



The Rt Hon Ruth Kelly  
Department for Communities and Local Government  
Eland House  
Bressenden Place  
London  
SW1E 5DU

12<sup>th</sup> May 2006

Dear Minister

### **Regional Spatial Strategy**

On behalf of the South West Regional Assembly we are pleased to have submitted our Draft Regional Spatial Strategy (RSS) on 24<sup>th</sup> April 2006. We launched the process of revising the RSS on 31<sup>st</sup> March 2004 with an event in Weston-super-Mare, and the Assembly was able to sign off the pre submission draft on 10<sup>th</sup> March 2006 with almost unanimous support of Assembly members. In submitting this Draft RSS, the Assembly recognises that a few authorities have specific concerns about the coverage of their local areas in the document, which will be addressed through consultation and the EiP. Our approach in producing the draft has been both strategic and inclusive, and, over the two year period of its preparation, we have engaged with stakeholders in the region on numerous occasions and have responded positively to their inputs.

We unreservedly commend the South West Draft RSS to you which comprises the following documents:

Draft RSS Document  
Implementation Plan  
Strategic Sustainability Assessment  
Pre- Submission Consultation Statement

In addition, to aid public engagement with the process, we have produced a non-technical Executive Summary which we shall be distributing widely in the region.

You will know that the South West region's population and economy have been growing at a significant rate throughout the 1990s and into this century. Our forecasts, embedded in both the Draft RSS and the Regional Economic Strategy, suggest this will continue into the foreseeable future. Our attitude to growth is clear in the region's Sustainable Communities Plan submission, 'The Way Ahead', and in the number of places applying for Growth Centre status. The region through its Integrated Regional Strategy 'Just Connect', and particularly through the Draft RSS and RES, recognises the real benefits which can arise from growth, if it is managed properly.

There was clear and strong support in all our consultation for the South West to embrace more fully the principles of sustainable development. As a result the policies of the Draft RSS have been strengthened as the process progressed. We are particularly conscious, however, that high growth rates and aspirations for more sustainable outcomes in resource use and emissions are not easily made compatible. This can only be reconciled with support from Government as necessary and your Department has a particularly important role to play in terms of national policy and funding.

Even though this region has been growing, we are increasingly beset by problems of housing affordability. The combination of relatively low average wages and relatively high costs of housing, together with pressures in some places from high demand and second homes, means that many communities and individuals are disadvantaged. The region is responding to the growth agenda and through the Draft RSS is planning to make provision across the region for housing at about 15% higher than current rates. However, in the South West, higher build rates of market housing are not necessarily the answer to affordability in all areas; particularly smaller rural communities. Our strategy is to focus new development at larger urban centres, not forgetting the needs of rural communities. This means in some of our main centres, development rates will be increasing by over 25%. The Assembly has opted for a housing provision figure of over 23,000 dwellings per annum though some forecasts indicate a need for 25,000 dwellings per annum; careful monitoring will therefore be needed to assess the ongoing implications. The rate of provision may need to be amended in subsequent five yearly reviews, especially if the region's concern around housing affordability is to be addressed over the lifetime of the RSS.

We believe we have a strategy which is in the best long term interests of the region and independent consultants who carried out the Strategic Sustainability Assessment tell us that it is a sustainable approach if it can be delivered; but, we are facing stiff challenges in terms of the effect of climate change on the region – rising sea levels could leave some key transport infrastructure highly vulnerable. There are of course severe limitations on what can be achieved within the powers of the planning system and the resources available to a region. On the latter point, we hope Ministers will recognise that while the region has been contemplating the long term future through the RSS and RES it has also been addressing shorter term priorities to secure immediate growth through 'The Way Ahead' and the recent Regional Funding Allocation process. In all of this work there are clear messages about the need for adequate resources to build the infrastructure and services which will underpin our future, as well as addressing the unwanted legacy of 'infrastructure deficits.'

The Assembly remains gravely concerned that the resources required to deliver the very substantial investments in social, health, educational and transport infrastructure will not be in place to facilitate the high levels of development envisaged in the Draft RSS. 'Making the cities and large towns work' is a recurring theme in the Draft RSS and in the Regional Funding Allocation submission (copy of transport tables from the bid are attached). Crucial to this, as well as investment in the programme proposed, is sufficient revenue resources available for capacity to enable necessary transport modelling and other master planning work to be carried out and to support growth in public transport services.

In submitting our draft RSS, our request to Government is as follows:

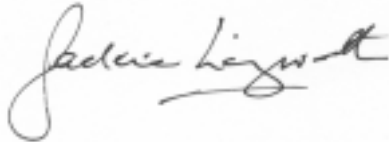
1. The region has demonstrated its willingness to embrace the growth agenda but has limited resources available 'to make things happen' and to deal with accumulated 'infrastructure deficits'. The region is looking carefully at a Regional Infrastructure Fund to enable forward funding of development and has identified the need for 'capacity building' in its RFA transport bid. In both cases, the Assembly seeks a positive response from government, the necessary resources, and the freedom and flexibility to enable RFA funds to be used for capacity building.
2. Affordable housing is one of the most pressing immediate problems facing the region. Increasing supply is part of the answer and the Draft RSS makes increased provision. Our concern is that in some parts of region, supply of market housing can generate demand without necessarily resolving the root problem. The region has benefited from a major uplift in funding for social housing but recent evidence is showing that the South West now has the most acute region-wide problem of affordability. Government is requested in subsequent rounds of funding to take account of what the Draft RSS is trying to achieve in terms of distribution of market housing and to ensure sufficient resources are available to allow significant inroads to be made into the rural affordability problem, by adequate provision of social and shared equity housing. In addition, Government is requested to address the under-utilisation of residential properties resulting from second homes and investment properties.
3. The achievement of a more sustainable region is highly conditional upon changes in individual behaviour and upon government policy. The Draft RSS can make only limited progress based on its effect on the scale and distribution of growth. Re-configuring the region so that a higher proportion of people live at the 21 identified Strategically Significant Cities and Towns in 2026 will have a major effect in sustainability terms especially if all local public services are of a consistently high quality. This could be overshadowed, however, by increased carbon dioxide emissions from car, and particularly, air travel. Reducing the need to travel by car is at the core of the RSS and as already indicated, encouraging people out of their cars will need the 'carrot' of increased public transport attractiveness and availability (bus and rail) as well as the 'stick' of demand management and possible national traffic reduction targets. When assessing this Draft RSS, Government will need to consider carefully whether its strategy of providing for increased air travel is sustainable in the long term and whether the resourcing of public transport in the South West is adequate.
4. Another main plank of sustainability in the Draft RSS concerns our policies requiring sustainable construction and on-site energy generation to become the norm. Making this aspect of the Draft RSS work in the South West will benefit from a level playing field nationally. We believe Government should set a much higher national mandatory standard than 2006 part L for energy performance in new housing. This needs to be extended to all other building types and major renovation should be required to achieve the highest practicable energy standards and at least 50% improvement in energy efficiency. Requiring all new buildings to be carbon neutral (equivalent to level 5 of the draft Code for Sustainable Homes) is practicable and should be made standard. We appreciate that these proposals could have an effect on capital costs of new dwellings but

taking a lifetime view, they should result in much lower running costs in the context of escalating fuel prices, so helping to alleviate fuel poverty.

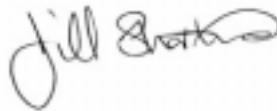
We hope that you and your colleagues recognise the great progress which has been made in the South West in the last two years in developing challenging strategies which are well integrated and are positive about the future and about growth, and in addressing regional priorities through 'The Way Ahead' and the RFA process. We have set out a number of items where the region needs help from Government if we are to deliver sustainable communities and meet Government's targets for emissions. We would welcome an opportunity to discuss with you and your colleagues the requests contained under 1 to 4 above. We would be particularly delighted if that were able to happen in the region.

An amended copy of this letter has been sent to Treasury, DTI, DfT and DEFRA to alert them to our strategy for the South West and actions needed to ensure its delivery.

Yours sincerely



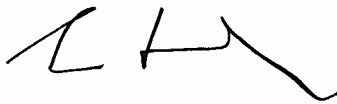
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