



GOVERNMENT OFFICE
FOR THE SOUTH WEST

Draft South West RSS – Proposed Changes Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South West Regional Spatial Strategy please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office for the South West before **5.00pm on Friday 17th October 2008**.

Please send all responses to:

Regional Spatial Strategy Team
Government Office for the South West
2 Rivergate, Temple Quay
Bristol
BS1 6EH

E-Mail: rssconsult@gosw.gsi.gov.uk

Telephone: 0117 900 1705

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Section A

| Comments submitted by: | | Agent (if applicable): | |
|------------------------|---------------------------------------|------------------------|--|
| Organisation | South West Protected Landscapes Forum | Organisation | |
| Surname | Dixon | Surname | |
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Signature.....*D.Y. Dixon*.....

. Date...17/10/08

Our response

This response has been developed by the **South West Protected Landscapes Forum** (SWPLF) Planning Co-ordination Group on behalf of the nationally designated landscapes of the region: the National Park Authorities (NPAs) of Dartmoor and Exmoor and the Areas of Outstanding Natural Beauty (AONBs) of Blackdown Hills, Cornwall, Cotswolds, Cranborne Chase and West Wiltshire Downs, Dorset, East Devon, Isles of Scilly, Mendip Hills, North Devon, North Wessex Downs, Quantock Hills, South Devon and Tamar Valley.

In addition to this collective response, individual AONBs/NPAs will be making their own representations on the Secretary of States Proposed changes to the Draft Regional Spatial Strategy For The South West.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | |
| For comments on the Sustainability Appraisal – Paragraph Number | |
| For comments on the Habitats Regulation Assessment Report – Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF welcomes the clearer use of language brought about as a result of the proposed changes. It is now a much more readable and clear document. However we are concerned that the cumulative effect of the proposed changes is to make the RSS less robust in terms of sustainability and less reflective of a region with a rich, distinctive and strong heritage.

Section D1

If you wish to expand your response please use the space below.

Section B

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| Support / Oppose / Comment (please specify) | COMMENT |
| RSS Reference – Policy or Paragraph Number | Section Three |
| For comments on the Sustainability Appraisal – Paragraph Number | |
| For comments on the Habitats Regulation Assessment Report – Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Concerns about the pace and scale of growth

Our key concerns regarding the Proposed Changes relate to the scale and pace of additional development. Whilst the pressures of growth will impact on individual Protected Areas in different ways – all will face the indirect impacts pressures which would be greatly exacerbated by the Secretary of State’s proposed increases to growth projections.

These pressures include, for example:

- overuse and damage to open access land, rights of way and sensitive wildlife habitat from walkers, cyclists, horse riders, inappropriate parking and off road vehicles;
- increasing traffic noise and pollution;
- erosion of important qualities of protected landscapes such as tranquillity and dark skies;
- loss of landscape character as a result of pressure for land use changes e.g. agriculture to leisure-driven equestrian use.

Under the Proposed Changes there will be 592,460 more dwellings in the region in 2026 compared to 2006, an increase in the total dwelling stock of 26%. This represents a 29% increase in the number of new dwellings than was proposed in the Draft RSS. The majority of the SSCTs will grow by more than 30% in 20 years. The pace and scale of this level of growth will undoubtedly place a strain on the services, facilities and infrastructure of settlements and will challenge opportunities to achieve a high quality of life and work within environmental limits. The “knock on effect” of growth will be felt, not only by protected areas, but also on other environmental asset.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

| Support / Oppose / Comment (please specify) | COMMENT |
|--|---------|
| RSS Reference – Policy or Paragraph Number | |
| For comments on the Sustainability Appraisal – Paragraph Number | |
| For comments on the Habitats Regulation Assessment Report – Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Concerns about the deliverability of the RSS

The draft RSS and the Proposed Changes were written for a buoyant and prosperous economy – Given the recent downturn in the economy and the house building sector in particular the RSS looks increasingly unrealistic and undeliverable. The south west region has never achieved the 3.2% economic growth central to the RSS vision. SWPLF is concerned at the lack of certainty about the delivery of the sustainability infrastructure, central to the RSS response to coping with the impacts of growth across the region.

SWPLF agrees with the Sustainability Appraisal findings that “ *the general trend of changes which are genuinely minor is cumulatively to erode and weaken the sustainability safeguards and credentials of the RSS and to replace clear and enforceable regional standards with exhortations to local planning authorities.* “

SWPLF is concerned that local efforts to achieve growth targets will compromise the implementation of environmental protection and sustainability policies. SWPLF takes the view that there remains a fundamental dis-connect in the RSS between delivery of the sustainability and growth policies.

The success or other of the RSS will rest on local delivery, SWPLF is concerned about the lack of guidance in the RSS as to how to tackle potential conflicts in Local Development Plan Documents. SWPLF continues to support the call for a ‘decision-making’ framework to help guide those using the spatial strategy to take decisions that aspire to meet all policy objectives, but also to show them how to approach decision-making when potential conflicts and tensions are apparent.

As well as working with local authorities it is crucial to support cross boundary partnerships and cooperation, including cross regional issues such as those associated with impacts on the New Forest National Park.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | COMMENT |
| RSS Reference – Policy or Paragraph Number | Section Four |
| For comments on the Sustainability Appraisal – Paragraph Number | |
| For comments on the Habitats Regulation Assessment Report – Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF endorses the Sustainability Appraisals concerns over the direct and indirect effects of housing growth on the environment:

“In identifying Areas of Search for development, the Proposed Changes have sought to avoid the most environmentally sensitive locations. Nonetheless, we have also highlighted concerns about indirect impacts on the environment. For example, several of the SSCTs are constrained due to their high quality landscape, biodiversity and historic interest. Indirect impacts could include the effects of development on the character and setting of natural and historic landscapes and assets, and impacts on biodiversity from recreation, and from noise, light and air pollution associated with increased population, new development and traffic.”

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | Policy HI |
| For comments on the Sustainability Appraisal – Paragraph Number | |
| For comments on the Habitats Regulation Assessment Report – Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Affordable homes required

SWPLF considers affordability to be the real housing challenge for the rural south west. The Proposed Changes provide for both a higher proportion and a higher total number of affordable homes. The overall percentage of affordable homes (35% of all new dwellings in the Proposed Changes as opposed to 30% in the Draft RSS). SWPLF welcomes this more challenging target in the RSS.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | OPPOSE |
| RSS Reference – Policy or Paragraph Number | SD1 |
| For comments on the Sustainability Appraisal – Paragraph Number | |
| For comments on the Habitats Regulation Assessment Report – Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF suggests that the proposed changes to this policy have weakened the aims of the policy which previously sent a clear message to implementation bodies of both the need to take this issue seriously and how they should go about it .

SWPL does not supported the proposed changes to SD1:

- Replacing “*ensuring that development respects environmental limits*” with “*achieving development that respects environmental limits*”.
- Replacing “*requiring ...*” by “*encouraging*” sustainable construction and design as the norm,
- Deleting “*reducing the reliance on the private car*”.
- Removing the implementation clause “*Local Authorities, regional agencies and others will include policies and proposals in their strategies, plans and programmes to assess how all new developments, regeneration areas and major refurbishments contribute to stabilising and reducing the region’s ecological footprint*”

The overarching sustainable development policies SD1 to SD4 are crucial to the RSS. The Proposed Changes have significantly modified policies SD1 and SD2 and this has resulted in a substantially weakened policy framework for achieving sustainable development

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF recommends reinsertion of the original text in Policy SD1 as presented in the Draft RSS.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | OPPOSE |
| RSS Reference – Policy or Paragraph Number | SD2 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The overarching sustainable development policies SD1 to SD4 are crucial to the RSS. The Proposed Changes have significantly modified policies SD1 and SD2 and this has resulted in a substantially weakened policy framework for achieving sustainable development.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF recommends reinsertion of the text that requires all local authorities to demonstrate how they intend to contribute towards the required 60% cut in CO2 emissions by 2050 and how they intend to identify and respond to the potential impacts of climate change in their area.

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Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | OPPOSE |
| RSS Reference – Policy or Paragraph Number | SECTION TWO |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Section two has been entirely deleted within the Proposed Changes. The Panel Report stated that although this section did not contain policies it “...*contributes significantly to setting the scene and developing the big picture for the policy approach, policies and their implementation*” (para .21).

The deletion of this section removes a significant area representing regional identity and an understanding of regional issues such as:

- the quality of environmental assets;
- expected population and economic change and
- the implications of this change; and the role and function of places.

The overarching sustainable development policies SD1 to SD4 are crucial to the RSS. The Proposed Changes have significantly modified policies SD1 and SD2 and this has resulted in a substantially weakened policy framework for achieving sustainable development.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF would like to see section 2 reinstated to accord with the Panel Report recommendation.

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Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | OPPOSE |
| RSS Reference – Policy or Paragraph Number | POLICY G |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Section two has been entirely deleted within the Proposed Changes. The Panel Report stated that although Policy G in the Draft RSS included strong and regionally distinctive policies and standards on energy efficiency and other aspects of sustainable construction. The Proposed Changes have removed the region-wide sustainable construction requirement from the policy in order to allow Local Planning Authorities (LPAs) to promote best practice in achieving sustainable construction and help achieve the national timetable for reducing carbon emissions from new or refurbished buildings.

SWPLF does not support the revision to Policy G within the Proposed Changes and agrees with the Sustainability Appraisal findings that it merely repeats national policy. SWPLF supports the principle of sustainable construction and suggests that the Panel Recommendation for Policy G to ensure a consistent region-wide approach to sustainable construction is re instated.

The Secretary of State’s attention is drawn to the government’s initial position, referred to in the EiP Panel Report (para 0.21), that it would not resist a regional approach towards achieving sustainable construction such as that contained in the original Development Policy G.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF recommend restoration of a specifically regional policy on sustainable construction in the spirit of Policy G from Draft RSS.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | SECTION FOUR |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF are pleased to see that the Secretary of State has identified that the Panels' analysis was erroneous to imply that the RSS/LDF can amend designated AONB boundaries - this correction has implications for the viability of the proposed housing growth allocation to the south of Bath (area of search E), within the Torbay HMA and the Weymouth and Dorchester HMA.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF supports the rejection of the Panel's analysis in paragraphs 4.5.16 to 4.5.19 of the EIP report and the resultant reduction of housing allocation for Torbay set out in HMA5

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | OPPOSE |
| RSS Reference – Policy or Paragraph Number | SECTION FIVE |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF supports the removal of a second strategic route as an ambition for the region.

SWPLF would like to see greater prioritisation of rail and incentives to support the modal shift of freight from road to rail.

Whilst the Secretary of State’s proposed changes include a requirement in Policy RTS4 to identify at a site in or near Exeter for a road/rail freight interchange, they weaken the potential highlighted in the Draft RSS for other sites in the region to come forward. Draft RSS Policy TR13 gave greater scope for the development of more sustainable freight movements by requiring the identification and safeguarding of rail freight interchanges in East Devon and Plymouth and the identification of sites in Cornwall and other parts of the region, subject to viability.

The supporting text in the Draft RSS para 5.6.7 promoted development of sustainable freight haulage much more proactively than the proposed changes as follows: ‘The requirements of the far South West are likely to be met at Plymouth and in Cornwall which offer the best opportunity to consolidate loadings from the diverse economic spatial pattern. However, there is scope for the development of local facilities and local authorities preparing LDDs and LTPs should work with the haulage industry to identify and protect opportunities for local rail freight facilities.’

Furthermore, Draft RSS Policy TR7 promoted improved rail access at ports in order to reduce road based haulage which is missing from the proposed changes in Policy RTS5.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF recommends the reinstatement of policies reflecting the potential in Draft RSS Policies TR7 and TR13 for the wider development of rail based freight haulage.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | POLICY Gi1 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF supports the proposed changes to Policy G11 particularly:
The identification, development and management of new areas not just intensification of existing areas. ensuring that a key aim is the maintenance and improvement of biodiversity; and protecting the integrity of international sites and providing new areas where development would otherwise cause unacceptable recreational pressure

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF supports the strengthening of Policy G11

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | POLICY ENV 1 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The protection and enhancement of the region's distinctive natural and cultural heritage are vital to maintaining and enhancing the quality of life in the region. The 38% of the region designated as nationally and internationally important landscapes help define the region as distinctive from other English regions. Landscape quality is also a fundamental contributor to the environment as an economic 'driver'. The conservation and enhancement of protected landscapes can contribute to the viability and vitality of rural centres. Maintaining a high quality environment helps attract skills, business and investment to the region giving a competitive advantage over other parts of the UK.

SWPLF supports the insertion of safeguarding text regarding Natura 2000 sites (SACs [Special Areas of Conservation] and SPAs [Special Protection Areas]) in line with Habitat Regulation Assessment.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | POLICY ENV 2-5 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

These policies were not considered at the Examination in Public and therefore no recommendations were made for any subsequent modifications to these policies – this has been upheld by the Proposed Changes.

- ◆ ENV2 – Landscape Character Areas
- ◆ ENV3 – Protected Landscapes
- ◆ ENV4 – Nature Conservation
- ◆ ENV5 – The Historic Environment

SWPLF supports and welcomes this decision particularly regarding ENV3 Protected Landscapes which incorporate the statutory purposes of the National Parks and AONBs ensures that Protected Landscape purposes have status in the Development Plan

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | OPPOSE |
| RSS Reference – Policy or Paragraph Number | POLICY RE5 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF has particular concerns regarding the changes to this policy which imply greater onus upon Local Planning Authorities to gather further evidence in order to set targets within local development documents. The regional standard recommended in the Panel Report for larger developments ensures consistency across the region.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

SWPLF recommends:

- **Restoring a region-wide minimum requirement for at least 10% decentralised renewable or low-carbon energy on or near larger developments, with flexibility for local planning authorities to raise but not lower the requirement.**
- **Removing the “*unless ...this is not feasible or viable*” let-out since the policy revised as we recommend should always be ‘feasible’ and would only cease to be ‘viable’ if a development was already right at the margin of viability.**

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | POLICY RE 8 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF supports the proposed changes to this policy to include the protection of ancient or veteran trees against loss.

SWPLF further welcomes the insertion of new text into paragraph 7.3.20 (supporting text for policy RE8) which states: “*The removal and management of trees and woodland may be necessary where this is needed to meet conservation objectives for open habitats, such as heathland and grassland*”. This insertion was a recommendation of the Habitats Regulations Assessment and ensures that the integrity of the regions Heathland is not compromised.

Comments from SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

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| Support / Oppose / Comment (please specify) | SUPPORT |
| RSS Reference – Policy or Paragraph Number | POLICY TO 1 |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

SWPLF supports the policy as set out in the Proposed Changes which embeds sustainability and recognises the potential of the region’s environmental assets for tourism where it is consistent with their conservation.

Comments from: SOUTH WEST PROTECTED LANDSCAPES FORUM

Section B

| Support / Oppose / Comment (please specify) | COMMENT |
|---|---------|
| RSS Reference – Policy or Paragraph Number | |

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

As Protected Landscapes across the region we endorse the findings of the Sustainability Appraisal (SA) prepared by Land Use Consultants in association with Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants.

SWPLF wish to add our support to the following SA recommendations:

Restoration of the original Draft RSS wording for Policies SD1 and SD2,

Restoration of specific, prescriptive, regionally distinctive policy content to Development Policy G and Policy RE5,

The need to ensure that housing numbers can be revised downwards as well as upwards in Policy HD1 if clear reasons emerge at the local level that mean that delivery of the numbers provided in the Proposed Changes will be unsustainable,

The need for specific and effective safeguards to ensure that ‘corridor’ improvements’ and ‘unlocking of pinchpoints’ do not in practice just mean providing extra capacity to accommodate motor traffic growth,

Aim to reduce traffic as a whole rather than just reducing the rate at which traffic is increasing,

Give clearer guidance on how those parts of the region that will be most affected by climate change should adapt (e.g. those coastal settlements that will be affected by sea level rise) and

Consider whether and how the RSS could give clearer guidance on how to deliver more sustainable patterns of development and activity outside of the SSCTs.