

# Chapter 1: A Sustainable Future

Matter 1; 1/1, 1/2, 1/3

Policies SD1, SD2, SD3, SD4 and ENV1

## Introduction

1.0.1 In this Chapter the Draft's Sustainable Future issues is considered, concentrating on the high level Sustainable Development Policies and the sub-matters considered as Matter 1 of the EiP: sustainability appraisal; appropriate assessment and climate change.

1.0.2 The Panel is aware that in the preparation of the draft RSS<sup>1</sup> one of the key foundations was the vision for the region as set out in the Regional Sustainability Framework entitled *A Sustainable Future for the South West*, published in March 2001. "*The South West must remain a region with a beautiful and diverse environment. By working together, applying the principles of sustainability, we can achieve lasting economic prosperity and social justice, whilst protecting the environment. This approach will secure a higher quality of life now and for future generations*".

### *Integrated Regional Strategy*

1.0.3 In November 2004 the Region published *Just Connect! An Integrated Regional Strategy (IRS)* which endorses this vision.

1.0.4 The IRS is an overarching document which contains five headline aims<sup>2</sup>:

- to harness the benefits of population growth and manage the implications of population change;
- to enhance our distinctive environments and the quality and diversity of our cultural life;
- to enhance our economic prosperity and quality of employment opportunity;
- to address deprivation and disadvantage to reduce significant intra-regional inequalities;
- to make sure that people are treated fairly and can participate fully in society.

1.0.5 These aims are supported by a number (20) of '*crunch objectives*' requiring integrated approaches<sup>3</sup>. The regional partners have agreed that these will be the focus for regional policy and delivery<sup>4</sup>.

1.0.6 At the heart of the draft RSS strategy is a desire to create a region that is more sustainable than it has been in the past. That strategy, together with developing more sustainable communities<sup>5</sup> is intended to be a key delivery mechanism for *Just Connect!*<sup>6</sup>

<sup>1</sup> *Information Note 1 – Draft RSS Issues, Strategy Vision and Aims*, South West Regional Assembly, January 2007.

<sup>2</sup> *Draft Regional Spatial Strategy*, South West Regional Assembly, June 2006, para 1.5.1, page 8.

<sup>3</sup> *Just Connect!* South West Regional Assembly, November 2004.

<sup>4</sup> *Draft Regional Spatial Strategy*, South West Regional Assembly, June 2006, para 1.4.2, page 6.

<sup>5</sup> *Draft Regional Spatial Strategy*, South West Regional Assembly, June 2006, para 1.4.1, page 6.

<sup>6</sup> *Draft Regional Spatial Strategy*, South West Regional Assembly, June 2006, para 1.4.2, page 6.

### *The Way Ahead*

1.0.7 *The Way Ahead*<sup>7</sup>, launched at the Sustainable Communities Summit in February 2005, is the region's response to the Government's sustainable communities plan. It identifies a range of proposals which broadly fall under 3 main aims:

- Improving regional productivity, including measures to develop workforce skills, business innovation and transport infrastructure;
- Building more (including affordable) homes – and more quickly; and
- Reducing regional disparities and deprivation, ensuring the benefits of growth are spread to individuals and communities currently disadvantaged.

1.0.8 It also identifies a small number of places that will be able to make the biggest contribution to these priorities through sustainable growth over the next decade. These are:

- Bristol and the wider West of England sub-region;
- Plymouth;
- Exeter;
- Swindon; and
- The key Cornish towns.

### **High Level Policies**

1.0.9 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.

1.0.10 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. Clearly Policy SD2 does this, and we support it.

1.0.11 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.

1.0.12 The Government has placed considerable emphasis on the development of sustainable communities and the draft RSS quotes *Securing the Future*<sup>8</sup> in this respect. We were advised that, while the Government is 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<sup>9</sup>, which sets out a regional approach to Sustainable Construction.

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<sup>7</sup> *The Way Ahead - Delivering Sustainable Communities in the South West*, Government Office for the South West, South West Regional Development Agency and the South West Regional Assembly, 2005.

<sup>8</sup> *The UK Government Sustainable Development Strategy, Securing the Future* HM Government, March 2005.

<sup>9</sup> See also paragraphs 7.2.15 – 7.2.17 of this report.

- 1.0.13 Policies SD1, SD2, SD3 and SD4 were universally accepted at the EiP and we support those policies as they stand.
- 1.0.14 We now turn to the consideration of the sub matters relating to Sustainability Appraisal, Appropriate Assessment and Climate Change.

## Sustainability Appraisal

### *Background*

- 1.1.1 The Government Office for the South West referred the Panel to the relevant policy background.
- PPS11 *Regional Spatial Strategies* (Sept 2004).
  - PPS 25 *Development and Flood Risk* (DCLG, Dec 2006).
  - PTSA 5.02 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (ODPM, Nov 2005).

### Issues

- 1.1.2 In the Panel's view the group of sustainability appraisal issues which arise are:
- the soundness of the Strategic Sustainability Assessment, and its influence on the draft RSS; and
  - the adequacy of the coverage to a realistic range of options.

### *Policy context*

- 1.1.3 PPS1, *Delivering Sustainable Development* states that development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy *Securing the Future*. According to PPS1, Regional Planning Bodies should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time<sup>10</sup>.
- 1.1.4 The Strategic Sustainability Assessment (SSA) process<sup>11</sup> combines the requirements of a Sustainability Appraisal under PPS11, *Regional Spatial Strategies* and a Strategic Environmental Assessment (SEA) under the *European SEA Directive*<sup>12</sup>.

<sup>10</sup> *Information Note 6 - Strategic Sustainability Assessment*, South West Regional Assembly, January 2007. para 1.2

<sup>11</sup> *Draft Regional Spatial Strategy*, South West Regional Assembly, June 2006, para 1.2.8, page 5.

<sup>12</sup> Directive 2001/42/EC, on the assessment of certain plans and programmes on the environment.

### *The original SSA*

- 1.1.5 A team of consultants<sup>13</sup> was appointed in February 2004. Their report<sup>14</sup> was published in March 2006. Their work covered the requirements such as scoping. For instance, the SSA was used to test 5 possible development strategies and 4 growth scenarios, broadly covering a number of different scales and locations of development. In line with PPS 11, the SSA concentrated on realistic options. In all of this we consider that the process gave consideration to a realistic range of options, the final draft RSS being substantially modified by that process. Throughout, there was consultation with a range of stakeholders such as the Environment Agency and Natural England via a recursive process. In other words the RSS was developed via an iterative approach with the SSA. We note that some tensions remain, but we consider that these are inevitable bearing in mind the draft RSS commitment to sustainability principles concurrent with growth.
- 1.1.6 The SSA included an examination of the sub-regional strategy statements carried out by the Joint Study Areas (JSAs). Each JSA, in its own way, attempted to reflect the sub-regional issues and constraints. Subsequently, another consultant reviewed the JSA work and concluded that the work was satisfactory; even though some JSAs work was better than others.
- 1.1.7 Overall we conclude that it was a sound process.

### *The EiP phase*

#### *Revised 2003 household projections*

- 1.1.8 In June 2006, shortly after the submission of the draft RSS, the Secretary of State informed the SWRA that further work was needed on the implications of the revised 2003 household projections on how the region would plan for their consequences and possible higher forecasts if the evidence supported the need to do so<sup>15</sup>.
- 1.1.9 The original SSA work considered higher levels of housing provision<sup>16</sup> and the revised DCLG projections were within the range of options appraised. The SWRA had carried out the additional work requested by the Secretary of State. This was also subject to SSA, and the consultants report<sup>17</sup> was published in January 2007. The work looked at four alternative distributional scenarios for the net additional 5,000 dwellings per annum that the SWRA believes are implied by the revised household projections. The concluding lines in the report say “*There may be some SSCTs, therefore, such as Bath, Bournemouth and Poole, where further development over and above that proposed in the draft RSS should be examined in more detail. Careful consideration is also needed to ensure that there is sufficient capacity of water supplies and sewage treatment to cope with even higher levels of development. In addition, the pace of development will require strict adherence to policies in the draft RSS that aim to protect and enhance the*

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<sup>13</sup> Information Note 6 - Strategic Sustainability Assessment, South West Regional Assembly, January 2007. para 5.1.

<sup>14</sup> Strategic Sustainability Assessment of the Draft South West Regional Spatial Strategy, Land use Consultants, Collingwood Environmental Planning & Levett-Therivel Sustainability Consultants, March 2006.

<sup>15</sup> Letter from Secretary of State for Communities and Local Government to SWRA, dated 23 June 2006.

<sup>16</sup> Information Note 6 - Strategic Sustainability Assessment, South West Regional Assembly, January 2007. para 5.7.

<sup>17</sup> The Revised 2003 Based DCLG Household Projections and the Draft South West Regional Spatial Strategy – Sustainability Implications, Land Use Consultations, January 2007.

*environment, both in terms of location and design, which will be a challenge given the pace of development proposed in the draft RSS, and in particular the emphasis on greater development in the earlier years of the period covered by the RSS".* Having undertaken this additional work, the SWRA concluded that there was no compelling reason to recommend higher overall housing allocations, nor to suggest altering the spatial strategy to make provision for higher annual growth rates.

- 1.1.10 A *Supplementary Sustainability Appraisal*<sup>18</sup> was carried out in March 2007 to provide additional analytical support to the submissions to EiP on the draft RSS being made by SWRDA. The Panel has had regard to the conclusions of this report and finds it helpful. It sets out the challenges and the holistic approach which should not be forgotten when discussing individual topics.
- 1.1.11 The Home Builders Federation and development interests put forward further alternative housing growth and distribution scenarios for SSA testing. These alternative distribution scenarios are for different scales and distribution for the full amount of housing to be provided in the South West over the plan period. The SSA of the development industry scenarios are a supplement to the SSA report prepared in the four SWRDA scenarios. The work commissioned by the developer interests, was undertaken by the same consultants who carried out the initial SSA and the supplementary report was published in March 2007<sup>19</sup>. They conclude that, subject to Appropriate Assessment requirements, the higher growth levels would not be out of kilter with the conclusions of that earlier SSA.
- 1.1.12 The EiP is part of the iterative process and has had before it sufficient additional advice to ensure that the SSA requirements were properly reflected at the EiP. The Panel are satisfied that the Process was sound and has met the requirements.
- 1.1.13 The SSA is an ongoing process and the soundness of the current SSA will require further work as the RSS progresses towards its statutory designation. An obligation is placed on the Secretary of State to carry out a further SSA round on any proposed changes prior to the approval process. That will ensure that any changes arising from our recommendations will be subject to SSA scrutiny.

## Appropriate Assessment

### *Background*

- 1.2.1 The Government Office for the South West referred the Panel to the relevant policy background.
- PPS9 *Biodiversity and Geological Conservation* (ODPM, 2005).
  - Consultation Document "*Planning for the Protection of European Sites: Appropriate Assessment - Guidance For Regional Spatial Strategies and Local Development Documents*" (DCLG, August 2006).

<sup>18</sup> SWRDA - *A Supplementary Sustainability Appraisal of SWRDA Submissions to the EiP* – ERM - March 2007.

<sup>19</sup> *The Developer Household Scenarios and the Draft South West Regional Spatial Strategy, Supplementary Report, Sustainability Implications of the Development Industry Alternative Housing Scenarios*, Land Use Consultants, March 2007.

## Issues

1.2.2 In the Panel's view the groups of appropriate assessment issues which arise are:

- the Policy context;
- the Habitat Regulations process;
- policy and safeguards.

### *Policy context*

1.2.3 Government Policy on protection of biodiversity through the planning system is set out in PPS9 *Biodiversity and Geological Conservation*<sup>20</sup>. The requirement to undertake a Habitats Regulation Assessment (HRA) of development plans was confirmed<sup>21</sup> in March 2006. The HRA refers to the assessment of the potential effects of a development plan on one or more European Sites collectively termed 'Natura 2000' (N2K) sites. The Appropriate Assessment (AA) assesses the impacts of a land-use plan against the conservation objectives of an European Site and to ascertain whether it would adversely affect the integrity of that site. The Consultation Document *Planning for the Protection of European Sites: Appropriate Assessment*<sup>22</sup> was published in August 2006.

1.2.4 Variations to the draft RSS Strategy will require the Sustainability Appraisal and Appropriate Assessment to be revisited to test out the implications of our relevant recommendations.

### *Habitats Regulations Assessment process*

1.2.5 Confirmation of the requirement for the RSS to be the subject of an Appropriate Assessment under the Habitats Directive came late in the process of preparing the draft RSS and at the same time as the draft RSS was approved by the Regional Assembly. Following its submission the Assembly appointed consultants to undertake a HRA of the draft RSS working closely with the statutory environmental bodies Natural England and the Environment Agency. The final report<sup>23</sup> was published in February 2007 and an erratum<sup>24</sup> in March 2007 in compliance with the requirements of the Directive before the start of the EiP.

1.2.6 Further work has subsequently been commissioned from Land Use Consultants by their clients to comment upon the potential implications of the development industry alternative scenarios on the N2K sites in the light of the findings and conclusions of the main HRA Report. The supplementary report<sup>25</sup> was published in May 2007.

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<sup>20</sup> Planning Policy Statement 9: *Biodiversity and Geological Conservation*, ODPM, August 2005.

<sup>21</sup> Letter from Office of the Deputy Prime Minister to all planning authorities including Regional Planning Bodies, dated 9 March 2006.

<sup>22</sup> *Planning for the Protection of European Sites: Appropriate Assessment - Guidance For Regional Spatial Strategies and Local Development Documents*, Consultation Document, DCLG, August 2006.

<sup>23</sup> *Habitats Regulations Assessment of the Draft Regional Spatial Strategy for the South West, Final Report* Land Use Consultants, February 2007.

<sup>24</sup> *Habitats Regulations Assessment of the Draft Regional Spatial Strategy for the South West, Erratum to the Final Report*, Land Use Consultants, 16 March 2007.

<sup>25</sup> *Habitats Regulations Assessment Supplementary Report*, Land Use Consultants, May 2007.

1.2.7 There are a wide range of N2K sites in the South West, representing a diverse range of broad habitat and species types which highlights the region's rich biodiversity resource. The Appropriate Assessment showed that there are a number of impacts potentially resulting from the draft RSS, in combination with other plans and projects, which mean that adverse impacts could not be ruled out, without additional safeguards.

1.2.8 The Appropriate Assessment recommends changes to the draft RSS to avoid adverse impact on the N2K sites. These include a) a generic policy; b) thematic policy safeguards; and c) sub-regional policy safeguards. A specific policy for the South East Dorset heathlands is proposed (see recommendation 4.7.7).

#### *Generic Policy*

1.2.9 The policy of the draft RSS that implicitly deals with N2K sites as a whole is Policy ENV1 which currently provides strong safeguards for 'international' nature conservation sites. It treats them in the same way as other aspects of the environment, such as the landscape, historic assets, as well as national nature conservation sites. The protection under European law given to N2K sites is more stringent than many other aspects of the environment. Policy ENV1 also gives the impression that adverse effects on N2K sites could be acceptable so long as compensation for the adverse effects is put in place. This is theoretically possible under the Habitats Directive but onerous compensation tests must be met for the N2K sites and effectively rule this out as an option.

1.2.10 It is recommended that the specific requirements that apply to N2K sites should be explicitly stated in policy in the RSS in order to clarify the position of the RSS with respect to N2K sites. This could be done by adding a new paragraph within Policy ENV1.

#### **Recommendation 1.2.1**

- Add to Policy ENV1:

“Any development that could have any negative effect on the integrity and conservation objectives of a N2K site would not be in accordance with the development plan. Further assessment of the implications for N2K sites may be required at subsequent levels including LDDs, and any development that would be likely to have a significant effect on a N2K site, either alone or in combination, will be subject to assessment at the project application stage”.

#### *Thematic safeguards*

1.2.11 The themes that should receive particular policies, as suggested by the Appropriate Assessment are The Coast, Flood Risk, Renewable Energy, Water Resources, Woodlands and Forests, Air Quality, Minerals, Tourism and the Regional Approach to Transport (also linked to Air Quality). The new “overriding” policy (see

recommendation 1.2.1) to be included in ENV1 would in the Panel's view be sufficient security, along with naming specific N2K sites in the sub-regional supporting text. More scattered references to safeguarding N2K sites would not add to the clarity of the document as a whole. Accordingly, the Panel takes the view that there should not be thematic policies in the RSS.

*Sub-regional safeguards*

- 1.2.12 The South West Wildlife Trusts and the HRA report (para 5.18) recommend that there is specific reference in the RSS to the Severn Estuary, the River Avon (and Avon Valley) and the South East Dorset Heaths. That is due to in-combination proposals and/or indirect effects as well as cross-administrative boundaries issues. As these areas (Dorset Heaths SAC and Dorset Heathlands SPA; River Avon SAC and Avon Valley SPA; and Ramsar, Severn Estuary pSAC, SPA and Ramsar Site) are considered to be particularly vulnerable from a potentially large number of locations, the Panel takes the view that they should be referred to specially. And we are recommending an addition to Policy ENV1.
- 1.2.13 In addition, the HRA identifies particular sub-regional strategies where development is proposed and where there is clear potential for adverse effects on the integrity of N2K sites and where generic policy safeguards are not considered to provide sufficient mitigation. These are referenced in paragraph 5.19 of the HRA report and subsequently amended<sup>26</sup>. In such instances, it is recommended that the N2K sites that could potentially be affected are specifically named in the sub-regional supporting text (section 4 of the draft RSS), including a description of the potential pressures, the need to protect the site's integrity from adverse effects, and the likely need for further examination through HRAs of LDDs.

**Recommendation 1.2.2**

- Add to Policy ENV1 - "Three locations are considered to be particularly vulnerable and require special protection – Dorset Heaths, River Avon (Hampshire) and Severn Estuary".
- Add text so that specific sub-regional sections specifically refer to the following sites:
  - River Avon SAC and Avon Valley SPA and Ramsar (South East Dorset and Salisbury).
  - Chesil & The Fleet SAC, Chesil Beach & The Fleet SPA, Ramsar (South East Dorset, Dorchester and Weymouth).
  - Somerset Levels & Moors SPA and Ramsar (Taunton and Yeovil).
  - Hestercombe House SAC (Taunton).
  - Mendip Limestone Grassland SAC (Weston-super-Mare).
  - North Somerset & Mendip Bats SAC (Bristol).
  - Bath & Bradford-on-Avon SAC (Bath).
  - South Hams SAC (Newton Abbott and Torbay).
  - Wye Valley & Forest of Dean Bat Sites SAC and Wye Valley Woodlands SAC (Forest of Dean Towns).

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<sup>26</sup> *Habitats Regulations Assessment of the Draft RSS for the South West, Final Report* Land Use Consultants February 2007, and Erratum to the Final Report, 16 March 2007.

- The text should specify the above N2K sites and say that:

“The integrity of the N2K sites should be protected from adverse effects; there is likely to be a need for HRAs at an LDD stage or project level application proposals”.

- 1.2.14 Detailed assessments can only be made when individual sites are identified. There are certain parts of the region, for instance the South East Dorset conurbation, where N2K sites are so close to likely development including the present urban area, that mitigation is virtually the only way of providing development and meeting the statutory obligations. As a general point, the EiP heard that mitigation would be possible for those locations where development is proposed. South-East Dorset is a special case and this is dealt with in Chapter 4 of this report.

*Other mechanisms*

- 1.2.15 Other legislation, by way of consents (and their review), relates to water abstraction and water quality. Thus potential impacts on N2K sites from those sources can be controlled.
- 1.2.16 At present no modelling exercises have been attempted to assess the Regional implications of the RSS with respect to air quality, so we take the matter no further.

*Summary on Appropriate Assessment*

- 1.2.17 The Panel is satisfied that the areas of search referred to in the draft RSS and by the Panel in this Report can provide for development, provided that our recommendations are accepted and that mitigation in respect of relevant NK2 sites is provided.

## Climate Change

### *Background*

- 1.3.1 The Government Office for the South West referred the Panel to the relevant policy background.
- PPS 1: *Delivering Sustainable Development* (ODPM, Feb 2005).
  - PPS 11: *Regional Spatial Strategies* (ODPM, Sept 2004).
  - PPS 22: *Renewable Energy* (ODPM, March 2005).
  - PPS 25: *Development and Flood Risk* (DCLG, December 2006).
  - PTCC 8.01 *Climate Change - the UK Programme* (HMG, 2006).
  - PTTA 25.01 *The Future of Air Transport* (DfT, 2003).
  - PTSD 19.02 *Securing the Future -The UK Sustainable Development Strategy* (HMG, 2005).
  - *Draft Planning and Climate Change: Supplement to PPS 1* (DCLG, Dec 2006).
  - Code for Sustainable Homes (DCLG, Dec 2006).
  - Consultation Paper: *Building a Greener Future, Towards Zero Carbon Development* (DCLG, Dec 2006).
  - PPS1 *Planning Response to Climate Change* (ODPM, 2004).

## Issues

1.3.2 In the Panel's view the group of climate change issues which arise are:

- policy context arising from climate change;
- spatial consequences of the strategy for the carbon footprint;
- mitigation and adaptation.

### *Policy context*

1.3.3 The Government seeks to address climate change through a number of policy initiatives<sup>27</sup> and published in December 2006 a draft supplement to PPS1 on *Planning and Climate Change*<sup>28</sup> and also *Building a Greener Future: Towards Zero Carbon Development*<sup>29</sup> all for consultation. The GOSW said that formulating an appropriate response to climate change is at the top of the Government agenda and, as such, it welcomed the coverage given to it in the draft RSS.

1.3.4 The Panel is of the view that paragraphs 1.6.9 to 1.6.13 of the draft RSS show that both the threats and the opportunities of climate change have been adequately reflected in the draft RSS.

### *Spatial consequences*

1.3.5 The draft RSS has been most positive in addressing climate change objectives, particularly in its clear strategic approach to the location of new development. The draft RSS proposes that the majority of new development is located at the SSCTs (Policy A), thus creating circumstances that reduce the need to travel. The remainder, which is not located there, should be provided at the urbanized towns and larger villages (Policies B and C). Clearly that strategy, along with encouragement to use public transport, should reduce the need to travel by car.

1.3.6 The draft RSS strategy, by achieving a better alignment of jobs, homes and services would reduce the carbon footprint.

### *Mitigation and adaptation –main policy*

1.3.7 Policy SD2 is the primary Climate Change Policy. This sets out directly how the region's contribution is to be achieved. The Panel considers that this is a robust and comprehensive policy; for instance it refers to the need to take account of flooding in new development but also to safeguarding the resilience and reliability of existing infrastructure. The RSS sets the framework for future regional growth and development. The Regional Assembly indicated that it was especially important to consider the implications for not only transport but also for buildings. For example, in developing Development Policy G on sustainable construction<sup>30</sup>.

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<sup>27</sup> *Information Note 10 –Climate Change*, South West Regional Assembly, January 2007. paras. 1.2-1.3.

<sup>28</sup> *Planning and Climate Change Supplement to Planning Policy Statement 1, Consultation Document*, DCLG, December 2006.

<sup>29</sup> *Building a Greener Future: Towards Zero Carbon Development. Consultation Document*, DCLG, December 2006.

<sup>30</sup> *Information Note 10 –Climate Change*, South West Regional Assembly, January 2007. paras 3.2.

*Mitigation and adaptation - supportive policies*

- 1.3.8 Clearly, transport has a role in the climate change scenario. Notwithstanding the Panel's comments on Transport, in Chapter 5 of our Report, we find that the draft RSS Transport Policies support the draft RSS strategy relating to climate change. For instance, Policy TR10 supports a modal shift to public transport and Policy TR11 also supports sustainable travel.
- 1.3.9 National aims in respect of the South West region's airports are set out in the document *The Future of Air Transport*<sup>31</sup> published in 2003 and *Air Transport White Paper Progress Report* published in 2006<sup>32</sup>. Many representations sought to restrict the expansion and current use of air transport in the South West. However, Government policy is that meeting regional demand for air travel within the region is an important first step in reducing the impact of growth in air travel. Were the Panel to support some of the representations on air transport we could only do so by conflicting with national policy.
- 1.3.10 There would appear to be scope for further attention to be given to the provision of public transport infrastructure to service the regional airports and make non-car journeys to them a more attractive option. But, bearing in mind the dispersed nature of the region, there is no evidence to suggest that public transport improvements could do much more than affect the margins of the current modal split.
- 1.3.11 In a region in which there is scattered rural development, it is unrealistic to rely on an absolute reduction in car use in order to achieve carbon reduction. Some representations sought an absolute reduction in the level of traffic. However, we believe that the existing dispersed settlement pattern and the current reliance on car-based tourism would be among the factors which would make that difficult, if not impossible. Chapter 5 (Transport) explains this in more detail and sets out a policy response. Overall we find that the draft RSS transport policies generally reflect and support Policy SD2.
- 1.3.12 Policy G – Sustainable Construction and Policy RE5 – Renewable Energy and New Development are relevant. Policy G seems to anticipate national policy intentions but the EiP was advised by GOSW that it was not the intention of the Government to resist such policies. There is a danger of local initiatives which would raise difficulties for those promoting development in different local authorities. And so we support consistency at the regional level. Matters regarding energy efficiency in buildings are dealt with in Chapter 7. We support in principle Policy G but detailed considerations and its relationship with Policy RE5 are considered there.
- 1.3.13 Issues regarding flooding are also referred to in Chapter 7.

<sup>31</sup> *The Future of Air Transport*, The White Paper, DfT, 16 December 2003.

<sup>32</sup> *Air Transport White Paper Progress Report*, DfT, 14 December 2006.