource continues to be eroded. Despite the legal and policy safeguards at international, national and regional level, it is not possible to state with confidence whether habitats and species in the region will be protected and enhanced. This is because of the scale and pace of development proposed in the RSS, which could put pressure on the wider biodiversity resource, and the often close proximity of some of the major locations of growth (e.g. Bournemouth, Exeter, Plymouth) to particularly sensitive habitats. Indirect effects, such as people pressure, may be as damaging as the direct effects of development.

Promote the conservation and wise use of land?  

The RSS requires that housing densities should exceed 30 dwellings per hectare in all parts of the region, that averages across housing market areas will be in excess of 40 dwellings per hectare, and that the density of housing at the SSCTs, including urban extensions, should be at least 50 dwellings per hectare. Although these densities are higher than has been experienced in recent years, draft PPS3 suggests that these densities could be higher given that most of the development is to be located in or adjacent to the SSCTs. The RSS requires that best and most versatile agricultural land needs to be taken into account alongside other sustainability considerations. This is important as it is a resource for current and future generations, which once lost to development is difficult to recover. Sustainable land management in general is encouraged in Section 7 of the RSS (although there is no policy attached to the text). The brownfield land target for housing development is at least 50%. Given the relative shortage of brownfield land in the region, compared to many other regions in the country, it is likely that a considerable amount of development (including employment, infrastructure, and community...
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<td>Services, etc.) will be on greenfield land. This will total 5,000 hectares if half of the dwellings are built on greenfield land at an average density of 50 dwellings per hectare. This figure is likely to be nearer to 10,000 hectares (i.e. 100 square kilometres) once associated non-housing development is taken into account. However, this does represent a significant permanent change of use, and a general continuation in the loss of greenfield land to development.</td>
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<tr>
<td>Protect and enhance landscape and townscape?</td>
<td>++/-</td>
<td>There are a number of policies in the RSS that aim to protect and enhance the landscapes and townscapes of the region, including Policies EN V1, EN V2 and EN V3. Development Policy E aims to ensure the highest possible standards of design of all development in urban and rural settings. These are positive policies in their own right. However, the scale and pace of development (the delivery of 500,000 dwellings and between 365,000 and 465,000 jobs, plus associated infrastructure) means that it is highly likely that the character of a large number of locations will change significantly. Ultimately this is a subjective judgement, but given current planning controls, and volume building methods, it is likely that this could be significantly adverse in some locations. This may not always be the case. For example, the emphasis in the RSS on improving urban environments could lead to some significant positive effects.</td>
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<tr>
<td>Value and protect diversity and local distinctiveness including rural ways of life?</td>
<td>?</td>
<td>Policy EN V1 aims to protect and enhance the quality, character, diversity and local distinctiveness of the natural and historic environment. Settlements outside the SSCTs are dealt with in Development Policies B and C, and to a certain extent in the sub-regional Section of the RSS. Sustainable communities in general are addressed in Policy SD 4, and recognition of the overall diversity of the region is covered by the Spatial Strategy Statement. There is reference to the economy of countryside areas and rural businesses in the supporting text of Section 8, plus the provision of employment sites in Policy E1. Overall, therefore, diversity and distinctiveness is addressed in the RSS. However, the emphasis on role and function of rural settlements (and networks of settlements) does not come across as strongly in some of the individual policies as it does in the overall approach of the RSS, as it does for the SSTCs. As a result, the effects may not be as positive as the RSS intends.</td>
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<tr>
<td>Maintain and enhance cultural and historical assets?</td>
<td>++/-</td>
<td>Cultural and historic assets are addressed in a range of policies throughout the RSS, including Policies LCF1, C1, EN V5. National planning policy also provides guidance on historic and archaeological assets. Despite this, given the scale of development, it is likely that there will be some loss or erosion of historic assets, including locally...</td>
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<td>Reduce vulnerability to flooding, sea level rise (taking account of climate change)?</td>
<td>?</td>
<td>Sea level is estimated to rise by 5mm per year in the South West, which will increase the likelihood of coastal flooding in the future (e.g. by 2080s Poole Harbour could have an increased likelihood of flooding of over thirty times the 2002 expected frequency). Fluvial flooding is also likely to increase due to climate change. Exposed shorelines are also vulnerable to wave action. The Environment Agency is examining flood risk at potential development locations. Work to date suggests that, in a number of locations flood risk could be an issue (e.g. Taunton, Swindon), but could be resolvable. Until the results of more detailed work are known, it is not possible to determine whether vulnerability will be reduced. Policy F1 aims to guide development away from floodplains, areas at risk of flooding or likely to be at risk in future from flooding, or increase the risk of flooding elsewhere.</td>
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SSA High Level Objective 6: Minimise consumption of natural resources

| Reduce non-renewable energy consumption and ‘greenhouse’ emissions? | 4-- | Policy SD2 sets a challenging target for the reduction of the region’s contribution to greenhouse gas emissions (a 20% reduction by 2026). Development Policy G aims to minimise energy consumption, and Policies RE1 to RE5 aim to increase the renewable energy capacity of the region so that 20% of the region’s electricity’s demand is met from renewable sources by 2020. Despite these policies, it is likely that the amount of greenhouse emissions from the region will increase over the period of the RSS. This is because of the scale of development proposed, the likely increases in traffic, and a general increase in energy consumption with rising prosperity. The increase on a per capita basis will be less than the increase in total emissions but it will nonetheless be an increase. |

| Keep water within local carrying capacity limits (taking account of climate change)? | ?             | The ability to accommodate the development proposed by the RSS within local carrying capacity limits for water has been subject to considerable study by the Environment Agency. The Agency concludes that the housing growth scenarios can, on the whole, be accommodated given investment in the supply-demand balance. However, there are a number of uncertainties with respect to this conclusion, including the combined effect of growth across regional boundaries, and the potential implications of the Habitats Regulations, which could lead to some reductions in abstractions. In addition, the supply-demand balance is highly predicated on the achievement of further active leakage control, auditing and retrofitting more efficient appliances in existing households, and in some cases 21% water savings, waste minimisation for industrial and commercial |

valued landscapes, landmarks and features.
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<td>use, and bringing forward planned options to increase supply and developing new resources. Given that some of the water resource zones (notably South West Oxfordshire and Severn) could be in deficit by 2009/10 without these measures, the scale of the efficiencies required, and the lead-times for the development of new resources, it is the view of this SSA that enough uncertainty over deliverability exists not to give a positive score.</td>
<td>+/-</td>
<td>Policies RE9 and RE11 deal with mineral extraction and the use of recycled and secondary aggregates. The policies in the RSS are based on technical work undertaken for the SW RA on aggregate supply options. There is little mention of the need to be as efficient as possible in the use of minerals. There is a target for recycled and secondary aggregates of 121 million tonnes per annum up to 2016, although this is just 35% of the total that will be derived from crushed rock and sand and gravel. <strong>It is not known how challenging this target is.</strong> Consumption of minerals could be reduced by dampening demand in the first instance, which is itself linked to the levels of development in the region (and elsewhere for exports), including infrastructure.</td>
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<td>Minimise consumption and extraction of minerals?</td>
<td>+/-</td>
<td>Check TL</td>
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<td>The Environment Agency has raised concerns relating to the ability of waste water treatment systems to cope with additional demand at Swindon, Falmouth/Truro, Salisbury and Cheltenham. Here and at other locations, advice is needed from water companies to confirm whether required standards can be met in practical terms. It is not possible to assess pollution to land and genetics as a result of the RSS, as this will be dependent upon local circumstances. Policy RE8 requires that new development should not exacerbate air quality problems in Air Quality Management Areas. The emphasis on addressing congestion in the SSTCs should help to improve air quality in these locations, although increased traffic elsewhere could offset these gains along main road corridors. Light and noise pollution are not dealt with by specific policies, and receive little reference in the RSS as a whole. Given that remoteness and tranquillity are defining characteristics of parts of the region, this could be given more prominence. Despite policies that aim to safeguard distinctiveness and landscape character, it is likely that the scale of development, increased traffic (at least outside the SSCTs), increased rail traffic, increased air traffic and associated development, will add to noise and light pollution in the region.</td>
<td>--/?</td>
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<td>Reduce waste not put to any use?</td>
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<td>Minimise land, water, air, light, noise, and genetic pollution?</td>
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17.8. It can be seen from the above summary assessment that there are a number of positive effects that are likely to arise as a result of implementation of the RSS. These include:

- Improvements to the health of the population of the region.
- Making suitable housing available and affordable (although deliverability could be an issue).
- Giving everyone access to learning, training, skills and knowledge, particularly in the SSTCs.
- Increased access to cultural activities.
- Giving everyone in the region access to satisfying work opportunities (although these benefits are most likely to be delivered in the SSTCs, and it is not clear how much more deprived communities will benefit as opposed to new arrival to the South West).
- A reduced need to travel by car, particularly in the SSCTs.
- Improved access to basic services, particularly in the SSCTs.
- Public transport, cycling and walking made more attractive, particularly in the SSCTs.
- Protection and enhancement of townscapes within urban areas.
- Maintenance and enhancement of cultural and historical assets (although some losses may still be inevitable).

17.9. Many of the most positive benefits will arise in the SSTCs, which is where some of the most significant sustainability ‘wins’ are likely to be achieved. The effects on more rural parts of the region are less clear.

17.10. A number of negative effects have also been identified, the most significant of which are as follows:

- Despite the reduced need to travel by car, particularly in the SSCTs, the actual amount of travel by car is likely to increase, especially outside of the SSCTs.
- An increase in air travel, which is the most unsustainable form of travel.
- Increases in the region’s contribution to greenhouse gas emissions.
- A potential increase in the vulnerability of the economy as a result of climate change.
- A change in landscape character, especially where development is likely to be most concentrated (although the RSS does aim for a high standard of design, delivering this may be difficult).
• A gradual increase in light and noise pollution, and possibly air pollution (outside the SSTCs), from development and traffic.

17.11. There are also a considerable number of uncertain or mixed effects of the RSS across a range of sustainability criteria. In these instances it is difficult to judge whether:

• Crime or the fear of crime will be reduced.

• Stronger and more vibrant communities will result from the development proposals.

• Everyone will be able to afford a comfortable standard of living.

• Poverty and income equality will be reduced.

• Local needs will be met locally.

• The circulation of wealth in the region will be increased.

• The economic potential of the coast will be harnessed in a sustainable way.

• A (significant) switch from transporting freight by road to rail or water will occur.

• Habitats and species will be protected and enhanced, taking into account climate change.

• The conservation and wise use of land will be promoted.

• Diversity and distinctiveness including rural ways of life will be valued and protected.

• Vulnerability to flooding, sea level rise, taking into account climate change, will be reduced.

• Water consumption will be kept within local carrying capacity limits, taking into account climate change.

• The consumption and extraction of minerals will be minimised.

• Waste not put to any use will be reduced.

• Water pollution will be minimised.

17.12. This may appear to be a long list of uncertain and mixed effects. This is not surprising given that many of the effects will be local and will be dependent upon the specific characteristics of individual locations. In practice, the effects could go either way. If the policy safeguards in the RSS that aim to make development in the region sustainable are applied with rigour (and in some cases strengthened as recommended in the SSA), then it is likely that many of these mixed or uncertain effects will become positive. Conversely, if the policy safeguards towards delivering sustainable
development in the RSS are not applied with rigour, then many of the uncertain or mixed effects would be likely to be negative.

17.13. In practice, the scale and pace of growth proposed in the RSS is such that it will be difficult to hold firm to these policy safeguards when the pressure to develop is so high. To be sustainable in the long-term, this should not be allowed to happen. The RSS sets out a pattern of development that goes well beyond 2026, and which will be a legacy for future generations. The Implementation Plan with the RSS should therefore stress the importance of adhering to the policies that aim to create a ‘step-change’ in delivering sustainable development, and preventing development that does not do so.
18. IMPLEMENTATION AND MONITORING PROPOSALS

18.1. To be completed
19. CONCLUSIONS AND KEY RECOMMENDATIONS

INTRODUCTION

19.1. This chapter of the SSA draws together the overall conclusions and sets out the key recommendations arising from the SSA process. In order to put the recommendations of the SSA into context, an understanding of the scope and remit of RSS is needed.

19.2. Planning Policy Statement 11 (PPS11) ‘Regional Spatial Strategies’ (ODPM, 2004), states that:

“The Government’s policy on spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function... Although RSS policies have to be related to the development and use of land within the region... they should not be restricted to policies that can be implemented through the grant or refusal of planning permission.” (para 1.6).

19.3. This raises a question about how far the RSS can go beyond ‘traditional’ land use planning. In preparing this SSA report, we have taken a broad view, and may be considered by some to go beyond the strict remit of what the RSS can do. We think this is necessary because the RSS is a particularly powerful tool in achieving sustainable development, and especially with respect to influencing “the nature of places and how they function”. Since it provides spatial expression to economic, social and environmental objectives, it deals with a wide range of aspects that are relevant to sustainable development. It sets out the scale and types of development that are to be delivered in the region, where in broad terms this development should take place, and the conditions by which the development should be delivered.

19.4. In addition, at the regional level, it is the policy document that is subject to the closest scrutiny and examination. If the RSS is to achieve the step-change in sustainability performance that is required by Policies SD1 to SD4, then it will need to push at the boundaries at what it can include.

19.5. The RSS does not exist in isolation. The success of its policies are dependent upon it being ‘joined-up’ with other regional strategy and policy documents. But it is also needs to be joined up with national Government policy, not only planning policy, but also education, health, and fiscal policies. For example, the RSS can aim to promote the use of public transport, but the success in it being able to actually encourage people to make the switch from cars to buses and trains will be limited so long as the real cost of travelling by car is cheaper.

19.6. PPS11 also draws attention to Section 39 of the Planning & Compulsory Purchase Act that requires an RSS to “contribute to the achievement of sustainable development”. Our recommendations should be seen in this light, in order to give the RSS the best chance of achieving this goal.
KEY FINDINGS

19.7. Chapter 6 of this report describes how the SSA has influenced the preparation of the RSS. It should be clear from Chapter 6 that SW RA have made great efforts to take on board the recommendations of the SSA throughout the RSS preparation process. As a result, from a sustainability perspective, there is much to commend in the RSS.

Sustainability strengths of the Draft RSS

19.8. The RSS contains a number of strengths from a sustainability perspective:

- Strong overarching sustainable development principles in Policies SD1 to SD4, and in particular the emphasis on reducing the region’s ecological footprint including its contribution to climate change, and the acknowledgement of environmental limits.
- The emphasis on achieving sustainable communities, based on settlement role and function, and improving the quality of, and access to, jobs, homes, facilities, services, and green space.
- The focus on directing the majority of development to existing urban areas where more jobs are likely to be created, and where some of the biggest sustainability ‘wins’ are likely to be made.
- The emphasis on ‘quality of development’, which is crucial to achieving sustainability outcomes, in particular the attractiveness of urban areas as places in which to both live and work.
- The recognition that different parts of the region, different settlements, and the rural areas have different characteristics, constraints and opportunities.
- The strong sense of the spatial structure of the region, and interconnections and interdependencies between different places and beyond the region.
- The overall aim to improve the alignment of homes with jobs, which should help to reduce the need to travel.
- The strong attempt to deal with issues of housing need and affordability.
- The emphasis on well-being and reducing inequality.
- The recognition that GVA is not the only measure of economic well-being.
- The acknowledgement that there needs to be significant improvements in public transport, coupled with demand management measures.
- The aim to improve environmental infrastructure within the region.
- The quality of development as a key ingredient for success.

Sustainability weaknesses within the Draft RSS

19.9. Despite the overall strengths in the RSS, a number of weaknesses remain:

- Overall levels of growth are likely to lead to increased impacts on the environment and character of the South West, plus increased consumption of
natural resources, further increasing the region’s ecological footprint (e.g. greenhouse gas emissions are unlikely to be reduced in line with the Government target to achieve a 60% reduction in CO₂ emissions by 2050).

• Despite the acknowledgement that GVA per capita is not the only measure of well-being, the scale of development is heavily influenced by anticipated economic growth (as measured in GVA terms).

• The emphasis on economic growth, competitiveness and productivity rather than types of economic activity may not always benefit those most in need.

• There is a sense in many of the sub-regional sections that realising economic potential is the over-riding objective (supported by significant lists of infrastructure requirements), without clear guidance on how the economic benefits will be delivered within environmental limits.

• The need for clearer direction for more rural settlements including their role and function, their relationship with urban areas, the role of the environment as a key economic driver, and the effects on rural services and ability to provide sustainable rural transport, especially given that over half the region’s population currently live outside the SSTCs.

• Despite many good policies in the regional approach to transport, particularly relating to the SSCTs, it is unlikely that these will lead to a reduction in traffic, which would require greater national and regional intervention (e.g. motorway charging and increased fuel prices).

• Improvements to ‘connectivity’ and in particular the A303/A358 are likely to increase traffic, and may not bring the economic benefits wished for in the peninsula.

• The acceptance of major growth in airports which are likely to lead to increase greenhouse gas emissions, and impacts on local amenity (e.g. noise, traffic, etc.).

**The sustainability challenge**

19.10. This tension between growth and sustainability lies at the heart of the findings of the SSA process. It is accepted by the SW RA that the region needs to plan for growth. Economic and population forecasts all suggest that the South West is likely to experience significant growth over the period of the RSS. There is a feeling amongst regional bodies that the region did not fully accept that past forecasts of growth would happen in reality, and that, when in fact high levels of growth did occur, the region was not as well prepared as it might have been.

19.11. The SW RA therefore aims to accept that growth will happen in line with forecasts, and that the RSS should be used as one of the main tools to ensure that this growth is delivered in as sustainable way as possible so that the region as a whole benefits.

19.12. The SSA has shown that in many respects this is likely to be achieved, and the RSS sets down challenging goals for the region with respect to environmental limits, reducing deprivation and inequalities, and development quality. Yet the region is to grow over a 20 year period by 15% in population, 22% in numbers of dwellings, and up to 21% in numbers of jobs. Whether this can be done whilst at the same time
reducing the region's greenhouse gas emissions, reducing the region's ecological footprint, and maintaining and enhancing the character and diversity of the region is doubtful given current planning controls and other policies, particularly at the national level, that do not support and sometimes conflict with these aims. Success will often be dependent upon behavioural change. This will not be easy until individuals, developers, businesses and other organisations decide to make sustainable choices not just because they are sustainable, but because they are the obvious and most attractive choice to make.

19.13. This then begs the question whether the RSS has done as much as it can to make the region more sustainable and provide the conditions that make the sustainable choice the natural choice.

19.14. Currently the South West offers a high quality of life for most people in the region. Its natural and built environment is by and large very attractive, and its economy is strong particularly in the north and east of the region. But this masks some often hidden unsustainable trends. The region's ecological footprint, including its contribution to greenhouse gas emissions, is too high. The region continues to experience loss and fragmentation of habitats and species. Levels of deprivation and social exclusion that affect certain communities are proving very persistent.

19.15. Dealing with these unsustainable trends is not easy. Throughout the SSA report, recommendations have been made that, in our view, should help to make the RSS more sustainable. Some of these will prove challenging, and may require a different way of thinking. Other recommendations will require support outside the strict remit of the RSS. Most importantly, they require joined-up action, so that all with an interest, influence and responsibility are pulling in the same direction. This is essential if the four Sustainable Development Principles (SD1 to SD4) are to be achieved.

KEY RECOMMENDATIONS

19.16. Growth, however high, would be sustainable if it could be delivered so that it benefited those most in need, helped to reduce traffic and greenhouse gas emissions, and did not result in a loss of biodiversity or access to amenity land, etc. In essence, this is what Policies SD1 to SD4 aim to achieve. If policies SD1 to SD4 are applied with rigour then the growth in the South West will be sustainable. However, the SSA has shown that this is unlikely to happen.

19.17. The most important recommendation, therefore, of the SSA is to introduce a mechanism for implementing the RSS that gives these four policies ‘teeth’, so that development proposals that are in accordance with these policies are welcomed by the region, whilst development proposals that conflict with them are not.

19.18. This requires a ‘decision-making’ framework, in which positive benefits are maximised and offsetting and substitutions of any negative impacts not achieved (firstly by eliminating at source, and then through good design, etc.). In some instances, for example with respect to environmental thresholds, a better understanding of what this means (and how to measure and assess it) in practical terms is required. Most
importantly, decisions made and the conditions attached to them need to be enforced.

19.19. The key recommendation therefore focuses on implementation. In this respect, it is essential that central Government provides the right policy and regulatory framework across all departments to support what the RSS aims to achieve to make development in the region more sustainable. It is still far too easy and attractive for people to make unsustainable choices. ‘Sticks’ as well as ‘carrots’, for example with respect to car use, will be needed to achieve the desired sustainable outcomes.

19.20. Once all the various influences on decision-making are aligned and going in the same direction, then there is a real opportunity for the sustainability weaknesses identified by the SSA in the RSS to be addressed and resolved.

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APPENDIX B