

**Regional
Planning Guidance
for the South West**

**A submission by CPREsouthwest
to the Public Examination Panel
on the draft published in August 1999
by the South West Regional
Planning Conference**

October 1999

Note

This report is a summary of the full submission (c 90 pages with seven supporting documents) made by CPREsouthwest in October 1999 to the Public Examination Panel on the *Draft Regional Planning Guidance for the South West*.

The draft was published by the South West Regional Planning Conference in August 1999 and is available from Government Office South West, The Pithay, Bristol BS1 2PB (Tel: 0117 900 1845). It can also be viewed on the RPG web site: www.rpg-sw.gov.uk.

Our submission was drawn up as a collective exercise, involving the seven CPRE branches in our region (Avonside, Cornwall, Devon, Dorset, Gloucestershire, Somerset and Wiltshire), a series of topic groups and individual volunteers. It draws on the experience of our members at a grass roots level and the advice and expertise of our national staff and national policy committee.

This summary sets out our main views and concerns, but please note, that some technical reports (including the final Sustainability Appraisal) were not published at the time our submission was made and we will be developing our arguments and views further before the Public Examination.

We hope this material will assist CPRE members and others in responding to any implications for the protection of the countryside and our environment as the *Regional Planning Guidance* is finalised and implemented. References to Sections, Policies and paragraph numbers refer to those in the draft *Guidance*.

Wendy Lutley
Regional Policy Officer
CPREsouthwest
PO Box 9
Ilminster
Somerset TA19 9YX

e-mail: wendy.cpre@cloveruk.net

CPRE — The Council for the Protection of Rural England — is a national charity which was formed in 1926. Our mission is *to help people protect their local countryside from threat and to keep it beautiful, productive and enjoyable for everyone*. We have 7,000 members across the South West (c 45,000 members nationally).

SUMMARY

This submission by CPREsouthwest comments on 66 Policies and eleven other policy-related items. Overall, we find this draft of the *Regional Planning Guidance* (RPG) less successful than the July 1998 Consultation Draft in meeting the needs of the South West. We believe the decision to omit the portfolio of “strategic” Policies is a mistake, and there are many opportunities for improvement.

1, 2 and 3. Vision, Aims and Objectives

These reflect the principles of sustainable development, but this needs to be followed through in the policies which follow. We would like to see more account taken of the distinctive environment and quality of life of the South West, and the responsibility to protect this as a national asset.

4. Patterns of Change

We welcome the decision to focus development on the principal urban areas but RPG fails to:

- exploit this to the full; There is much more potential for brown-field development, and the proposal to review Green Belt boundaries in advance of an “urban renaissance” is taking the soft option.
- sign up to the Plan-Monitor-Manage (PMM) approach, persisting instead with Predict-and-provide.

5a. Environmental Protection and Resource Management

This is one of the more satisfactory sections, but in addition we would like to see:

- recognition of the value and tranquility of ordinary undesignated countryside as a regional asset.
- recognition of the value of all of our undeveloped coastline, including undesignated sections, as a distinctive regional feature.
- a commitment to PMM for minerals, waste and water.

5b. The Economy

The thrust of this section runs counter to the declared aims and objectives of RPG, and assumes that consigning large blocs of green-field land to development will automatically deliver prosperity. CPRE believes the priorities are:

- to foster sustainable development;
- to address the implications, in this most rural of all regions, of the decline in agriculture.

RPG should highlight these priorities for the regional and national agencies.

5c. Housing

CPRE is aware that housing provision has been the most hotly debated issue among officers and members during the RPG preparation process. We agree with those who remain unconvinced that RPG has made due allowance for the decelerating rate of new household

formation, and that housing allocations for some areas are unsustainable. We do not understand why RPG ignores the change in Government policy from Predict-and-provide to a PMM regime, and makes no effort to increase the use of urban brown-field land. The housing proposals in our view do not stand up to scrutiny.

5d. Transport

The climate of Government and public opinion has swung strongly in favour of reducing the rise in car travel in favour of other more sustainable forms of travel, and of more choice — the “multi-modal” principle. RPG Transport Policies do not reflect an intention to follow this priority with any vigour; they imply “business as usual”.

This section requires a re-think and integrating with Employment and Housing Policies. There should be no reference to specific road schemes which pre-empt the multi-modal studies.

5e. Tourism

We welcome the inclusion of policies which address both the opportunities and the problems of tourism, but would like them to demonstrate a greater awareness of the damaging consequences of locating “flagship” attractions in rural areas.

6. Implementation and Monitoring

Much work still needs to be done on targets and suitable indicators, and to agree sensible procedures with local authorities and relevant agencies. We regard Section 6 therefore as a preliminary statement of intent. RPG cannot be monitored until appropriate targets and indicators are in place.

Availability of Reports

Some of the background reports essential for the Consultation process have become available late in the period, or will not be available before the consultation period closes: for example, the Sustainability Appraisal, the Halcrow Fox report on development around the Principle Urban Areas (PUAs), and the paper on Affordable Housing. Since these are likely to contain significant information, we assume that in such cases, further comments will be accepted and taken into account by the Public Examination Panel.

CPRE publications and reports included as supporting documents

1. *Tranquil Areas Map* CPRE 1996
2. *Review of the Strategic Study of Urban Housing Potential in the South West*
Green Balance for CPREsouthwest 1999
3. *Plan, Monitor and Manage: Making It Work* Wenban-Smith for CPRE 1999
4. *Towards Sustainable Economic Development* CPRE 1999
5. *Response to consultation on SWERDA’s Regional Strategy* CPREsouthwest 1999
6. *Response to consultation on the Objective 1 Programme* CPREsouthwest for CPRE Cornwall 1999
7. *Public Examination of draft RPG, following the East Anglia and South East’s experience.* CPRE 1999

1. 2 and 3 The Vision, Aims and Objectives

The Vision statement and the Aims reflect the general principles of sustainable development and are therefore a reasonable basis for developing sustainable policies. Unfortunately, they do not really reflect the particular character and circumstances of the South West — that it is the most rural of all the regions. The Vision and the Aims are not “tailor-made”. With that proviso, CPRE would nevertheless support most of the detailed Objectives. The problem is that too often, the following Policies ignore them.

Many statistics are quoted to illustrate that the South West is the most rural of regions. Two figures from “*Focus on the South West*”, published by GOSW and the Government Statistical Service, bear repeating here. In this region 47 per cent of people live in rural areas (nationally, the figure is 18%) and, taking 1992 as typical, 54 per cent of new development was on rural land (nationally, the figure was 42 per cent).

The signal to planners is that if it is the intention to maintain regional distinctiveness, then one of the greatest threats to this in the South West is the rate of encroachment on the rural environment in which so many “south west” people live.

4 Patterns of Change

Policy 1: Spatial Policy

CPRE welcomes this overall approach to the distribution of development, focusing activity on existing Principle Urban Areas (PUAs). We are concerned however that this has been described as a “spatial” policy. The word “spatial” is used in planning matters to address a region as a geographic entity - a dimension which Policy 1 does not address. We recommend that it is re-titled “distribution of development”, and thus makes it clear that this Plan has no spatial strategy.

In contrast, the July 1998 Consultation Draft contained a spatial policy, S2, which specifically called for a strategy of restraint for the more easterly and northerly parts of the region, and regeneration for the west. This strategy has now been eliminated, opening the way for a more aggressive growth scenario, to the detriment of the environment. This shift in emphasis has not been subjected to a Sustainable Development Assessment, and in this respect RPG does not conform to the requirements of Draft PPG 11.

Policy 2: The Sequential Approach

CPRE welcomes the sequential approach to the identification of land for development, but considers that this policy should be strengthened with supporting text on implementation procedures, including phasing, and on the need for environmental impact assessments for green-field proposals.

Policy 3: Achieving the Spatial Strategy

CPRE believes this to be a key policy which has not received the attention it requires. We are calling for a comprehensive commitment to Plan-Monitor-Manage (PMM) as the basis for achieving the RPG’s strategy, and a series of targets to ensure that PMM becomes a meaningful and effective process.

We call for a comprehensive commitment in Policy 3 to the PMM approach, for the amendment of the relevant policies for Housing, Employment Land, Transport, and Minerals accordingly, and the setting of a series of targets as part of the monitoring system. Both indicators and targets are needed: indicators to identify what to monitor; targets to establish the triggers for corrective action.

Policy 4: Principal Urban Areas

CPRE fully supports the thrust of Policy 4. Nationally, CPRE has identified itself with the challenge of urban renaissance. We therefore call attention to the fact that in terms of implementation, RPG does not follow up on the good intentions of Policy 4: Policy 60 for example settles for a brown-field development rate of only 36 per cent.

We suggest that the fourth clause of this Policy should cover investment in “sustainable” rather than just “public” transport; and we question whether RPG has taken proper account of geographical constraints of several of the region’s PUA’s, as well as the planning constraints.

Policy 5: Green Belts

We welcome the opening statement endorsing the principle and objectives of Green Belt, but object to the second sentence, which invites wholesale review of Green Belt boundaries. There is no justification for an “enabling” policy for such reviews.

PPG 2 already makes it clear that “exceptional circumstances” are the prerequisite for reviewing Green Belt boundaries. Policy 5 should set out only the criteria which in the South West might constitute “exceptional circumstances”.

- Bristol/Bath: The first step for Bristol has to be a comprehensive survey of brown-field and derelict sites and an urban capacity study. The very special environmental and urban heritage of Bath (a World Heritage Site) makes it a priority to prevent urban sprawl and the role of the Green Belt in combating this is crucial.
- Gloucester/Cheltenham: The prime purpose of the Green Belt between Gloucester and Cheltenham is to prevent the coalescence of the two urban areas. A case has been made in the Gloucestershire Structure Plan that post 2011, a review should be undertaken. Although CPRE remains unconvinced that this is a necessity, there is in this instance a precedent in the current Structure Plan that a Green Belt review should be undertaken.
- Bournemouth/Poole: Policy 12 does not call for a Green belt review and highlights the need for constraint.

In conclusion, therefore, of the three Green Belt areas, only one (Gloucester/Cheltenham) warrants any reference to Green Belt review and there is no need for a general “enabling policy” to cover this.

Policy 6: Study of Sustainable Development Patterns in the North of the Region

CPRE agrees that the undertaking of a joint study by the relevant authorities in the north of the region to consider longer term requirements is a worthwhile initiative in principle. The value of this study will depend however on the brief and its terms of reference. The Policy says that the study “should accord with the general principles outlined in this RPG”. Some of these principles do not in our view reflect best practice for sustainable development or current

Government policy: for example, ‘Plan-Monitor-Manage’ (PMM), the target for brown-field development and the criteria which should govern review of Green Belt boundaries, to name but three. CPRE recommends therefore that Policy 6 should be changed to say that the studies should be in accordance with “best practice for sustainable development”.

Policy 7: Bristol

Although CPRE would support some of the proposals which reflect recommendations in the recent report of the Urban Task Force, the main thrust of this Policy seems to be one of continued growth and expansion. We believe this to be unsustainable.

We therefore object to Policy 7, unless the first, fifth and seventh bullet points are rewritten to reflect a policy of constraint and acceptance of environmental limitations, and a reconsideration of the intention expressed in Para 4.18 to continue adding to the supply of employment land. Economic prospects no longer depend on the allocation of more land.

Policy 8: Bath

As stated in our comments on Policy 5, CPRE does not consider there is a need to review the Green Belt boundary. Any reduction between Bristol, Keynsham/Saltford and Bath would remove its effectiveness. The assumption in the Policy that development and protection of Bath’s unique environment are incompatible needs to be challenged; sustainable development should lead to enhancement.

Policy 9: Weston-Super-Mare

CPRE endorses the priorities for Weston-Super-Mare identified in paragraphs 4.23 and 4.24, and supports the Policy proposals which follow. Housing development in the area over the last ten years has not been matched by the creation of job opportunities. This has resulted in an increase in commuter and shopping traffic to Bristol, and all future major development must therefore be based on mixed and sustainable schemes.

Policy 10: Swindon

The Policy for Swindon is not in accordance with Policy 4, which provides the basis for all PUA development and which has CPRE support; we therefore recommend changes to bring Policy 10 more into line with Policy 4.

The town should no longer be seen as one seeking to attract new major development but one designed to provide for organic growth.

Policy 11: Gloucester and Cheltenham

CPRE supports the first two clauses of Policy 11. We do not however agree that it is necessary to review the Green Belt during this RPG period, since the current commitment position covers land requirements beyond 2016.

PUA’s in the South East of the Region - Policy 12: Bournemouth/Poole

We support the thrust of Policy 12 but have some reservations regarding the proposed sub-regional study and review of the Green Belt. Paragraphs 4.30 to 4.35 are an excellent recitation of the reasons why further expansion of this urban area is virtually impossible

within the constraints imposed by Vision, Aims and Objectives set out in Section 3. Money spent on a study and review may well be wasted.

Policy 13: A Study for Sustainable Development Patterns in the Centre of the Region

This Policy is identical to Policy 6 for the north of the region, which CPRE supports in principle, but with the recommendation that the last sentence should be changed. We believe that the same considerations apply here.

Policy 14: Taunton

Taunton has seen considerable growth in recent years, and this has already severely encroached on surrounding green-field areas. There are opportunities for the redevelopment of brown-field sites, and green-field development should therefore be restricted. An urban capacity study is a priority. Housing development should be based on the results of this study, and restricted to match local job availability and be accessible by public transport.

Policy 15: Exeter

The priority for meeting Exeter's housing requirements is to undertake an urban capacity study, in accordance with Government recommendations in Draft PPG 11. Without this, there is no case to consider looking outside the city's boundaries. The reference to Exeter as "peripheral" is an erroneous assumption which seems to reflect an undeclared and questionable spatial policy for the South West (see our detailed comments on Policy 1).

PUA's in the West of the Region

Policy 16: Plymouth

The last two clauses of this Policy referring to development at South Hams and other towns in the area have been overtaken by the Government's commitment to urban regeneration as the priority. This part of Policy 16 should be rewritten accordingly. We request some detailed alterations to the brief for the sub-regional study on future development needs.

Policy 17: Torbay

CPRE supports this Policy, particularly its recognition of the priority for regeneration in the central urban areas and the need to diversify employment opportunities. We would like to see these same priorities featured more clearly in Policy 16 for Plymouth.

Policy 18: Other Locations, including new Settlements

CPRE believes that this Policy should be rewritten, so as to address towns and new settlements separately. The Policy for towns needs strengthening, to provide guidance on the criteria for development in the medium-sized towns of the region.

The reference to new settlements should be clarified. CPRE does not consider that large new settlements are warranted, but the alternative term "new communities" could be used if it implied a determination to avoid the large impersonal dormitory estates of the past. Our full comments on this Policy include an extract on CPRE's submission to a House of Commons Committee in 1998 advocating a series of tests to establish the validity of proposals to develop new settlements.

Policy 19: Rural Areas

CPRE welcomes the overall thrust of Policy 19, and the analysis of rural issues contained in the text. We have nevertheless some suggestions for improving the wording:

- rural tranquility should be singled out as a regional asset in need of protection. A copy of our Tranquility Map accompanies our submission, as a reminder of what has happened in the past and what needs to be addressed much more dynamically in the future. It is vital that “tranquility” is added to the environmental assets which RPG must protect.
- the need for guidance on reconciling rural diversification priorities with environmental concerns should be acknowledged (see also our comments under Policy 59);
- clarification of ‘key villages’;
- small towns should be seen as more than “service centres” — many, as with our larger towns and cities, are in need of urban renaissance;
- innovative solutions to rural transport problems should be encouraged (see our comments under Transport, Policy 63);
- there should be recognition that the region’s countryside is not all the same. Much of it is increasingly in an “urban shadow”, whilst elsewhere it is characterised as “deep countryside”. Such differences sometimes demand different solutions.

Policy 20: The Coast

CPRE welcomes Policy 20, but would like to see it and the supporting text strengthened. Our coast is internationally known and a unique and distinctive asset of the English countryside, and of our region and it’s economy. The first clause of the Policy should give the highest protection to all the presently undeveloped coast, so that new development is confined within the boundaries of existing coastal areas or ports.

We recommend that where development is allowed, the Policy should call for the highest standards of design as part of the initiative for regenerating small coastal towns and villages.

Policy 21: Cornwall and the Isles of Scilly Objective 1 Area

CPRE generally welcomes this Policy package designed to address the particular requirements of this part of the region. We are concerned however that the opportunities opened up by Objective One status may result in inappropriate development to the detriment of Cornwall’s distinctive environment and heritage. We therefore make a number of suggestions for strengthening the detailed clauses of the Policy.

We urge that the first clause of Policy 21 is strengthened, by referring to:

- the need to “enhance” as well as to “maintain” the environment;
- the importance of appropriate design;
- and by deleting the final phrase “alongside ... economy”.

In addition, we believe that the Policy should call for urban capacity studies and that there should be more emphasis on regeneration schemes for Cornwall's towns, to reduce the adverse impact of development on the coast and the countryside.

Policy 22: Areas of Special Need

CPRE notes that this Section and Policy will be reviewed following EU decisions, and publication of an updated Index of Local Deprivation. Pending that, we welcome the inclusion of the rural areas nominated in the Policy, as well as the urban nominations. With regard to the latter, the report of the Urban Task Force has now been published, and its recommendations will presumably be taken into account when the Regional Planning Body reviews this matter.

We would like to call attention to our remarks on Policy 19, regarding the differing circumstances of what is sometimes referred to as "deep countryside", in comparison with rural areas in "urban shadow". In general, the rural areas nominated in Policy 22 might be regarded as examples of "deep" countryside. RPG should address the specific needs of each area, including transport (see our comments on Policy 63) and opportunities for fostering the development of micro-businesses (see our comments on Section 5b Economy).

Regional Priorities for investment (page 23)

This investment programme of 38 items is presented without explanation or supporting text. Many of the items relate to Policy proposals which are unauthorised and in CPRE's view unsustainable, or dependent on studies not yet completed. There are, for example, specific proposals for road and airport schemes, which are either dependent on studies (e.g. inter-modal or air services studies) which have not been completed, or to proposals which have not been endorsed.

In its present form this Table is unacceptable and full of dangerous assumptions. It should be withdrawn, and represented with proper explanation and support, with sufficient time for study and comment before the Public Examination.

Policy 23: Achieving Strategic Objectives

CPRE strongly objects to certain statements in this Policy. Firstly, the implication of the phrase "... mitigate or compensate for environmental impacts..." is contrary to the intentions of Government policy, and the first two objectives of this RPG as declared in paragraph 3.8. In effect, it says that development in the South West will damage the environment, but those involved should do what they can to soften the blow. This is diametrically opposite to the principles of sustainable development, and the words should be removed.

We object to RPG including remarks in this Policy which perpetuate the '106 agreement' problem, which enables developers to secure approval for unsustainable development by offering to pay for infrastructure. These arrangements have become discredited through abuse of the system, and CPRE has for sometime advocated a complete review of the 106 procedure.

5a) Environmental Protection and Resource Management

Policy 24: Landscape and Biodiversity

CPRE welcomes the intent to protect and enhance the landscape and biodiversity of the region, and suggests modified wording which would strengthen this commitment.

We recommend also that the scope of the Policy is broadened to encompass:

- the concept of “tranquility” as a key element of landscape protection;
- protection of the landscape of undesignated as well as designated areas.

CPRE’s 1996 research on tranquility in collaboration with the Countryside Commission, shows that the South West has some of the largest individual tranquil areas in southern England and the second highest total of tranquil areas in the country. Most notable is the large area covering the northern part of Cornwall, parts of western, northern and central Devon and the western part of Somerset. Much of this and other tranquil areas in the South West, consists of ordinary countryside without special designation.

As well as its tranquility, the value of “ordinary” countryside comes from a variety of factors such as its remoteness, lack of visual clutter, dark skies at night, local distinctiveness and character, the opportunities it provides for access for quiet recreation, its pastoral scenery, contact with nature and slower and more community-orientated pace of life. Such “ordinary” countryside can provide high quality landscapes even when biodiversity values are low.

Policy 25: Protection of Agricultural Land and Soils

The Policy fails to address the central issue facing the environmental protection of rural land - that agriculture and forestry are the custodians of that land, but their immediate and long-term viability is in doubt. CPRE argues the case for RPG to respond much more positively to this in its comments on the Economy Section 5b. But we consider that Policy 25 is the place for the Region to highlight the issue as a major policy concern, and to pinpoint the implications.

The Policy statement dealing with land grade implies that lower quality land is of lesser value. In terms of landscape and nature conservation, that is not necessarily true and is misleading.

Policy 26: Community Forests and Woodland

CPRE welcomes both clauses of the Policy, but believes that forests and woodlands in this region are more diverse in character, and the opportunities for supporting and enhancing this important regional asset are greater, than the Policy suggests.

Our detailed comments illustrate how we believe the policy should be further developed, to reflect the fact that the South West has well above the national average for woodland/forest cover: average (England) 7.5 per cent; South West 10 per cent.

Policy 27: Built and Historic Environment

CPRE welcomes this Policy, which we believe has a significance well beyond its place in the Environment section. It implies that the quality of development is important as well as the quantity of development. This is equally important for new industrial and commercial development as well as for new residential development.

Policy 28: Urban Environment

We presume that the text for this Policy was prepared before the Report of the Urban Task Force was published. In the light of this report's many recommendations, the brief statements in Policy 28 do not in our view convey the scope and scale of response which is needed to achieve an "urban renaissance" in the towns and cities of the South West. Bearing in mind that RPG calls for Principal Urban Areas to be the focus of new development, we believe that Policy 28 should call for a more ambitious programme of objectives.

Policy 29: The Sustainable Use of Water Resources

The Policy and supporting text are broadly supported. For example, the intention of water companies to cease using abstraction from endangered rivers in the Region is warmly welcomed. However, while Policy 29 states that the need for new water resources should be minimised, this is dependant on effective management of demand and the Policy is not yet reflected in the *Regional Priorities for Investment* table (p23) which talks about investing in new water resource schemes without reservation.

Policy 30: Water Quality

The Policy and supporting paragraphs are strongly supported subject to clarification of 'unacceptably' in the last sentence of the Policy.

Policy 31: Flood risk

The Policy is strongly supported, including the intention of significant investment to restore flood plain capacity mentioned in Para 5A26.

Para 5A 28: Monitoring the Environment and Water Resources

The indicators for monitoring the effectiveness of the environment and water resources are often unmeasurable and far to general.

Policy 32: The Approach to Minerals Planning

This policy does not reflect the emphasis placed on the environment in Para 3.8, Key Objectives (a) and (b), nor the preamble to this chapter. Mineral extraction where it occurs can pose a substantial threat to the environment through visual impact, noise, dust, pollution, additional HGV traffic and loss of tranquillity. It must be managed in a way that primarily safeguards, and where possible enhances the environment. There should be recognition that mineral extraction can be detrimental to other parts of the economy, such as tourism.

To achieve this it is necessary to have policies which:

- require Mineral Planning Authorities to conduct Strategic Environmental Assessments at sub-regional level in order to establish the Environmental Capacity of the Region;
- emphasise the need to "Plan, Monitor and Manage" the need for minerals as opposed to the current ethos of "Predict and Provide";

- have a strong presumption against the granting of permissions in Designated Areas;
- require all mineral planning applications to be accompanied by a full Environmental Impact Assessment (EIA).

Policy 33: Transport of Minerals and Mineral Products

This policy is broadly supported, but with the traffic on the rural roads of the Region forecast to double over the next thirty years it is essential that the inappropriate use of the lower class roads by HGVs is prevented.

New Policy to support Policies 33 and 34

Local liaison committees have been found effective in easing neighbourhood problems brought about by mineral working. A new additional policy advocating this approach should be inserted after Policy 33 and before Policy 34.

Policy 34: Reclamation of Mineral Workings

This policy is generally supported but it should be made clear that the reclamation should enhance the environment.

Policy 35: Primary Land Won Aggregates

The current guidelines on the provision of aggregates contained in MPG6 have been totally discredited. The methodology of “Predict and Provide” has proved to be flawed in the same way that it has been for housing. The predictions of need are widely acknowledged to have been greatly exaggerated. The policy does not reflect this or the very robust stance previously taken by Conference on this issue. The importance of maximising aggregate recycling also needs to be emphasised.

Our submission on this Policy reflects the fact that MPG6 is in need of revision. This is a particular concern for the South West as properly controlled mineral extraction is an important factor in protecting our countryside. Our full submission quotes correspondence from Government to CPRE in 1999, which suggest that the current regional and sub-regional allocations in MPG6 are not inviolate and that mineral planning authorities can take account of ‘other relevant considerations’ (Para 58 of MPG6).

Policy 36: Conservation of High Quality Primary Aggregates

This Policy is fully supported.

Policy 37: Aggregates Supply

The workings of the Regional Aggregate Working Party (RAWP) need to be more transparent. They are currently shrouded by “commercial confidentiality” and we request the involvement of nominated representatives of environmental / voluntary conservation organisations.

Policy 38: Oil/Gas Production

This Policy is supported.

Policy 39: Coal Mining

This Policy is supported.

Policy 40: China Clay and Ball Clay

The Policy is generally supported but would benefit by including specific reference to the role which secondary rock and sand, generated in the production of china clay, plays in supplying the Region's aggregate needs.

Policy 41: Traditional Building Stones

This Policy is strongly supported.

Para 5A40 Monitoring Minerals

The indicators as described need to be more exact.

Policies 42 and 43 Waste Management and Transport of Waste

There is no guidance given in the text or the policy as to how the targets and commitments contained respectively in "*A way with waste*" and "*Less Waste More Value*" are to be met. Paragraphs 5A42 to 5A47 and Policy 42 constitute nothing more than a wish list and a passing of responsibility to the Local Authorities. It is difficult to avoid the conclusion that there are no co-ordinated Regional policies for waste at present and that these await the recommendations of the Regional Technical Advisory Body (RTAB) referred to in Paragraph 5A44. In which case it would be more honest to say so.

In light of the 1999 EU Directive on Landfill, the over dependence on this means of waste disposal by virtually all Local Authorities in the Region needs to be addressed urgently. New landfill sites should be discouraged and every effort should be made to investigate new techniques, such as Waste to Energy systems, to reduce the requirement for landfill.

Policy 44: Waste Implications of Development

In the short term the Region's generated waste volume will increase, and the pressure to reduce the amount going to landfill requires positive measures at the points of generation of the waste.

Para 5A49 Monitoring Waste

The proposed indicator is insufficient by itself to produce effective monitoring. We recommend additional indicators including the proportion and type of waste: going to landfill; being recycled; being exported or imported into the Region; and the mode of transport.

Policies 45, 46 and 47 Energy Generation and Use

We made no response to these policies.

5b) The Economy

The Economy of Rural Areas

We call for a Rural Economy Section and Policy(ies) to be added to underpin the rural economy and remove the threat of neglect hanging over the rural environment. It is generally acknowledged that the South West is the most rural of regions, that we rely on agriculture and forestry to exercise their role as custodians of that rural environment, but that the future viability of these industries is at risk. The essence of the situation is that environmental protection is endangered by economic decline.

RPG is expected to address such critical situations by policies which identify what needs to be done and which agencies or organisations are expected to deliver. We can find no such commitment in the Economy section or elsewhere in RPG. The supporting text for Policy 19, paragraphs 4.58 to 4.64, is a well expressed analysis of the situation, but the Policy itself has only six words to convey “the framework” for which PPG 11 calls.

We would like to see Policies which support the recommendations in CPREsouthwest’s submission to SWERDA’s consultation on its Regional Strategy, where we call for “soft” economic development, i.e. that does not require significant built infrastructure, is environment friendly and which is appropriate to rural areas (e.g. support for training, meeting local need, small and micro-businesses, etc.). RPG should be signalling to SWERDA that this should be a priority in this region.

In addition, we believe there is a place for regional investment in schemes to enhance the environment, and recommend that this is included in the Investment Priorities for Rural Areas listed on page 23.

Policy 48: Provision of Employment Land

CPRE believes that PPM approach should be applied to land for employment purposes, as much as for housing and minerals (see CPRE comments on Policies 3, 35 and 55) and that this Policy should say so. Our detailed submission includes our 1999 publication “*Towards Sustainable Economic Development*”, which outlines the difficulties of the current system of “Predict and Provide” for employment land.

We also consider that the “brown-field” priority (i.e. Policy 2) should be incorporated in the Policy statement, along with reference to Policy 1 (as opposed to mention in the supporting text only). The Government’s emphasis on brown-field as opposed to green-field development is equally valid for employment uses.

With appropriate emphasis on ‘soft’ styles of economic development (see above) and comprehensive urban capacity studies (including vacant/redundant buildings), the assumption that employment land requires green-field sites can be effectively challenged. Recent experience also demonstrates that employment growth does not necessarily require more land. ICT and its use is developing rapidly, and many high growth businesses do not require as much space as their predecessors.

CPRE is also sceptical about the concept of “clusters”. We are not convinced that enough consideration has been given to the idea and its relevance across the Region. Without publication of the background work referred to, it is too early to include a reference in RPG.

Policy 49: Major Strategic Sites

CPRE objects to Policy 49 and to much of the supporting text. We are particularly concerned about the proposal for as many as 30 major strategic sites. We can find no evidence to substantiate this either in the RPG or the information which SWERDA has made available on its Regional strategy.

Guidance for planning authorities is inadequate, and the scale of site development is unwarranted and unsustainable. Where, for example, are the cross-references to transport and housing policies, and the evidence that these three key considerations have been planned together? Text and Policy should be withdrawn, and if there is a case for major strategic sites, the proposals should be incorporated in Policy 48, which already deals with employment land.

Policy 50: Development of Telecommunications Networks

CPRE welcomes the benefits of development of IT networks for life and employment in rural areas. This should not however undermine the protection of site locations and surroundings from unacceptable visual impact, and we would like the Policy to say so. As technologies change and networks proliferate, an awareness of possible health hazards will be necessary. Policy 50 should therefore make reference to Policy 78, “New Development and Health”.

Policy 51: Physical Regeneration

We made no response to this policy.

Policy 53 (and 52 and 54): Opportunities for Retail Development

CPRE considers that all three Policies on retail development (i.e. Policies 52, 53 and 54) are poorly drafted and unclear. We recommend that they are consolidated into one Policy on “Retail Development”. This should contain as its core statement an RPG commitment to follow the recommendation of PPG 11 on this subject, that “retail development should be used to regenerate existing town centres”.

5c) Housing

Policy 55: Levels of Housing Development

This Policy sets out both the overall level of housing for the region and its distribution. CPRE considers that both the total and the distribution are unwarranted, and should be revised.

The housing figures are based on a “Predict-and-provide” approach which has been rejected by Government in favour of “Plan/Monitor/Mange” (PMM). There is no reference to the introduction of PMM and no acknowledgement of this fundamental change in Government’s approach to planning.

The information for making the predictions is either unreliable or not yet available, and some over optimistic views have been taken. Migration figures into the Region, for example, have remained below the high levels of the 1980’s, show a downward trend in several counties and are expected to fall further as the effect of the urban renaissance movement grows. A wide variation in statistics on job forecasts was supplied during the preparation of Draft RPG and the housing requirement is based on the most optimistic economic forecast.

CPRE disagrees therefore with the Policy, the figures, and the methodology. It should be revised when all the necessary information is available, with more realistic and sustainable levels of development, and supported by a clear commitment to the PMM approach.

Policy 56: Affordable Housing

CPRE welcomes the requirement for planning authorities to set targets for Affordable Housing, and to review the threshold level for small sites. Conversely, we consider that the caveat in the Policy statement about financial considerations undermines the thrust of the Policy as a whole, and should be removed. Since requirements for Affordable Housing in the South West represent around 50 per cent of the total, the failure to provide the detailed Background Paper on the subject is a matter of serious concern.

Policy 57: Housing in Rural Areas

CPRE welcomes this Policy in principle and makes some suggestions for improvement to: strengthen the wording; take a more positive line on the question of second homes; and clarify the reference to the Isles of Scilly. It is important the Policy is not used as an excuse for development which on any other grounds could not be substantiated and the phrase “subject to environmental impact considerations” should be included. There may be a case for broadening the scope of Policy 58 to incorporate some more specific policy proposals for second homes.

Policy 58: Vacant Housing

As at April 1998, there were 69,000 empty houses in the South West. This is well above the government’s target of a maximum of three per cent of the housing stock. CPRE therefore requests that this target is incorporated in the Policy statement as the objective for all planning authorities in the Region.

Policy 59: Previously Developed Land and Buildings

CPRE supports Policy 59. We particularly welcome the remarks in Para 5C21 which make it clear that some brown-field sites in rural areas should not be used for residential development because the location would not be sustainable. This relates here only to residential development, but the same sustainability argument applies to any type of brown-field development in rural areas. We have been unable to find Policy statements elsewhere in RPG which provide protection for other categories of development in this situation and we ask that this omission be corrected in the final document.

Policy 60: Targets for Previously Developed Land and Buildings

CPRE rejects the figure of 36 per cent for brown-field development. This represents an admission of “business as usual”. A step change is required to existing attitudes. Current norms and practices need to be questioned, including assumptions on housing densities.

We have had the methodology used by the Baker report for RPG reviewed independently by Green Balance, and a copy of this review accompanies our full submission. This review points out the potential of: *.. more adventurous urban regeneration policies ... in which best practice rather than current standards inform future policy and practice.* and suggests that *RPG should put more effort into urban regeneration policy development, and the links between environmental, social and economic benefits deriving from it ... the dynamics of ongoing regeneration have been largely neglected.*

Every five per cent increase in brown-field development would reduce green-field requirements by 18,500 dwellings. CPRE believes that the Region should aim at the 60 per cent national target, and that it would then stand a good chance of achieving at least 50 per cent.

Policy 61: Mix of Housing Types

CPRE supports Policy 61 and the list of examples of housing types to which it is to apply, but we suggest that a phrase such as “housing for key staff and workers” might be more acceptable than “executive” housing.

5d) Transport and Communications

Para 5D1: The Regional Transport Strategy

CPRE supports in principle the first three objectives and the fifth objective. But although moving in the right direction, they do not represent a really radical shift from “business as usual”. They need to be far more challenging to get results. We do not support Objectives 4 and 6 as they stand; specific alterations are recommended:

- to delete ‘help overcome peripherality, and meet travel needs’ from the wording of objective 4;
- and to replace wording re ‘completing missing links’ by ‘make better use of existing transport infrastructure’.

We recommend three additional objectives and make some policy proposals accordingly to:

- reduce car use;
- ensure that all new and existing development is accessible by a variety of means (multi-modal) so that people have the choice to leave their car at home;
- ensure that more freight is transported by sustainable means.

In addition the Strategy does not give sufficient guidance to planning authorities, particularly with regard to demand management.

CPRE does not support the assumption that traffic growth and economic growth are linked. It is not clear why certain schemes are mentioned and others not, nor is there any evidence that they have been assessed against the strategic objectives or other regional alternatives.

Para 5D34: Priorities for Investment in Transport

CPRE supports most of these priorities except for Priority 2. Our main concern is that the order of the various items suggests that the mind-set behind the Transport Policies remains on unsustainable rather than sustainable forms of travel.

Regarding Priority 2, inter-urban networks, we have commented on Policy 64 concerning what we believe to be the fallacy of the “peripherality” issue, i.e. there are much more influential elements to generating prosperity in an economy such as that of the South West than physical distance from say London. We would therefore place this component of the transport investment portfolio much lower down the priority order.

Conversely, we consider that Priorities 5 and 6 should receive more preferential treatment. Investment in modal shift and interchange facilities are over-arching commitments of support for all the other investment proposals.

Policy 62: Principal Urban Areas

We broadly support Policy 62, but the first bullet point requires cross-referencing to a separate, new regional policy for accessibility and parking standards, requiring that:

- all new residential development should be located where people can access the majority of their services by walking, cycling and by bus;

- all new non-residential development should be located where, or provided with, sufficient transport services so that a certain per cent of potential users have a genuine modal choice — the percentage varying (according to rural or city location);
- all new employment, retail and leisure sites should have a full travel impact assessment, and all large sites a Green Transport Plan to encourage the use of sustainable modes of travel;
- Regional Car Parking Standards should be set.

We also propose a change to the second bullet point, to broaden its application to cycling.

Policy 63: Other Urban and Rural Areas

CPRE broadly supports Policy 63 but, as we have already recommended in our comments on Policy 62, the first bullet point (identical to Policy 62) needs strengthening by cross-referencing to a new regional policy on accessibility and parking (see above).

We question the decision to combine the requirements for urban and rural areas under the same policy, and comment in particular on certain issues relating specifically to mobility, social exclusion and tranquility which relate to rural rather than urban concerns. We believe there is a case for an additional group of policies which specifically address transport in rural areas.

We recommend new wording to encourage rural traffic management to:

- improve safety on rural roads for walkers and cyclists;
- stem the loss of rural tranquility;
- create a clear road hierarchy, including designated Quiet Lanes and Greenways.

Policy 64: Inter Urban and Inter Regional Transport

CPRE supports the first bullet point statement, but objects strongly to the second. Our overriding concern is that it makes no reference to sustainable travel, multi-modal choice, or to setting priorities. We consider that it neither reflects current Government policy, nor provides the guidance to local authorities required by Draft PPG 11.

It is also not clear whether the extensive list of “implications” in the supporting text is meant to legitimise these schemes. It is essential that this is clarified. Our full submission includes a number of detailed comments.

Overall, we welcome the programme to improve the rail services of the Region, but wish that the RPG was more ambitious. The TEN proposals are in fact relatively modest, and when viewed in conjunction with the cautious proposals referred to in Bullet point 2, will not lead to the “step change” in transport mode which is required.

Conversely some of the road schemes listed would not necessarily meet the objectives stated in the Regional Transport Strategy, and are still awaiting the results of multi-modal studies. CPRE, for example, considers that there is no justification for the Regional Transport Strategy to take the view that the A30/303 route will be generally upgraded to dual carriageway.

Policy 65: Ports

The inclusion of a specific policy for ports is to be welcomed because sea traffic is recognised as a particularly sustainable mode of transport and the region should capitalise on its geographic advantage in this respect. It is regrettable therefore that the Policy and text fail to provide authorities and development agencies with guidance or criteria to address the various options for port development across the region as a whole.

Policy 66: Airports

CPRE supports the second clause of this Policy, encouraging public transport links with selected airports. It is opposed however to the first clause, which endorses the uncontrolled development of an unsustainable mode of transport, providing no guidance or criteria for identifying which airports have a place in the Regional Transport Strategy and which do not.

Policy 67: Walking and Cycling

We strongly support both clauses of this Policy, but would like to see greater emphasis throughout the RPG on everyday journeys to work, school etc., not just for recreation.

Para 5D32: Accessibility and Parking Standards

CPRE does not think it is acceptable to say that accessibility and car parking standards will be published separately, following publication of the Government Guidance. There needs to be an interim policy statement.

Para 5D35: Monitoring Transport

See our comments under Section 6, where we emphasise the importance of setting targets. As an example of specific, measurable targets which might be set for more sustainable forms of travel, we quote recommendations made by the Inspector following the Examination in Public of the Avon Structure Plan re targets for reducing CO₂ emissions and reducing car journey lengths.

On the subject of HGV traffic, CPRE recommends that a measurement of “soft” damage to verges and hedgerows should be included, not just HGV weight on the road.

Regional Transport Strategy Map, Version 3

The Map does not present all the relevant information relating to the Transport Strategy and Policies, and is not therefore a satisfactory document for reference purposes. For example:

- Rail — why is Westbury not shown as the junction of four railway lines, in recognition of its potential both for improved passenger services and as an inter-modal freight facility?
- Roads — why are the already largely improved north-south routes from M5 at Taunton to Dorchester (i.e. A358, A303, A3088, A37) and from Gloucester via Swindon and Salisbury to Bournemouth/Poole (A417, A419, A346, A338) not shown? The net result is that the A350 is portrayed as the only strategic route north from Poole. This pre-empts the GOSW corridor review and is not in keeping with the Government decision to exclude this route from the Trans-European Network and not to contemplate it as a trunk road.

5e Tourism and Leisure, Sport and Healthcare

68: Tourism Facilities

CPRE fully supports this Policy, especially the list of criteria contained in the four bullet point statements. It implies that these criteria apply to all tourism development in the region, including those highlighted in Policies 69,70,71 and 72 - i.e.. it is an “over-arching” Policy. We would like to see this brought out more clearly in the presentation of Policy 68, and we have commented further on this in our remarks on Policy 70.

Policy 69: Areas under Tourism Pressure

CPRE welcomes this recognition that some tourist areas and locations have reached visitor saturation point, and that a laissez-faire attitude to this is not acceptable. We recommend that the intent of the Policy is strengthened by altering the wording of the first bullet point to read as follows - “Restricting additional development so as not to increase visitor pressure”.

Policy 70: New Flagship Attractions

CPRE is concerned that this Policy makes no reference to environmental considerations. We therefore request the addition of two specific clauses, as follows:

- that the four criteria listed in Policy 68 apply to this Policy as well;
- secondly that there should be a presumption in favour of locating flagship developments in principal urban areas and large towns, as part of the urban regeneration programme, rather than rural locations.

As it stands, the policy relies on the phrase “readily accessible by public transport” to prevent the development of large-scale visitor attractions in the countryside which would overwhelm the surrounding rural environment.

Policy 71 to 78

We made no comment on these Policies.

6 Implementation and Monitoring

CPRE recognises that there is much work to be done on monitoring, and that this is only a preliminary statement. We believe this is a particularly important part of RPG, and recommend a specific Policy commitment to support monitoring is incorporated in Policy 3, Achieving the Spatial Objective.

Indicators — We have made some preliminary comments about these in some of the Topic Sections in which they appear. We recommend that Tranquility be included in the Environment box of the Indicator Chart on page 53. A second CPRE recommendation is that the “Use of Resources” box should include data on the use of brown-field land, referenced to Policy 60. We hope to add to these recommendations, in response to the invitation to contribute in para 2.3 of Background Paper 12, Monitoring.

Targets — Indicators are of little use unless they are accompanied by targets, and we have commented elsewhere that this RPG is sadly lacking in targets. We recommend that part of the brief for those tasked with developing monitoring procedures for this RPG should be to identify targets for all Indicators. These targets should be contained in the RPG document.

Sustainability Appraisal — There is also a close connection between the monitoring process and the Sustainability Appraisal of RPG, the final version of which is yet to be published. Government “Best Practice” advice on this subject has recently become available and CPRE is studying these recommendations. This is therefore another factor which will need to be taken into account as part of the work on monitoring and implementation.
