

Chapter 0: Overview and Summary

Introduction

- 0.1 This Chapter provides a broad overview and an executive summary of strategic matters. The broad overview offers some comments on more general aspects of the draft RSS, which were drawn to our attention during our consideration of the submitted material and at the EiP. The executive summary of strategic matters sets out our conclusions and recommendations.

Broad Overview

- 0.2 Some of these more general aspects relate to the format and presentation of the draft RSS and tend to interact, but they are dealt with under the following headings:
- Chapter Sequence;
 - Policy Presentation;
 - Alternative Geographies; and
 - Hierarchies
- 0.3 We are aware that some of the representations on these issues may be a response to the fact that the draft RSS follows a different format to that of the RPG10, but we offer our views on these matters in order to assist the Secretary of State at the proposed changes stage.

Chapter Sequence

- 0.4 We believe that most of the differences between the structure of the RPG10 and the draft RSS can be explained by the need to better reflect the changing national context for Sustainability and Climate Change issues and the need to incorporate a more significant geographical element to provide better guidance for local planning in the absence of Structure Plans.
- 0.5 Most of the debate centred on the relationship of the thematic chapters relating to housing, transport and economic development to Chapter 4, which deals with sub-regional guidance. The main thrust of the representations was that the thematic chapters should precede and provide the context for the sub-regional chapters. In our view Chapter 2 provides the justification for the main economic and housing context for the draft RSS and this diminishes the need for any re-arrangement. Furthermore we note that the housing matters considered in Chapter 6, while important, have no sub-regional dimensions.
- 0.6 Chapter 2 provides an economic context for the sub-regional strategies and the draft RSS provides guidance for the sub-regional elements in terms of job projections. We accept that there was much debate on the merits of this guidance and we deal with this issue more specifically later in this report. In our view these deficiencies might have been overcome by the provision in Chapter 2 of an interpretation of the economic forecasts to the Housing Market level and some broad guidance on the land implications. We do not have the evidence base to take this suggestion any further.
- 0.7 Paragraph 2 of PPS11 highlights the need to prepare a Regional Transport Strategy (RTS) as an integral and clearly identifiable part of the draft RSS, but the Regional Assembly argued

that transport should be treated as a cross-cutting issue and that as a result components of the RTS are to be found across the draft RSS. We deal with this issue in more detail later in this report, but as far as the structure of the draft RSS is concerned we are of the opinion that there is some advantage in considering the sub-regional as well as the broad strategic implications before setting out the RTS outcomes in terms of priorities in Chapter 8.

- 0.8 On balance we do not consider that there are sufficient advantages to support a recommendation for a major change to the structure of the draft RSS.

Policy Presentation

- 0.9 Some of the representations to the EiP highlighted the lack of justification for a number of policies. In our view all policies should be accompanied by some textual justification. We urge that the drafting of the final RSS should incorporate that approach. Our attention was drawn to a number of policy statements that are presently embedded in the supporting text. Several of these were the subject of debate at the EiP and where appropriate we have recommended that they be recast as policy. We are aware that there are other such statements elsewhere in the draft RSS and we are of the opinion that the proposed changes stage should be used to ensure that all policy statements are given the proper status.
- 0.10 In addition parts of the supporting text are highlighted and it is not clear what implications should be drawn from this emphasis. We suggest that the draft RSS could be improved at the proposed changes stage by some re-drafting to achieve greater consistency of presentation. While we agree with the Regional Assembly that the draft RSS should be read as a whole and that extensive cross-referencing is not required, we are of the opinion that selective referencing to the relevant parts of the SD policies would enhance the policy justification. We suggest that this might be considered at the proposed changes stage.
- 0.11 We have become aware of a number of errata and corrections, some of which were pointed out by the Regional Assembly. These relate to both text and maps within the document. We have identified specific parts of the draft RSS where changes to policies, supplementary text and diagrammatic maps are necessary, but have not attempted to produce a comprehensive list of corrections.

Alternative Geographies

- 0.12 Our attention was drawn to a variety of geographical approaches to the planning of the region such as Landscape Character Areas, Economic Activity Zones and Travel to Work Areas. The Landscape Character Area approach provides a useful planning tool for the consideration of development impact, but the component “character areas”, illustrated in Map 7.2, do not offer any wider meaning in terms of matters such as housing or economic functions. The Economic Activity Zones illustrated in Map 8.1 provide useful insights on the geography of economic activity, but the overlapping of these zones and the inclusion of a number of major urban areas within a single zone reduces the value of this system for wider planning purposes. Travel to Work Areas are referred to in the draft RSS in relation to the employment forecasts. However it was indicated at the EiP that a review of these areas is likely to result in the merging of a number of areas. This instability makes the current Travel to Work Area network less useful as a vehicle for more general planning guidance.

- 0.13 As noted in the Preface, we believe that the adoption of Housing Market Areas as the basis for guidance on housing matters is to be welcomed. We accept that the transition zones identified in Map 4.2 reflect real life and that the use of District boundaries can result in some conflict with these realities. Nevertheless we consider that they do reflect a useful sub-regional pattern, which could be of value in the consideration of other planning issues such as economic development and retailing.

Hierarchies

- 0.14 In paragraph 2.5.10 of the draft RSS the Regional Assembly sets out a functional approach to settlements in the Spatial Strategy, which is identified as distinctly different from the hierarchical approach in RPG10. We note however that paragraph 1.3.1 of the draft RSS includes a statement on settlements which takes a somewhat hierarchical form with Bristol and Plymouth being distinguished from other major settlements.
- 0.15 Paragraph 1.3.1 is expressed in terms of the roles Bristol, Plymouth and the other major settlements are expected to play, but we do not think it is surprising that the importance of the roles tend to coincide with the scale of the population of the settlement/conurbation concerned. We believe that a hierarchy of the region's settlements does exist within which function and scale are reasonably aligned and that this hierarchy can provide a basis for positive planning. We will return to this issue in Chapters 3 & 8.
- 0.16 We note that page 9 of the Regional Economic Strategy indicates that solutions for communities will have to recognise the significant differences between settlements in the region. We note that *The Way Ahead*¹ identifies a number of settlements where significant action will be required. In our view it is important to distinguish between the scale of action and the function that it is designed to support. For example the significant level of development proposed at Swindon can be expected to enhance the facilities within the town and its hinterland, but it is unlikely to materially alter its broader function within the region.

Executive Summary of Strategic Matters

- 0.17 We set out below a summary of our conclusions on each of the broad areas of debate at the EiP.

A Sustainable Future

- 0.18 We note the linkages between the draft RSS and the Integrated Regional Strategy and consider that they provide a sound foundation for the development of the Sustainability Principles and Policies. We support the objectives of reducing the region's ecological footprint and decoupling growth and carbon dioxide emissions and hence support Policy SD1.
- 0.19 Section 39 of the Planning and Compulsory Purchase Act 2004 requires the RSS to contribute to the achievement of sustainable development. Furthermore it is clear that the Government is expecting the draft RSS to confront the threat of climate change. As a result we support Policy SD2.

¹ *The Way Ahead: Delivering Sustainable Communities in the South West*, South West Regional Development Agency, Government Office of the South West and South West Regional Assembly, February 2005.

- 0.20 The region has significant non-renewable resources that call for good stewardship on behalf of future generations. We regard Policy SD3 as an important contribution to sustainable development and therefore support it.
- 0.21 The Government has placed considerable emphasis on the development of sustainable communities and the draft RSS quotes *Securing the Future*² in this respect. We were advised that, while the Government was seeking to achieve sustainable construction standards at a national level, it would not resist more local initiatives. As a result we support Policy SD4 and Policy G, which sets out a regional approach to Sustainable Construction.
- 0.22 The Strategic Sustainability Assessment (SSA) process was established to ensure that development plans such as the draft RSS properly reflected sustainable development principles. We considered the application of the SSA process to the draft RSS and conclude that the preparation of the draft RSS was properly carried out. As noted in the Preface the requirement to carry out a Habitats Regulations Assessment was confirmed at the same time as the draft RSS was approved by the Regional Assembly. The Appropriate Assessment commissioned by the Regional Assembly recommended changes to the draft RSS and we support the thrust of the changes suggested by the Regional Assembly in order to protect the Natura 2000 sites within the region.

The Context

- 0.23 Paragraph 2.8 of PPS11 indicates that an RPB should have regard to the Regional Economic Strategy (RES). We note that the RES sets a growth range of 2.8% to 3.2% and that economic development guidance within the draft RSS is generally consistent with the upper level of the range. In our view the higher level of growth can be regarded as aspirational, so provision at this level should ensure that economic development will not be inhibited.
- 0.24 We were advised that the ONS population forecasts for the region provide a common basis for the draft RSS household projections and the 2003/2004-based projections at the regional level. It was also established that they were consistent with the 2.8% level of growth provided significant improvements in productivity were achieved to reduce the manpower requirements of that level of growth. It was established that the higher level of growth would require a level of in-migration well above past trends. We conclude therefore that the ONS population projections can be regarded as consistent with the needs of the RES.
- 0.25 The EiP discussions established a wide consensus that the level of housing provision proposed in the draft RSS is not consistent with the level of population required to support the RES. The 2003-based household projections that were published by the Government in March 2006 were the first to fully take into account the 2001 Census data. It was accepted by the Regional Assembly that the new household formations rates could not be reasonably questioned. It was accepted by the RDA that the new projections were consistent with the 2.8% rate of growth. The 2004-based household projections were published during the EiP process and showed a high degree of consistency with the earlier projections at the regional level, but significant variations at District level. We were advised that the 2004-based projections utilise a new approach to the distribution of migrants and are to be revised later

² *Securing the Future, The UK Government Sustainable Development Strategy*, HM Government, March 2005.

in 2007. We conclude therefore that the 2003-based projections provide the most appropriate basis for our deliberations. The Regional Assembly provided an estimate of the dwelling requirement of the 2003-based projections, which indicated a total requirement of 563,834 dwellings over the 2006-2026 period or about 28,000 dwellings per annum. We therefore propose provision for at least 28,000 dwellings per annum at the regional level as the basis for our consideration of the distributional implications in Chapter 4 of this Report.

The Spatial Strategy

- 0.26 In response to many representations and as a means of providing an overall framework for other policies in the draft RSS a more comprehensive policy statement on the overall ‘core’ spatial strategy is proposed.
- 0.27 As part of the development of the policy statement on the overall spatial strategy, the three emphases set out in the draft RSS are reviewed and it is concluded that the planning emphasis required in the south east of the region is similar to that required in the north and central parts of the region. The policy gradient between the north and east and the western parts of the region is identified as the most important policy issue and therefore it is proposed that there should only be two policy emphases and that Map 3.1 should be modified to become the illustration of the general extent of the two emphases.
- 0.28 Requests to designate further Strategically Significant Cities and Towns (SSCTs) under Development Policy A are rejected. The need for a hierarchical statement to reflect the functional differences between the SSCTs is considered and Policy A is modified to include a hierarchy of settlements.
- 0.29 The suggestion that Policy B towns should be named is rejected. A re-formulation of Policy B is proposed taking into account the need to obtain greater clarity on matters such as dormitory settlements and to avoid duplication with other policies.
- 0.30 In modifying Development Policy C, the Panel seeks to make it clear that the allocations under this policy should be regarded as independent of the allocations to the SSCTs and Policy B towns and not the residue of a sequential process. More emphasis is placed on the role of these settlements as part of the urban focus of the overall strategy and on their effective functioning.
- 0.31 There is a need to give policy expression to the requirement for the countryside to accommodate “land based” activities, while protecting it from unnecessary development. A new policy, C2 Development in the Open Countryside, is proposed to meet this requirement.
- 0.32 Policies H and I deal with the approach to Previously Developed Land and the Panel proposes only slight modifications to Policy H. Policy I, which deals with land in public ownership should be deleted.
- 0.33 Policies D and J deal with the need for joint working and the Panel identify the need to recast Policy J to focus on the specific areas where cross-boundary co-operation is required. The modification identifies locations where the land required for the extension of an SSCT falls within the area of another authority.

Sub-Regional Strategies

- 0.34 The Housing Market Area approach is adopted as a means of dealing with the trend based limitations of the DCLG Projections at the local authority area level. It is also considered to offer a more comprehensive and transparent approach. Within each HMA, locational proposals are only supported where cross-boundary issues could result in a “policy deficit”.
- 0.35 In setting out the distribution of housing development within each HMA, consideration has been given to the broad thrusts of the employment projections, but an overly rigid interpretation of self-containment is rejected. Nevertheless a balance between employment growth and housing provision is supported.
- 0.36 The level of housing provision is based on the 2003-based DCLG Projections, which identify higher levels of housing requirement, particularly in the HMAs in the rural and western parts of the region. This level of housing provision equates to the overall growth rate of 2.8%, whereas the economic development proposals are largely based on 3.2%. It is considered that this apparent discrepancy allows an element of flexibility for economic growth, while at the same time reduces the risk of overprovision of housing.
- 0.37 There is no need for any phasing of the greenfield land housing supply in order to support the brownfield regeneration process. Evidence from places such as Swindon supports the view that greenfield and brownfield development can be regarded as complementary and the contribution of both will be required to meet the projected demand.
- 0.38 The identification of the development areas proposed in the draft RSS is considered to be soundly based. Proposals are made in a number of HMAs for the release of additional development areas to meet the projected housing demand. It is considered that these areas reflect the principle of sustainable development and are consistent with the Habitats Regulations.
- 0.39 The scale of demand and the principles set out in Policies SD1-4 provide the exceptional circumstances to justify alterations to the Green Belts within the region. In our view the proposed Areas of Search do not threaten the integrity of the Green Belts. Proposed extensions to the Green Belts are rejected due to lack of justification.
- 0.40 In some cases a broader definition of SSCTs is adopted to reflect the evidence available on functional relationships between core urban areas and adjoining settlements, for example in South East Dorset. It is not considered that such changes challenge the broad thrust of the strategy.
- 0.41 Consideration is given to the phasing of the housing provision. It is concluded that the level of development should be spread evenly across the whole plan period. This implies an increase well above the rate proposed in the draft RSS.
- 0.42 The projected levels of housing provision in each HMA will require an acceleration in the rate of development. Action will be required to release the land required and the proposed modification to Policy J is intended to assist in this matter where cross-boundary action is required.

- 0.43 There is insufficient evidence to allow judgements to be made on the relative importance of the items in the Lists of Key Infrastructure set out in the draft RSS. Proposals are made in certain HMAs for additional items of infrastructure where the evidence indicates they are required to support the strategy.
- 0.44 The Panel are convinced that there are strategic dimensions to green infrastructure provision within the region such as the Stour River Valley in South East Dorset. Consideration should be given to this matter in a subsequent review of the RSS.

Transport/Regional Transport Strategy

- 0.45 Section 5 of the draft RSS cannot be regarded as an identifiable Regional Transport Strategy (RTS). The Panel concludes that the draft RSS should be recast as a RTS to meet the requirements set out in PPS11 founded on a new policy statement incorporating the main aim and objectives of the RTS.
- 0.46 Demand management will be required to achieve the main aim of reducing the rate of growth of traffic. Policies on Demand Management and Managing Demand from Development are proposed to make the approach to these matters more explicit. Guidance is given, for example, on the locations where congestion charging would be most appropriate.
- 0.47 Parking is an important component of demand management and the draft RSS does not include a policy on parking. A new policy is proposed which sets out a regional framework for parking provision.
- 0.48 Making urban areas work is critical to the achievement of the overall spatial strategy and an effective transport strategy for the SSCTs is considered to be essential. A new policy is proposed to provide for growth and regeneration, address congestion, safety and pollution and minimise the use of the strategic road network. The new policy also seeks consideration of the establishment of a Public Transport Authority for Greater Bristol as a means of achieving more effective integration of public transport and encouraging modal shift to more sustainable means of transport.
- 0.49 The improvement of public transport facilities and services will be essential to achieve a reduction in the rate of growth of traffic. A new policy is proposed to set out a framework for the improvement of public transport across the region.
- 0.50 The integration of action across the full spectrum of transport provision is the most effective approach to the achievement of the main aim and objectives. A transport corridor approach is proposed to obtain that integration. A general corridor approach is set out and specific action is proposed for eight strategic corridors, which are to be identified in a corrected Map 5.1. The critical importance of the integration of the transport planning of the Greater Bristol area and other SSCTs with the planning of the Exeter to London Strategic Corridor is highlighted. A more measured approach is suggested for the planning of the “Second Route” in the Exeter to London via Salisbury and Basingstoke Strategic Corridor.
- 0.51 A number of proposals are made in the draft RSS for action that is outside the region. It is recommended that these proposals should be more appropriately expressed as recommendations to the DfT.

- 0.52 The draft RSS includes policies for ports and airports. It is considered that there is a need for greater clarity on these matters and proposals are made to modify the policies. A proposal is made for joint action on the preparation of a master-plan for Bristol Docks and in the case of airports greater guidance is provided on the surface transport requirements.
- 0.53 The draft RSS treatment of freight transport issues was the subject of much debate and criticism. Map 5.2 was the source of most confusion and it is proposed that this Map should be deleted and that the road network in the corrected Map 5.1 should provide the guidance together with a modified policy.

Housing

- 0.54 Consideration is given to affordable housing targets and it is proposed to modify Policy H1 to allow for an increased level of provision of affordable homes. It is proposed to increase the level of aspiration from 7,500 dwellings per annum to 10,000 dwellings per annum.
- 0.55 The draft RSS cannot provide added value to National Guidance in terms of the approaches to the provision of affordable housing. Sub-regional targets are rejected.
- 0.56 Draft RSS Policy H2 is unduly prescriptive and too narrowly focussed. In view of the wide range of factors influencing density, it is proposed that a modified policy should express densities as indicative targets rather than firm requirements.
- 0.57 A slight modification of the densities applying to SSCTs is proposed to reflect the wide variation of circumstances across the region. This modification requires a consequential modification to Policy F.

Environment and Resource Management

- 0.58 Development in the areas we have recommended is not considered to be at risk from flooding, but we are of the view that there is insufficient evidence for more detailed treatment of the subject in the RSS. The more detailed assessment is left for the LDFs.
- 0.59 In considering the proposals for renewable energy, the emphasis is placed on ensuring greater clarity. A clearer expression of strategy is recommended, distinguishing between capacity and generation targets and between on-shore and off-shore development. More clarity is sought on the relationship between 2010 and 2020 targets.
- 0.60 Consideration is given to the linkages between Policies G and RE5. Support is given to the broad principles of both policies in order to ensure a consistent approach across the region.
- 0.61 In dealing with Waste it is proposed to include the apportionments as policy and not as appendices and to omit the artificial ceiling on secondary treatment.
- 0.62 Insufficient evidence is available on which to give clear guidance as to what types and distribution of facilities are required. It is our view that this will have to be a matter for LDDs. It is proposed to clarify the criteria based Policy W2.

Economy and Employment

- 0.63 The draft RSS would be enhanced by a more general policy setting out the general thrust of spatial development in terms of the economy of the region.
- 0.64 Further interpretation of the employment projections is required to provide guidance on economic development. We also conclude that there is an immediate need for further work on a region-wide approach to the provision of employment land in order to avoid inconsistency.
- 0.65 The SWRDA proposal to consolidate draft RSS Policies E1, E2, E3 and E4 into two policies should be modified to reflect the role of the RSS. The modification includes a requirement to identify and preserve a portfolio of the best employment sites.
- 0.66 There is a need for further evidence and for guidance on the scale of office development. Such guidance should be the subject of consultation and SA evaluation. Further work should be carried out prior to the next review.
- 0.67 Evidence demonstrates the prospect of significant levels of out-of-town office development in the pipeline. Policy TC1 should be modified to provide more adequate guidance on out of centre developments.
- 0.68 The identification of specific retail floor-space figures is not solely a matter for local planning. There is a need for a regional distribution of future retail demand that reflects the hierarchy of centres within the region. Further work is required to inform the next review.
- 0.69 There is a need for greater clarification on the planning of retail centres outside the main strategic centres and for a new policy to set out the context for planning other centres within the region. The policy deals with the need for new regional shopping centres, strategic additions to existing out-of-town centres and new centres to serve new communities and urban extensions.
- 0.70 The proposed amendment by the Regional Assembly to the tourism policies is a step forward until the next review, subject to certain modifications. The section on tourism should be the subject of an early review of the RSS in order to fully meet the requirements of the Good Practice Guide.

Implementation and Monitoring

- 0.71 The Implementation Plan is not part of the statutory plan and therefore we have limited our recommendations to matters of particular relevance to key aspects of RSS delivery. We identify, for example, a need for the introduction of timelines for LDD formulation to support Policy J. Further work is required to reflect the restructuring of the Transport Section as a RTS.
- 0.72 The Key Infrastructure Lists are not consistent and much more work is required to ensure a systematic evaluation of infrastructure priorities.