

The Draft Regional Spatial Strategy for the South West 2006-2026

South West of England Regional Development Agency (SWRDA) Schedule of Representations

RSS Section	<u>Title</u>	Page
	Executive Summary	
1	A Sustainable Future for the South West	8
2	The Context for the Spatial Strategy	13
3	The Spatial Strategy and Guidance for the Scale and Location of Development	19
4	Sub-regional Strategy Statements and Housing Distribution	31
5	The Regional Approach to Transport	52
6	Harnessing the Benefits of Population Growth and Managing the Implications of Population Change	55
7	Enhancing Distinctive Environments and Cultural Life	59
8	Enhancing Economic Prosperity and Quality of Employment Opportunity	65
9	Addressing Deprivation and Disadvantage to Reduce Intra-Regional Inequalities	72
10	Ensuring People are Treated Fairly and can Participate in Society	73
	Strategic Sustainability Appraisal	74
	Implementation Plan	77

Executive Summary

1. A Sustainable Future for the South West

- A. There is a shared economic evidence base underpinning both the Regional Economic Strategy (RES) and the draft Regional Spatial Strategy. Alignment of the draft RSS with the RES, as published in May 2006, has improved in relation to earlier draft RSS documents but there is still scope for significant improvement, particularly in relation to planning positively for sustainable economic growth.
- B. The RSS covers the period to 2026 and therefore needs to set out a visionary and ambitious framework for the region which will support delivery of the current RES and also future iterations of it. The RSS must help to drive and influence change such as through the use of new technologies and by promoting innovation and enterprise.
- C. The draft RSS identifies some considerable challenges facing the future development of the region over the next 20 years including tackling climate change and reducing the region's ecological footprint. The general aspiration, to make the South West a leading region for sustainable development, is supported by SWRDA and complements the RES which aspires to achieving economic growth within environmental limits and identifies the environment as one of three important drivers of the economy.
- D. The challenges, delivery issues and implications associated with specific proposals of the Strategy, such as carbon neutral development and renewable energy targets, need to be more fully understood so as to ensure that the policy aspirations are deliverable.
- E. There are considerable risks to successful delivery bound up in the draft RSS. These apply both in terms of aspirations proving undeliverable or unachievable and assumptions about economic growth proving to be incorrect.

2. The Context for the Spatial Strategy

- A. SWRDA supports the recognition in draft RSS that since RPG10 was prepared economic growth has been sustained and has exceeded that which was planned for in RPG10.
- B. Given this under-provision for growth in RPG10, it is vital that the region is prepared for the highest levels of economic growth that it might realistically experience including the continuation of recent strong growth. The draft RSS plans only for 'average' growth in the future at a level which is below the recent performance witnessed in the region. Successful RES and

RSS delivery is more likely to result in 'strong' growth and hence the RSS should plan for the top end of the GVA range set out in the RES, at 3.2%. This should be factored in to all relevant aspects of the Strategy. In planning for successful economic growth the region will be more able to capture the wider benefits of growth and achieve the most sustainable outcomes for a diverse region.

3. The Spatial Strategy and Guidance for the Scale and Location of Development

- A. The identification of 21 Strategically Significant Cities and Towns (SSCTs) is supported. However, differentiation between their relative roles is needed. Specifically;
 - o The need for Bristol and Exeter to play more significant roles than is currently articulated to ensure a better alignment between economic growth and housing provision.
 - o Recognition of the scale of the challenge, and the risks inherent therein, in achieving the anticipated step change in the economic performance of Plymouth and Torbay and to a lesser extent Weston
- B. Newton Abbot should be included as an SSCT in order to align with the DCLG's New Growth Points initiative and the sustainable communities agenda in the region
- C. The emphasis placed on the SSCTs should not be to the exclusion of other areas of the region. Specifically the Strategy should be amended so as to adopt a more positive stance to promoting the successful regeneration of market and coastal towns, the renaissance of rural areas and the diversification of the rural economy.
- D. The relationships and dynamics between cities, towns and rural areas should be articulated more clearly and reflect the functional economic zones in the region. This will ensure the RSS more clearly reflects the diversity of the region.

4. Sub-regional Strategy Statements and Housing Distribution

- A. RSS should ensure there is a consistent approach for Strategically Significant Cities and Towns (SSCTs) in setting out specific figures for growth in employment. The figures should relate to growth in GVA of 3.2% p.a. and should be expressed as a minimum. Such an approach would comply with Government guidance.
- B. Individual policies for SSCTs should be more explicit about the actions required to facilitate and achieve those policies. This should be based on better articulation of the economic potential of those places and on the wide variety of work being undertaken at a local level. It will help ensure a better synergy with the RES Delivery Framework and other delivery mechanisms.

- C. SWRDA is concerned that in key parts of the region, such as West of England and Exeter, the RSS fails to promote an approach which will result in better alignment between employment supply and new housing provision. As such, draft RSS underplays the role of those places as key economic drivers in the region. The risks to delivery of sustainable development objectives of this approach are recognised in the Strategic Sustainability Appraisal.
- D. RSS will require a better articulation of the role and potential of the Areas of Search identified in draft RSS, so that the need for sustainable communities and mixed use development is recognised, and the necessary symbiotic relationships between city / town centres and urban extensions are reinforced.
- E. The SWRDA considers that an alternative development strategy should be considered which builds on the current approach and which:
 - o is predicated on a higher level of housing provision in the region;
 - o helps achieve better alignment between jobs and housing;
 - o supports the key economic role of SSCTs;
 - o responds to recent DCLG household projections; and
 - o considers and responds to the implications of the recent Rural Affordable Housing Commission report, which may lead to higher housing numbers for some market towns and rural settlements.

5. The Regional Approach to Transport

- A. SWRDA considers there is a need for the transport element of RSS to be more forward looking and innovative, and to provide greater support for the use of ICT to achieve a step change in public transport provision and implementation of 'soft measures' to complement capital investments.
- B. RSS should draw on the lessons learnt from the recent Access West research by Forum for the Future, which built on the Greater Bristol Transport Study and recommended an approach to a sustainability mobility strategy for the West of England. In particular this emphasised the importance of placing CO2 reduction at the heart of transport strategies, improving public awareness and providing accessible and integrated information on public transport.
- C. SWRDA believes that a clear policy to promote sustainable aviation in the region is required in RSS. This should include a vision for sustainable aviation, a baseline of the assessment of regional aviation's contribution to the economy, environment and society, and agreed actions that acknowledge the role and responsibilities of airports, aviation and related businesses.
- D. SWRDA considers there is a good case for setting out, in RSS, an integrated approach to rural accessibility.

- E. The RSS approach to Ports should be reviewed in light of the outcome of the National Ports Review (currently ongoing). The need for a stronger planning framework, and the possible development of port master plans, could impact on regional policy. Equally the need to develop a consistent approach to surface access to Ports could result in identifying regional port corridors. The development of the Regional Freight Map could assist this process.

6. Harnessing the Benefits of Population Growth and Managing the Implications of Population Change.

- A. SWRDA is concerned that the approach of the draft RSS will lead to a further worsening of the housing affordability issues facing the region. The problem of housing affordability is a potentially significant barrier to economic growth. The SWRDA is concerned that the approach of the RSS to the provision of affordable housing will continue to result in an under-supply.
- B. The spatial, as opposed to purely land use based, emphasis of the Strategy means that it should take account of the full range of factors that will impact on the future spatial development of the region. This includes addressing issues of skills provision and attainment and skills for employment as well as promoting enterprise and innovation.

7. Enhancing Distinctive Environments and Cultural Life

- A. SWRDA considers RSS should include specific policies for cultural facilities in relation to specific SSCTs, reflecting the Cultural Infrastructure Development Strategy and supporting culture led regeneration.
- B. RSS should help ensure the region maximises opportunities arising from the London 2012 Olympics, including using the Olympics as a catalyst for the long term regeneration of Weymouth and Portland.
- C. SWRDA supports the recognition of environmental technologies as a key sector of the economy, the setting of targets for renewable energy and promotion of a sustainable energy supply for the region.
- D. The waste section of the draft RSS fails to convey the increasingly critical need for change in current practice, the need for new waste infrastructure and the potential economic and environmental impacts if the targets set out in the Regional Waste Strategy are not achieved. Further clarity is required on the development of markets and supply chains for increased quantities of recyclable materials needed to be diverted from landfill.

8. Enhancing Economic Prosperity and Quality of Employment Opportunity

- A. This section of the RSS is essential to ensuring effective integration with the RES and must include consideration of wider spatial, as opposed to purely land use, issues inherent in achieving the IRS aim.
- B. An additional policy is proposed to help secure successful and competitive businesses. The policy relates to issues such as skills, quality of employment land provision, role of HE / FE institutions and hospitals, science parks, key sectors of the economy and the important role of SMEs.
- C. SWRDA suggests a clearer approach to the delivery of sustainable sites and premises for business growth to reflect the needs of large and small businesses, the need to provide live/work space and the ongoing economic restructuring and diversification of rural areas.
- D. SWRDA considers that policy development is required to ensure city and town centres make provision for the forecast step change in retail, leisure and office space requirements, helping to ensure the region addresses issues such as city centre renaissance.
- E. SWRDA welcomes inclusion in the RSS of policies relating to tourism, but considers these will need to be redrafted to reflect recent guidance from DCMS and that these should be moved to section 7 of the Strategy.

9. Addressing Deprivation and Disadvantage to Reduce Intra-regional Inequalities.

- A. SWRDA supports the intentions of this section of the RSS but considers that it requires definition in policy in order to have maximum effect. This should support both urban and rural initiatives including targeted regeneration programmes to address concentrations of deprivation, regeneration through Urban Regeneration Companies and effective deployment of European funding programmes including the Convergence and Competitiveness programmes.

10. Ensuring People are Treated Fairly and can Participate in Society

- A. A specific delivery activity for the RES is to encourage wider participation in the economy and enterprise in particular. The use of Equality Impact Assessments is welcomed, helping policies in Local Development Documents and Local Transport Plans to be developed in recognition of the diverse needs, concerns and circumstances of the people affected by them.

Strategic Sustainability Appraisal (SSA)

- A. SWRDA has consistently expressed concerns about the way in which the SSA has been undertaken, particularly in relation to future growth, development of the economy and an apparent desire to promote a strategy that would result in an economically inward looking region in which national and international economic linkages are reduced. SWRDA does not consider this alternative approach to be reasonable, realistic or in line with the RES.
- B. The SSA recognises that the assumption about economic growth in the predecessor document to the RSS has been exceeded resulting in a number of significant negative consequences. SWRDA considers that the region now needs to test the alternative approach which should be based upon accommodating the highest levels of growth, both in terms of population and the economy, that the region might realistically expect over the next 20 years. This includes the continuation of strong rates of economic growth and accommodating levels of development commensurate with this. SWRDA considers that this should have been a fundamental component of the SSA.

Implementation Plan

- A. The production of a delivery plan is welcomed and SWRDA notes that it has been identified as a lead organisation and key partner for many policy areas in the draft RSS. SWRDA is considering the implications of this and is reserving its position accordingly.
- B. SWRDA considers the list of priority Area Action Plans, relating to key areas in the region, to be critical to delivery and should be the subject of a specific policy within RSS.
- C. New and innovative ways of delivering the Strategy should continue to be explored. This should include developing the proposals for a Regional Infrastructure Fund for example.

<u>Section 1</u>	<u>A Sustainable Future for the South West</u>
Paragraph 1.2.2 Page 4 Support	The SWRDA supports the recognition that since RPG10 was prepared economic growth has been sustained and has exceeded that which was originally expected and planned for. It is important that, in moving forward, the RSS learns lessons from the past and adopts a robust assumption about future economic growth to ensure 'under-planning' for sustainable economic growth does not continue.
Paragraph 1.3.1 Page 5 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • Amend text so as to maximise the degree of alignment with the Regional Economic Strategy. <p>Explanation</p> <p>The SWRDA broadly supports the summary of the regional future that the Strategy is working towards. However it is considered that there is potential for further improvement in order to help maximise the degree of alignment with the Regional Economic Strategy.</p> <p>Change sought</p> <p>The text should be amended so as to:</p> <ul style="list-style-type: none"> • Include reference to the SW becoming the best connected region in Europe through the improved provision and use of ICT; • Specifically recognise and further develop the particularly pivotal roles of Exeter and Bristol in helping to spread economic benefits to the south and west of the region; • Amend the 2nd bullet point so as to read 'The economy continues to prosper, intra-regional disparities are reduced and the South West develops as a leading region for innovative and knowledge based business utilising a skilled and versatile workforce'.

<p>Paragraph 1.4.3 Page 7 Support</p>	<p>The SWRDA welcomes the recognition of the need for good alignment between the draft RSS and the RES.</p>
<p>Paragraph 1.6.2 Page 9 Support</p>	<p>The SWRDA supports the recognition that the South West’s ecological footprint is unsustainable as it currently stands. Stabilising and then reducing the ecological footprint of the region is a major challenge. The SWRDA supports the recognition of the need for strong leadership and innovative solutions to achieve this, but is keen to ensure the region has a better understanding of the significant implications of future policy strands and actions required to meet this challenge.</p>
<p>Paragraph 1.6.5 Page 10 Support</p>	<p>The SWRDA supports the recognition that critical to achieving a more sustainable region is the continuation of the South West’s relative economic prosperity as is the acknowledgement that economic prosperity is measured by well being as well as economic wealth. Furthermore the text acknowledging the role of the RES in setting out an economic prospectus for the region is also welcomed along with the reference to the need for the RES and RSS to offer complementary approaches to development.</p>
<p>Policy SD1 ‘The Ecological Footprint’ Page 11 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Include definition of the term ‘ecological footprint’. • Promote the development and use of new technologies including ICT and environmental technologies. <p>Explanation</p> <p>The SWRDA supports the inclusion of a policy to stabilise and then reduce the ecological footprint of the region. The overall thrust of the policy is also welcomed although it would be</p>

	<p>helpful if the policy included a definition of the term ‘ecological footprint’.</p> <p>The challenges, delivery issues and implications associated with specific proposals of this policy need to be more fully understood so as to ensure the policy aspirations are deliverable. Equally this should not frustrate the delivery of the Development Policies of the Strategy. There is also a clear link with the South West Debates, particularly in terms of securing economic growth within environmental limits.</p> <p>The SWRDA believes that the policy would benefit from the inclusion of an additional bullet point which would promote innovation through the development and use of new technologies including ICT and environmental technologies.</p> <p>Change Sought</p> <ul style="list-style-type: none"> • Include a definition of the term ‘ecological footprint’. • Include an additional bullet promoting innovation through the development and use of new technologies including ICT and environmental technologies.
<p>Policy SD2 ‘Climate Change’ Page 12 Oppose</p>	<p>Again the SWRDA supports both the inclusion of a policy aimed at tackling climate change and the overall thrust of the policy. It sets out challenging targets for the reduction of greenhouse gas emissions and for adapting to anticipated changes in climate. The challenges, delivery issues and implications associated with specific proposals of this policy need to be more fully understood so as to ensure the policy aspirations are deliverable. Equally this should not frustrate the delivery of the Development Policies of the Strategy.</p> <p>The SWRDA believes that this policy could be further improved by including a specific bullet point which promotes innovation and the development and use of new technologies including both ICT and environmental technologies.</p>

<p>Policy SD3 'The Environment and Natural Resources' Page 14 Oppose</p>	<p>The SWRDA supports the overall thrust of this policy. However it is considered that it would benefit from the inclusion of a specific bullet point which seeks to harness the role of the environment as an economic driver. The recognition of the role of the South West environment as an economic driver is a key strand of the Regional Economic Strategy which aspires to achieve economic growth within environmental limits.</p> <p>The protection and enhancement of the region's unique environmental and cultural assets will continue to attract investment and develop economic advantage. The RES states that the overall Vision will be realised when the South West has developed an economy where <i>inter alia</i> the region respects the environment as the foundation of people's quality of life and as a business opportunity.</p>
<p>Policy SD4 'Sustainable Communities' Page 16 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Amend policy by the inclusion of additional criteria. <p>Explanation</p> <p>The SWRDA welcomes the inclusion of a policy which sets out the Strategy's approach to promoting the development of sustainable communities in the region. This will help to deliver The Way Ahead, the sustainable communities plan for the region. The SWRDA believes that the policy could be further improved by the inclusion of additional criteria.</p> <p>Change sought</p> <p>Include the following criteria in the policy:</p>

	<ul style="list-style-type: none"> • Realising the economic potential of the South West including developing as a leading region for innovative and knowledge based business; • Reducing intra-regional disparities and tackling concentrations of multiple deprivation; • Promoting the development and use of new technologies including ICT and environmental technologies; • Ensuring a range and choice of employment land, sites and premises to meet the needs of business and which recognises the differing 'competitive advantages' of different SSCTs; • Recognising the linkages between urban and rural areas; • Delivering a rural renaissance through diversification of declining traditional industries to support a thriving rural economy and viable rural communities; • Helping deliver the skills for, and participation in, the economy.
Omission	<p>It would be helpful if the relationship between the RSS and other documents, most notably the Regional Economic Strategy but also The Way Ahead, could be set out at the front of this section of Strategy. This could be accompanied by a short statement of objectives. This would help to both place the RSS in context and to make it clear what it is aiming to achieve.</p>

<u>Section 2</u>	<u>The Context for the Spatial Strategy</u>
Paragraph 2.2.2 Page 21 Support	The SWRDA supports the recognition that the environment is identified by the RES as a driver of the regional economy.
Paragraph 2.3.2 Page 22 Support	The SWRDA supports the recognition that since 1996, economic activity in terms of job numbers and GVA in the region, has surpassed the highest forecasts made in the preparation of RPG10 with most of the growth in activity associated with the major cities and towns. The SWRDA also supports the reference to the GVA scenarios which form part of the RES and the recognition that successful RES delivery is more likely to result in ‘strong’ growth at the top end of the GVA range. It is important that the RSS, and subsequent LDDs, promote positive planning for the economy to facilitate a sustainable future for the region.
Paragraph 2.3.5 Page 23 Support	The SWRDA supports the identification of the key economic trends in the bullet points which form part of this paragraph. This includes the need to ensure that the region raises its productivity in order to compete more successfully as well as the recognition that economic development turned away from the prosperous parts of the region is likely to be lost to the South West. They reflect the joint evidence base with regard to the spatial economy which underpins both the RES and the draft RSS.
Paragraph 2.3.13 Page 26 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • The RSS needs to be prepared for the highest rates of economic growth that the region might realistically experience including the continuation of the strong performance that the region has witnessed in the last 10 to 15 years. • The Strategy needs to work on the basis of an assumption of 3.2% growth in GVA in the period 2006-2026.

Explanation

The bold text accompanying this paragraph sets out the main economic and population assumptions influencing the scale and distribution of development. As the Strategic Sustainability Appraisal recognises, these are fundamental to the development of the Spatial Strategy as a whole. The first sentence states that ‘there is a need to plan for economic growth at or above the current rate, equating with annual growth in Gross Value Added (GVA) of 2.8% or higher (and towards the higher end of the range 2.4% to 3.2%)’. It is clear, however, that the Strategy actually assumes 2.8% growth in GVA per annum. This is despite the recognition in paragraph 2.3.2 of the Strategy that successful RES delivery is likely to result in ‘strong’ growth at 3.2% per annum.

By assuming that the economy will only grow at the ‘average’ rate of 2.8% then the draft RSS is not, by implication, planning for successful RES delivery. This is a fundamental concern for the SWRDA. Successful RES delivery will to a large degree be dependent upon the two statutory regional strategies being both aligned and mutually reinforcing. The RES states that the region needs to prepare itself for an outcome in which recent strong rates of growth continue. It is recognised in this respect that the level of housing provision set out in the Spatial Strategy is below that necessary to support even ‘average’ rates of growth.

The SWRDA acknowledges that there are various external factors that may cause the South West economy to revert to the more limited growth exhibited for much of the 1970s and 1980s. Paragraphs 1.2.2 and 2.3.2 of the draft RSS both recognise however that the assumptions underpinning the predecessor document (RPG10) have been significantly exceeded. This was by a factor of nearly 50%. There is a very real danger that by assuming only ‘average’ growth in GVA, this cycle will continue and, as such, less than sustainable patterns of growth and development are likely to result.

The SWRDA is very keen to ensure that this is not the case. The RSS needs to be prepared

for the highest rates of economic growth that the region might realistically experience including the continuation of the strong performance that the region has witnessed in the last 10 to 15 years. The SWRDA therefore considers that the Strategy needs to work on the basis of an assumption of 3.2% growth in GVA in the period 2006-2026. This will also help to address the issues identified in the SSA that there is an apparent contradiction between the employment figures identified for the individual SSCTs (which cumulatively suggest a level of growth in excess of even the 3.2% GVA scenario) and the housing figures which are below that required for even the 'average' 2.8% growth scenario.

The SWRDA considers that amending the assumption about future growth in GVA is fundamental to the strategy. This will result in the consequential need for changes in many other sections of the plan including the approach to individual settlements. The SWRDA supports the recognition in the third bullet point that the realisation of economic growth will require provision of adequate housing to support it, in locations with the greatest potential for aligning jobs, homes, services and facilities and where infrastructure exists to support growth in this respect.

The key challenge, therefore, is to achieve high levels of economic growth within environmental limits. The SWRDA supports this approach and believes it to be deliverable, although further work is required to better understand the delivery issues. The region must be prepared for an outcome in which recent strong levels of growth will continue. How the RSS facilitates this is critical.

Change sought

- Predicate the strategy on the basis of an assumption of 3.2% growth in GVA in the period 2006-2026.
- Make consequential changes in other relevant sections of the plan including the

	approach to individual settlements.
Paragraph 2.4.1 Page 27 Support	The SWRDA supports the reference to The Way Ahead, the sustainable communities plan for the region in this section of the text. This will be a vital ingredient in helping to deliver future development.
Paragraph 2.5.5 Page 28 Support	The SWRDA supports the emphasis in the Strategy on understanding the needs, role, function and potential of places. In particular the recognition that the number of market and coastal towns is a distinguishing characteristic of the region is welcomed. The trends identified in the text highlight the challenges that these settlements face. It is vital that the Strategy articulates a positive and more sustainable future for such settlements. This should include augmenting the role of Market and Coastal towns as the hubs of wider rural hinterlands.
Paragraph 2.5.8 Page 29 Oppose	Whilst the SWRDA supports the recognition of the challenges facing the region in terms of securing a more sustainable pattern of development, it is important that the response considers all potential mechanisms for reducing the need to travel, not least in a climate of relatively small resources to deliver greater change and improvements to the transport network. The physical alignment of employment and housing provision will undoubtedly be a key a strand of this but it will be important to also consider other mechanisms. The region already has the highest rate of home working of any region and Development Policy G of the Strategy aims to promote the further development of live/work space. Equally the role of new technologies, particularly ICT, in responding to these challenges should also be harnessed. This will allow remote working for example and the impact of such technologies on living and working patterns is likely to increase significantly over the next 10 to 20 years.
Paragraph 2.5.10 Page 30 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • Ensure that the Strategy reflects the functional economic zones in the region. • Present a positive approach to the future development of market and coastal towns and the diversification of the rural economy.

Explanation

The SWRDA supports the emphasis on understanding the role and function of places in the Strategy and acknowledges that this is a distinctly different approach from existing RPG10. It is important that the 'fine grain' approach to development referred to in the fourth bullet point also reflects and responds to the functional economic activity zones included in section 8 of the Strategy.

The SWRDA supports the recognition that the majority of new development needs to be focused at the strategically significant settlements, in a way that encourages a better balance between homes and jobs and better articulates the differences between and economic potential of SSCTs. The SWRDA is also keen to ensure that the Strategy articulates a positive strategy for areas outside of these strategic settlements so that they too can benefit from a more sustainable future. This should include both promoting the ongoing role of market and coastal towns as the economic hubs of wider rural hinterlands as well as diversifying the rural economy and achieving a rural renaissance. Such an approach is unlikely to be achieved purely by seeking to limit future development (and notably housing) in such places. The Strategy needs to respond to specific regeneration initiatives, particularly the market and coastal towns initiative.

The SWRDA believes that presenting a positive approach to the future development of market and coastal towns and to planning for more economically diverse rural areas should be a specific bullet point in terms of outlining what the functional approach to spatial planning means. This should respond to the settlement structure in the different functional economic zones. For example, the approach to development in the North Peninsular zone will need to be very different to that in the North East Triangle.

	<p>Change sought</p> <ul style="list-style-type: none">• Ensure that the fine grain approach reflects and responds to the functional economic zones in the region.• Articulate a more positive vision for sustainable rural communities.
--	--

- Ensure that the fine grain approach reflects and responds to the functional economic zones in the region.
- Articulate a more positive vision for sustainable rural communities.

<u>Section 3</u>	<u>The Spatial Strategy and Guidance for the Scale and Location of Development</u>
Paragraph 3.1.2 Page 32 Oppose	<p>This paragraph makes reference to a long standing ‘gradient of prosperity’ in the region. Whilst there are undoubtedly gradients in terms of productivity levels and concentrations of multiple deprivation from the north and east to the south and west of the region, this is not the same as a gradient of prosperity. The use of this term should be clarified in or deleted from the text of the plan.</p>
Paragraph 3.1.3/Map 3.1 Page 32/3 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • Articulate a more positive vision for sustainable rural communities which responds to the functional economic zones in the region. • Include reference to supporting the deployment of European Structural and Convergence Programmes. <p>Explanation</p> <p>The SWRDA supports the broad thrust of the Strategy as set out in this section of the Plan. This includes the identification of a number of Strategically Significant Cities and Towns in the region. However the SWRDA believes that the Strategy could go further in articulating a more positive and sustainable future for areas outside of the SSCTs. This should include promoting the successful regeneration of market and coastal towns, supporting their development as the hubs of wider rural hinterlands and diversifying the rural economy. The current statement appears to be based on a desire to limit the scale of change rather to promote a more positive future.</p> <p>The SWRDA believes that as well as being an important presentational issue this is also a vital ingredient of the overall spatial strategy. This should also reflect and respond to the functional economic activity zones included in section 8 of the Strategy and the different</p>

	<p>settlement structures and linkages therein. The approach to development in the North Peninsular zone will need to be very different to that in the North East Triangle for example.</p> <p>The spatial strategy statement also refers to stimulating economic activity and development to help achieve regeneration and reduce disparities. It would be helpful if this could also refer to supporting the successful deployment of European Structural funds. This would link with Map 3.1 which shows Cornwall's status as an Objective 1 area. For completeness this should also refer to Convergence funding which is the successor to the Objective 1 programme.</p> <p>Change sought</p> <p>Amend text so as to:</p> <ul style="list-style-type: none"> • Articulate a more positive vision for sustainable rural communities which responds to the functional economic zones in the region; • Include reference to supporting the deployment of European Structural and Convergence Programmes; • Include reference to the Convergence Programme with regard to Map 3.1.
<p>Paragraph 3.3.1 Page 34 Support</p>	<p>The SWRDA supports the reference to the influence The Way Ahead, and the key areas therein, have had in determining the Strategically Significant Cities and Towns in the region.</p>
<p>Development Policy A 'Development at the Strategically Significant Cites and Towns (SSCTs)' Page 35 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The need to increase the level of housing provision at the SSCTs so as to ensure that employment and housing can be brought in to better alignment. • Ensure the application of necessary checks and balances for individual settlements. • Include Newton Abbot as a SSCT.

Explanation

The SWRDA supports the Strategy in making the SSCTs the primary focus for accommodating future development. A key strand of the Strategy is to bring the location of employment and housing in to closer alignment. It is notable therefore that the policy makes provision for nearly a third more jobs than houses in the SSCTs. This is more likely to continue the current divergent trend rather than to bring these two critical aspects of sustainable development back in to alignment. This will be particularly the case in certain of the SSCTs, notably Bristol and Exeter. In other SSCTs, notably Plymouth, Torbay and Weston, the challenge will be to ensure that employment provision keeps pace with the proposed level of housing provision.

The Strategic Sustainability Appraisal recognises that the SSCTs provide the best opportunity to make major substantive contributions to the achievement of sustainable development. It also recognises the apparent contradiction between the level of housing and employment provision identified in the Strategy. It is vital that this is corrected by increasing the level of housing provision at the SSCTs and by introducing the necessary checks and balances for individual places if a coherent Strategy is to be progressed. This should not, however, be achieved at the expense of housing provision in smaller towns and rural areas.

The SWRDA also believes that the list of SSCTs should be extended to include Newton Abbot. This settlement occupies a pivotal position on the axis between Exeter/Torbay and has the potential to make a significant contribution to the realisation of regional objectives. The SWRDA intends to commission further research to understand more fully the dynamics of the relationships and inter-linkages between the main settlements in the South Central functional zone (namely Exeter, Newton Abbot, Torbay and Plymouth).

	<p>Change sought</p> <ul style="list-style-type: none"> • Increase the level of housing provision at the SSCTs so as to ensure that employment and housing can be brought in to better alignment. • Ensure the application of necessary checks and balances for individual settlements. • Include Newton Abbot as a SSCT.
<p>Paragraph 3.3.3 Page 35 Oppose</p>	<p>The SWRDA supports the majority of the approach to planning for change at the SSCTs as set out in this paragraph. However the SWRDA considers that the approach would also benefit from the following amendments and additions:</p> <ul style="list-style-type: none"> • Bullet #2 Include reference to tackling concentrations of multiple deprivation. Include reference to Further as well as Higher Education; • Bullet #3 Include reference to a range and choice of sites to meet business needs and to promoting the development of the knowledge driven economy; • Bullet #4 Include reference to improving ICT infrastructure.
<p>Paragraph 3.3.5 Page 36 Oppose</p>	<p>This text makes reference to extensions to Green Belt designations including in the West of England. The SWRDA is concerned that such extensions are being proposed without a fully coherent development strategy first being in place for the individual SSCTs that they will affect. Such extensions will need to be considered afresh in light of the suggested increase in development levels. Equally the proposed extension to the Green Belt boundary adjacent to the Portbury Dock arises from the Local Plan which only looks forward to 2011 and does not consider the wider needs of the Port over the period to 2026. The SWRDA considers greater clarity is required with regard to specific areas of green belt review (e.g. Policies SR3 and SR 27) and land to be included / excluded from that review and, hence, whether policies intend for specific areas of land to remain within or be excluded from future green belt designation.</p>

<p>Development Policy B 'Development at Market Towns' Page 35 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The need for the Strategy to articulate a positive vision of vital and viable rural communities • Ensure that this is rooted in an appreciation of the functional economic zones in the region <p>Explanation</p> <p>The SWRDA believes it is essential that the RSS articulates and presents a positive vision of vital and viable rural communities with market and coastal towns at their heart. The wording of this policy needs to be amended so as to ensure that this is the case. This should promote a more sophisticated “fine grained” approach to the complex and diverse relationships between these towns, the wider rural hinterlands and the SSCTs. The policy should also be rooted in an appreciation of the functional economic zones detailed in Section 8 of the Strategy and the inter-relationships and linkages therein.</p> <p>The classic “market town” model as a centre servicing its surrounding rural area is not necessarily appropriate or realistic for all such towns in the region. The policy should also help to support the delivery of Community Strategic Plans developed as part of the Market and Coastal Towns Initiative (MCTI) for example.</p> <p>Change sought</p> <p>The policy wording should be amended so as to:</p> <ul style="list-style-type: none"> • Promote the creation of vibrant and attractive towns with an improved range and quality of services; • Focus on achieving sustainable economic development whilst respecting distinctive
---	--

	<p>local character and environmental assets;</p> <ul style="list-style-type: none"> • Recognise and augment the role of the towns as hubs of wider rural hinterlands; • Encourage community-led local assessments of need and action planning; • Promote the provision of workspace to encourage business development and social enterprise activity which improves access to services, quality of life and tackles rural disadvantage; • Support the increased use of ICT and development of ICT skills to raise rural productivity, reduce the need to travel and improve access to services; • Develop public transport networks which meet the needs of both the market towns and their surrounding rural area.
<p>Paragraph 3.5.1 Page 37 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Amend text so as to articulate a more positive and sustainable future for rural areas. • Ensure that this is rooted in a robust appreciation of the functional economic zones in the region. <p>Explanation</p> <p>The text in this paragraph states that the draft RSS seeks to present a positive vision of vital and viable rural communities. The SSA which accompanies the draft RSS concludes however that a sustainability weakness is that ‘the guidance and planned outcomes for more rural settlements, and the role that they should play in contributing to a more sustainable region within a more urban-focused strategy is not very clear, especially given the current trends of loss of rural services and sustainable modes of transport, and that over half of the region’s population currently live outside of the SSCTs’. It recommends that consideration be given to ‘whether and how the draft RSS could give clearer guidance on how to deliver more sustainable patterns of development and activity outside of the SSCTs’.</p>

	<p>It is a fundamental concern for SWRDA that the draft RSS does not present nor articulate this positive vision for vital and viable rural communities. Over the lifetime of the RSS the issue of how people are employed and what they do is likely to be as important as where they work. The SWRDA believes that the text should be amended so as to present this positive vision and and that there should be consequential changes to the relevant policies together with the introduction of a specific policy which will guide development in rural areas outside of individual settlements. This should be rooted in an appreciation of the functional economic zones as contained in section 8 of the Strategy.</p> <p>Change Sought</p> <ul style="list-style-type: none"> • Amend text to articulate a more positive and sustainable future for rural areas and ensure that there are consequential changes to other relevant aspects of the Strategy. • Ensure that this is rooted in a robust appreciation of the functional economic zones in the region.
<p>Omission Policy with regard to Rural Areas Page 38</p>	<p>Summary</p> <ul style="list-style-type: none"> • The need for the Strategy to include a policy specifically with regard to rural areas. <p>Explanation</p> <p>Whilst the draft includes policies on development at market towns and in small towns and villages there is no specific policy for rural areas outside of settlements. The SWRDA believes that this is a significant omission and that such a policy should be introduced.</p>

	<p>Change Sought</p> <p>Introduce a policy with regard to rural areas. Specifically this should support:</p> <ul style="list-style-type: none"> • Tackling rural disadvantage and contributing to maintaining viable rural communities; • The diversification of the rural economy and a broadening of the range of employment opportunities; • Raising productivity levels, particularly in the 10 rural priority districts; • A flexible approach to rural workspace provision, including the re-use of existing buildings and facilitation of home based businesses; • Promoting a more knowledge driven rural economy including through the provision of appropriate business premises including live/work space; • The delivery of the Strategy for Sustainable Farming and Food including making provision for distribution hubs for the food and drink sector. <p>This should be rooted in an appreciation of the functional economic zones as contained in section 8 of the Strategy.</p>
<p>Paragraph 3.6.8 Page 40 Support</p>	<p>The SWRDA supports the recognition of the role of The Way Ahead and the establishment of a Regional Infrastructure Fund in helping to support the delivery of development at the key areas.</p>
<p>Development Policy D 'Infrastructure for Development' Page 41 Support</p>	<p>The SWRDA supports this important policy. Devising appropriate delivery mechanisms will ensure the timely delivery of major development in an integrated manner.</p>

<p>Development Policy E 'High Quality Design' Page 43 Oppose</p>	<p>The SWRDA fully supports the desire to achieve the highest quality of design. However it is considered that the policy is capable of further refinement and improvement. This should accord with the provisions of 'Designing our Environment – Towards a Better Build Environment for the South West'. This should include the principles underpinning good design as set out in the document. It should also encourage the adoption of specific mechanisms for ensuring high quality design such as design codes. The existing South West Design Review Panel will play a key role in the delivery of this policy.</p>
<p>Development Policy F 'Master Planning' Page 43 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The need to amend policy so as to include reference to incorporating employment land and uses • The need to test the requirement for densities to be at least 50 dwellings per hectare so as to ensure that this will result in mixed and balanced communities <p>Explanation</p> <p>The SWRDA supports the main provisions of this policy. However the policy as currently drafted makes no reference to the need to incorporate employment land and uses in to such master plans. The SWRDA believes that employment uses form an essential ingredient of mixed use development. The policy needs to be amended accordingly.</p> <p>The SWRDA supports the approach of encouraging higher density development in that this will help to make the most efficient use of land. However the SWRDA believes that setting densities of at least 50 dwellings per hectare will not necessarily result in mixed and balanced communities.</p>

	<p>Change sought</p> <ul style="list-style-type: none"> • Amend policy so as to include reference to incorporating employment land and uses. • The need to test the requirement for densities to be at least 50 dwellings per hectare so as to ensure that this will result in mixed and balanced communities.
<p>Development Policy G ‘Sustainable Construction’ Page 45 Support</p>	<p>The SWRDA supports this important policy. Achieving high standards of sustainable construction will be critical to meeting a number of the major challenges facing the region such as reducing the region’s ecological footprint and reducing greenhouse gas emissions. In particular the SWRDA supports the aspiration for all major development to be carbon neutral. This presents a major challenge in terms of future delivery to which the region needs to respond. It would be helpful if this term was defined in the explanatory text accompanying the policy. It is also important that the practical aspects of actually achieving the aspirations embodied in the policy continue to be worked up. The requirement to include live/work space in new residential development is welcomed.</p>
<p>Development Policy H ‘Re-using Land’ Page 47 Support</p>	<p>The SWRDA supports the target to achieve at least 50% of new development on previously developed land as set out in this policy.</p>
<p>Development Policy I ‘Release, Redevelopment or Disposal of Land’ Page 47 Oppose</p>	<p>Land in the ownership or control of public bodies / organisations can provide valuable means to help deliver the RSS. However, the SWRDA is unsure as to the purpose of this policy in the way that it is currently worded. It appears only to state that the release, redevelopment or disposal of publicly owned land should accord with the provisions of the RSS. This presumably is true of all land, regardless of ownership. The SWRDA therefore cannot understand what value this policy is adding. Equally clarification is sought in terms of the ‘sequential approach’ referred to in the policy.</p>
<p>Development Policy J ‘Joint</p>	<p>The SWRDA supports the recognition of the need for joint working in these areas. This is</p>

<p>Working' Page 48 Support</p>	<p>more likely to reflect functional areas of economic activity which span administrative boundaries. This should form a critical element of the Implementation Plan accompanying the Strategy.</p>
<p>Omission Policy with regard to 'Areas of Search'</p>	<p>Summary</p> <ul style="list-style-type: none"> • The need for the Strategy to include a specific policy to guide the development of the Areas of Search. <p>Explanation</p> <p>The Strategy identifies a total of 19 Areas of Search with regard to future expansion of the SSCTs. Clearly they will accommodate a substantial quantum of development and it is vital that their contribution to the achievement of sustainable development is maximised. The SWRDA believes that this section of the Plan should include a specific policy setting out the ambitions for the future development of these areas.</p> <p>Change Sought</p> <p>Introduce a policy to guide the future development of the Areas of Search. Specifically this should include requirements <i>inter alia</i> that they:</p> <ul style="list-style-type: none"> • Will be exemplars of sustainable development including being carbon neutral; • Achieve the highest standards of design with a focus on mixed use development; • Make a substantive contribution to the achievement of employment targets including through the identification of strategic employment sites; • Contribute to wider economic development objectives including diversifying local economic structures and meeting the needs of key business sectors; • Support wider regeneration objectives including in terms of town/city centre regeneration and with regard to adjacent areas;

- Make provision for further and higher education uses.

The policy should also emphasise that the future development of these areas should be guided by the preparation of bespoke Area Action Actions Plans. This should form an important part of the Implementation Plan accompanying the Strategy.

<u>Section 4</u>	<u>Sub-regional Strategy Statements and Housing Distribution</u>
Policies for the SSCTs generally Oppose	<p>Summary</p> <ul style="list-style-type: none"> • The need for the employment figure for the individual SSCTs to be derived from the top end of the RES GVA range and for these expressed as a minimum. • The need for the individual SSCT policies to be more explicit about the types of actions that to need to happen in order to facilitate and achieve the successful delivery of the policy. <p>Explanation</p> <p>The SWRDA welcomes the fact that the policies setting out the future development of the individual SSCTs include specific figures for the growth in employment. These are derived from the spatial interpretation of the RES GVA scenarios undertaken by Cambridge Econometrics. There is, however, considerable variation in the approach. For example the figure for Exeter is derived from the 3.2% growth scenario and is expressed as an ‘about’ figure. For Bristol the same scenario is used but is expressed as an ‘at least’. Conversely for Bath and Weston-super-Mare a range is given between the 2.8% and 3.2% figures. In other places, notably Plymouth, a locally derived figure is used which is significantly above the Cambridge Econometrics benchmark figure.</p> <p>It would be helpful if there were greater consistency in the way that the employment figures are set. SWRDA’s preference would be to use the 3.2% figure and for this to be expressed as an ‘at least’. This would reflect the fact that the SSCTs are the key economic engines in the region. The locally derived figures, notably for Plymouth, could be added in to this approach where they are in excess of the 3.2% ‘benchmark’ figure. This would in effect present an ‘enhanced’ growth scenario which accords with Government guidance (Guide to Improving the Economic Evidence Base Supporting Regional Economic and Spatial</p>

	<p>Strategies, ODPM, September 2005). This should then be used to determine the basis for the overall approach to future development including housing and infrastructure provision.</p> <p>In this respect the individual policies for the SSCTs should be more explicit about the types of actions that to need to happen in order to facilitate and achieve the successful delivery of the policy, for example a step change in the economic performance of Plymouth or Torbay. The SWRDA is aware of a wide variety of work that is being undertaken at the local level, the headline actions of which could usefully be included in the individual policies. This should include strategic employment, retail and education provision, neighbourhood renewal and cultural and transport infrastructure provision. Whilst the policies are usually accompanied by a list of the key infrastructure improvements that will be required, the headline actions also need to be included in the main body of the text. This will help to ensure a good degree of synergy with the Spatial Annex to the RES. Equally this should be followed through into the Implementation Plan accompanying the Strategy.</p> <p>Change Sought</p> <ul style="list-style-type: none"> • Amend the SSCT policies to ensure that the employment figures are derived from the top end of the RES GVA range and that these are expressed as a minimum. • Add further detail to individual SSCT policies so as to ensure that they are more explicit about the types of actions that to need to happen in order to facilitate and achieve the successful delivery of the policy.
<p>Policy SR1 Page 55 Oppose</p>	<p>The SWRDA supports the general approach to the future development of the northern and central parts of the region. It is important however that this also reflects the functional economic zones as contained at Section 8 of the Strategy. This is particularly important where the RSS sub-regional approach effectively splits individual function economic zones and the settlements. Exeter, Torbay and Plymouth are prime examples of this. It is also important that this approach recognises the potential economic dynamics of particular places</p>

	separated by local authority boundaries such as with regard to north and south Bristol and Weston Super Mare.
Inset Diagram 4.1 West of England Page 55 Oppose	The SWRDA believes that the Avonmouth/Sevenside area should be specifically identified for strategic employment development in the inset diagram. This would help to acknowledge the importance of this area to the ongoing development of the sub-region.
Policy SR3 Page 57 Oppose	<p>Bristol Port and Airport are critical pieces of infrastructure that are of both regional and national significance. The Policy makes provision for the partial rolling back of green belt boundaries at these locations in order to support their ongoing role and development. The SWRDA is concerned that this provision is not based on a full appreciation of the likely development needs over the period to 2026. For example, the proposed extension to the green belt to the west of Royal Portbury Dock reflects the Local Plan position which only considers the period to 2011 rather than the next 20 years. It is also inconsistent with policy TR8 of the Regional Transport Strategy.</p> <p>The SWRDA considers that this policy should be amended so as to ensure that the future development needs of both the port and the airport can be fully met. This includes taking account of the emerging airport masterplan as well as the need to agree a long term development plan with the port company.</p>
Policy SR4 Page 58 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • The need for the Strategy to adopt a more positive and ambitious policy for the future development of Bristol. • Include specific reference to supporting the development of key sectors. • Include an objective to realise the economic potential of the Avonmouth/Sevenside area. • Include reference to the importance of improving cultural and sporting facilities, notably in the city centre and south Bristol.

- Include reference to completing the South Bristol ring road.

Explanation

The SWRDA supports the recognition of Bristol's Core City status in this policy. Bristol is the economic powerhouse of the region and is also significant in national terms. It has the potential to play a more significant role in the future. The SWRDA supports the reference to making provision for at least 92,000 jobs in this respect.

This should be supplemented by specific reference in the policy to supporting the development of key sectors including creative industries, ICT, professional services, defence and aerospace and advanced engineering. This should include promoting the spatial linkages between businesses and knowledge intensive institutions such as HE and FE Institutions through appropriate site provision. The aviation/defence cluster in the north Bristol area, of which the forthcoming Science Park (S Park) is a key element, is of particular importance and should be specifically referenced in the policy.

Reference is made in paragraph 4.2.13 to realising the economic potential of the Avonmouth/Sevenside area. This should also be a specific objective of the policy as should supporting the development of the role of both the port and the airport. Equally no reference is made in the policy to the importance of improving cultural and sporting facilities, notably in the city centre and south Bristol. Specific reference should also be made to the importance of completing the South Bristol ring road.

The SWRDA is concerned that there is an existing divergent trend between Bristol's role as an economic powerhouse and the scale of housing provision. This is recognised in the SSA accompanying the draft RSS (see Table 10.6). It is considered that the policy as currently drafted is more likely to accentuate this trend rather than to address it and that it underplays the significance of Bristol as a key growth area. It has one of the lowest ratios of new

	<p>dwelling provision to employment increase for example.</p> <p>The SWRDA considers that the approach to the future growth and development of Bristol is fundamental to the success of the region as a whole. It is therefore imperative that a positive policy stance is adopted to further augment this role and to realise the vision of Bristol becoming a major European city. This should cover the full range of issues and stipulate the specific delivery activities necessary to achieve this role including those detailed above. The fact that this is currently considered to be lacking is a major cause for concern.</p> <p>Change sought</p> <ul style="list-style-type: none"> • Adopt a more positive and ambitious policy for the future development of Bristol. • Include specific reference to supporting the development of key sectors. • Include an objective to realise the economic potential of the Avonmouth/Sevenside area. • Include reference to the importance of improving cultural and sporting facilities, notably in the city centre and south Bristol. • Include reference to completing the South Bristol ring road.
<p>Policy SR5 Page 59 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Reconsider policy so as to achieve a better alignment between jobs and houses. <p>Explanation</p> <p>Bath is a key economic driver within the West of England sub-region. The SWRDA believes that the policy should refer to the provision of 'at least' 20,200 jobs and that this should be followed through in to other aspects of the policy, notably housing provision. Specific reference should be delivering sustainable sites and premises for business growth,</p>

	<p>especially in terms of leisure and tourism in order to augment the city's World Heritage City Status.</p> <p>The policy as currently framed would result in Bath having one of the lowest ratios of houses to jobs in the region. It is difficult to see that this approach would result in a better alignment of jobs and houses particularly given the existing travel to work imbalance identified in Table 10.6 of the SSA.</p> <p>Change sought</p> <ul style="list-style-type: none"> • Reconsider policy so as to achieve a better alignment between jobs and houses
<p>Policy SR6 Page 60 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Amend policy so as to refer to 10,000 jobs and to express this as a minimum • Express the proposed level of housing development as a maximum • Ensure that the policy is more closely aligned with the Spatial Annex to the RES <p>Explanation</p> <p>The SWRDA supports this policy's endorsement of the work that has been undertaken to prepare the vision for Weston-super-Mare and the subsequent Area Development Framework. Redressing the current imbalance between the location of employment and housing so as to correct existing unsustainable commuting patterns is a fundamental aspect of the future development strategy for Weston which will require considerable investment. The statement that strategic releases of new housing areas should only be provided where it can be demonstrated that an increasing rate of employment provision has brought employment and housing more closely into balance is supported. It is important that appropriate mechanisms are put in place to achieve this. In this respect the SWRDA considers that the</p>

	<p>policy should refer to the creation of at least 10,000 jobs and a maximum of 12,000 houses.</p> <p>Change sought</p> <p>In order to ensure that the policy is more closely aligned with the Spatial Annex to the RES, the SWRDA considers that the policy should also include the following objectives:</p> <ul style="list-style-type: none"> • Improving skill levels particularly in terms of talking basic skills attainment in areas of multiple deprivation; • Providing sites and premises for high growth businesses and enterprises in new and emerging sectors to diversify the town’s economic structure and address out commuting; • Developing the role of Worle public transport interchange and improving linkages with the Airport. <p>The policy should also refer to the creation of at least 10,000 jobs and a maximum of 12,000 houses.</p>
<p>Policy SR7 Page 63 Oppose</p>	<p>The SWRDA supports the broad thrust of this policy. It would be helpful if the reference to improving the skills base could be extended so as to include the following text;</p> <p>‘especially in high technology and knowledge based sectors to meet business needs’.</p>
<p>Policy SR8 Page 64 Support</p>	<p>Summary</p> <ul style="list-style-type: none"> • Amend policy to express 32,000 jobs as a minimum. • Include specific reference to supporting the development of key sectors. • Include an objective to improve HE provision and support NMSI Wroughton. • Recognise the potential for linkages with the South East.

	<p>Explanation</p> <p>The SWRDA supports the main provisions of this policy which recognise Swindon’s status as a major economic driver in the region and a key growth area in The Way Ahead. It would be helpful if reference could be made to ‘at least’ 32,000 jobs to more accurately reflect this role.</p> <p>Change sought</p> <p>This should be supplemented by the following policy objectives:</p> <ul style="list-style-type: none"> • Provision of quality sites and premises to develop key sectors including Biotechnology, ICT, automotive and Business Services and the knowledge-based industries including through incubators linked to centres of learning and R&D facilities; • Augment the higher education presence in the town; • Support the development of the NMSI Wroughton; • Investment in public realm improvements in the NSC area. <p>It would also be helpful if the policy could recognise the potential for increased economic linkages with the South East region.</p>
<p>Policy SR9 Page 64 Support</p>	<p>The SWRDA supports this policy and particularly reference to the Regeneration Framework prepared by the New Swindon Company. It is vital that urban extensions actively help to support the regeneration of the town centre.</p>
<p>Policy SR10 Page 67 Support</p>	<p>The SWRDA supports this policy in that it recognises the functional economic linkages between Cheltenham and Gloucester and the need for them to be considered together.</p>

<p>Policy SR12 Page 68 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Include reference to the retail, cultural and FE / HE benefits of regeneration of the city centre and docks • Amend policy to include reference to a minimum of 12,750 jobs. • Include specific reference to supporting the development of key sectors. <p>Explanation</p> <p>The SWRDA supports the main provisions of this policy including the reference to the Gloucester Heritage Urban Regeneration Company. Regeneration of the city centre and docks area will help to support improved retail, cultural and FE / HE provision. This should be a specific objective of the policy. It is vital that the proposed urban extension actively helps to support regeneration of the centre. The reference to appropriate phasing is therefore welcomed.</p> <p>Change sought</p> <p>The policy should make specific reference to the improved retail, cultural and FE facilities arising from regeneration of the city centre and docks area. Given Gloucester's role as a key economic driver the policy should refer to 'at least' 12,750 jobs for the development. This should also include reference to developing key sectors, particularly aerospace and advanced engineering, bio-medical and healthcare and ICT.</p>
<p>Policy SR13 Page 69 Support</p>	<p>Cheltenham is an economic driver for the region and is identified as a key area in The Way Ahead along with Gloucester. Projections illustrate, however, that if current trends continue, Cheltenham would make a declining contribution to the regional economy. This is clearly an undesirable trend for one of the region's largest urban areas. The need to address this situation should be specifically recognised in the policy. The reference should be to 'at least'</p>

	<p>10,750 jobs. This should also address ongoing issues, such as the identification of strategic employment sites, as a priority. This should include consideration of the role of the proposed Area of Search.</p>
<p>Policy SR15 Page 72 Support</p>	<p>The SWRDA supports the provisions of this policy.</p>
<p>Policy SR16 Page 72 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA is concerned that the policy, as currently framed, will underplay the role of Exeter as a key economic driver. • Amend policy to bring the location of employment and housing into alignment, including bringing forward the second strategic urban extension. <p>Explanation</p> <p>Exeter is a key economic driver for the south and west of the region. Its role and status is recognised in The Way Ahead. Research has indicated that it has the potential to play a more significant role in the future. The figure for employment should therefore be expressed in terms of it being a minimum.</p> <p>The SWRDA is concerned that the policy as currently framed will underplay the role of Exeter as a key economic driver. Analysis in the SSA reveals that Exeter has the second highest imbalance in terms of travel to work trips of any settlement in the region. Equally it has one of the lowest ratios of new housing provision to likely future employment supply. It is therefore difficult to understand how the location of employment and housing can be brought back in to alignment through the current policy.</p>

	<p>This is a significant concern for the SWRDA. At the very least the proposed second strategic urban extension identified in the policy will need to come forward immediately.</p> <p>Change sought</p> <ul style="list-style-type: none"> • The figure for employment should be expressed as a minimum. • Specific reference should also be made to the proposed development of a Science Park at Exeter which is related to the presence of the University, Met Office and Peninsula Medical School.
<p>Policy SR17 Page 74 Support</p>	<p>The SWRDA supports the provision of this policy.</p>
<p>Policy SR18 Page 75 Support</p>	<p>The SWRDA supports the provisions of this policy although evidence suggests that the approach for Exeter set out in policy SR16 will not result in more appropriate balance between labour and housing markets.</p>
<p>Policy SR19 Page 75 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Newton Abbot has the potential to support the regeneration of Torbay and should therefore be recognised as an SSCT. • Amend reference to reducing the level of development in the latter part of the plan period <p>Explanation</p> <p>Newton Abbot occupies a pivotal position on the Exeter/Torbay axis. These two settlements have experienced contrasting fortunes in recent times, Exeter has witnessed a step change in its economic performance and is now a beacon for inward investment. Torbay on the</p>

	<p>other hand has witnessed ongoing decline as a result of pronounced structural issues and it now has the lowest GVA/head of any NUTS3 area in the region.</p> <p>Newton Abbot has the potential to contribute to the achievement of wider regional objectives including supporting the regeneration of Torbay, but further evidence is required to better understand the economic dynamics between Exeter, Torbay, Newton Abbot and Plymouth to ensure there is a positive framework for investment and intervention. The SWRDA intends to commission further research in this respect.</p> <p>Change sought</p> <p>The SWRDA believes that Newton Abbot should be recognised as a SSCT accordingly. Equally the strategy to reduce the level of development in the latter part of the plan period as set out in paragraph 4.2.55 should be amended.</p>
<p>Policy SR20 Page 76 Support</p>	<p>The SWRDA supports the provisions of this policy.</p>
<p>Policy SR21 Page 77 Support</p>	<p>The SWRDA supports the provisions of this policy including the emphasis placed on regeneration of the central area which will be fundamental to achieving the overall vision for Taunton. This should also include reference to improving productivity levels by supporting the development of key sectors including ICT, tourism, biotechnology, environmental technologies and creative industries.</p>
<p>Policy SR22 Page 79 Oppose</p>	<p>The SWRDA considers that this policy should also make reference to diversifying the local economy by supporting the development of high technology and knowledge based sectors including ICT. This will help to achieve the objective of securing greater self containment for Chippenham.</p>

<p>Policy SR23 Page 79 Oppose</p>	<p>The SWRDA considers that this policy should also make reference to supporting the delivery of the vision that has been developed for Trowbridge. This should include the progressive restructuring of the town's economy supported by skills development, to help attract and retain business, and investment in the public realm.</p>
<p>Policy SR25 Page 80 Oppose</p>	<p>The SWRDA considers that this policy should also be grounded in a robust appreciation of functional economic linkages in the area on both an intra and inter regional basis. This includes the proposals for significant growth in the urban south Hampshire area as promoted in the South East Plan.</p>
<p>Inset Diagram 4.6 South East Dorset Page 81 Oppose</p>	<p>The SWRDA considers that the notation for the Areas of Search N, O, P and Q should also include the employment symbol so as to reinforce the emphasis being placed on mixed use development.</p>
<p>Policy SR27 Page 82 Support</p>	<p>The SWRDA supports the provisions of this policy (subject to further clarity re policy objectives) including to exclude land at Bournemouth International Airport from the green belt. This will allow the Airport to develop its role in accordance with the Aviation White Paper and will also help to facilitate the delivery of the associated strategic employment site.</p>
<p>Policy SR28 Page 83 Oppose</p>	<p>Research has illustrated that the Bournemouth/Poole/Christchurch conurbation has considerable economic potential. This is reflected by the conurbation's status as a key area in The Way Ahead. The policy recognises that economic potential should not be restricted and also highlights the importance of the environmental designations. It is unclear as what the strategy for the conurbation actually is. The accompanying paragraph refers to strengthening and developing its role without ever really explaining what this is or should be.</p> <p>Equally the SE Plan contains proposals for significant growth in the urban South Hampshire area. This is likely to impact on the future growth and development of the conurbation and wider SE Dorset area although this does not seem to be either recognised or taken in to</p>

	account in the Strategy.
<p>Policy SR29 Page 85 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Reconsider the policy approach to ensure better alignment between the location of employment and housing. • Amend policy to make specific reference to supporting the development of the port and airport. • Include specific reference to supporting the development of key sectors. • Make provision for the forecasted growth in requirements for retail and office space. • Amend policy to consider linkages with urban South Hampshire. <p>Explanation</p> <p>Research has indicated that the Bournemouth/Poole/Christchurch conurbation has considerable economic potential and has exhibited a growing influence over the wider SE Dorset area in recent times. The SWRDA is concerned that the approach adopted to the conurbation will not result in a better alignment between the location of employment and housing. This approach needs to be reconsidered in the light of a clearer articulation of what the Strategy is trying to achieve.</p> <p>The SWRDA considers that supporting the ongoing development of the airport, including the adjacent strategic employment site and necessary infrastructure improvements, and the port should be a specific objective of the policy. In terms of the former, two scenarios should be considered in assessing and planning the availability of employment land in the SE Dorset area over the RSS period. One should assume that the link road can be provided so as to fully realise the employment opportunity. A second alternative scenario would be without the link road thereby providing more limited employment development at the Airport based on upgrades to existing road infrastructure. This would require additional alternative sites to be identified.</p>

	<p>This policy should also include an objective to support the development of key sectors (including clusters of business activity in marine and environmental technologies in Poole for example) which is allied to the text in paragraphs 4.3.6 and 4.3.7.</p> <p>Research has also illustrated that there is will be significant demand for retail, leisure and office space in the area over the next 20 years. This includes potentially doubling retail provision and forecast demand is also significantly above historic growth rates for office space. Responding to these challenges is a major issue for the ongoing development of the SE Dorset area and the policy should provide specific objectives in this respect.</p> <p>The approach to SE Dorset should also consider linkages with the urban South Hampshire area where the SE Plan proposes significant future growth. It would also be helpful if the policy emphasised that the Areas of Search will deliver mixed use development, including employment, rather than purely housing. The SWRDA supports Area of Search Q which will deliver 20 Hectares of employment land to the west of Ferndown.</p> <p>Change sought</p> <ul style="list-style-type: none"> • Amend the policy to include as a specific objective supporting the development of the port and airport. • Include specific reference to supporting the development of key sectors • Amend the policy to include objectives to respond to the challenges of growing retail and office sectors. • Policy approach should be amended to better reflect linkages with urban South Hampshire.
<p>Policy SR30 Page 86</p>	<p>The SWRDA considers that the strategy for the future growth and development of Salisbury should also consider the relationship with the growth proposals for the urban South</p>

Oppose	Hampshire area contained in the SE Plan.
Policy SR31 Page 87 Oppose	The SWRDA broadly supports the provisions of this policy. The policy should also make specific reference to capturing the full benefit from the 2012 Olympics. This will help to achieve the overall thrust of the policy in terms of broadening and strengthening the economic base of Weymouth for example.
Policy SR32 Page 88 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • Adopt an approach that appreciates the area’s functional economic linkages, especially those between Exeter, Plymouth and Torbay. • Include reference to facilitating successful delivery of European Structural and Convergence Funding <p>Explanation</p> <p>The SWRDA supports the broad thrust of this policy in terms of seeking to stimulate economic activity and to transform and revitalise Plymouth. It is essential that the approach to the western part of the Peninsula is rooted in a robust appreciation of functional economic linkages in the area, particularly where these span sub-regional boundaries. Notably this includes the linkages between Exeter and Plymouth and Torbay.</p> <p>Change sought</p> <p>In this respect the approach should reflect the functional economic zones included in Section 8 of the Strategy. It would be helpful if the policy could also specifically refer to Torbay which now has the lowest GVA/head of any NUTS3 area in the region. Equally reference should be made to facilitating the successful delivery of European Structural and Convergence Funding.</p>

Policy SR33 Page 89 Support	The SWRDA supports the provisions of this policy.
Policy SR34 Page 90 Supports	The SWRDA supports this policy and in particular the recognition of the need to deliver a step change in the performance of Plymouth. This accords with the recognition of Plymouth as a key growth area in The Way Ahead. The step change will require significant and sustained investment for it to be achieved.
Policy SR35 Page 91 Oppose	<p>Summary</p> <ul style="list-style-type: none"> • The policy should be more explicit about how the step change will be delivered. • It should support the growth of knowledge based sectors, based on an enterprising culture and appropriate skills. • The policy needs to address the issue of worklessness to allow residents to benefit from the expected growth. • The growth of Plymouth must be supported by commensurate transport improvements. <p>Explanation</p> <p>The SWRDA supports the broad thrust of this policy. However the policy should be more explicit about the types of measures that will be necessary to ensure that the step change in economic performance is actually delivered. Specific reference should be made to supporting the delivery of the Plymouth Economic Strategy in this respect.</p> <p>The policy should specifically recognise the economic importance of the continued development of the University (including incubation facilities), hospital, Peninsula Medical</p>

School, Tamar Science Park and the Plymouth Medical and Technology Park as well as the potential offered by the Langage strategic employment site. A specific objective should also be to support the growth of knowledge based sectors including advanced engineering, creative industries, marine industries, medical/health care, biotechnology, business services and tourism and leisure.

This should be supported by an emphasis on entrepreneurial culture change together with accompanying increases in skill attainment. This will support an increased rate of business start ups and specific provision should be suitable premises to meet the needs of small business.

Worklessness should be identified as a specific issue which the policy is seeking to address. Reference should be made to supporting initiatives such as the Neighbourhood Renewal and Local Economic Growth Initiative. This will allow the residents to benefit from the anticipated growth.

Finally it is essential that the future growth of Plymouth is supported by commensurate transport improvement. The improvements identified in paragraph 4.4.10 should be specific policy objectives in this respect and these should also be followed through in to the Implementation Plan accompanying the Strategy.

Change sought

Amend text so as to:

- Include specific reference to the Plymouth Economic Strategy;
- Support the growth of knowledge based sectors together with the entrepreneurial culture and skills required to develop these sectors;
- Address the issue of worklessness to ensure residents can benefit from the growth;
- Include transport improvements as specific policy objectives.

<p>Policy SR36 Page 94 Oppose</p>	<p>The SWRDA supports this policy including the recognition of the need to deliver a step change in the performance of Torbay. It would be helpful if the policy could also detail the headline activities that will be needed to deliver this step change. This should take a lead from the regeneration framework being prepared on behalf of the Torbay Development Agency. This should include further developing the role of South Devon College and building on the success of harbourside and waterfront regeneration currently underway.</p>
<p>Policy SR38 Page 96 Oppose</p>	<p>The SWRDA welcomes the fact that this policy recognises that the Cornwall and the Isles of Scilly have been identified for Convergence Funding in the period 2007-2013. The policy should specifically aim to support the successful deployment of this funding and should include some of the headline actions from the Operational Programme when they are known. This will help to facilitate their delivery through LDFs etc.</p>
<p>Policy SR40 Page 98 Oppose</p>	<p>The SWRDA supports the approach of the RSS in considering the future growth and development of Falmouth/Penryn, Camborne/Pool/Redruth and Truro in the same policy as this reflects the functional relationships between them. However it is also important that the policy differentiates between them. For Truro the policy should recognise its predominant retail and service role as well as the need to capture the opportunities provided by the presence of the hospital (including the Peninsula Medical School and proposed Medi Park) and CUC and College. For CPR the need to strengthen communities and diversify the economic base should be recognised including through the provision of sites for potential growth sectors including environmental technologies, education, retail and business services. Specific reference should also be made to enhanced health and sports provision as well as critical transport infrastructure improvements. For Falmouth an objective of the policy should be to capture opportunities arising from the CUC hub at Tremough and to support the ongoing development of the role of the Port.</p>

<p>Policy SR43 Page 100 Oppose</p>	<p>An important ingredient in stimulating the economy in north Devon will be raising skills levels. This will require enhanced further education provision. This should be specifically promoted as an objective of the policy.</p>
<p>Policy HD1 Page 101 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA is concerned that the strategy currently underplays the role of the SSCTs. • The overall level of housing provision is significantly below the anticipated level of employment growth in many areas. • The strategy needs to consider issues of affordable rural housing which may result in higher housing numbers for some rural settlements. • An alternative distribution is proposed, based on higher levels of housing in the region. <p>Explanation</p> <p>The SWRDA has raised concern about the overall scale of development and whether this is sufficient to support the sustainable economic development of the region. Coupled with this is a concern that the proposed distribution will not bring the location of employment and housing in to better alignment which is a key objective of the strategy. In particular the SWRDA considers that the Strategy, and hence the distribution of housing, currently underplays the role of the SSCTs. The overall level of housing provision is significantly below the anticipated level of employment growth with pronounced disparities evident in particular settlements, notably Bristol and Exeter.</p> <p>Equally the distribution needs to consider the implications of the recent Rural Affordable Housing Commission report. This report specifically suggests that larger numbers will be</p>

needed in rural towns, including market towns.

Change sought

The SWRDA considers that an alternative development strategy should be considered which builds on the current approach and which:

- is predicated on a higher level of housing provision in the region;
- helps achieve better alignment between jobs and housing;
- supports the key economic role of SSCTs;
- responds to recent DCLG household projections; and
- considers and responds to the implications of the recent Rural Affordable Housing Commission report, which may lead to high housing number for some market towns and rural settlements.

<u>Section 5</u>	<u>The Regional Approach to Transport</u>
Paragraphs 5.2.6/7 Page 112 Oppose	<p>This section of the text could draw on the lessons from the Access West research which was undertaken by Forum for the Future to supplement the Greater Bristol Strategic Transport Study, but which could be applied in a generic sense across the region. This work concluded that although many of the good ideas for modal shift are already out there, what is holding stakeholders back from moving beyond small scale success is frequently the scale and co-ordination of effort that is required; i.e. issues of governance, funding, leadership, public awareness and legislative arrangements.</p>
Policy TR1 'Demand Management and Public Transport in the SSCTs' Page 113 Oppose	<p>The SWRDA believes that this policy should refer to new and innovative approaches that are required alongside demand management and a step change in public transport. The policy should encourage local authorities in the SSCTs to pursue 'soft measures' to complement capital investments. This might include:</p> <ul style="list-style-type: none"> • Significant and increased effort in marketing and awareness raising; • Working with employers and schools; • Innovative approaches to land use planning such as Homezones; • New and improved information and integrated ticketing for public transport; • Investigating greater use of ICT technologies; • Possible new approaches to government. <p>Encouraging local authorities to place CO2 reductions at the heart of transport strategy through option development and scheme appraisal may result in different and innovative strategies and proposals emerging which would more fully help to deliver policies SD1 to SD4 of the draft RSS.</p>
Policies TR7 and TR8 'Ports'	The regional approach to Ports should be reviewed in light of the National Ports Review and

<p>Page 120 Oppose</p>	<p>policy framework which emerges. Support for the region's ports might be strengthened by encouraging the preparation of port masterplans to be agreed by local and regional partners working in collaboration with each port. In the case of Bristol Port, it is important to ensure consistency between Policy TR8 and Policy SR3 in that the land referred to in Policy SR3 should help deliver Policy TR8. Where it does not do so, working with the Port and local authority, an alternative strategy must be developed.</p> <p>The National Ports Review is also considering the issue of surface access. In our view, national policy could set a framework approach for identifying important port corridors. If this were to happen, a regional approach might usefully build on the work undertaken to produce the regional freight map, identifying rail links to ports and a further map developing the strategy for both road and rail networks.</p>
<p>Policy TR9 'Airports' Page 122 Support</p>	<p>The SWRDA considers that the Regional Transport Strategy should set out a clear policy to promote sustainable aviation in the region. This include the following:</p> <ul style="list-style-type: none"> • A vision for sustainable aviation in the region; • A baseline of the assessment of regional aviation's contribution to the South West's economy, society and environment; • An agreed set of actions which acknowledges the role of airports and aviation growth as a reality and which seeks to work with airports, air travel companies and aerospace / advanced engineering businesses to manage and reduce the impact on the environment.
<p>Policy on Rural Accessibility Omission</p>	<p>The Regional Transport Strategy does not contain a specific policy or guidance setting out the approach to rural accessibility. The SWRDA considers there is a case for setting out an integrated approach to rural areas, across authority boundaries, building on the lessons from research already undertaken by the Assembly. A specific regional approach policy should cover the following;</p>

	<ul style="list-style-type: none"> • Encouragement for local authorities to develop their Accessibility Plans with partners to consider needs and identify both ‘services to people’ and ‘people to services’ solutions in liaison with strategic partners and local community groups. • Require consideration of links between villages and from villages and towns to larger settlements which is consistent with the strategies being pursued for individual SSCTs • Encourage a range of innovative and adaptable transport solutions appropriate for rural areas with a dispersed population and a poor highway infrastructure • Ensure that public transport provision in rural areas is fit for purpose to meet local needs and tackle disadvantage arising from a lack of accessibility
Reference to the role of ICT Omission	<p>The SWRDA believes that the roll out and use of ICT will have growing significance on living and working patterns and the subsequent need to travel. It should therefore be the subject of a specific reference in the RTS. This should cover the following:</p> <ul style="list-style-type: none"> • Aligning with and helping to deliver the Regional ICT Strategy; • Improving the regional coverage of broadband infrastructure, particularly in rural and peripheral areas; • Promote the take up and use of ICT so as to reduce the need to travel, reduce congestion, tackle climate change and support the creation of sustainable communities; • Link with the provision of relevant training and skills in the workplaces together with ICT support for new businesses; • Promote the development of ICT enabled sites, premises and facilities suitable to support changing and flexible working practices and home based businesses; • Using ICT to improve access to work and services thereby increasing social inclusion.

<u>Section 6</u>	<u>Harnessing the Benefits of Population Growth and Managing the Implications of Population Change</u>
Paragraph 6.1.1 Page 128 Oppose	<p>This text illustrates that the overall level of housing provision is below the technical estimates of demand. In its response to section 2 the SWRDA emphasised that this in turn was below what is necessary to support the sustainable economic development of the region. The approach therefore is highly unlikely to result in ‘plentiful and affordable housing’ which the text in paragraph 6.0.1 acknowledges is a critical ingredient of sustainable communities.</p> <p>The SWRDA is extremely concerned that the approach of the RSS will lead to a further worsening of the affordability issues facing the region as illustrated in Map 6.1. Lasting economic success depends on having high quality and affordable housing. The problem of housing affordability is therefore a potentially significant barrier to economic growth. The current approach of the RSS is also contrary to The Way Ahead, a key priority of which is to address the shortfall in provision of new homes in the region.</p>
Policy H1 ‘Affordable Housing’ Page 131 Oppose	<p>Summary</p> <p>The SWRDA is extremely concerned that the approach of the RSS to the provision of affordable housing will continue to result in an under-supply.</p> <p>Explanation</p> <p>Lasting economic success depends on having high quality and affordable housing. The problem of housing affordability is therefore a potentially significant barrier to economic growth. The current approach of the RSS is unlikely to deliver the quantum of affordable housing needed to address current issues of lack of affordability and will be contrary to The Way Ahead, a key priority of which is to address the shortfall in provision of new homes in</p>

	<p>the region. This is likely to result in significant negative economic and social consequences.</p> <p>Change sought</p> <p>The SWRDA has suggested that RSS needs to make provision for a higher overall level of housing provision so as to support the sustainable economic development of the region. This will also bring pronounced social benefits by facilitating the development of higher levels of affordable housing.</p>
<p>Policy H2 'Housing Densities' Page 132 Support</p>	<p>The SWRDA supports the approach of encouraging higher density development in that this will help to make the most efficient use of land. However the SWRDA believes that setting densities of at least 50 dwellings per hectare will not necessarily result in mixed and balanced communities. It is important that the provisions of this policy are tested so as to ensure that this will not be the case.</p>
<p>Policy HE2 'Provision of Additional Healthcare Facilities' Page 136 Oppose</p>	<p>Whilst the SWRDA supports the overall thrust of this policy it is important that it also recognises the wider role of hospitals as key knowledge intensive institutions and the potential arising for associated development of the bio-medical sector arising from the provision of additional healthcare facilities.</p>
<p>Paragraph 6.2.12 Page 136 Oppose</p>	<p>The reference to the Framework for Regional Employment and Skills Action (FRESA) should be amended to the South West Skills Strategy.</p>
<p>Policy SK1 'Facilitating Access to Skills Training' Page 136 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA supports the principle of this policy but feels it could be amended to include two distinct policies around (respectively) skills and training and skills for employment.

	<p>Explanation</p> <p>Whilst the SWRDA supports the principle of the inclusion of this policy, it is considered that it could go further.</p> <p>Change sought</p> <p>The policy should focus on two specific areas which should be the subject of their own policies as follows;</p> <p><i>Skills and Training</i></p> <p>The policy should cover the following;</p> <ul style="list-style-type: none"> • Address issues of access to, quality of and progression through education and training provision • Assist delivery of capital programmes of Learning and Skills Councils and Further and Higher Education Institutions • Improve direct access to skills training provision through Local Transport Plans • Use education and training institutions and programmes to help tackle multiple deprivation and contribute to the achievement of successful regeneration • Ensure that education and training provision form an essential ingredient of major mixed use development proposals including the identified Areas of Search <p><i>Skills for Employment</i></p> <p>The policy should cover the following;</p>
--	---

	<ul style="list-style-type: none"> • Working with the Regional Skills Partnership, local employers and local learning partnerships to ensure that the skills needs of employers and individuals are met. • Facilitating the spatial linkages between employment opportunities, skills needs, business productivity and investment, and the needs of excluded communities. • Ensuring that opportunities provided by major new development are used to assist in skills action and the targeting of job opportunities to local communities • FE and HE establishments need to plan for an increase in demand for places on courses and continuous development in the workplace. • Ensuring sufficient and accessible premises are available for training and education to meet the requirements identified through relevant strategies including the RES and those of the Regional and Local Skills Partnerships.
<p>Policy LCF1 'Local Cultural Facilities' Page 137 Oppose</p>	<p>The SWRDA welcomes the inclusion of this policy. It is considered however that it should also refer to cultural infrastructure which is of sub-regional or regional significance although this appears to be covered by policy C1. The relationship between these two policies which fall in to two different sections of the Strategy could usefully be re-examined.</p>
<p>Policy GI1 'Green Infrastructure' Page 138 Support</p>	<p>The SWRDA supports the provisions of this policy which will help to strengthen the region's environmental capital and to develop the South West as a leading region for sustainable development.</p>

<u>Section 7</u>	<u>Enhancing Distinctive Environments and Cultural Life</u>
<p>Policy C1 'Regional and Sub-regional Cultural Infrastructure' Page 141 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA welcomes the policy but considers it should relate more closely to the Cultural Infrastructure Development Strategy. <p>Explanation</p> <p>The SWRDA welcomes the inclusion of this policy. It is considered however that it should refer to the provision of specific facilities the need for which has been identified in the Cultural Infrastructure Development Strategy. These should be detailed in the policy and also incorporated in the specific policies for SSCTs as appropriate. This would help to support culture led regeneration for example.</p> <p>Equally the policy should set out the approach to maximising the opportunities for the region arising from the London 2012 Olympics. This should include using the Olympics as a catalyst for the long term regeneration of Weymouth and Portland for example.</p> <p>Change sought</p> <ul style="list-style-type: none"> • Amend to include reference to specific facilities identified in Cultural Infrastructure Development Strategy. • Include the policy approach to maximising opportunities from the London 2012 Olympics.
<p>Paragraph 7.2.3 Page 143 Support</p>	<p>The SWRDA supports the recognition of the role of the environment as an economic driver in this section of the text. This accords with the RES.</p>

Policy ENV3 'Protected Landscapes' Page 146 Oppose	The SWRDA supports the broad thrust of this policy. However it considers that the third bullet point should refer to 'social and economic' well-being of communities.
Policy ENV5 'Historic Environment' Page 149 Oppose	The SWRDA believes that this policy could usefully recognise the potential for heritage-led regeneration in the region. There are already notable examples of this in the region including the Gloucester Heritage Urban Regeneration Company and the regeneration of Royal William Yard in Plymouth. The re-use of listed buildings for alternative uses will be a key means of ensuring their long term preservation and conservation.
Policy CO1 'Defining the Coastal Zone' Page 150 Oppose	The SWRDA considers that this policy should make specific reference to supporting the ongoing development of the role of ports in the region. These are a key interface in a marine context and the policy framework should support the delivery of the forthcoming Ports White Paper.
Policy CO2 'Coastal Planning' Page 151 Support	The SWRDA supports the provisions of this policy which will allow the region to respond positively to the proposals in the Marine Bill.
Paragraph 7.3.2 Page 154 Support	The SWRDA supports the recognition of environmental technologies as a key sector in the RES.
Policy RE1 'Renewable Energy Targets: 2010 and 2020' Page 155 Support	The SWRDA supports the provisions of this policy. Promoting a sustainable energy supply for the region is a key delivery activity for the RES. The challenging targets for the generation of electricity from renewable sources will make a significant contribution to the key objectives of the Strategy, including tackling climate change and reducing greenhouse gas emissions, and will also contribute to the ongoing economic development of the region.

<p>Policy RE2 'Coastal Zones and Offshore Energy' Page 156 Support</p>	<p>The SWRDA supports the provisions of this policy. The geography of the region means that the coastal zone presents a considerable opportunity for the development of offshore energy production. The Wave Hub proposals in Cornwall in particular illustrate that the South West could develop as a leading international region in this respect.</p>
<p>Policy RE3 'Renewable Heat Targets' Page 156 Support</p>	<p>The SWRDA supports the provisions of this policy.</p>
<p>Policy RE4 'Meeting the Targets Through Development of New Resources' Page 157 Support</p>	<p>The SWRDA supports the provisions of this policy.</p>
<p>Policy RE5 'Renewable Energy and New Development' Page 157 Support</p>	<p>The SWRDA supports the provisions of this policy.</p>
<p>Policy RE7 'Sustainable Land Management' Page 159 Oppose</p>	<p>One of the proposed delivery activities to secure a sustainable future for rural areas included in the RES is to develop a land use strategy to integrate food and energy production, tourism, forestry, environmental management and access to the countryside. The SWRDA therefore supports the inclusion of this policy in the Strategy. It would be helpful if the policy could be more explicit about the types of issues that sustainable land management will seek to integrate as well as giving clearer guidance on what is meant by 'area specific packages'.</p>

<p>Paragraph 7.4.3 Page 165 Oppose</p>	<p>Implementing the region's sustainable waste strategy is one of the specific delivery activities for the RES. SWRDA supports the approach to waste as set out in paragraph 7.4.1. It would be helpful if this paragraph could set out the scale of additional alternative infrastructure that will be required in order to achieve this approach. This will help to provide a real indication of the scale of the challenge facing the region.</p>
<p>Paragraph 7.4.4 Page 165 Oppose</p>	<p>Limited data is currently available with regard to the inter/intra regional movement of waste other than MSW and Hazardous. This paragraph could usefully include a proposal to quantify the about of waste moving into and from the region.</p>
<p>Policy W1 'Provision of Waste Sites' Page 166 Oppose</p>	<p>No explanation is provided in this policy or in the accompanying text of how the Appendix figures that are referred to have been calculated. Nor is a comparison with existing waste management capacity in each respective authority area provided. The figures therefore have to be taken at face value. A Waste Planning Authority dealing with a major planning application may therefore find it difficult to assess the need for any application in the absence of this baseline date. It is noted that the RTAB intend to conduct a survey of existing waste treatment/disposal capacity. The RSS could therefore make reference to current lack of available data and the need to take into account emerging and planned research and data collection.</p> <p>It would also be beneficial if the policy could give consideration to the possible added value of strategic or shared facilities which serve more than one Waste Planning Authority Area.</p>
<p>Policy W2 'Waste Facilities and the Waste Hierarchy' Page 167 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • Some amendments need to be made to this policy with regard to waste minimisation • The SWRDA is keen to ensure that the approach to waste facilities does not compromise the delivery of employment sites.

	<p>Explanation</p> <p>The first bullet point of this paragraph refers to waste minimisation, whereby waste should be managed on the site where it arises. This sentence is misleading and should be amended as waste minimisation refers to the prevention of waste at source, not the re-use or recycling of waste-on-site once they have been generated.</p> <p>Reference to the proximity principle should be qualified with ‘where appropriate’ as the proximity principle may not provide the most appropriate overall waste management option (e.g. for the management of hazardous wastes).</p> <p>The policy also identifies ‘established and proposed industrial sites’ as suitable for development of the required infrastructure. It is important that this approach does not compromise the development of commercial land which is being promoted for high employment density/high value uses and particular the portfolio of the best employment sites which result in the employment land review policies contained in section 8. The policy should therefore take into account the relationship with section 8 of the Strategy and the potential for conflict between waste facilities and employment uses. Where such conflict exists it will be important to ensure that the employment site is not compromised.</p> <p>Change sought</p> <ul style="list-style-type: none"> • Amend reference to waste minimisation to reflect its proper meaning. • Include ‘where appropriate’ within the text on the proximity principle. • Amend policy to take into account the relationship with section 8 (economy) and ensure that delivery of employment sites is not compromised by waste policy.
<p>Policy W3 ‘Hazardous Waste’ Page 168</p>	<p>It is questionable whether the policy as currently worded places sufficient emphasis on the need for additional alternative hazardous waste recovery/treatment/disposal capacity as</p>

Oppose	opposed to ensuring the continuing availability of landfill.
Policy W4 'Controlling, Re-using and Recycling Waste in Development' Page 169 Support	The inclusion of a policy on controlling waste arising through the lifecycle of a development is strongly supported. It would be helpful if this could also be cross-referenced to Policy RE12 and the need to promote the use or recovered or recycled aggregate.
Waste Management Section generally Oppose	The SWRDA considers that the waste section of the Strategy currently fails to convey the increasingly critical need for change in current practice, the associated need for new infrastructure and the potential economic and environmental impacts on the region is the targets set out in the Regional Waste Strategy are not achieved. Little reference is made to the need for disposal capacity for the residual waste arising from physical, chemical, biological or thermal treatment process or the need for the development of regional infrastructure, markets and supply chains for the increased quantities of recyclable materials that will need to be diverted from landfill in future. This is likely to be a particular issue for the South West given the geography of the region.

<u>Section 8</u>	<u>Enhancing Economic Prosperity and Quality of Employment Opportunity</u>
<p>Section 8 generally Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA considers section 8 to be essential to ensuring effective integration between the RSS and RES • The section should consider the wider spatial aspects of the economy such as promoting enterprise and innovation. An additional economy policy is therefore proposed. <p>Explanation</p> <p>The SWRDA considers section 8 to be a critical component of the Strategy and one which will help to ensure effective integration between the RES and the RSS. The SWRDA is grateful to the Regional Assembly for the opportunity to influence the development of this section. However it is considered that the section as currently drafted is very land use based in its orientation and would benefit from also considering some of the wider ‘spatial’ aspects of achieving the IRS aim, and as such meeting the requirements of PPS11 and previous proposals by the SWRDA. This includes promoting enterprise and innovation for example.</p> <p>Change sought</p> <p>The SWRDA believes that this shortcoming would be overcome, better integration achieved with other elements of the RSS and the relationship between the RES and the RSS improved if the following policy was included towards the front of section 8,</p> <p><i>Policy E1 ‘Successful and Competitive Businesses’</i></p> <p>Local Authorities working with SWRDA, other public sector organisations, the private sector</p>

and local authorities should include measures in their LDDs to;

- Guide investment to locations where it will have maximum benefit, recognising the role of the region's large urban areas as key drivers of productivity, the need to diversify the rural economy and to achieve successful regeneration;
- Ensure a range and choice of appropriate sites and premises to meet business needs, including a quota of smaller sites for micro, small and medium sized enterprises, to cater for both organic growth and inward investment;
- Facilitate the spatial linkages between skills development, business productivity, prosperity and sustainable communities;
- Promote innovation and the development of the knowledge driven economy harnessing the potential of Higher and Further Education Institutions, hospitals and other knowledge intensive institutions;
- Support the development of science parks, innovation centres and incubator units through the identification, provision and safeguarding of appropriate sites and premises;
- Support the development of priority business sectors (as identified in the RES), including clusters of related activity, and other key business sectors of importance sub-regionally;
- Support the development of a more entrepreneurial society with higher rates of business start ups, a larger number of smaller businesses and better business survival rates;
- Promote best practice and opportunities for businesses related to the region's unique cultural and environmental assets, including sustainable construction, climate change, resource efficiency and environmental technologies.

The SWRDA considers that this policy is an essential addition to section 8 which will help to articulate the objectives for the section as a whole as well as recognising the linkages with other sections of the Strategy.

<p>Paragraph 8.1.4 Page 172 Oppose</p>	<p>The text in this paragraph makes reference to a 'range of relatively high growth scenarios for GVA'. This is misleading. The 2.8% GVA reflects the average growth the region has experienced in the last 2 years. The 3.2% GVA scenario reflects improved performance in the last 10 years. This section of the text should be redrafted so as to put the growth scenarios in to their historic context also to emphasise that the predecessor to the draft RSS considerably under-estimated the level of economic growth that has been witnessed in the region.</p>
<p>Paragraph 8.1.5 Page 173 Oppose</p>	<p>The SWRDA supports the recognition of the role of key sectors in the region. The text should however be amended to reflect approach in the RES and particularly table 5 thereto.</p>
<p>Paragraph 8.1.7 Page 173 Oppose</p>	<p>The text in this paragraph should be updated so as to refer to the South West Regional Skills Partnership rather than the South West Enterprise and Skills Alliance.</p>
<p>Paragraph 8.2.3 Page 176 Oppose</p>	<p>The SWRDA considers that the text in these paragraphs should be updated so as to reflect the current situation with regard to the structural changes facing rural areas. This should allow synergies with the proposed additional Development Policy specifically geared towards rural areas.</p>
<p>Paragraph 8.3.1 Page 176 Oppose</p>	<p>The SWRDA considers that specific reference should be made in this paragraph to the need to cater for a larger number of smaller businesses. Equally the reference should be to 'key established and emerging business sectors'.</p>
<p>Paragraph 8.3.5 Page 177 Oppose</p>	<p>The SWRDA considers that specific reference should be made to the role of the Areas of Search in incorporating the provision of strategic employment sites. This would accord with the suggested policy to guide the future development of these Areas.</p>

<p>Policy E1 'Assessing Employment Land Provision' Page 178 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA welcomes a policy on providing sites and premises to meet business needs • It is considered that the policy should be redrafted as suggested to provide a clearer approach with more easily identifiable criteria. This would also replace Policy E2. <p>Explanation</p> <p>Delivering sustainable sites and premises for business growth is a specific delivery activity of the RES. The SWRDA therefore welcomes the inclusion of this important policy. However, the policy as currently worded is considered to be rather ambiguous. For example it implies that the inward investment needs of only small businesses should be considered.</p> <p>Change sought</p> <p>The SWRDA consider that the policy should be redrafted as follows to provide a clearer approach with readily identifiable criteria;</p> <p>Local Authorities working in partnership with SWRDA, other public and private sector representatives and sub-regional partnerships will ensure that LDDs provide for a range and choice of available employment land, sites and premises to meet the needs of business both in terms of organic growth and inward investment. A 20 year supply of employment sites, including strategic sites, will be identified to support;</p> <ul style="list-style-type: none"> • The ongoing development of the SSCTs including providing sufficient sites to accommodate the employment numbers identified in the individual policies in section 4; • A better balance between the location of jobs and housing including providing for
--	--

	<p>live/work space</p> <ul style="list-style-type: none"> • The ongoing restructuring and diversification of the economy including the rural economy • The successful delivery of economic development and regeneration initiatives • The development of key established and emerging business sectors including clusters of related activity • The development of the knowledge driven economy by fostering linkages with knowledge intensive institutions including HEIs/FEIs, hospitals and research institutions through the development of science parks, innovation centres and incubator units • The development of a smaller number of smaller businesses including smaller units for SMEs and micro-businesses • The role of airports and ports as economics drivers • The role of non B-use class sectors including health, leisure, tourism, and education as key employment generators including the delivery of icon projects • The contribution of mixed use development to employment supply <p>Sites should reduce the need to travel including maximising the use of ICT and sustainable transport modes. In identifying strategic employment sites consideration should be given to promoting on-site support facilities including access to child care and training facilities.</p> <p>The SWRDA considers that this policy would also form a replacement for Policy E2 'Identification of Employment Sites'</p>
<p>Policy E3 'Review of Employment Sites' Page 179 Oppose</p>	<p>The SWRDA supports the need to review employment sites on a three year rolling basis. This accords with the conclusions of the ODPM commissioned 'Planning for Economic Development' study. The policy should make reference to 'current and longer –term needs' so as to accord with the proposed 20 year supply requirement in policy E1. It is also considered that a further sentence should be added to the end of this policy which states</p>

	<p>that;</p> <p>'A portfolio of the best employment sites should be identified and should be preserved for such uses'.</p>
<p>Policy E4 'Redevelopment of Employment Sites' Page 179 Oppose</p>	<p>The SWRDA supports the sequential approach to the redevelopment of employment sites set out in this policy. However it is considered that the provisions of this policy could be added to the end of Policy E3 'Review of Employment Sites' to form one more rounded policy.</p>
<p>Policy TC1 'City and Town Centres' Page 183 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA supports the inclusion of a policy on city and town centres but considers that it should make specific proposals for addressing the forecasted step change in retail, leisure and office space requirements across the region. • These proposals should also be reflected in the corresponding policies for the SSCTs. <p>Explanation</p> <p>The SWRDA supports the inclusion of a policy on city and town centres. The DTZ study underpinning this policy highlighted the scale of the issue facing the region in terms of the step change in the provision of retail, leisure and office space. Indeed these figures were only predicated upon average (as opposed to strong) growth in GVA. Paragraph 8.4.9 refers to the challenge in making centre locations more attractive to occupiers. The more fundamental issue however is physically accommodating the sheer scale of development suggested by the DTZ study.</p> <p>This is considered to be a major issue for the region and one which this policy must provide practical guidance. This should address issues such as the SW not having a retail centre in</p>

	<p>the top 20 nationally and the relative decline in certain centres in the region. The SWRDA does not consider it sufficient for the explanatory text merely to state that work will continue with local authorities to determine how these forecasts can be accommodated and what they mean for the SSCTs.</p> <p>Change sought</p> <p>The SWRDA considers that policy TC1 should make specific proposals for addressing these issues and that these should follow through in to the corresponding SSCT policies in section 4.</p>
<p>Policy TO1 'Tourism', Policy TO2 'Safeguarding and Investing in Tourism Destinations' and High Profile Attractions' together with accompanying explanatory text.</p>	<p>The SWRDA supports the inclusion of specific policies with regard to Tourism which is a key sector for the region. The SWRDA together with South West Tourism consider that this section of the Strategy should however be re-written so as to more closely follow recent best practice guidance published by the DCMS. This should result in corresponding amendments to the three policies. A specific proposal has been put forward in this respect. Equally the Tourism element of the Strategy would fit more happily in section 7 and should be moved accordingly.</p>

<u>Section 9</u>	<u>Addressing Deprivation and Disadvantage to Reduce Intra-Regional Inequalities</u>
<p>Paragraph 9.2.4 'Statement of Priorities for Addressing Deprivation and Disadvantage in the South West' Page 194 Oppose</p>	<p>Summary</p> <ul style="list-style-type: none"> • The SWRDA supports this text but considers that, in order to ensure alignment with the RES, it requires definition in policy with specific reference to urban and rural initiatives. <p>Explanation</p> <p>Supporting areas with the greatest concentrations of multiple deprivation and supporting the communities of greatest need in rural areas are two of the specific delivery activities of the RES. The SWRDA supports the statement of priorities which accords with these activities and also identifies areas with a high degree of economic potential.</p> <p>The SWRDA considers that this statement would benefit from an accompanying policy or being turned in to a policy itself.</p> <p>Change sought</p> <p>Such a policy should support:</p> <ul style="list-style-type: none"> • Targeted regeneration programmes to address concentrations of deprivation; • Regeneration through the Urban Regeneration Companies; • Effective deployment of EU funding including the Convergence and Competitiveness programmes; • Regeneration of the towns as hubs of wider rural areas through programmes including the Market and Coastal Towns Initiative; • The creation of new social and community enterprises.

<u>Section 10</u>	<u>Ensuring People are Treated Fairly and can Participate in Society</u>
Policy SI1 'Equality Impact Assessment' Page 198 Support	A specific delivery activity for the RES is to encourage wider participation in enterprise. The use of Equality Impact Assessments is therefore welcomed. This will allow policies to be developed in full recognition of the diverse needs, circumstances and concerns of the people who will be affected by them.
Policy SI2 'Taking Account of the Needs of All Groups in Society' Page 198 Support	The SWRDA supports the provisions of this policy.

Strategic Sustainability Appraisal	
General	<p>The SWRDA supports the fact that the development of the RSS has been supported by an accompanying Strategic Sustainability Appraisal. The final SSA document continues to identify areas where the RSS might be improved. This includes in terms of articulating a more sustainable future for rural areas for example.</p> <p>The SWRDA has, however, consistently expressed concerns over the last 18 months about the basis upon which the appraisal has been undertaken. This applies particularly in terms of the future growth and development of the economy. There appears to be a desire to promote an alternative strategy which would result in a more economically inward looking South West where both national and international economic linkages are reduced. Indeed this is explicitly stated in para. 8.24. Equally there appears to be a desire to isolate/insulate existing SW businesses from competitive market forces and, as such, commit public bodies to significant additional subsidy and support for businesses. Short of some form of trade tariffs or barriers it is difficult to understand how this can be possible. It also runs contrary to the approach of the RES in terms of both encouraging regional businesses to trade internationally and attracting domestic and foreign direct investment. The SWRDA therefore considers the suggestion that this should form a reasonable alternative to the current Spatial Strategy as being unrealistic. This is compounded by the fact the SSA misses some of the practical measures to increase the circulation of wealth locally such as promoting the development of social enterprises.</p>
	<p>The SWRDA believes that the analysis with regard to the 'growth circle' on page 95 of the SSA is an over simplification of the real relationship between the economic, job and population growth. The SWRDA will be undertaking further work to set out the Agency's interpretation of this relationship.</p>

Summary

- The SWRDA considers that this should include specific reference to the need to increase housing provision in order to ensure better alignment between the location of employment and housing.
- A history of failing to plan for economic growth has resulted in a shortage of housing and unsustainable development, meaning that the region now needs to test higher growth levels.

Explanation

Pages 129 to 149 of the SSA include some really important analysis with regard to the key objective of the Spatial Strategy to bring about a better alignment between the location of employment and housing. Paragraph 10.45 highlights that for many of the SSCTs the employment figures are in line with the higher end of the RES GVA range for the region and that for a number of the SSCTs the job figures provided in the draft RSS are actually above those forecast by Cambridge Econometrics under the 3.2% scenario. Paragraph 10.48 recognises that to be more certain of achieving the desired realignment between jobs and houses, both the provision of jobs and the provision of dwellings should be based on the same forecast of GVA growth. However the section on potential improvements to the RSS (para 10.61) goes on to state the following;

'Consider whether the balance between jobs provision and housing distribution fro the region as a whole is sufficiently aligned on the basis of similar economic forecasts. In order to reduce the pressure on the environment, and the challenge of delivering development that is in accordance with sustainability principles ... consider whether the number of jobs should be reduced'

	<p>Changes sought</p> <p>The SWRDA considers that explicit reference should be made to the need to increase housing provision in this context. The fact that the assumptions about future economic growth have been exceeded in the predecessor document to the RSS is acknowledged in paragraph 19.9 of the analysis. The SWRDA considers that the region now needs to test the alternative approach which should be based upon accommodating the highest levels of growth, both in terms of population and the economy, that the region might realistically expect over the next 20 years. This includes the continuation of strong rates of economic growth and accommodating levels of development commensurate with this. The SWRDA considers that this should have been a fundamental component of the SSA.</p>
	<p>It is unclear as to how the Appraisal has tested alternative levels of development. For example the reduction in housing numbers from 25k to 23k this seems to warrant only 2 sentences on page 214. It appears to result in a reduction from a '++' assessment to a '+'. Equally whilst the analysis recognises that there is a likely to be a significant shortfall in terms of affordable housing provision this is not considered to have any negative sustainability consequences (pages 163-167). The SWRDA believes that this analysis underplays the economic and social consequences of the planned level of housing development in the draft RSS.</p>
	<p>The SWRDA supports the recognition in para. 19.15 that 'growth, however high, would be sustainable if it could be delivered so that it benefited those most in need, helped to reduce traffic and greenhouse gas emissions, and did not result in a loss of biodiversity or access to amenity land etc.'. The analysis goes on to state that 'in essence, this what policies SD1 to SD4 aim to achieve'. This reinforces the importance of ensuring that these policies are delivered.</p>

<u>Implementation Plan</u>	
	<p>Summary</p> <ul style="list-style-type: none"> • The production of an Implementation Plan to accompany the RSS is welcomed. • The SWRDA considers that the list of priority AAPs is critical to delivery and should therefore be the subject of a specific policy in the main body of the RES. <p>Explanation</p> <p>The SWRDA welcomes the fact that the publication of the draft RSS is accompanied by an Implementation Plan. There are clearly major aspirations and challenges inherent in the Strategy and the Implementation Plan will need to be refined as the Strategy evolves.</p> <p>The SWRDA is identified as either a lead organisation or other key partner with regard to many of the policies. The SWRDA is currently considering the implications of this and wishes to reserve its position accordingly. The reference to The Way Ahead and the proposed Regional Infrastructure and Capacity are welcomed.</p> <p>Appendix 1 a list of priority Area Action Plans (AAPs) which will be fundamental to delivery the RSS. The SWRDA considers that AAPs will be a key mechanism in ensuring comprehensive development and concerted regeneration. It is considered therefore that rather than just being an Appendix in the Implementation Plan the priority AAPs should be the subject of specific policy in the main body of the RSS (perhaps a Development Policy in Section 3). Equally the reference to 'suggested additional AAPs' should be amended so as to emphasise these are both fundamental to the strategy and that they also need to be brought forward at the earliest opportunity. Reference should also be included to an AAP to guide the future development of the Avonmouth/Sevenside area including the Port.</p>

	<p>Change sought</p> <ul style="list-style-type: none">• Move the list of priority AAPs identified within the Implementation Plan to the main body of the RSS, perhaps as a Development Policy in section 3.
--	---