

South West Round Table for Sustainable Development

Sustainability Appraisal of Draft Regional Planning Guidance for the South West (August 1999)

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Summary of findings

Preamble

This is an appraisal of the Draft Regional Planning Guidance (RPG) for the South West (August 1999). It is the final version and will be submitted to the RPG Public Examination.

Introduction

- 1 *The measure against which the Guidance has been judged is a set of regional objectives for sustainable development. These were prepared by the South West Round Table for Sustainable Development. They are an interim set of objectives in that they are yet to be widely consulted on, but provide a robust basis for the appraisal. They are not the responsibility of the South West Regional Planning Conference (SWRPC). The objectives are based around central government's four themes set out in "A Better Quality of Life: A Strategy for Sustainable Development for the UK", May 1999 (Cm4345). These are:*
 - *social progress which recognises the needs of everyone*
 - *effective protection of the environment*
 - *prudent use of natural resources*
 - *maintenance of high and stable levels of economic growth and employment.*
- 2 *There is evidence that the SWRPC has considered the principles underlying sustainable development and has worked (in some respects more successfully than others) to incorporate them into the Draft RPG. However, many of the points made in the appraisal question how things will work in practice. The appraisal emphasises that lack of a clear policy framework frequently means it is not certain that the principles of the strategy will turn out to be sustainable when expressed in development plans.*
- 3 *Lack of policy precision is a limitation both on what the appraisal can achieve and on what can be expected from the Draft RPG. However, the Guidance does incorporate a number of specific targets including, for example, regional targets for biodiversity and for quantities of housing to be built on previously developed land. A number of national targets are also included, for example renewable energy and waste, which are to be used on an interim basis until appropriate regional targets are developed. This is part of the development of the new approach to RPG preparation. Accompanied by proper monitoring and review, it provides a much more rigorous basis for both plan making and evaluation of impacts and is seen as a significant statement of commitment by the Regional Planning Body to this new approach. As the new approach (more detailed and more spatially specific) to RPG is implemented in the South West, it is anticipated that more detailed appraisal of the strategies, targets and policies for the Region should be possible.*

4 *The Draft RPG is dominated by the issue of new development. This reflects both the role of RPG in the planning system, and the fact that historically more attention has been paid to development than to other aspects of the Guidance. However, there are a number of other key strategy areas where RPG should have a substantial contribution to make, providing the basis for a more sustainable approach in the future. These include water, waste, energy, minerals and transport. It is notable that these are much less well developed than other aspects of the strategy, and in some cases tend to maintain the status quo rather than to move towards a more sustainable position (eg policies with respect to water). This weakens the strategy's contribution to sustainable development.*

The spatial strategy

5 ***Strategy principles*** *The guidance sets out principles which are to guide development in the Region rather than a specific spatial strategy. It does this in two steps (policies 1 and 2) which this appraisal assumes need to be read together. In combination, these principles become the sequential approach to development in the region. They have the potential to shift new development towards urban areas, onto brownfield land, and to land well related to appropriate transport networks and employment opportunities.*

6 *On a comparative basis, this has the potential to be a much stronger and more sustainable strategy than the earlier Draft Revised Regional Strategy for the South West. It is a matter of concern, however, that the Draft RPG does not then deliver the really strong messages needed to progress this approach. There is no clarity, for example, over how land is to be identified which is well located for achieving sustainable development and reducing the need to travel. Furthermore the thrust of the strategy principles is undermined to some extent by policy 18 which is difficult to interpret.*

7 ***The needs of rural areas*** *The strategy provides no clarity on how much development is to be in the urban areas, either as a proportion of all new development or in relation to the pattern of the preceding years. This raises an important issue in the South West Region which is still significantly rural. As currently expressed, the rural areas could be interpreted to be of low priority in the strategy. The important task is to give a clear understanding of what is meant by 'primarily to address local needs', together with clarity on how this is to be assessed. Properly meeting local needs in rural areas is a very important issue to sustainable development patterns in the South West.*

8 ***Unpredictability*** *In practice, it is concluded that, despite the framework provided by the RPG's strategic principles, the strategy is unpredictable in its outcome because of the absence of targets (for example, for housing numbers and employment growth) by types of settlements or by the types of area described in the sequential approach. It is currently unclear, for example, how much development is to go into the PUAs as a proportion of all development. From the thrust of the strategy we interpret this to be a higher proportion than in the past, but without targets this may not prove to be the case. Whilst the overall approach is sound, there is ambiguity about how it will work in practice which may undermine its overall intent.*

9 **Strategic development locations in the Region** Overall, there is an absence of guidance on the strategic development locations to be pursued in the Region. Future broad strategic patterns of development are to be determined at the sub-regional level and this has been left to sub-regional studies. From this, it is unclear how the issues are to be resolved. There is a risk that studies (as opposed to plan making) will involve significant delay in taking the strategic decisions which affect the future development of the region. If more sustainable approaches to, and patterns of, development are to be pursued then delay is difficult to justify and every effort should be made to include as much guidance in this current RPG as possible. If significant decisions about the development patterns have to be postponed, then, as far as possible this current RPG should develop criteria against which future patterns of development can be considered. Any necessary further work should be pursued as a matter of urgency.

10 **Principal Urban Areas** Though PUAs are central to the strategy, there is a lack of clarity over what is meant by the term PUA. Whilst the Guidance indicates that significant changes to current policy for these areas will need to be considered, it remains unclear for what strategic purpose. For example, are the PUAs in combination to take the bulk of regional development (and how much more than pro rata to their size)? Are PUAs and their hinterlands conurbations where the Region should be seeking a strategic balance between jobs and homes? Are PUAs to accept further development in proportion to their existing size or are other principles to preside? The answers to these questions will influence the overall contribution made to sustainable development, and further clarification would significantly strengthen the Guidance as a planning tool.

Significant comments on other policies

11 **The level of housing development** With respect to housing numbers, there is a concern that the case for the housing numbers has not been justified. (This point is pursued further in paragraphs 5.1 – 5.4, and in annex 4.) Moreover, regardless of numbers, the Guidance needs more emphasis on building houses in a sustainable way.

12 **Distribution of housing** An important principle underpinning the strategy appears to be the aim to shift development patterns in the future so as to achieve a better strategic balance between employment, housing, and services in order to foster an environment in which journey patterns show reductions both in length and in travel by car. This accords well with the principles of sustainable development. There is a concern, however, over whether the policies as currently expressed in the Draft RPG can really provide the mechanism to achieve this. This is reinforced by the fact that the distribution of housing numbers is difficult to match with the employment pattern (including growth) and there appear to be some significant anomalies.

12 **Landscape** Landscape emerges as an area of significant policy weakness and the links between landscape and the 'strategic environmental areas' shown on the Key Strategy Diagram are unclear. A strong landscape strategy could help to ameliorate the potentially adverse effects of not having a spatial strategy in place, since strategic guidance on this important

matter would then be provided and would provide a proper framework for shaping future patterns of development.

- 13 **Employment and strategic sites** *Policies on quality and location of sites for new office floorpace, and for manufacturing/distribution are relatively weak and would benefit from strengthening by explicit policy statements of intent in bold rather than cross reference to the strategic principles. For example, the strategy might be for the majority of new and replacement office floorspace to be in city and town centres where it can be accessed by sustainable transport modes by large numbers of people. Some of the omissions in this area are assumed to derive from the on-going development of the Regional Economic Strategy, but RPG presents an opportunity to develop the criteria by which subsequent sites are sought.*
- 14 **Transport** *The transport strategy is not well integrated with the rest of the strategy and is a good demonstration of an observable lack of integrated thinking. Successful policy integration would be the hall mark of a document which really addressed the agenda for sustainable development but in the case of the Draft RPG is often absent. With specific respect to transport, the Guidance does not adequately address the issues faced by a region which is both heavily dependent on road transport and is seeking more sustainable patterns of activity and movement in the future. The relationship between transportation and a wide range of other factors including future economic change, the implications of a likely need to start to 'ration' access to transport infrastructure, land use mix, and layout of new developments on the periphery of urban areas, all need to start to be addressed in a new way. RPG cannot achieve this on its own, but provides one of the means for getting the regional thinking underway and the associated strategy in place.*
- 15 **Renewable energy** *The strategy is relatively weak on the issue of renewable energy given the potential for renewables in the South West.*

Significant policy omissions

- 16 **A managed approach to future housing** *The Draft RPG as currently set out pays insufficient attention to monitoring and review of housing numbers. Forecasts of housing numbers depend on a complex mix of demographic, social and economic factors and are notoriously prone to revision. Given the requirement to meet housing needs and to pursue sustainable development, unnecessary housing allocations are to be avoided and the strategy has sought to do this by casting doubt on the underlying forecasts. The potential exists to explore other mechanisms rather than simply allocating to meet whatever is the finally agreed level of forecast needs, eg measures such as phased release of housing sites as part of a properly monitored system. A phasing approach can, inter alia, avoid premature release of greenfield sites and prevent excessive land releases resulting from uncertainties over household formation and migration rates. At the same time it seeks to ensure that there is no underprovision of housing in areas of need. A proposed approach for the South West should be set out.*
- 17 **Densities** *Whilst reference is made to densities in the discursive text, there is no specific policy to increase residential densities other than at Bournemouth-Poole. This reflects a wider absence of comment on the*

tools/mechanisms to be used to re-focus attention on urban areas (eg significantly increased densities in urban villages, use of CPO powers etc)

- 18 **The urban fringe** *The quality of the next generation of plans is likely to be judged to a significant extent by the success of policies for the urban fringe. The Draft RPG is relatively weak in this area. The strategy places great emphasis on the urban areas, but for the South West, given the levels of greenfield development that are proposed, proper attention to the planning of the urban fringes is critical to pursuit of a more sustainable strategy for the Region. Currently there are no criteria for selecting sites around the PUAs and other substantial towns ie in the urban fringe. Successful choice of sites will be a significant determinant of how sustainable the future pattern of development proves to be. As a minimum, criteria are required which planning authorities can follow as they formulate development plans. In addition, a broader policy for the urban fringe could set out the Region's expectation for significantly improved approaches to urban expansion and could set a framework linked to community forests, access from urban areas etc.*
- 19 **New approaches to development** *Following on from the previous point, the strategy makes no commitment to achieving development in ways which are significantly different to the past – public transport access, layout, services, opportunities for pedestrians/cyclists, energy efficiency, new habitat creation, design. South West can achieve much better than the suburban expansions which have characterised the 1970s, 1980s and 1990s and which rarely fit within or contribute to the character of the Region. Development in the South West will only be more sustainable if issues relevant to environmental protection and quality of life are properly integrated into development from the outset.*

1 Approach to Sustainability Appraisal

What is a sustainability appraisal?

- 1.1 A sustainability appraisal is a *systematic and iterative process* which tests the intended performance of a plan or strategy against the agenda for sustainable development and thereby provides the basis for the plan's improvement.
- 1.2 The requirement to prepare a sustainability appraisal of regional planning guidance (RPG) is new (1999) and reflects the desire of central government to ensure that sustainable development is central to all policies and programmes.
- 1.3 In the case of the South West, the South West Sustainable Development Round Table has been invited by SWRPC and Government Office for the South West to initiate such an appraisal. This work has, as a consequence, been undertaken on the Round Table's behalf and has been guided by them. The Round Table is aiming to add value to the Draft RPG, helping to ensure that the Guidance contributes to a more sustainable South West Region.

An objectives-led approach

- 1.4 The approach taken to the appraisal is 'objectives-led'. This is the approach recommended in "Sustainability Appraisal of Regional Planning Guidance: A Good Practice Guide", DETR, 1999.
- 1.5 The essence of the approach is that an independent set of objectives and associated targets (which are really quantified objectives) is used as the basis for testing the RPG performance. These objectives articulate what is meant by sustainable development and they provide an independent measure of the RPG. It follows that the process of appraisal of the RPG uses the objectives as the criteria for assessment.

Preparation of the objectives

- 1.6 The South West Round Table prepared the objectives used in the appraisal in response to a request from Baker Associates (see Table 1). However, it has to be recognised that these objectives are preliminary in the sense that they are yet to be widely debated in the region, which in turn means that they are likely to evolve and be refined as that regional debate takes place. Currently, therefore, they represent only an interim set of objectives around which the appraisal could be constructed.

Table 1: Interim Regional Objectives for Sustainable Development

Objective	Illustrative targets
"Prudent use of natural resources"	
To reduce consumption of undeveloped land	<ul style="list-style-type: none"> - reduce greenfield land take - increase use of previously developed land - increase average residential densities in all new developments - increase provision of additional dwellings through conversion and reuse of existing building stock - reduce annual loss of flood plain to nil
To protect soils and the best and most versatile agricultural land	<ul style="list-style-type: none"> - reduce irreversible loss of targeted agricultural land
To promote a move up through the waste management hierarchy 1 reduce 2 reuse 3 recycle 4 incineration with energy recovery 5 landfill	<ul style="list-style-type: none"> - achieve a reduction in commercial waste for disposal - reduce amount of domestic waste disposed of by landfill - increase recover of energy from waste
To reduce consumption of minerals from primary sources	<ul style="list-style-type: none"> - reduce extraction of sand and gravel - reduce extraction of crushed rock - reduce extraction of building stone
To ensure that water is efficiently used to meet needs whilst reducing environmental impact and resource depletion	<ul style="list-style-type: none"> - extend use of water conservation measures in all properties - reduce (to zero) all new development which would mean damage to river flows, new reservoir construction which causes significant environmental damage, or significant aquifer depletion
To promote the prudent use of energy	<ul style="list-style-type: none"> - increase use of renewable energy sources - reduce the energy consumption of development
To maintain and enhance biodiversity resource in the region	<ul style="list-style-type: none"> - halt damage to nationally and internationally designated sites - meet regional BAP targets for species - increase the stock of wildlife habitats at very level from regional to community - improve population of farmland and woodland birds - increase achievement of favourable management status of species rich hedges within every district - halt loss and maintain important habitats including <ul style="list-style-type: none"> - wetlands - estuaries - coasts and cliffs - lowland heath - moorland
"Effective protection of the environment"	
To maintain and enhance the quality, viability and distinctiveness of the landscape as a place to live and work	<ul style="list-style-type: none"> - reduce the loss of countryside valued for its intrinsic quality - reinstate/enhance strategic landscape features - halt the loss or fragmentation of 'tranquil areas' - increase protection of coastal zones

To make towns and cities more attractive places to live	<ul style="list-style-type: none"> - maintain and improve quantity and distribution of open space with an amenity value (no per capita net loss) - reduce the number of households affected by ambient noise - reduce volume of traffic - increase the provision of wildlife and green space within 300m of every household
To improve the accessibility of urban dwellers to surrounding countryside and its products	<ul style="list-style-type: none"> - increase community forest area and country parks
To maintain and improve the quality of ground, river and sea waters	<ul style="list-style-type: none"> - reduce length of non-compliant river stretches - upgrade standards of all bathing beach water - reduce incidents of groundwater pollution - reduce farm based pollution incidents
To improve air quality and reduce man-made components of climate change and other threats to the global atmosphere	<ul style="list-style-type: none"> - achieve air quality targets in full (CO2, particulates etc) - increase trips/km by walking cycling - reduce vehicle based distance travelled - increase proportion of freight movement by rail starting and/or finishing in the region - implement integrated transport system in designated areas (both urban and rural) - increase woodland cover
To maintain and enhance the historic environment and assets of the region	<ul style="list-style-type: none"> - halt loss or damage to sites of national or international significance - conserve and enhance historic built fabric
“Maintenance of high and stable levels of economic growth”	
To grow and trade in ways that are environmentally and socially benign	<ul style="list-style-type: none"> - trade fairly
To encourage and accommodate the process of economic change and diversification	<ul style="list-style-type: none"> - achieve stable long run average growth in regional GDP - achieve stable employment growth - reduce locally high unemployment
To ensure good accessibility to, and movement of goods by, businesses within the region	<ul style="list-style-type: none"> - all new sites for industry and commerce to be within x00m of the primary road network - increase proportion of new office floorspace within town or city centres - all new sites for manufacturing and distribution to be well located with respect to freight interchange facility - reduce lost time as % of total travel time
To encourage and accommodate the expansion of identified growth sectors eg business/industries	<ul style="list-style-type: none"> - increase % of total employment in targeted growth sectors - achieve a continued supply of strategic sites for advanced manufacturing and export services
To encourage stronger linkages between firms	<ul style="list-style-type: none"> - achieve a continued supply of strategic sites to promote clusters and specialisms
To support and maintain the rural economy	<ul style="list-style-type: none"> - decrease the loss of local shops/post offices - promote development of rural specialisms
To increase regional economic autonomy, and in particular to increase value-added within the region	<ul style="list-style-type: none"> - reduce the proportion of the value of exports from the region accounted for by unprocessed goods
“Social Progress which recognises the needs of everyone”	
To find a strategic balance in the distribution of population, employment and housing related to infrastructure	<ul style="list-style-type: none"> - match housing provision to employment growth at the sub-regional level - increase the accessibility to housing for household needs arising within communities and for economic migrants

To reduce disparities in income, access to jobs, housing, and services between areas within the region and between segments of the population	<ul style="list-style-type: none"> - implement regeneration programmes in all areas in the top quartile for relative multiple deprivation - reduce unemployment in defined priority areas - achieve infrastructure investment to support the relevant employment sites
To ensure good accessibility to jobs, facilities and services in the region	<ul style="list-style-type: none"> - increase % of population with access to pt service - increase % of population near primary school - increase % of population near a hospital
To provide a decent affordable home for every household whilst minimising the need to build additional units	<ul style="list-style-type: none"> - increase % of new homes in social housing
To protect and improve the health of all residents	<ul style="list-style-type: none"> - targets from 'Our Healthier Nation'
To promote and enhance quality of life across the region	Improve regional performance against quality of life indicators

1.7 The Round Table took, as a logical starting point for the regional objectives, the Government's four themes set out in "A Better Quality of Life: A Strategy for Sustainable Development for the UK", May 1999 (Cm4345). These are:

- social progress which recognises the needs of everyone
- effective protection of the environment
- prudent use of natural resources
- maintenance of high and stable levels of economic growth and employment.

1.8 However, the Round Table has reservations about the formulation of the economic theme, namely the 'maintenance of high and stable levels of economic growth'. The Round Table anticipates that alternative formulations may be more appropriate to the South West and has therefore begun the task of developing a more detailed and robust framework for regional sustainable development to provide more appropriate guidance in the future.

The steps in appraisal

1.9 The guidance on preparing a sustainability appraisal of RPG identifies four different types of task:

- **'scoping' the guidance** to ensure that it covers the most important issues for sustainable developing in the region
- **appraising the spatial strategy** to ensure that the proposed distribution and location of development is the best option for the region
- **appraising the policies** to ensure that they help with the task of delivering more sustainable development in the region

- **inputting to monitoring and review** to ensure that the most important things for sustainable development are monitored, and that the RPG is subsequently reviewed in the light of the findings from the monitoring.

1.10 This report covers the first three of these tasks. The Round Table will be addressing the issue of monitoring and review in conjunction with Regional Planning Conference at a later date when the Guidance is closer to finalisation.

Appraisal as a process

1.11 Appraisal is intended to be a process. It is a sequence of reviews of emerging plan content, where the findings get fed back to the plan makers so that they are able to amend the plan in order to improve it from the perspective of sustainable development. In the case of this round of RPG preparation, however, much of the work had already been done with the full Consultation Draft being prepared in July 1998 before the requirement to do a sustainability appraisal was introduced.

1.12 Regional Planning Conference, however, was concerned to understand how earlier rounds in RPG development performed in relation to sustainable development, and a series of tasks has been performed on earlier documentation (see figure 1). The results were fed through to Conference.

Scope of this report

1.13 This report addresses the findings from the final stage of appraisal and is a commentary on the Draft RPG.

1.14 In carrying out the appraisal of the Draft RPG, we have looked at and worked with the main policy statements ie at the text in bold. In a number of instances we have drawn additional guidance from the supporting text, but the primary focus has been on the policy statements themselves. On occasions we have made comments about lack of **policy** guidance, when elements of that guidance are present, but only as supporting material rather than as a specific policy statement. In these situations, there may be a case for restructuring the material in order to achieve a more certain policy framework.

1.15 The approach taken has been to examine each policy in turn against each objective and each illustrative target. In the field of sustainable development very many direct and indirect relationships will exist between any one policy and many of the objectives. In this appraisal, we have confined our interest to those relationships where a clear strategic (direct) link can be established.

1.16 In a number of instances (eg process policies such as Policy 3), the policy could not be appraised in this manner and was therefore excluded.

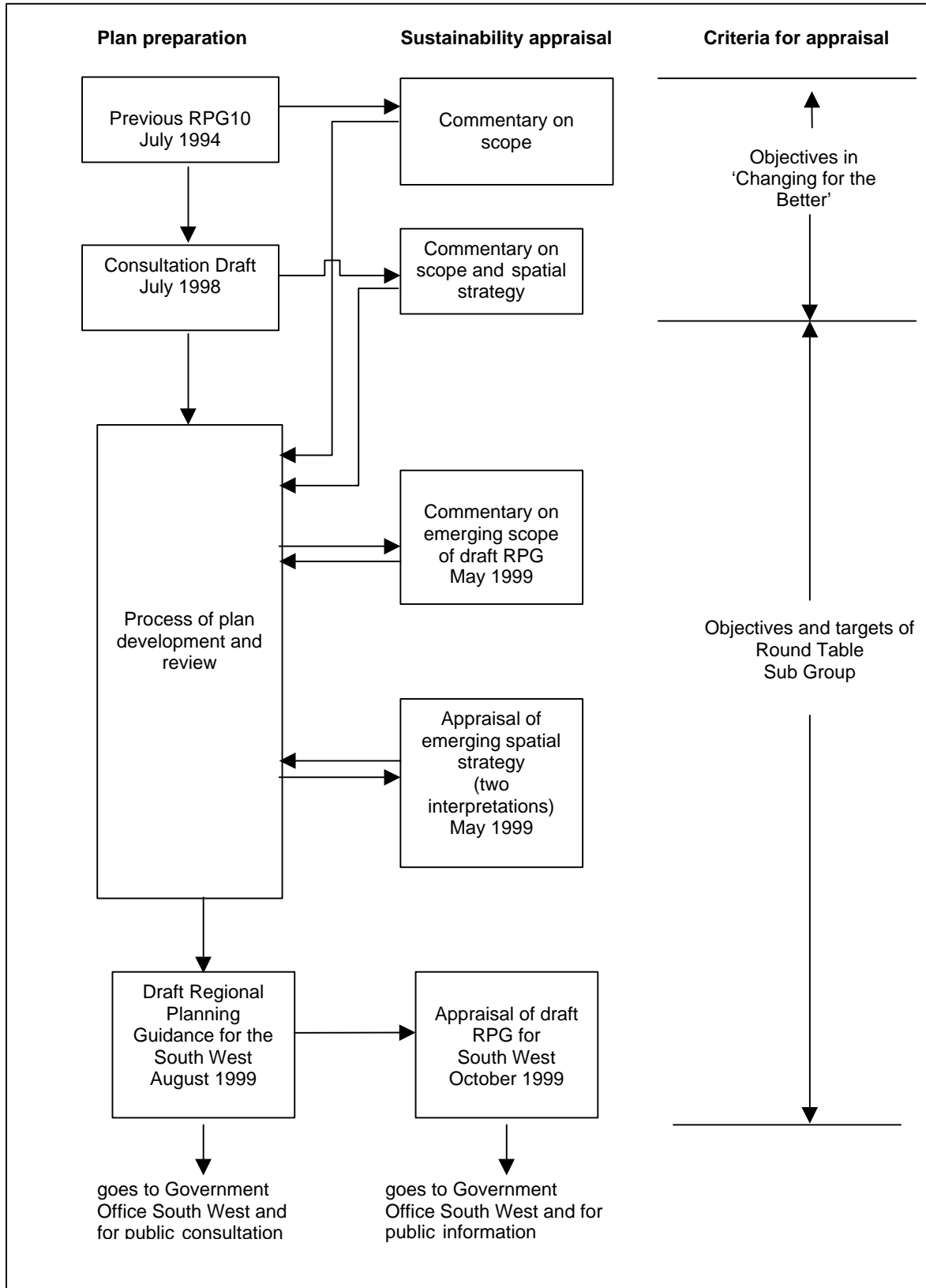


Figure 1: Process of appraising Draft RPG for the South West

- 1.17 The report contains four substantive sections:
- Section 2 sets out the findings from the scoping exercise
 - Section 3 examines the policies in the Draft RPG which relate to the spatial strategy (policies 1-23 and policy 55)
 - Section 4 examines the other, topic based policies (policies 24-54 and 56-78)
 - Section 5 explores identified omissions in the Draft RPG.
- 1.18 Sections 2-4 are each accompanied by an annex which sets out the findings in more detail.
- 1.19 In the course of preparing the appraisal and these annexes, a significant number of worksheets were prepared. These have been submitted to the Round Table as a supplementary record of work undertaken and are available to anyone wishing to understand in more detail the process that has been followed. They are available from the distributors of the main report on the appraisal. If you would like to see a copy, please contact Kevin Tinsley at Government Office for the South West, The Pithay, Bristol BS1 2PB in writing or telephone 0117 900 1820

2 Scope of the Draft Regional Planning Guidance

Methodology for scoping

- 2.1 The scope of the draft RPG was checked against the Round Table's objectives and targets for sustainability. This exercise was completed three times in all as the document was re-drafted. Repetition of the exercise enabled the consultants to report on the scope of the strategy and policies as they evolved. The outputs from the scoping exercise enabled more detailed and constructive comment at the policy appraisal stage.
- 2.2 Annex 1 summarises the findings from the scoping exercise conducted for the final version of the Draft RPG as it stood in July 1999. It makes a brief commentary against each of the Round Table's objectives.

Key findings

- 2.3 The purpose of this exercise is to explore scope and not quality. In other words, it is examining whether or not the broad range of issues that should be addressed are addressed. The question of quality is addressed in chapters 3 and 4.
- 2.4 In general, the scope of the RPG is good when considered against the sustainability objectives for the South West. It addresses all of the Round Table's sustainable development objectives (in whole or in part), with the exception of fair trade.
- 2.5 A number of weaknesses were identified, the most important of which are as follows:
- the scope on consumption of undeveloped land is wide, but fails to address mechanisms for achievement or priority setting, other than through the application of a sequential approach; for example, there is no strong explicit policy to promote increased residential densities at appropriate locations throughout the Region, although the supporting text does make reference to increased densities at various points
 - there is no guidance, spatial or otherwise, on resolution of issues arising from the pursuit of alternative energy sources
 - with reference to a number of sustainability objectives, the scoping exercise picked up the loss of an earlier policy on the urban fringe which has diminished the overall scope of the strategy to its detriment
 - whilst economic policies exist for each location and most issues, they are not well integrated; strategic guidance on future location of economic activity (eg strategic sites, office development in town centres) is absent from the topic specific policy statements; there is some supportive text on potential criteria for site selection, but this is not comprehensive in terms of a sustainable development agenda and does not have full policy status (eg para 5B120)

- with respect to a number of other economic issues the scope is weak eg rural specialisms and their implications (other than tourism), increased autonomy and added value in the region; this probably reflects the current visionary (rather than detailed) Regional Economic Strategy
- whilst many references are made to transport related issues, there is a general weakness in terms of the policy content, for example opportunities to promote more integrated approaches (such as priority *inter alia* for pedestrians and cyclists on road space in PUAs)
- the loss of earlier policies on revenue obtained from transport charges and its re-investment in suitable transport infrastructure, weakens the scope of policies on transport, air quality and climate change.

2.6 In addition, a number of other omissions have been identified against the sustainable development objectives but where the inclusion of material may not be so relevant for RPG. These include:

- water conservation measures
- prevention of farm based pollution incidents
- noise
- mechanisms to address social disparities (other than identification of areas of greatest priority for regeneration)
- disabled access.

2.7 Apart from the issues identified above, much of the comment is about the general nature of policies (eg energy, transport) rather than absence of policies. The detailed policy appraisals take these issues further and are discussed in the following chapters.

3 Appraisal of spatial strategy

Methodology for appraisal of the spatial strategy

- 3.1 The spatial strategy represents the core of the Guidance. The relevant policies can be grouped as follows:
- policies which set out the strategic principles (*policies 1 and 2*)
 - policies which set out development principles for different categories of area defined in the strategic principles (*policies 4, 18 and 19*)
 - a policy on the spatial distribution of housing development (*policy 55*)
 - policies which refer to specific geographical areas (*policies 6-17 on the Principal Urban Areas, policy 20 on the coast, policy 21 on Cornwall and the Isles of Scilly, and policy 22 on areas of special need*).
- 3.2 The approach taken to the appraisal was to examine each policy in turn against the objectives and targets. In the first instance this was recorded on a policy appraisal sheet which set out the findings in a discursive form and also summarised them, wherever possible, in a tabular form using the symbols set out in the table below.

Symbol	Meaning	Commentary on use in appraisal
✓	positive impact	used when a positive impact can reasonably be identified
=	policy is consistent with objective (target) but no certain contribution can be identified from policy as worded	
?	Relationship exists, but difficult to determine outcome	
-	reiteration of PPG (neutral outcome)	
•	RPG could have achieved more	In some cases there might be a low, positive impact, but the opportunity to create more sustainable development patterns was not fully used.
X	negative impact	not used much in appraisal; reflects fact that outcomes often cannot be identified <i>nb cannot be assumed that as strategy is worked up in more detail, that more X will not emerge</i>
Blank	no relationship	

Figure 2: Notation used in appraisal

3.3 The findings of these appraisal sheets are drawn together and set out in Annex 2.

Summary of findings

3.4 A summary of the findings of the appraisal of the first, second and third groups of bullet points (in para 3.1) is set out on figure 3. A descriptive appraisal of the geographic areas is included in the text, but the difficulty of identifying impacts means that it has not been given a tabular expression.

	Policy 1 Spatial strategy	Policy 2 Sequen. app.	Policy 4 PUAs	Policy 18 Other locations	Policy 19 Rural areas	Policy 20 Coast	Policy 55 Dist. of housing
Natural res.							
Objective 1	✓	✓	=	?	?	?	?
Objective 2	=	=	=	?	?	X	?
Objective 3							
Objective 4							
Objective 5							
Objective 6		?					
Objective 7	=	?	?	?	?	?	?
Environment							
Objective 8	=	✓	=	?	?	✓	?
Objective 9	?	=	•	=	?		
Objective 10	=	?					
Objective 11						✓	
Objective 12	✓	✓	=	?	?	?	?
Objective 13		=	•	?	?		
Economy							
Objective 14							
Objective 15	?	?	✓	?	?	✓	?
Objective 16	?					X	
Objective 17	?	?	?	?	?	✓	?
Objective 18	?		?			?	
Objective 19	X	?				✓	
Objective 20						✓	
Social progress							
Objective 21	✓	=	=	=	=		?
Objective 22	=	=	=	?	?	=	?
Objective 23	?	✓	✓	?	?		
Objective 24		?					
Objective 25						•	
Objective 26			?	?	?		?

Figure 3: Appraisal of spatial strategy

Strategic principles (policies 1 and 2)

3.5 The strategy promotes a preferred sequence to the identification of land to meet development requirements. In so doing it aims to limit both use of greenfield land and development in the countryside by channelling development to larger towns, particularly the Principal Urban Areas (PUAs).

This is neatly reinforced by a policy on a sequential approach which promotes, first, reuse of brownfield sites in urban areas, secondly, new locations in urban areas, and thirdly, other sites well located for achieving sustainable development and reducing the need to travel.

- 3.6 This strategic approach is sound in principle. The two aspects are potentially mutually reinforcing and accord well with a number of important principles for achieving more sustainable development patterns, for example reducing greenfield land take, increasing the potential for journeys made on foot, by bike, or on public transport, and promoting the potential for a strategic balance in the distribution of population, employment and housing, appropriately served by transport infrastructure. It is not surprising therefore that the appraisal shows (in figure 3) high levels of either positive links or links which are not incompatible but not fully exploited with respect to sustainability objectives both for environmental protection and prudent use of natural resources.
- 3.7 There are concerns that the success of this overall strategy leans heavily on the identification of sites that are well located for achieving sustainable development. In practice, such sites may be difficult to identify and agree between the relevant authorities. The strategy provides insufficient guidance on this. Without high quality sustainable transport infrastructure, the net result may be that the volume of additional numbers at any location outweighs any modal shift or reduction in need to travel.
- 3.8 With respect to economic growth, the strategy has potential for complementarity with the appraisal objectives as expressed, given that the strategy emphasis is on the PUAs and other substantial towns which contain a significant proportion of the economic activity in the Region. A lack of clarity, however, means that positive impacts cannot be identified at present.
- 3.9 A significant negative impact appears to emerge with respect to rural areas. Here, the lack of clarity about what is meant by development 'primarily to address local needs' may underestimate the need to bring about economic diversification and change outside the principal settlements in a Region where half the population still lives outside the major urban centres.
- 3.10 The social agenda is potentially relatively well addressed by the spatial strategy. For example, by placing the emphasis on urban areas, it has the potential (but not the certainty without associated policies of positive discrimination across a broad spectrum of activity, many unrelated to RPG eg training, social exclusion) to benefit the largest concentrations of deprivation in the Region.

Principal urban areas (policy 4)

- 3.11 In practice, neither the strategy nor any of the supporting policies provides guidance on the extent to which development in or close to the urban areas is to be the priority. Without clearer guidance on this matter the outcome is uncertain and the assumed benefits set out in paragraph 3.3 remain open to question.

3.12 PUA's have been chosen on the basis of their size rather than on the basis of their ability to accommodate change. The PUA's are very different in character, function and potential for further urban development. The main policy for urban areas properly identifies the importance of urban areas and the aim that policies for these areas should be seeking to achieve 'urban renaissance' and this resonates with the agenda for more sustainable development. Again, however, there is no indication of the scale of growth which is intended to be achieved in each PUA and its hinterland.

3.13 In terms of the strategic guidance which can be offered by RPG, the following represents a possible approach to the guidance on PUA's:

- PUA's have the greatest potential to accommodate change and in so doing bring the greatest potential benefits; a target % of development to be accommodated in PUA's should be set (either on a whole region or sub-regional basis) which needs to be both significant and a greater proportion than in the past
- ideally, a target could then be set for each PUA plus its hinterland
- a commitment should be made to achieving a balance between homes and jobs
- guidance should be provided on a consistent approach to the peripheries of urban areas including criteria for site selection, strategic landscape, recreation and forestry provision, and accessibility issues.

Other locations for balanced development (policy 18)

3.14 This policy introduces three separate components into the second tier of the development hierarchy set out in policy 1:

- substantial towns smaller than PUA's
- smaller settlements
- new settlements.

3.15 For each it is understood from the policy title that the critical consideration is that they should be of sufficient size to achieve balanced development (ie with the potential to keep lengthy trips to work, to school etc to a minimum). This principle is supported.

3.16 In detail, the policy is difficult to interpret. In particular, it appears to be more accommodating of development in or adjoining the substantial towns than the policy is for development in PUA's. This is difficult to reconcile with the priority given to PUA's. Appraisal is difficult to take further than the broad support set out in para 3.11 because the intended operation of the policy is not clear. Relevant questions are:

- how are settlements which are not likely to become principally dormitory towns to be identified?

- are dormitory towns linked by good public transport to major employment areas seen as a way of relieving pressure on PUAs?
- when is a new settlement preferable?

3.17 Broad guidance is provided in the supporting text, but the way that the criteria are combined is confusing. Clarity could be gained if different elements of the strategy were set out separately, together with an indication of their relative importance.

Rural areas (policy 19)

3.18 The corollary of lack of clarity over how much development is to go into urban areas is that the relative importance of development in rural areas is not given specific expression. Policy 1 indicates that development is intended to primarily address local needs. This will have a significant effect, altering past patterns of dispersed development in rural areas based on car transport. In principle this approach accords with many environmental aspects of the sustainable development agenda.

3.19 Policy 19 presents the overall strategy for rural areas. It conveys mixed messages. On the one hand, like policy 1, it implies restricting the role of rural settlements and communities to their current level/function, in this case by promoting the idea of service centres and essential services. On the other, it promotes facilitating the restructuring of the rural economy which may involve economic and social changes which go beyond addressing local needs. Each of the components that it sets out can be supported with respect to one or more aspects of the sustainable development agenda.

3.20 An important omission relates to lack of protection for tranquil areas, which in turn reflects the fact that there is no distinction made between different types of rural area, whereas in practice they are very varied.

3.21 In rural areas the majority of development decisions involve trade offs. Here, as elsewhere, the aim must be to search for 'win:win' situations. It is proper that decision making with respect to rural issues should be based on local priorities and local understanding of local needs rather than strategic considerations (other than strategic environmental considerations). However, the scope to do this is potentially limited by the restrictions set out in policy 1. To be clearer and to have a decisive positive impact on rural areas, the policy needs to say more precisely how the overall thrust of 'primarily to address local needs' is to be interpreted, and whether, and to what extent, any of the policy aspects for rural areas can be compromised for the sake of others, and under what circumstances.

The coast (policy 20)

3.22 The policy aims to promote an integrated approach to coastal development based on good management principles and regard for environmental impact. The implications are both for regeneration based on economic diversification, and important development around important assets. The policy needs to spell out with more clarity what the spatial implications are, and to take up the important point made in the text that planning for the

location of new development needs to be informed by sea level trends and potential flood impacts.

Distribution of housing (policy 55)

- 3.23 Whilst this policy is not presented in the Draft RPG as part of the spatial strategy, it nonetheless could prove very influential in determining future development patterns. It makes provision both for the future level and distribution of housing.
- 3.24 In terms of the level of housing, a number of adjustments are made which have the effect of reducing the housing requirement. At the regional scale, the most significant of these is an adjustment to reflect an assumption that in-migration will be 10% less than predicted (DETR 1996-based household projections) over the period 1996-2016. A background paper on Population and Housing sets out the justification for this adjustment. The uncertain nature of this assumption, however, (and others included in the same paper) emphasises the difficulty in robust forecasting of future housing demand and consequently the relative weakness of the 'predict and provide' approach. By implication, it points up the need for an approach which ensures an adequate supply of housing without permitting over-allocation and development at some locations. This is discussed further in section 5 of this report.
- 3.25 A number of county adjustments have been made to the figures, notably those for Dorset and Avon. In the case of Dorset these adjustments are presented in the Background Paper as technical ones due to 'labour market factors' but a reverse adjustment is not made in the case of Wiltshire which on the evidence presented would be a consistent approach. In the case of Avon, the adjustment is linked to the difficulties of achieving the scale of development. Overall, technical and policy-led adjustments appear to be mixed, with a resultant lack of clarity over how the figures have been derived.
- 3.26 The spatial strategy takes strong guidance from national policy presumptions that travel by car should be minimised and if possible reduced. Development in PUA's and in settlements where it can promote and support self-containment reflect this. The extent to which the allocations of housing to counties are seeking to redress current strategic (significant) imbalances in distribution of jobs and housing is unclear. The Background Paper makes reference to current significant net commuting flows from Cornwall to Devon, and from Somerset, Gloucestershire and Wiltshire to Avon. The critical question is whether the strategy will either reduce these flows or accommodate them in more sustainable modes of transport. It cannot be answered from the information currently available.

Specific geographical areas

- 3.27 The appraisal identifies a lack of spatial guidance with respect to the strategic development locations. In addition, the draft RPG does not provide guidelines or criteria to be used for making those decisions. Instead, a number of sub-regional studies are proposed, covering the north of the Region (almost 40% of the Region's population), the centre of the Region

(Taunton and Exeter), Bournemouth-Poole, and Plymouth. A new round of studies introduces further delay without commitment to a timetable and subsequent action plan making, when the objective must be to get more sustainable guidance into place as soon as possible. In these studies, and in the subsequent policy development, it must be clear that planning for PUAs involves both the urban area itself and the hinterland which should be treated for strategic policy purposes as a whole, eg 'Greater Bristol' with significant parts of South Gloucestershire, Bath and North East Somerset, and North Somerset, or 'Greater Plymouth' including adjacent parts of Cornwall and Devon.

- 3.28 The focus of the policies for each PUA varies reflecting their different nature. The scope of the PUA approach as applied at each of the specific PUAs is neither consistent nor comprehensive and contributes to the uncertainty about what a PUA designation implies. The general nature of the statements makes their impact difficult to identify and detailed appraisal impossible. The most important findings are summarised below, but are of a general nature rather than being specific to details of the performance with respect to sustainable development.
- 3.29 For **Bristol**, the policy has the potential to benefit the whole region by providing investment in the Region's flagship city, recognising its regional and national role, and helping to ensure in the long term access in the Region to a range of national or international quality facilities and services ranging from cultural opportunities through to business services. The intended scale of development for the city and its hinterland is not clarified, but in order to meet the broader strategic objectives (eg focus on PUAs, economic role) is assumed to be substantial. The greatest strategic concern attaches to the issues of transport, road and rail infrastructure and congestion. These are difficult to resolve in the context of current national policies, but require early resolution if Bristol is to retain a pre-eminent role and more sustainable development patterns are to be achieved.
- 3.30 For **Bath**, the policy does not clarify its intended future role with regard to development. Local Plan policies will need to "recognise the need for economic development" ensuring it is "limited" and does not significantly damage environmental quality. The policy is very general. There are no identifiable impacts and all will depend on the Local Planning Authority's interpretation of where the desirable balance between economic success and environmental conservation lies. These interests are co-dependent as well as potentially conflicting. Areas, or types of site, will need to be identified at a local level, for which one aspect is prioritised above the other, as not all development can contribute to both. The RPG does little to encourage or guide this task.
- 3.31 For **Weston-super-Mare**, there is a clear priority for economic based regeneration, with support for the tourist industry specifically. There is no clarification of its intended future role viz a viz Bristol or of the intended scale of future development. There is a danger that the improvement of transport links to Bristol, though leading to more sustainable travel patterns and possibly more visitors, could undermine sectors outside tourism, as net out-commuting to Bristol could increase. On this basis, the package of measures to improve economic prospects in Weston needs to be effective

and well resourced. Otherwise the basic strategy is very positive in terms of impacts on economic, social and environmental objectives.

- 3.32 For **Swindon**, there is a clear emphasis on economic growth with benefits for the economic objectives.. Swindon has good links to the South East and has the capacity to draw in investment from outside the region. The Draft RPG wishes to exploit this opportunity to the benefit of the South West, helping to ensure continued investment in new technologies, new products and new skills within the Region. By implication, the intended scale of growth is significant. It is not clear how this will affect the role of Bristol which is better related for creating/retaining links to more western parts of the Region. There is little spatial content to the policy and there are no criteria or targets to help determine the extent of growth and the level of environmental change that will take place. Whilst economic growth can lead to other, wider environmental benefits (eg investment in new technologies, reduced air pollution, energy conservation measures), the appraisal nonetheless identifies impacts relating to the use of greenfield land (agricultural, landscape and biodiversity resources). The potential constraint with regard to water resources in the Swindon area is not resolved.
- 3.33 For **Gloucester and Cheltenham**, the policy has very limited scope. The policy recognises their roles as PUAs and identifies the need to review the Green Belt which by implication may have net environmental benefits by allowing the development of more sustainable patterns of growth when combined with the priority that is to be given to public transport investment (eg shorter journeys to work) However the general nature of the statements made means that there are no strategic principles for the future development of these settlements.
- 3.34 The strategy for **Bournemouth and Poole** addresses a very complex set of issues relevant to sustainable development. In this area there is a clear conflict between significant environmental assets and continued economic growth. In response, the strategy promotes an emphasis on urban containment. As a consequence, this is the only policy to address development density and it provides for a significant increase in densities for new development. The impacts of this on the urban area will depend partly on local policies for urban design and open space. Continued economic expansion is to rely on increases in productivity and the use of existing resources and therefore relies on measures to promote it which lie outside the scope of the RPG. Generally, the protection of important environmental assets surrounding the conurbation appears to be favoured over other aspects of sustainable development. The potential implications of this combination of policies are not resolved strategically by the RPG, eg whether housing growth on any significant scale is to be permitted in the conurbation and/or its hinterland. A sub-regional study is therefore proposed. Support for airport growth, in this and any other area, may be inherently unsustainable in terms of its impact on global atmospheric stability, though this has to weighed against the benefits to social progress of business levels, job creation and so on that increasing air transport could bring.
- 3.35 For **Taunton**, it is difficult to be precise about impacts as there is no indication of how much and of what sort of development will be

required/accommodated in order to enhance its role. Its functional role as a PUA is less clear than for the other urban areas with the distinction between it and 'substantial towns, smaller than the PUAs, which offer the prospect of contributing towards meeting regional as well as local development needs' (policy 18) being hard to make. Neither is it clear how Taunton should develop its role in relation to other larger PUAs. The policy will not necessarily impact on patterns of development, as no targets are set.

- 3.36 **Exeter** is promoted as the most influential PUA in the central region. In order to develop this role the need to diversify the town's economic base is considered important. This would allow varying forms of economic growth, opportunities and choice for investors. This would amplify the chances of economic success in the long run. The policy does not guarantee success, but it does facilitate it. Presuming that further development land would be required, there will be impacts on the consumption of greenfield land and other resources. The strategic principle of balanced development (housing and employment) is reiterated and growth is to be supported by inter-modal transport development. If this is successfully implemented then there will be wider economic and social benefits in the sub-region. However, the transport opportunities are not fully identified and will not be realised on the strength of this policy alone.
- 3.37 **Plymouth** is promoted as the gateway to the western area of the region and in particular to the funding opportunities that exist there. There could be additional benefits for the sub-area as a whole, if the funding opportunities are explicitly linked to the need to reduce peripherality. As with Exeter, the principle of economic diversification is promoted as the basis for long-term economic success. If successful such diversification could bring wider social and environmental benefits. Again it is combined with the need to improve transport links to the rest of the region though the economic benefits of improved transport infrastructure do not always accrue to the target area. There is a potential conflict between the desire to encourage locally based economic activity and that of reducing peripherality. Greater access to the rest of the region and the UK may encourage firms from outside the region to move into the area, but equally it may encourage firms within the area to move up country. Some of the broad principles can be adopted by local planning authorities and translated into spatial policies, but until they are made more specific it is difficult to appraise the impacts. What is clear is that that economic interests are promoted. Environmental constraints are referred to in the supporting text, but overall the implication appears to be that environmental interests will be of lesser priority than economic growth. The overall impact of the strategy could be reduced by a commitment to aim for all new economic investments to be linked to good environmental practice (eg re energy conservation, waste minimisation, non-car based travel). Again, support for airport growth, in Plymouth or any other area, may be inherently unsustainable in terms of its impact on global atmospheric stability, though this has to weighed against the benefits to social progress of business levels, job creation and so on that increasing air transport could bring.
- 3.38 The strategy for **Torbay** provides strong guidance that economic regeneration and growth are of the highest priority. Negative impacts on environmental assets and resources are not considered, but again these

could be ameliorated by an approach that seeks environmental gains where possible. Within the economic aspirations of the policy there are potential conflicts. Reducing peripherality may increase economic links and reliance on activity in other areas rather than enabling more locally based economic activity.

4 Other policies in the Draft RPG

Overview

- 4.1 This round of preparation of RPG is embarking on the task of developing a more detailed regional strategy than previously which is a significant challenge. It is not expected to be completed in this round of RPG preparation.
- 4.2 Nonetheless, there is evidence that the process required to do this has started. With respect to biodiversity, for example, the strategy has achieved a significant degree of precision. This has required a substantial amount of work by many bodies to develop a consensus which could then underpin a regional approach to which the relevant bodies in principle agreed (though there may be differences with respect to clarity remaining to be resolved).
- 4.3 A corresponding approach remains to be carried through in a range of other topics. A major finding from the review of the topic based policies is that the strategic thinking to develop a genuinely regional approach remains to be done for a number of topics, for example, transport, landscape, waste. This is indicative of the need to continue to progress strategic policy development now, rather than waiting for the start of the next round of RPG preparation.
- 4.4 A summary of findings on the policies is set out in Annex 4, and the major findings are summarised below.

Environmental protection and resource management

- 4.5 RPG contains targets for the protection and restoration of the principal regional habitats of strategic importance and sits comfortably with the agenda for sustainable development. The landscape strategy is less well developed. Whilst ensuring that development does not threaten the special character, diversity and distinctiveness of the Region is set out as a key objective of the Draft RPG, this is not translated into policies for any specific landscape priorities. All priorities outside national designations are left to development plans to determine. As such, the Draft RPG does not provide strategic guidance, with no framework for strategic decision making, say at the sub-regional level. As a consequence there is no landscape basis for input to comparison of alternative development options as lower tier plan making commences.
- 4.6 Policies for community forests and woodland are consistent with sustainable development but could make a much greater contribution to it if they were set within the context of a landscape strategy and were linked to proposals for the use and management of the urban fringe.
- 4.7 The Guidance incorporate a number of principles (both policy and supporting text) and targets for waste which provide the basis for the future development of an integrated waste management strategy for the Region. In the absence of that strategy, the Guidance is relatively unspecific. The principles of sustainable development should underpin preparation of the strategy.

- 4.8 The South West is a region with significant potential for generation of energy from renewable sources but this has not been explored in this round of RPG preparation which means there is a lack of guidance on strategic aspects of renewable energy. The target provided within the RPG is consistent with the Government target. Given the South West's greater than average potential this can be construed as a negative statement. Renewables frequently require trade-offs, for example landscape impacts (of windfarms, biomass) against atmospheric stability. The Guidance supports renewable energy production 'where this is compatible with other environmental objectives' which effectively enables all decisions to be shaped by very local considerations even when the gains are global.
- 4.9 To be sustainable, more specific guidance is needed which distinguishes between different kinds of impacts, eg of fossil fuels on global atmosphere (widespread, long term, irreversible and unpredictable) and of visual impacts of windpower development (local, short term, predictable and reversible). The RPG needs to promote an approach that allows political impediments to the achievement of global impacts to be reduced. This could involve provision of sub-regional targets, based on local investigation and reporting, that are then given strategic weight in RPG and are monitored and supported by the Regional Assembly, or the South West Development Agency.

Economy

- 4.10 A number of the key objectives of the Guidance (c-f) address the strength of the regional economy and the social and economic benefits to residents that flow from this. In terms of specific policy content in the Draft RPG, the Guidance has focused on those matters where RPG can have most direct influence, namely the supply of employment land, including strategic sites.
- 4.11 In general the economic policies are not well integrated into other aspects of the plan. For example:
- strategic guidance on future locations for economic activity does not make links between the needs of different types of activity (including clusters), and the potential to meet these needs in ways compatible with the overall strategy and, hence, with securing more sustainable patterns of development; eg no links are made between types of activity and appropriate locations eg major employment generators such as offices to be in town/city centres
 - criteria for site selection are not set out as a policy; useful progress is made in this respect in the supporting text but, to be sustainable, the criteria need to be extended to strategic environmental considerations, including relationship to transport
 - no links are made in policy terms to the strategy for rural areas; meeting rural needs, including opportunities to develop rural specialisms, is an essential strategy theme which could be reflected in a policy statement, though again the supporting text make a useful link to rural economic diversification; by implication global gains (atmospheric stability) are

traded off for local economic and social ones with the suggestion that transport criteria will need to be relaxed, and the Guidance could be looking for ways to mitigate this eg growing sectors in rural areas which require less movement.

- 4.12 It is anticipated that RPG will be strengthened in terms of level of clarity as the RES is more fully developed. Prior to that, however, it is important for RPG to provide a strategic framework within which the spatial components of the RES can be developed.

Housing

- 4.13 The distribution of housing to the structure plan areas was considered in Chapter 3.
- 4.14 For a rural region, where low levels of social rented housing are combined with significant pressures for holiday accommodation and for in-movement for retirement, the issue of affordable housing is critical to the social and economic fabric of rural areas and as such is a fundamental aspect for sustainable development. The affordable housing policy properly focuses attention on affordable housing needs at the local authority level. The policy relating to exceptional development to meet affordable housing needs in rural areas is an important component for both economic and social sustainability.
- 4.15 It could, however, be strengthened in order to ensure that important social objectives are met. RPBs have been discouraged from including targets for affordable housing in RPG. Disaggregated targets would be inappropriate (given the need for detailed local studies), but a case can be made for an overall target to increase the supply of social housing in the Region as a whole, for example from the current 66% of the national level to a significantly greater proportion by 2016. This would indicate commitment to an increased supply of affordable housing without which a number of negative trends are likely to continue eg increases in distance travelled for work if employment growth is not matched by availability of affordable housing, and lack of housing opportunities for indigenous residents in remote communities.
- 4.16 A strong strategic framework is provided with respect to the use of previously developed land, which is firmly rooted in current thinking on good practice with respect to sustainable development. The overall target is disappointingly low and is substantially less than the Government's target, but there is no evidence that a significantly higher figure could be achieved. This is one of the major dilemmas facing the South West. It is important to start to make the links between this scale of greenfield development and other areas of policy making, for example policies for the urban fringe (see paras 5.5-5.6 below).
- 4.17 Achieving higher densities at appropriate locations is widely regarded as one, relatively easily achieved, mechanism for reducing greenfield land take. At a number of points in the Draft RPG, reference is made in supporting text to increased densities. However, the guidance avoids making a specific

policy statement on the matter which diminishes its overall impact in this respect.

Transport

- 4.18 The transport section commences with six key objectives of the transport strategy, which are in bold text, but not numbered as a policy. These provide a context for the chapter which is intended to be rooted in sustainable development, including the support of cycling, walking and public transport. The spatial content of these objectives relates to the reduction of peripherality and the completion of ‘missing links’ in transport infrastructure, though the latter depends on the outcome of multi-modal studies and the proven benefits of the former are open to question.
- 4.19 There is a policy for PUAs and a policy for other urban and rural areas. These contain sustainable principles, but do not provide enough specific clarity to demonstrate integration with the rest of the spatial strategy. The same can be said for the policy on inter urban and inter regional transport which is consistent with policies and strategic principles for PUAs, the economy etc. but does not extend them.
- 4.20 The policy for transport in PUAs addresses the need to reduce the environmental impacts by managing road traffic. It raises the issue of competition between centres, but does not provide guidance on how to address this. The RPG would be more effective if it provided a more detailed and specific approach since it is at this strategic level of planning that policies, targets and standards for these approaches need to be agreed.
- 4.21 The supporting text sets out regionally important road improvements, and the need for studies in some areas. Whilst overall, the improvements are limited in number and in purpose to safety and local congestion relief, the upgrading of sections of the A30 is significant and prioritises social and economic concerns above environmental considerations in this instance. There is a need for further examination of all costs and benefits before a regional commitment can be made to this scheme.
- 4.22 The supporting text recognises that large increases in road capacity are not a sustainable option. Other options are explored through a section on priorities for investment. This is not numbered as a policy, but the key points are in bold text. They are given in “broad Regional priority order”, along with a caveat that simultaneous investment is needed in order to deliver the regional strategy. The list reinforces both the chapter objectives and the spatial strategy as it places PUA investment at the top of the agenda. Emphasis is then given to the need to reduce peripherality in areas of special need, thereby prioritising economic and social objectives. There are, however, continuing concerns about the impact of transport investment on areas affected by peripherality (eg SACTRA Report) which need to be carefully examined in the context of the South West. Other approaches to economic and social objectives may prove to be more effective.
- 4.23 There is no policy for rail investment. This reflects the restraints on developing additional capacity in the South West. The transport strategy does not directly address this problem and generally will only impact on

short term, or local improvements. Neither does it raise issues of critical importance for future investment outside the Region, for example the South West is constrained by capacity going into Reading.

- 4.24 The policy for ports does not set out the individual role of each port and so the emphasis on supporting these roles does not carry much weight. Airport priorities will be determined by the current Airports Study, but in the Draft RPG no account is taken of the long term impacts of air travel on the global atmosphere.
- 4.25 Overall the transport strategy does not provide a clear regional context which fits alongside, and is integrated with, both land use and economic planning. In part this is a reflection of a difficult national context which makes radical transport proposals difficult to implement. In part it also reflects the difficulty in progressing a strategic approach. In particular there is no evidence of a debate over the emerging need to prioritise types of movements (as part of a process of rationing the available infrastructure capacity). Whilst this current round of RPG preparation cannot be expected to conclude such a debate, it is one that needs to be commenced without delay.

Tourism and Leisure, Sport and Healthcare

- 4.26 The chapter sets out, through policies, broad criteria for different types of tourism development. They aim to reduce environmental impact and maximise local economic and social gain. They provide a significant level of guidance, but impacts will vary significantly from place to place. There is no discussion of how the criteria (policy 68) are to be prioritised in different types of area, and much of the success of the policy will depend on this.
- 4.27 Contributions to sport and leisure facilities are sought from developers and valued open space is provided with protection, which reinforces the reference to amenity interests made in policy 2. The policies in this section should indirectly contribute to health targets and quality of life.

5 Significant omissions

Introduction

- 5.1 Given that the Draft RPG for the South West implies significant amount of greenfield land release, it is very important both that those releases are handled well and that future development is of a significantly better quality than hitherto. There is a need, therefore, for the strategy not just to address brownfield development and a sequential test, but also to consider the issues relevant to greenfield land release in terms of where it takes place, how it takes place, and its timing.

A managed approach to future housing

- 5.2 One of the most debated aspects of all parts of the development plans system is the level of housing provision contained in any guidance or plan. The Draft RPG for the South West is unlikely to prove an exception.
- 5.3 A sustainable strategy is seeking to ensure that sufficient housing is provided to meet needs, without excessive greenfield land releases at inappropriate locations. Given the uncertain nature of all forecasts of housing need (however good), a mechanism is required which ensures that there is sufficient flexibility to bring forward or hold back future allocations in accordance with the levels of take-up (need) identified through monitoring, whilst at the same time encouraging early development of brownfield land in the interests of 'urban renaissance'.
- 5.4 Currently a number of approaches are being discussed as this issue is addressed around the country. They include one or more of use of a range of housing numbers both at regional and sub-regional levels rather than one fixed figure, use of a sequential test to ensure that greenfield land is not taken up whilst suitable brownfield opportunities are available, and use of a phasing system to ensure that sites favoured by sustainability considerations are all used before the less favoured ones.
- 5.5 The Draft RPG should ideally set out a preferred approach for the South West, or alternatively guidance on the need for an appropriate mechanism to be incorporated into development plans.

The urban fringe

- 5.6 The urban fringes are the areas where significant quantities of development will be located in the period of this Draft RPG. This will inevitably bring major changes and it is essential that this development is done in a manner which does not repeat many of the patterns of the 1970s and 1980s.
- 5.7 The Draft RPG could make a significant contribution to the quality of this new development by incorporating positive guidance on a range of matters. This might include, for example:

- a greater mix of uses than has been the recent pattern (including employment, commercial, schools, other social, and residential uses) and a greater mix of housing tenure, housing affordability and type
- the integration of development within its strategic setting, including making full use of strategic landscape opportunities supported by a strategy to create woodland with recreation access where appropriate
- the creation of new areas of accessible open space providing for the needs of existing and new residents, and extending existing green networks, biological corridors etc
- the integration of more sustainable transport networks into fringe development from the outset
- guidance on the range of criteria to be used in determining the location of new development.

Densities

- 5.8 Several references are made to densities in the supporting text of the Draft RPG, but a policy for increased densities is only set out for Bournemouth and Poole. The Draft RPG could provide guidance on those situations where higher densities are both appropriate and expected. These would include, for example, areas of new development in or adjacent to PUAs and other substantial towns, urban villages and other locations where urban intensification can appropriately be promoted as a result of good access to public transport.

Design

- 5.9 Following on from the comments on the urban fringe and on densities, the Draft RPG makes no policy statement about the need to achieve development in ways which are significantly different from in the past, though there are a number of references in the supporting text. Commitment is needed over a range of issues including design (energy efficiency, aesthetics) habitat creation, accessibility and services.

6 Conclusions

- 6.1 The first major conclusion of the appraisal is that SWRPC has endeavoured to reflect many of the **principles** of sustainable development in its spatial strategy and the strategy as now presented has the potential to perform better than the strategy contained in the Consultation Draft Regional Strategy. This could provide the framework for a more sustainable approach to new development throughout the Region.
- 6.2 The level of clarity currently presented in the Draft RPG does not permit the same degree of confidence over how the strategy will work in **practice**. The most frequently occurring comments with respect to anticipated policy performance are that the impacts cannot be identified.
- 6.3 Substantially more information is required about the levels of development and the broad locations proposed for that development in different parts of the Region. Ideally, this should be in the form of targets at a scale substantially smaller than the Region. The current exclusive dependence on allocation of housing numbers to administrative areas provides a very broad picture of levels of growth around the Region but makes no significant contribution to providing a framework for a more sustainable pattern of development. The outcomes will depend on decisions taken at the development plan level and these appear to be insufficiently guided by the RPG.
- 6.4 Use of targets has commenced in this round of RPG preparation by the setting of targets for biodiversity (habitat protection and restoration) and re-use of brownfield land (suggested levels for such development in structure plan areas). Both are in the supporting text rather than set out as policies, but an overall target for total housing provision on brownfield land is set as a policy for the whole Region. This is part of the development of the new approach to RPG preparation. Accompanied by proper monitoring and review, it provides a much more rigorous basis for both plan making and evaluation of impacts and is seen as a significant statement of commitment by the Regional Planning Body to this new approach.
- 6.5 The findings with respect to the overall policy content (other than the spatial strategy) vary from topic to topic. The majority of policies have taken relevant aspects of sustainable development into account, though it is frequently observed that more gains could be achieved through more specific guidance and through a more systematic approach to making the lateral connections between different parts of the sustainable development agenda. In a number of instances, a major regional review is required in order to get into place a sustainable regional approach (eg waste management, renewable energy, transport) and these should be completed without waiting for the next round of RPG preparation.
- 6.6 A number of omissions are identified. The most important of these related to a managed approach to housing provision, matters relevant to the urban fringe and a policy on densities.

- 6.7 It is in the nature of an appraisal that it is looking either for negative impacts or for areas where positive relationships could be strengthened. Overall, the Guidance as currently drafted reveals very few specific negative impacts. In part this reflects the overall lack of clarity so that impacts at this stage are hard or impossible to predict. It is likely that as policies become more specific (eg at the development plans stage) more negative impacts will be identified. For RPG, concern must also centre around ways to strengthen positive relationships or to create positive links where currently they are neutral, and it is anticipated that Conference will do this by continuing to develop and strengthen the approach that has been set out in the Draft RPG.

ANNEX 1: SUMMARY OF FINDINGS FROM SCOPING EXERCISE

Objective	Commentary
1 To reduce consumption of undeveloped land	<p>The issue is covered by a number of policies on increasing the use of previously developed land and reducing greenfield land-take. Basic scope on the re-use of existing building stock is achieved by the sequential approach and other policies. Policies do not provide clarity on types of mechanisms to be employed.</p> <p>A policy on CPO, feasibility studies, design guidance and the dissemination of opportunities was removed.</p> <p>The removal of a policy relating to the prevention of isolated development has reduced scope.</p> <p>The basic scope on reducing loss of floodplain is met and extended to the prevention of additional flood risk through development, although the relevant policy is not stringent.</p> <p>A policy exists to promote higher densities in Bournemouth, but the RPG does not contain <u>policies</u> to guide LPAs in the pursuit of greater efficiency of land use for housing. A previous policy on this matter was removed.</p>
2 To protect soils and the best and most versatile agricultural land	<p>The scope is adequate, reflecting PPG7. Policies do not indicate in spatial terms where choices between losses of agricultural land may be required.</p>
3 To promote a move up through the waste management hierarchy: reduce, reuse, recycle, incinerate with energy recovery, landfill)	<p>The scope is broad, but lacks depth and spatial content.. Environmentally sound practices are for the tourism sector, but not for other sectors.</p>
4 To reduce consumption of minerals from primary sources	<p>The broad scope is good. Sustainable concepts and principles are addressed, place, but the intended policy outcomes impacts are unclear; for example, what is a “balance” between demand, economic benefits and the achievement of environmental objectives.</p> <p>Policies on sand, gravel and crushed rock, which existed in previous versions of the draft RPG were not present in the final version leaving a policy void.</p> <p>Basic scope is achieved on reducing the extraction of building stone. Figures for the mineral requirements are given.</p>
5 To ensure that water is efficiently used to meet needs whilst reducing environmental impact and resource depletion	<p>Policies address this matter but outcomes are unclear. There are no policies to reconcile the potential conflict arising through proposals for development in areas of water shortage. There is inadequate scope on water conservation.</p>
6 To promote the prudent use of energy	<p>Adequate scope is achieved and is generally supported by the transport section, with exceptions, e.g. policies to expand on airport activity. Targets for emissions and energy sources are in place.</p> <p>Basic scope on energy consumption is achieved, but there is a need to develop policies to engage LAs and their role in the decision making process through, for example, a criteria based approach. There is a lack of direction on specific spatial issues such as wind farms.</p>

<p>7 Maintain and enhance the biodiversity resource in the region</p>	<p>Policies address the objective but not necessarily the targets of the Round Table. Policies for the protection and enhancement of habitats prioritise designated areas. Scope is good. Although some policies for the protection of local biodiversity have been lost through the re-drafting of the RPG, adequate scope has been maintained. There are no policies to address the protection of hedgerows.</p>
<p>8 To maintain and enhance the quality, diversity & distinctiveness of the landscape as a place to live & work</p>	<p>The scope is good and addresses quality of landscape. Policies start to address peripheral urban growth issues, but there is no indication of how conflicts will be resolved. The final scope does not address the general issue of pollution risk, whereas earlier drafts had done. A designation-based approach is taken. The RPG does not attempt to incorporate the character-based approach as promoted by the Countryside Agency and referred to in PPG7. The tourism chapter indirectly addresses the issue of tranquil areas, but overall scope is inadequate and further reduced by the loss of a policy relating to the prevention of isolated development in the countryside. Policies on the protection of coastal zones achieve adequate scope.</p>
<p>9 To make towns and cities more attractive places to live</p>	<p>The scope is good. Policies address the issue of open space with amenity value, but do not address the Round Table's target. The overall scope is diminished by the loss of a policy referring to village design statements, but generally remains sound. There is inadequate scope on noise, with reference made only through a transport policy. There are many policies relating to the reduction of traffic, especially in the transport section, which supports the objective through policies for investment and priorities. However, the loss of a previous policy on reinvesting revenues raised through transport charges in the transport system reduces the weight of this section. The scope of policies on wildlife and green-space in urban areas is good. There were some losses in scope as the document was redrafted, relating to planning gain opportunities and positive recreational development in urban fringe areas.</p>
<p>10 Improved accessibility of urban dwellers to surrounding countryside and its products</p>	<p>The scope is adequate, but could be more spatially specific, especially with reference to community forests and country parks.</p>
<p>11 To maintain and improve the quality of ground, river and sea waters</p>	<p>The objective is directly addressed. Policies for management strategies broadly address the target of reducing non-compliant river stretches, but will not necessarily achieve the target. The scope of policies for coastal management is good. Policies on groundwater pollution are in place, but a clear and strong message on pollution risk is not made. There are no policies on farm based pollution incidents.</p>

<p>12 To improve air quality and reduce man-made components of climate change and other threats to global atmosphere</p>	<p>Policies reflect Government targets for air quality. The strategy does make reference to the role of cycling and walking (though many relevant opportunities for 'joined up' policy making are missed eg including cyclists and pedestrians as priority users of road space in PUAs). All new developments are to facilitate cycling and walking and the transport section is generally supportive of the Round Table's target.</p> <p>The transport section addresses the target of reducing vehicle-based distance travelled, eg through policies for locating development and policies for transport infrastructure development. Overall it is weak on traffic reduction.</p> <p>The basic scope is achieved for freight movement targets, but there is a lack of focus on locations.</p> <p>Whilst the RPG aims to set out a transport strategy, not all aspects could claim to be sustainable eg growth of air travel.</p> <p>The loss of a policy relating to re-investment of revenue (raised through transport charges) reduces strength of strategy.</p> <p>Scope on increasing woodland cover is achieved, but could be more spatially specific.</p>
<p>13 To encourage and accommodate the process of economic change and diversification</p>	<p>In terms of economic development the strategy is fragmented. There are policies for each location and policies for most issues, but they are not integrated. As a result the scope is broad, but the strategy is unfocussed.</p> <p>The key problem areas (in terms of unemployment) are identified and the priorities for regeneration are identified. Mechanisms weaker.</p> <p>Basic support is given for improving the skills base.</p> <p>Policies address the broad issue of competitiveness and small firm survival.</p>
<p>14 To ensure good accessibility to, and movement of goods by, businesses within the region</p>	<p>Policies do not address criteria for the location new economic activity (eg re office development, manufacturing, businesses generating significant quantities of freight).</p> <p>The transport section recognises and supports the need to reduce lost time, in order to enhance economic competitiveness.</p>
<p>15 To encourage and accommodate the expansion of targeted growth sectors e.g.: business/industries</p>	<p>Scope is generally adequate in that the RPG identifies the roles and strengths of different settlements.</p> <p>However, the strategy could be more specific with reference to what the targeted growth sectors are and where they are to grow.</p>
<p>16 To encourage stronger linkages between firms</p>	<p>The basic scope is achieved, but there is little clarity or specific reference to sectors or locations. There is little indication of how the objective can be achieved.</p>
<p>17 To support and maintain the rural economy</p>	<p>Scope is generally adequate for the competitiveness of the rural economy.</p> <p>Policies under the transport, economy, tourism sections and those for Cornwall and the Isles of Scilly and strategic objectives all contribute to the scope.</p> <p>Policies on objective 1 funds do not address rural needs in clarity, though reference is made.</p> <p>Rural policies do address the need to protect/ enhance the roles of towns and service centres and protect facilities. Other than for Tourism there are no policies on rural specialisms.</p>
<p>18 To increase regional economic autonomy and in particular to increase value-added within the region</p>	<p>A policy relating to Cornwall addresses this objective, but generally scope is inadequate. Plymouth also receives some relevant attention.</p>

<p>19 To find a balance in the distribution of population, employment and housing related to infrastructure</p>	<p>The strategy's focus on PUAs has the potential to bring homes closer to existing jobs. Policies attempt to address infrastructure constraints in areas where a balance could be achieved. Accessibility to housing is addressed.</p>
<p>20 To reduce disparities in income, access to jobs, housing, and services between areas within the region and between segments of the population</p>	<p>The scope is adequate and priority areas are identified. There are few policies on the approaches and mechanisms through which disparities will be addressed</p>
<p>21 To ensure good accessibility to jobs, facilities and services in the region</p>	<p>The scope is adequate on all counts, focussing on vitality and viability and regeneration. Future needs are also considered. The target of increasing the percentage of population close to a public transport service is not directly addressed, but the scope is generally adequate. The scope could be widened with regards to education accessibility. Basic scope is achieved with regards to health care.</p>
<p>22 To provide a decent affordable home for every household whilst minimising the need to build additional units</p>	<p>The scope of policies for the provision of homes is sufficient, but could be wider More consideration of the mechanisms for implementation, in terms of the re-use of land and property, would greatly improve the scope. The issue of social housing needs is recognised but the target is not addressed.</p>
<p>23 To protect and improve the health of all residents</p>	<p>The Scope is sufficient. Policies address access to facilities and the impact of development proposals on health.</p>
<p>24 To promote and enhance better quality of life for all residents of the region</p>	<p>Within the criteria for selection of areas of special need, criteria impacting on quality of life are identified. The scope is adequate given the overall intentions of the plan for sustainability. Policies support access to leisure and recreation opportunities. Directly address rights of way. The loss of a policy on the positive use of urban fringes diminishes the overall scope. The issue of increased access to public transport is addressed There are no policies to address disabled access</p>

ANNEX 2: SUMMARY OF FINDINGS ON SPATIAL STRATEGY

Appraisal of spatial strategy against objectives for prudent use of natural resources

- Concentration of development within towns and cities has the potential to assist in reducing greenfield land take through emphasising the recycling of previously developed land.
- If associated with wide ranging policies (many of which are non RPG) to improve the quality of urban life, may contribute to market demand for urban living with consequent increases in densities and pressure for re-use of building stock. Consistent with 'urban renaissance' approach.
- Potentially has indirect benefits in terms of conserving agricultural land. May also positively impact on other matters relevant to natural resources (and environmental protection) eg biodiversity, landscape, historic fabric, but this will depend on the detail of how the policy is developed and implemented by the local authorities. For example a 'land at any price' approach could be very damaging to wildlife interests in urban areas whereas an approach to concentrating development in towns and cities which actively incorporated good environmental practices with respect to use of native species and biological corridors might actively benefit those same interests.
- Whilst the strategy appears to favour development in urban areas/on previously used land, in practice it will involve very high levels of greenfield land take. Whilst this land take is based on a reasoned attempt to explore the likely potential of the urban areas through empirical study, the figure of circa two-thirds of development on greenfield land is disappointingly low. There is no evidence that a significantly higher figure could be achieved. Given the likely order of magnitude of greenfield land take it is essential that development on greenfield land is well integrated with other areas of policy making eg transport, development on urban fringes, community forests etc.
- Higher densities in urban areas are generally favourable to energy conservation.
- There are concerns over whether the strategy is sufficiently specific to lead to a change in development patterns in practice, and thus over how it will ensure that any new development patterns are sustainable in terms of their impact on the use of natural resources. In particular, it needs to be extended to cover matters such as criteria for development area selection, policies on densities for development etc

Appraisal of spatial strategy against objectives for protection of the environment

- Impacts on many environmental aspects cannot be identified with the certainty required for appraisal because of the general nature of the policy statements.

- Overall, by focussing on urban areas, in principle has the potential to minimise impacts on landscape and open countryside. However, in practice involves a lot of greenfield development, and the strategy is weak on how sites should be identified , how they should relate to the urban area etc.
- Intensification of urban areas should provide opportunities for more trips to be made on foot/bike, providing that development is done well. Achieving a high proportion of development within or close to urban areas should reduce average trip length, whilst higher population densities should increase the viability of some forms of public transport. Strategy therefore has strong positive relationship with improving air quality and reducing the manmade components of climate change by reducing the need to travel (assuming it is successful). Overall concern, however, that the transport strategy is weak and insufficiently innovative.
- In long term, overall growth in urban areas may more than counterbalance shift to reduced distances and more sustainable urban modes. Net effect may not be for better, but only better than might otherwise have been.
- Potential benefits of the strategy could be enhanced through promoting strategic environmental enhancement (eg landscape and habitat re-instatement, community forests) which would also bring social and economic benefits (eg improved community access to open/space/wildlife etc, upgrading of area to create better locations for new investment with potential benefits for jobs, community stability etc)
- Focus on urban area has strong positive correlation with making towns and cities more attractive places to live in.

Appraisal of spatial strategy against objectives for high and stable levels of economic growth

- Emphasises urban areas and significant towns where much economic activity currently located; existing businesses in these areas will be significant contributors to future economic growth and therefore the strategy and the objective are potentially mutually reinforcing. In so doing, however, a number of potential conflicts emerge eg those PUA's with the greatest potential for economic growth tend to have very low quantities of brownfield land.
- Emphasis on urban areas tends to disguise the importance of the rural economy over all of the region, and in particular in the south west peninsula. There is no indication of the intended scale of growth (ie of what development 'to address local needs' means. Rural diversification and change is likely to imply more significant growth at selected locations. Many of the planning measure to assist rural diversification lie outside the scope of RPG, but RPG should give a strong lead.
- The spatial strategy is weak on the provision of strategic sites which should be integrated into the overall development pattern; also the location policies for different types of economic activity (eg offices in town centres).
- There may be conflicts between sustainability objectives for re-using brownfield land, and providing strategic sites for key sectors (clusters) some of which may

have strong corporate identities and be looking for high profile sites. RPG needs to address this in conjunction with RDA, and to consider ways that high quality strategic sites can be created through integration with a suite of other policies eg transport, landscaping, forestry, biomass.

Appraisal of spatial strategy against objectives for social progress

- Provides for increasing strategic balance between homes/jobs/transport by concentrating on urban areas where balance more likely to be possible, and by recognising balance as a criterion in identifying smaller settlements for development.
- However, to be successful, the strategy depends on sound sub-regional and local strategies to achieve this, and gives insufficient guidance to ensure that this is the case. Implementation in practice may be very different from the theoretical framework provided by the strategy.
- Emphasis on urban areas should increase investment and add to opportunities, but divisions within urban areas will not necessarily be overcome. The greatest concentrations of deprivation are in the urban areas. May indirectly be helped. Rural deprivation remains outside this policy.
- Housing development on brownfield land is often subject to higher developer costs, with less scope for securing high levels of affordable housing from such development.
- Risk of further polarisation in terms of access to facilities, to pt etc between rural and urban areas.

ANNEX 3: SUMMARY OF FINDINGS ON OTHER POLICIES

This annex presents the findings on the policies other than the spatial strategy. It is set out as a series of tables of the relevant symbolic summary of the appraisal. These are described below.

Symbol	Meaning	Commentary on use in appraisal
✓	positive impact	used when a positive impact can reasonably be identified
=	policy is consistent with objective (target) but no certain contribution can be identified from policy as worded	
?	Relationship exists, but difficult to determine outcome	
•	RPG could have achieved more	in some cases there might be a low, positive impact, but the opportunity to create more sustainable development patterns was not fully used.
X	negative impact	not used much in appraisal; reflects fact that outcomes often cannot be identified <i>nb cannot be assumed that as strategy is worked up in more detail, that more X will not emerge</i>
Blank	no relationship	No relationship currently observable. Does not mean to say that one could not exist.

This form of representation is inevitably a simplification. It is more valuable to examine the overall **patterns** of symbols rather than to dwell on the value attributed to any one relationship.

Environmental protection and resource management (Environment and Water)

Objective	policy no									
	24	25	26	27	28	29	30	31	-	-
Natural resources										
1		•		✓	✓	✓		•		
2		•				✓				
3				✓						
4										
5						✓				
6			•	✓		✓				
7	• ✓	X	•							
Environment										
8	•		•	✓						
9			•		•					
10			•							
11			•			✓				
12			•		✓					
13				✓						
Economy										
14										
15										
16										
17										
18										
19			=							
20										
Social progress										
21										
22										
23										
24										
25										
26				✓						

Environmental protection and resource management (Minerals)

Objective	policy no									
	32	33	34	35	36	37	38	39	40	41
Natural resources										
1				✓				✓		
2				=				=		
3				✓						
4										✓
5										
6								=		
7				•						
Environment										
8				X				✓		
9										
10										
11				✓				✓		
12										
13										=
Economy										
14				•						
15								X		
16										
17				✓						
18										
19										
20								X		
Social progress										
21										
22										
23										
24										
25				X						
26										

Environmental protection and resource management (waste and energy)

Objective	policy no									
	42	43	44	45	46	47	-	-	-	-
Natural resources 1 2 3 4 5 6 7			= ✓	=	• =	=				
Environment 8 9 10 11 12 13					=					
Economy 14 15 16 17 18 19 20		= =			• • •					
Social progress 21 22 23 24 25 26					• • •					

The economy

Objective	policy no									
	48	49	50	51	52	53	54			
Natural resources										
1	?	X?	?	•		?				
2	?	?								
3										
4										
5										
6										
7	?	?								
Environment										
8	?	?	X?	•	✓					
9	?	?								
10										
11										
12	=	?	✓		✓	✓				
13										
Economy										
14										
15	✓	✓	✓			✓				
16	=	=	✓	=						
17	=	✓	✓							
18	=	✓			?					
19	=	=								
20										
Social progress										
21	=	=								
22	?=	?=	✓?							
23										
24										
25										
26										

Housing

Objective	policy no									
	55	56	57	58	59	60	61	-	-	-
Natural resources 1 2 3 4 5 6 7			=		?					
Environment 8 9 10 11 12 13					?					
Economy 14 15 16 17 18 19 20			✓							
Social progress 21 22 23 24 25 26			✓		?					

Transport and communications

Objective	policy no									
	62	63	64	65	66	67	-	-	-	-
Natural resources										
1					X					
2					X					
3										
4										
5										
6	✓	✓	✓		X					
7										
Environment										
8		X								
9		✓								
10										
11										
12	✓		✓?							
13		?								
Economy										
14			X		X					
15	?				✓					
16	✓		✓		X					
17					✓					
18										
19										
20			X		✓					
Social progress										
21										
22		✓								
23	✓	✓								
24										
25										
26										

Tourism and leisure, sport and healthcare

Objective	policy no									
	68	69	70	71	72	73	74	75	76& 77	78
Natural resources										
1	?									
2	X									
3	✓									
4										
5	?									
6	?									
7	✓	✓			✓					
Environment										
8	✓	✓			✓					
9					✓					
10					✓					
11	✓									
12	✓									
13	✓	✓								
Economy										
14	✓	✓								
15	=	✓								
16										
17	?	✓								
18		X								
19	X									
20										
Social progress										
21										
22										
23										
24										
25					=					
26					✓					

Addendum on housing numbers and the Draft RPG

Summary

- S1 *The Government's objectives are that everyone should have the opportunity of a decent home. Unlike transport, there is no intention of rationing housing through limiting supply. RPG is required to make an assessment of the housing provision required for the whole period of the strategy, taking into account the Government's latest published housing projections, and to provide a distribution of the figure by structure plan areas. It is in the nature of any such projections that they are liable to be inaccurate, and there will always be uncertainty over 'how much' and 'where'.*
- S2 *With respect to housing and planning, the previous system of 'predict and provide' has been abandoned in favour of 'plan, monitor and manage' whereby:*
- *plans are to accommodate forecast demand*
 - *monitoring is to be used to assess progress both on housing (eg take up of brownfield land, households in need of alternative accommodation) and related matters (eg changes in job numbers) which influence need for housing*
 - *management is to use the results of the monitoring to, for example, trigger or delay the phased release of housing sites or even a review of the plan itself.*
- S3 *The South West Region faces a difficult combination of issues. It is the recipient of continuing flows of migrants. It cannot on its own affect these national flows, though it can join with other regions to lobby for more effective national regional policy, and can develop programmes to reduce demand for labour eg through better training for the existing South West workforce. At the same time the Region has limited opportunities for brownfield development and re-use of existing buildings. Meeting housing requirements of the whole community involves significant allocations of greenfield land. Not meeting the housing requirements has significant implications for social equity, the regional economy, and patterns of movement (with knock-on effects for global atmospheric stability).*
- S4 *The sustainability appraisal took as its starting point that housing need in the Region should be met in full. Our comments fell into two main parts. The first related to lack of transparency. A number of technical adjustments have been made to the figures which are based on assumptions which are difficult to support. Others have been made which appear to be led by policy considerations, but these are included in the same thinking as the technical adjustments. We argue that the consequences of accommodating forecast housing provision (plus other forms of related required development eg public transport infrastructure) should be exposed and discussed. Then the types of trade off that need to be made can be explored, rather than obscuring them in the debate on housing need.*
- S5 *Our second concern relates to the absence of an approach to plan, monitor and manage in the Draft RPG. The aim must be for an approach to planning which is more responsive to the emerging situation, avoiding premature*

release of greenfield sites, whilst at the same time ensuring that there is no underprovision of housing in areas of housing need. Devising such an approach is not easy, but RPG should provide guidance on this, both for operation at the regional level and for use in development plans.

Addendum on housing numbers and the Draft RPG

1 The Government's objectives

- 1.1 The Government's objectives for planning policy as it affects housing are summarised in PPG3 (public consultation draft, March 1999). In this it states that *the Government intends that everyone should have the opportunity of a decent home.... the housing needs of all in the community should be recognised, including those in need of affordable or special housing.*
- 1.2 The guidance goes on to say that local planning authorities should, inter alia:
- plan to meet the housing requirements of the whole community
 - provide greater choice and a better mix in the size, type and location of housing
 - provide sufficient housing land but give priority to the re-use of previously-developed land, bringing empty homes back into use and promoting the conversion of existing buildings within urban areas, in preference to the development of greenfield sites.
- 1.3 RPG is required to make an assessment of the housing provision required for the whole period of the strategy, taking into account the Government's latest published housing projections, and to provide a distribution of the figure by structure plan areas (PPG11, public consultation draft, February 1999).

2 How the housing numbers are generated

- 2.1 The housing numbers used for the preparation of RPG derive from Central Government housing projections which are based on three elements:
- age specific forecasts of population change (births, deaths) which can be reliably forecast on a cohort basis except for minor demographic aspects eg they can lag behind changing patterns in preferred age for child-bearing
 - household formation rates which depend on both demographic factors (eg increasing longevity) and social factors (eg the increasing numbers of people living alone); the social factors are more difficult to forecast
 - international and inter-regional migration which is based on a mix of anticipated economic change and past trends.
- 2.2 The Government's latest published projects are the 1996 based household projections for the period 1996-2016. These were used as the starting point for the housing figures for the South West incorporated into the Draft RPG. At the time that Conference staff were developing their views on these

numbers, the background papers on the projections were not available and indeed they have only been published in the course of last week (some time in the week beginning Monday 18 October). Our brief commentary on the figures is included later in this paper, but it is important to note that there is a sense in which any such forecasts will inevitably be 'wrong'. However refined they are, there will always be some uncertainty over 'how much' and 'where'.

3 Do the numbers matter?

- 3.1 The context is that it is national policy (section 1) that housing needs are to be met. It follows that there is no intention of introducing rationing through limiting supply. There is no comparison to be made here with transport where policy is now moving in the direction *inter alia* of limiting supply of road space and starting to think of rational ways of rationing use of that road space to meet overall societal goals.
- 3.2 Hitherto the housing numbers have been of the utmost importance since the overall approach has been to agree the numbers on the basis of the Government forecasts (subject to heated debate over amendments to the forecasts) and then to allocate sufficient land through the development plans system to ensure that those forecast numbers could be accommodated. Recently, however, the Government has turned its back on this 'predict and provide' approach, in part because of concerns that the forecasts can become self-fulfilling prophecies.
- 3.3 In practice there is a whole range of problems associated with 'predict and provide' which has been highlighted as attention has been paid to pursuit of more sustainable development. The previous system of allocation did not facilitate the promotion of use of brownfield land over greenfield, with the consequence that where allocations were in excess of manifest demand it was the attractive greenfield sites that got used, to the detriment of a range of planning policies relevant to sustainable development.
- 3.4 Problems are not confined to over provision of housing land. Without adequate provision, those most adversely affected in housing terms will be the most vulnerable in the housing market (those on low and/or insecure incomes). A short term effect of insufficient housing in economically buoyant areas is likely to be an increase in commuting, with potentially a long term impact on economic prosperity. Furthermore, in a situation of under-provision, 'planning by appeal' becomes more dominant, resulting in unplanned increments of development completely unlinked to any thinking about a more sustainable strategy.
- 3.5 Given this, it is prudent to plan properly for the forecast increase in households, ensuring that it goes to the most sustainable locations where proposals and measures for environmental protection, economic activity, social provision and infrastructure can be integrated.
- 3.6 The aim therefore is to plan using the best available information, but to do so in such a way that there is sufficient flexibility to accommodate changes

in the pattern of demand as they emerge. This is being called 'plan, monitor and manage' (PMM), in which:

- *plan* involves forecasting and then providing for known demand; whether this planning should be at the level of the Government's own forecasts or at a lower/higher level is currently a matter for major debate, for example the furore over the Panel Report on the Draft RPG for the South East
- *monitor* involves a regular review of a range of housing indicators such as house and land prices, indicators of housing stress (eg increases in homelessness and/or involuntary sharing), take-up of brownfield housing land, overall supply of housing land; as RPG becomes more specific in the guidance that it offers the constituent planning authorities, these indicators can be extended to start to link supply of housing land to other issues, particularly economic ones; it can be anticipated, for example, that in some rural parts of the South West, significant development in and around rural towns will only be acceptable where it is linked to expansion of existing businesses or investment in new ones and where, therefore, increase in job numbers or take up of employment land may be as important for monitoring as housing indicators
- *manage* is the component which responds to the results of the monitoring in the light of the plan; monitoring may trigger or delay the phased release of housing sites or, where this is not an option, a review of the plan itself.

3.7 It follows from this that the numbers do still matter because they are the basis on which the plan is developed. However, as PMM becomes the norm, the precise numbers become less important because the monitoring and managing will mean that a more flexible system is in operation whereby adjustments can be made in the rate of supply of land in response to the findings on housing take-up established through the monitoring procedures. This is entirely proper given a recognition that the numbers are in themselves necessarily bound to be 'wrong'.

3.8 This should not be taken to mean that PMM is going to be an end to all the problems associated with planning for increasing household numbers. There are practical problems associated with PMM which are yet to be resolved (eg how a suitable phasing system might work). In addition, philosophical and technical debates about levels of housing numbers remain. Notwithstanding this, there is a growing consensus that this type of approach is much more flexible and appropriate than the previous one and that planners and authorities should be working to develop ways to make it succeed.

4 The situation in the South West

4.1 The South West is the recipient of continuing flows of migrants, the most significant source of which is the South East, where population growth and increasing demand for housing is in turn fuelled in part by migration from less economically favoured regions.

- 4.2 From almost any perspective (but particularly that of sustainable development), there must be a profound discomfort with the long term implications of these trends. They imply continued outflows of the skilled and most able from regions with less buoyant economies, leaving behind those with lower skills who are uncompetitive in job markets, growing concentrations of social deprivation, and reducing opportunities for new investment in the social, environmental and economic fabric of those regions. At the same time, they contribute to intense environmental and social pressures in the receiving regions. On its own the South West cannot affect these national flows, though it can join with other regions to lobby for more effective national policy for the regions and it can work to develop and implement policies which will influence in-migration by reducing the demand for labour, for example through better training for the existing South West workforce and investment in labour-saving equipment
- 4.3 The supply of brownfield land and of opportunities to make use of redundant buildings within existing urban areas in the South West is very limited and there is no prospect of the Region meeting the Government's overall target for use of brownfield land. If the Region is to plan to meet the housing requirements of the whole community, this involves significant allocations of greenfield land.

5 Commentary made in the sustainability appraisal

- 5.1 The starting point for the sustainability appraisal was that housing need in the Region should be met in full. The reasons for this were:
- our view that any strategy which does not meet housing need is inherently unsustainable in that it does not properly address issues of social equity and is likely to produce very unsatisfactory results in environmental terms since a tranche of subsequent development may be on an ad hoc basis rather than in accordance with sustainable principles
 - the Round Table had not had the opportunity to debate and develop a position on this matter which we could use to guide us
 - we could not develop and defend an argument that the South West is 'full up' and that further development beyond a specific level is unsustainable ie it is not possible to technically define and justify a 'threshold' for the South West, though there are sub-regions (most notably Bournemouth-Poole) where a combination of national, international and global *environmental* priorities makes substantial further development very difficult.
- 5.2 In arriving at their housing figures, South West Regional Planning Conference (SWRPC) properly took account of the Government's 1996 based household projections. At the time they did so, the full details on assumptions incorporated were not available. A background technical paper prepared by SWRPC (Population and Housing, Background Paper 5) states that when the details of the projections are known, the housing provision will

if necessary be revised. Given their recent publication, it is likely that a review of these figures will be a relevant input as Conference prepared for the Public Examination of the Draft RPG.

- 5.3 Our comments on the housing numbers fell into two parts:
- adjustments to the numbers have been made which are not transparent and which appear to run the risk of not meeting overall housing need
 - the Draft RPG does not promote a more flexible approach based on PMM.
- 5.4 Regional Planning Conference has made a number of adjustments to the 1996 based figures. In particular:
- dwellings required for net in-migrants were reduced by 10%, reflecting an assumption that regional inequalities will be reduced eg through work of RDAs and through urban renaissance
 - a series of adjustments were made with respect to increases in economic activity rates, reductions in unemployment, and increases in double jobbing which are based on questionable assumptions and all of which have the effect of reducing the forecast need for new economic migrants
 - specific alterations were made with respect to Dorset, Avon and Wiltshire which are partially explained, but not transparent.
- 5.5 We fully accept that the DETR figures are likely to be 'wrong' and that they will be revised. However, we believe that the proper way to do this is through a process of regular monitoring of what is actually happening followed by review of the figures on the basis of the monitoring, rather than through adjustments for the whole period based on difficult to justify assumptions. An exception to this would arise if the review of the projections which is now to take place revealed anomalies which needed adjustment for justifiable technical reasons.
- 5.6 Furthermore we are concerned that, for some parts of the Region, 'policy-led' reductions are being presented as part of the debate about housing need. In parts of the Region there are very significant debates to be had about future patterns of change and RPG should be providing overall guidance. The two most important appear to be Bournemouth-Poole and the former Avon area. The issues should be addressed directly and the consequences of accommodating forecast housing provision plus other forms of required development (eg public transport infrastructure) should be discussed (ie the types of trade off that need to be made) rather than obscuring them through the debate on housing need. The policy components can thereby be revealed and debated, and if agreed then provide a robust basis for subsequent development plans.
- 5.7 Our second concern is with the fact that the Draft RPG does not appear to promote a PPM. Given the arguments set out above, it is proper to look for, and actively promote, an approach to planning which is more responsive to

the emerging situation. The aim must be an approach that avoids premature release of greenfield sites and prevents excessive releases which might arise from uncertainties over household formation and migration rates. At the same time it should seek to ensure that there is no underprovision of housing in areas of housing need. We are not saying that devising such an approach is easy, but we are arguing that without progress in this area the South West runs the risk of perpetuating problems from the past. RPG should provide guidance on this, both for operation at the regional level and for use by in development plans.