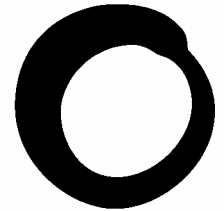


August 2006



**Friends of
the Earth**

Briefing

Growing within limits

The South West Regional Spatial

Over the course of the next year the most ambitious and comprehensive ever development plan for the South West of England will be finalised.

The [Regional Spatial Strategy](#) (RSS) has high ambitions to encourage genuinely sustainable development in the region. But it will also:

- Promote rapid growth in jobs and housing
- Tell every local council how much housing they have to provide up to 2026#
- Set out priorities for investment in roads and other forms of transport

Friends of the Earth inspires solutions to environmental problems, which make life better for people.

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And it could:

- Lead to the removal of green belt protection and the outward expansion of towns and cities in many areas
- Support the growth of regional airports

The RSS will be a statutory document, and local councils will have to conform to it when they draw up the plans for their own areas.

Whose RSS?

The main regional body responsible for writing the RSS is the [South West Regional Assembly](#). This is an unelected body, but consists mostly of councillors chosen by each local authority in the region to represent them, together with Social Economic and Environmental Partners.

Two other regional bodies, the [Regional Development Agency](#) (RDA) and [Government Office for the South West](#), will also be very influential:

- The RDA is the economic development body for the region, and the Regional Spatial Strategy will be expected to support the level of economic growth that the RDA plans for, by ensuring enough land is made available for new jobs and houses.
- The Government Office is made up of appointed civil servants from each government department, and their task is to ensure that national policies are applied in the region.

Democratic Deficit

Our elected local councils do have a role in all of this, but it is very much diminished compared to the powers they used to have when they drew up the Structure Plans for each county. Structure Plans are already being phased out and the RSS takes their place.

The Regional Assembly however does not have the staff or the resources to plan for every one of the South West's 51 local authorities to the level of detail required and so they have to contract out the work and ask the local authority planners for advice. The Assembly calls this a "strategic policy deficit", but it would be just as true to call it a "democracy deficit". The council planners now work in shadowy "sub-regional" groupings, which often include powerful business interests but are much harder for local people to hold to account. The unelected Regional Assembly is a popular target for the region's conservative press and politicians, but the greater loss of democratic rights may be closer to home.

Planning for Sustainable Development

Government [planning policy](#) now recognises that "Sustainable development is the core principle underpinning planning." The [Sustainable Development Strategy](#) gives the guiding principles for all policy as:

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy

- Promoting good governance
- Using sound science responsibly.

It also makes clear that these goals should be pursued together, rather than traded off against each other.

The RSS for the South West embraces these principles and has policies that set out to:

- Make the region more “climate friendly” by reducing carbon dioxide emissions in line with national targets
- Use resources much more efficiently so that we achieve “one planet living” (at present if everyone in the world consumed as much as the average citizen of South West England it would take three planets to sustain us)
- “Make sustainable construction the norm”, including zero carbon standard for all new developments of more than ten houses
- Achieve growth and development within environmental limits
- Protect and enhance the natural environment

If successfully implemented this approach would make the South West of England a world leader in building a sustainable economy. But are these goals realistic, or will the sheer scale of growth overwhelm good intentions? RSS itself acknowledges that unless it puts “sustainable development at the heart of the strategy, growth has the potential to erode the very quality of life that makes the region distinctive”. Despite the strong statements of principle, there is much in the draft RSS that gives cause for concern, and suggests that growth will lead to degradation of the environment, growing emissions (from transport in particular) and a reduced quality of life for many people across the region.

The draft RSS has been subject of a [Strategic Sustainability Assessment](#), as required by [European law](#), and the independent consultants who carried this out raise similar concerns.

RSS and Climate Change

Climate change is now almost universally acknowledged to be the most severe crisis facing human societies, and the natural environment, the world over. The UK Government recognises this and has set a target of 60% reduction in emissions of carbon dioxide (the main greenhouse gas responsible for climate change) by 2050.

Friends of the Earth strongly supports this target (while recognising that as scientific understanding advances even greater cuts may be shown to be necessary). There is a risk however that action will be delayed and the political drive too weak because 2050 seems such a long way off. Increasingly scientists recognise that the emissions over the next one to two decades will be critical in determining our eventual fate and Friends of the Earth and others are promoting a [Climate Bill](#) to make it a legal duty of government to reduce carbon emissions by 3% year on year.

Spatial planning has a major and positive contribution to make in meeting this challenge by promoting policies which reduce the threat of climate change through:

- promoting the highest standards of resource and energy efficiency in new development so

as to reduce carbon dioxide (CO₂) emissions arising from construction and use

- requiring land-use patterns that reduce the need and the propensity to travel by car
- vigorously promoting small and large scale renewable energy projects
- restricting development which has a major negative impact on CO₂ emissions
- adapting to the harmful impacts of climate change.

RSS in particular has a key role, because it is the leading statutory plan for the whole region and, because it runs up to 2026, it can set an intermediate target to ensure that the South West is contributing to the achievement of a 60% cut by 2050.

Policy SD2 of the draft RSS proposes a 30% cut in carbon dioxide emissions by 2026. The document claims that its policies are able to achieve this, but it is doubtful that the transport policies will succeed in cutting emissions, and the effects of increasing air travel, which the draft RSS supports, are excluded.

Friends of the Earth will be pressing for a regional Climate Action Plan so that the responsibilities of each sector – homes, businesses, transport etc. – are clear to see and everyone knows what has to be done to achieve a low carbon future for the region.

Policy RE5 of the draft RSS requires all new developments of 10 houses or more to reduce their carbon dioxide emissions by a minimum of 10% through the provision of on-site renewable energy generation. For larger developments **Development Policy G** specifies that they should be “carbon neutral”, although it is not explained exactly what this means and it is not clear from when the policy has to take effect.

Taken together these policies mark a radical shift in the energy standards of buildings in the South West and would contribute significantly to carbon reduction targets. In addition, Policy RE5 would stimulate a boom in domestic scale renewable energy and energy efficiency measures (such as heat pumps, micro Combined Heat and Power boilers, solar hot water, space heating and electricity) and so would have widespread economic benefits. Friends of the Earth strongly supports these policies, while suggesting that the proportion of energy from renewables could be progressively raised to more than 10%.

Policy RE1 sets targets for renewable electricity generation in the South West, in line with Government targets. These are for at least 10% of the region’s electricity consumption to come from such sources by 2010, and 20% by 2020. Friends of the Earth strongly supports this policy in principle. The actual target figure however (850 MW of onshore renewables by 2020) relies on reductions in electricity demand over the next 14 years, and on large scale deployment of wave and tidal technologies that are as yet in early stages of development. If these things do not happen the 20% target will not be met. It also counts some “Energy from Waste” towards the target. Other regions are now setting more ambitious targets than central Government and in Friends of the Earth’s view it is quite wrong for the South West, with some of the best renewable energy resources in Europe, to have one of the lowest targets.

Policy RE4 aims to safeguard protected areas of landscape and biodiversity importance from the adverse impacts of renewable energy schemes, which in principle Friends of the Earth supports.

Growth within Limits?

The scale of projected growth is one of the main reasons why it will be such a challenge for development in the South West to be truly sustainable. The region's population, now 5.1 million, is expected to grow by three-quarters of a million in the next 20 years. According to the draft RSS, 80% of this growth will be accounted for by people over the age of 60.

For the past decade and more planning policy has been to concentrate growth in larger urban areas. The reality has been somewhat different with very rural areas such as North Dorset and Torrington in Devon experiencing some of the fastest growth, while the city of Plymouth has been the only area in the South West actually to lose people.

The draft RSS risks carrying on this tradition, claiming to have an urban focus while nominating towns as small as Dorchester (population 16,000) and Penryn (6,227) as "Strategically Significant Cities and Towns".

The danger is that a widely dispersed pattern of development, coupled with the expansion of roads "to improve connectivity", will lead to yet more car-borne commuting across the region. The draft RSS lays emphasis on matching the growth in homes and jobs at each place so as to reduce the need to travel. This approach is to be welcomed, but again experience lays bare the flaws: on an average day 1.2 million people travel to work into these cities and towns, while at the same time 1 million people travel out of them to work somewhere else.

Many of the named settlements will be put under severe pressure by the scale of growth proposed. This applies both to large (Swindon, number of dwellings to increase by 48.9%) and small (Truro, number of dwellings to increase by 49.1%). The biggest question must be whether or not the infrastructure to support such growth can realistically be provided, and this applies with the greatest force to transport. Road traffic is already a serious burden across the range of cities and towns, creating problems of pollution, noise and congestion which depress local economies and erode peoples' quality of life.

...or Bursting the Bounds?

Development Policy H sets a target of at least 50% of new development to be on previously developed land. Friends of the Earth supports this approach and suggests that the target could be higher. But even with a strong emphasis on re-using land and building at high densities, the region's existing urban areas will not be able to accommodate another 750,000 people. The draft RSS therefore proposes a number of "urban extensions". These are not mapped in detail, but local councils are instructed by the RSS to look in specified "areas of search" and told how many houses they are expected to fit in.

Some of these extensions, around Bristol, Cheltenham and Gloucester and Bournemouth and Poole, together with proposals to expand airports and roads leading to them, conflict with green belt policies. The draft RSS therefore proposes to move the green belts. It observes that, "overall, this will lead to a small net increase in green belt in the region", but this is of little comfort if a later revision of policy can simply delete it again.

Friends of the Earth has strong concerns about the loss of Green Belt and the proposed urban extensions. There is a grave danger of major new development proposals being set in train, which will be unstoppable at a later date, before their impacts on local environments, resources, traffic and quality of life are truly understood. In principle there may well be cases

where urban extensions are justified and will present exciting opportunities to build in more sustainable patterns of living from the start. It is doubtful however that basing them around roads and airports will achieve such an aim.

The Approach to Transport

Whatever debates may rage about the correct scale of housing growth across the South West, it is clear that transport is a key to determining whether or not growth is within environmental limits – and particularly the need to get carbon emissions on a sustained downward path.

The draft RSS acknowledges that past patterns of development are flawed and that there is a need for a “step change” in the quality of our urban living and public transport provision.

Friends of the Earth believes that for all its good intentions, the transport chapter of the draft RSS is too beset with weaknesses and inconsistencies to achieve its aims. There is no overall aim to reduce traffic, and the high levels of investment proposed for roads would continue to fuel the growth in the number and length of car journeys.

Perhaps the greatest contradiction of all is the support the draft RSS gives to air travel – the most polluting form of transport. The excuse for this is that government policy requires it, but government policy also requires the South West to implement sustainable development, and if the two policies are in conflict the region’s planners should not be afraid to point this out.

What Happens Next?

The draft RSS is open for consultation until 30th August. Anyone can make their views known, but comments should not be sent to the Regional Assembly. Instead the government has set up an independent panel to examine the RSS, and comments should be sent [here](#).

Friends of the Earth South West will be making a full and detailed submission. In this briefing we have been able only to scratch the surface of the issues and highlight some key opportunities and concerns. The full draft of the RSS is 205 pages long and contains much more that we have not commented on here.

If you share some of our concerns, we encourage you to respond to the consultation.

You can also air your views on the draft RSS in local papers and on radio, and contact your local councillors to ask them where they stand. Although local councils had some involvement in writing the draft, they do not necessarily support all it says. South Gloucestershire council, for instance, will be challenging the housing figures for their area.

We will place further material on the Regional Spatial Strategy on our website in the near future – check the [South West homepage](#) for updates.

There are also other websites with views and campaigning suggestions on the Draft RSS; see for example:

[Stop Bristol Airport Expansion](#)
[South Gloucestershire Friends of the Earth](#)