Background – the RSS and its Importance

The Regional Spatial Strategy (RSS) being drawn up over the next two years will replace Regional Planning Guidance, RPG10. It will then be the leading, statutory, planning document, which local authorities will have to conform to when drawing up Local Development Frameworks for their areas.

Responsibility for the RSS lies with the South West Regional Assembly, who have consulted the public on “Possible Development Strategies for the Region”1. While stressing that “We are not asking you to select one”, they asked for views on three possible strategies:
1) Continue the RPG10 approach of concentrating development on the “Principal Urban Areas” (PUA’s)
2) A stronger focus on a limited number of PUA’s (Bristol, Plymouth, Bournemouth & Poole, Swindon, Cheltenham and Gloucester)
3) A “differential approach” to reflect the differences in settlement patterns across the region

Whose Region, Whose Choice?

With the North East having so decisively rejected an elected assembly, the government is left in the embarrassing position of having set up a new statutory planning system with little prospect of it being subject to democratic control for the foreseeable future. Many will question the legitimacy of a Regional Assembly with such strong powers to constrain elected local authorities on such fundamental matters.

Quantity or Quality?

Lurking behind the RSS are the Government’s plans for massive growth in the economically “high performing” parts of the country, mainly London and the South East, but including parts of the South West as well. These proposals are underpinned by assumptions about the role of these areas as the engine of the UK economy. Faced with the negative effects of high economic growth on environmental and social justice, this model presumes that the cure for these ills will be more of the same. Thus housing sprawl has blighted many areas of the South East, yet its high cost has put it out of reach of ever larger numbers of people. The treasury economists’ response is to push for still larger numbers of houses, seeing the affordable homes crisis as a failure of the planning system rather than a failure of the market to meet social need. (In fact the Barker review of house building proposes to make the planning system subservient to the market.)2

The environmental impacts of the proposed scale of new housebuilding are as yet poorly understood, but potentially very large. A study for DEFRA “confirms that the greatest burden of environmental impact falls on the South East, London and the South West regions, and this reinforces the need for further study to

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**Need for a National Spatial Strategy**

Closely linked to the pressure on “growth areas” is the lack of an overall national spatial plan. Growth goes where markets deem it most profitable to go, not to areas where there is environmental capacity for it or greatest social need. The starkest illustration of this is the contrast between the South East where there is large scale greenfield development attended by rising congestion, poor air quality, loss of biodiversity and access to nature, pressure on water resources and so on; and Northern towns where entire streets lie virtually abandoned and large scale demolition of property is proposed as a means of “regeneration”.

**SOME COMMENTS ON THE ASSEMBLY’S CONSULTATION DOCUMENTS**

Some of the confusion surrounding the model for future growth in the region is apparent from the Assembly’s consultation leaflet. In outlining the possible strategies this states that: “development in future will be sustainable in economic, social and environmental terms if it is concentrated at the eleven largest towns and cities in the region (PUAs).”

Yet in the Assembly’s review of the future options - on the same pages - we are warned that option 2, to concentrate to a still greater degree on the PUA’s, “would place more pressure on habitats and landscapes close to the PUA’s which are already environmentally constrained and more pressure on quality of life within PUA’s “. In other words, a good thing becomes a bad thing once you have too much of it. But if that is the case, then what is the tipping point? How much development can the PUA’s take before the costs start to outweigh the benefits? Might that point already have been reached in some areas?

Even so, the Assembly is prepared to state that, “The RSS is at an important stage in its development. Its core development strategy needs to be decided upon.” We are worried that this decision is premature. There is a great deal that is not understood about the impacts of the three spatial planning options. While the Assembly and the consultants engaged for the Strategic Sustainability Assessment have made brave attempts, there is much in this consultation document that is quite breathtakingly superficial. We do not believe that there is anything like a good enough evidence base to make so fundamental a choice at this stage.

**The Context for RSS**

There is a risk of the concepts of sustainability becoming obscured through sloppy use of language: the Government’s definition of “sustainable communities” is a case in point. The RSS needs to be underpinned by a solid and rigorous definition of sustainable development. The key to the achievement of sustainable development is the integration of economic goals with social and environmental needs: this is what RSS should strive to achieve rather than “balance” one against others.

**The main development issues facing the region**

We welcome the Assembly’s recognition that maintaining and enhancing environmental quality is an “imperative”. The recent, also very welcome, adoption by the Assembly of an Environmental Strategy “Our Environment: Our Future” has highlighted the range of pressures that exist and the adverse trends across many areas of environmental policy (e.g. energy generation, greenhouse gas emissions, waste, resource use, soils, farmland biodiversity, traffic growth). A key test of the RSS will therefore be its effectiveness in combating these trends, improving on RPG10 whose environmental policies were assessed as “too general to be effective”.

The “Strategic Sustainability Assessment” states that “RSS will require much stricter sustainability constraints in the future, including protection of environmental assets; higher density development; lower energy/water usage; traffic restraint and demand management... If such constraints are not applied vigorously and consistently, any growth is likely to have a range of negative consequences, and even the better spatial strategies will not deliver their potential for benefits.” We agree. In our view the nature of these sustainability policies and the way in which they are applied will prove the most important determinant of the success or otherwise of the RSS in shaping the future of the region.
These however receive scant recognition in this section of the consultation document. The only specific environmental pressures mentioned are “loss of tranquillity and light pollution”. Growing emissions and other impacts of transport, climate change, water and energy consumption, resource use, loss of biodiversity, and the future of rural land-based industries apparently don’t merit a mention as “main development issues”!

We strongly agree that a key challenge is the transformation of urban living environments. We suggest that for spatial planning the priority action for urban liveability is to ensure that development is not car-based.

An implication of all the strategies, especially option 2, is the pressure for expansion of PUA’s beyond their current boundaries. It is essential here to emphasise the sequential approach: favouring development within the existing urban areas and the re-use of previously developed land and buildings over greenfield sites; and the need to increase the density of development.

Even with strong policies in place to secure these, however, the projected level of housing demand will inevitably require extensions to the existing urban areas. A criticism of RPG10 was that it failed to pay sufficient attention to this. Criteria for where and how such development should be steered were lacking, and as a result this remains one of the most contentious and poorly understood aspects of strategic planning. This again surely merits recognition as a “main development issue”?

**RSS: guiding change and development over the next 20 years**

In the whole of this introduction, there is a conspicuous failure to grasp the issues of climate change. Strategies need to be climate proof and climate friendly. The Prime Minister and the Government’s Chief Scientist are agreed that climate change is the biggest single problem confronting us. To put us on a development path that will secure the needed 60% cuts in CO₂ emissions by 2050 will require radical changes in our whole approach to economic and social development, and spatial planning will have a crucial role to play. The period covered by this RSS will take us half way to 2050, so it has to be consistent with, and indeed a powerful driver of, 30% cuts in CO₂ emissions compared to the present day.

**SECTION 2: Possible Development Strategies**

We suggest that a “key driver for strategic thinking” should be to aim for greater self-containment of all settlements regardless of their size. It should not automatically be assumed that self-containment will be easier to achieve in the larger towns and cities.

Appendix 4 lists other possible strategies that were rejected. It is only a very superficial analysis. In particular there is inadequate justification for rejecting a strategy based on lower growth rates.

We fully agree on the need for adequate infrastructure investment “up front” of planned expansion of any settlements. Past history however gives little grounds for confidence that this will happen. Nor should it be assumed that the required infrastructure can be provided as a matter of course and without unacceptable consequences. Swindon is a clear case in point where both water resources and wastewater treatment capacity are seriously stretched and yet continued expansion is blithely planned as though these fundamental constraints were mere formalities.

**Possible Development Strategy 1:**

We agree that “effective mechanisms will be required to deliver good quality affordable housing to meet local needs”. They are needed now and are likely to be under any conceivable future strategy. Perhaps the more helpful question to address is which option will be more likely to facilitate this, if indeed there is any significant difference between them? As the “mechanisms” are not specified it is hard to say.

The Strategic Sustainability Assessment is reported as concluding that “deprived areas outside PUAs will not benefit from economic activity”. It seems a harsh conclusion that economic activity will cease if there is no inward migration. Other means of enhancing a local economy exist such as the development of markets, improving the skills base, and “plugging the leaks”: seeking to ensure that as much economic activity as
possible stays within the local area (e.g. by favouring independent shops over supermarkets).

**Possible Development Strategy 2:**
This begins by stating that “fewer large urban centres capable of accepting significant new development are identified under this strategy”. How are the settlements identified? It would seem sensible to set some rigorous and testable criteria first, identify the settlements and then decide on the strategy rather than the other way around.

The very high rates of development proposed for the major PUA’s under this strategy militate against the type of high density brownfield development that is desirable to make public transport viable. This increases the likelihood of low density greenfield development, of necessity car-based.

Would it necessarily follow that driving up regional pay and labour productivity in Plymouth “would have marked beneficial effects” in Cornwall or other parts of the far south west? Statistically there is no doubt that GVA per head would rise, but how evenly would the benefits be spread among the population in the hinterland? Might they not suffer a continued loss of rural services and an even greater housing affordability crisis? (South Hams has already been reported this year as having the worst ratio of earnings to house prices of any English district).

**Possible Development Strategy 3:**
This strategy has obvious attractions in its recognition that not all parts of the region are the same. The settlement pattern in Cornwall for instance is very distinctive and different from that of the English counties. We note however the warning in the “Strategic Sustainability Assessment”\(^7\), that if sustainability constraints are not applied “vigorously and consistently” then the benefits of any of the strategies will be lost.

It is not clear why transport priorities would concentrate on “improving inter-urban connectivity” in the north of the region under this strategy, when surely the “PUA focus” is just as strong as it is under the other strategies? Under all strategies we suggest that transport investment should serve greater self-containment of settlements rather than encouraging more and longer journeys between them.

In general the transport consequences of this strategy seem worrying. The acknowledgement that “competition in shopping and related facilities” may increase for some of the smaller towns suggests that rural access may actually be worse under this strategy than on the more strongly PUA-focused ones.

Finally, it is not clear how this strategy might help reduce existing health inequalities between the different ends of the region. A proper assessment of the health impacts of the different strategies would be welcome, which would need to look at health in the round and not just the provision of health care facilities.

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2. [http://www.foe.co.uk/resources/campaign_evidence/eac_sustainable_housing.pdf](http://www.foe.co.uk/resources/campaign_evidence/eac_sustainable_housing.pdf)
5. ibid. 4.2 “Six Key Issues For The South West’s Environment” [http://www.swenvo.org.uk/publications/ENV%20strat%20main%5B1%5D.pdf](http://www.swenvo.org.uk/publications/ENV%20strat%20main%5B1%5D.pdf)