

**WEST OF ENGLAND PARTNERSHIP**

**19<sup>th</sup> July 2007**

**Report by Chief Executive**

**REGIONAL SPATIAL STRATEGY – Feedback from the Examination in Public**

**Context and Implications**

1. The Examination in Public (EiP) into the draft Regional Spatial Strategy (RSS) has recently finished after 10 weeks of deliberations. It was held in Exeter with a Panel of 3 Inspectors and around 20/24 participants at each session – Regional Assembly, GOSW, SWRDA, local authorities, consultants, and relevant groups.
2. The EiP has dealt with strategic matters not individual site boundaries and each session has been guided by questions set beforehand by the Panel. Each session is introduced by a participant selected by the Panel.
3. The Panel will now prepare its report on the EiP which will be submitted to Government in winter 2007 which is likely to be November / December. Following consideration by GOSW and by the Secretary of State it is anticipated that Modifications to the draft RSS will be published for public consultation in Spring 2008 for a period of 3 months. Following consideration of consultation responses the RSS is likely to be adopted in its final form in Autumn 2008.
4. The West of England has presented a positive and cohesive sub regional case throughout the EiP and has led the discussion (at the request of the Panel) at sessions dealing with transport, housing density and tourism.
5. The likely implications of the EiP for the West of England are difficult to assess but may include:
  - Higher housing figures resulting from revised national household projections. The Panel recognised the requirement for higher numbers but also commented that it was unusual for the statistics to be so volatile. The additional housing for the sub region might amount to an extra 5 – 10,000 houses over the next 20 years (in addition to the 92,500 already in the draft RSS). There will be more clarity once the Panel report is published. Depending on future housing distribution the total figure could conceivably be even higher.
  - Additional sub regional work to show how the job proposals are to be delivered in terms of the broad location and scale of growth, thereby clarifying the context for LDD preparation. The Panel clearly considered that the draft RSS was weak in this respect. The Panel may also advocate the joint preparation of a comprehensive development strategy for Avonmouth / Severnside or, possibly, a joint Action Area Plan.

- Similarly the Panel is likely to recommend that further work is undertaken to show how broad area projections of retail floorspace requirements are to be accommodated.
- There was a lengthy discussion regarding possible future development options around Bath with GOSW proposing an early “mini review” of the RSS to deal with this complex issue. Whilst an early RSS review may be unlikely it is possible that the Panel will recommend additional studies to be undertaken in and around Bath in order to provide evidence to guide LDD work.

6. In total the Panel considered 9 Matters which they selected in order to provide detailed guidance to their assessment of the draft RSS. A brief commentary on these is contained below:

- **Matter 1 “A sustainable future”** – sustainability appraisal, appropriate assessment and climate change. Broad support for draft RSS policies with general agreement to setting regional targets to avoid each LDD setting its own targets.
- **Matter 2 “The Context”** – very important series of sessions covering key issues at a very broad level – the level of economic change, regional population implications, overall level of housing and housing market implications:

The **level of economic change** prompted a bid by SWRDA for higher growth rates than those proposed by the Assembly. SWRDA see the need to plan for 3.2% annual economic growth rates and to “overplan” rather than to under provide. SWRDA identified an internal discontinuity in the RSS where housing allocations are based on a 2.8% rate whilst economic growth is at 3.2%.

There was a lengthy discussion on likely future rates of growth with SWRDA pointing out that 20 years is long period to plan for which will include at least one recession. There is clearly very little control over future economic growth. The West of England representatives saw 3.2% as being aspirational and unrealistic.

Turning to **regional population implications** there was complex debate over emerging statistics for 2003 and 2004. New work is still very much in progress leading the Chairman to say that the figures were causing mayhem and that the volatility of the statistics was unusual. The Assembly stated that the RSS annual rate of 23,000 houses would have been increased to 28,000 if the new statistics had been available at the time.

These sessions led into the **overall level of housing** where SWRDA argued for 31,000/32,000 houses p.a. to support economic growth, a view supported by many consultants. There was a backlog of suppressed demand and a need to deliver affordable housing as well as the economic argument. A strong rural lobby wanted increased figures to meet local needs, assist regeneration and help deliver affordable housing.

The Assembly had proposed the 23,000 house figure based on advice from strategic planning authorities (4/4 advice).

There was considerable doubt over the ability to Plan – Monitor – Manage with many feeling that monitoring was taking place but no evidence of management.

Housing Management Areas (HMAs) were seen as a useful new tool – the West of England HMA extends to include Mendip and West Wiltshire. Plymouth had successfully worked with neighbours. Boundaries inevitably overlapped. The session started to spill into local detail – to be sorted under Matter 4.

- **Matter 3 “The Spatial Strategy”** – A general debate concerning the strategy for growth distribution. The draft RSS envisages a concentration on Strategically Significant Cities and Towns (SSCTs) and this prompted lengthy debate concerning the role of other centres, many of which encouraged additional growth. For the West of England the draft RSS strategy is generally supported.
- **Matter 4 “Sub regional strategies”** – These sessions covered the whole of the region over four weeks of the EIP. The sub regions are based on Housing Market Areas with the West of England also including Mendip and West Wiltshire. The Panel raised issues about Weston super Mare and the ability for employment growth to increase in line with housing; about the need to support Bristol City Centre; and requested details about the regeneration proposals for South Bristol. There was very little reference to development possibilities in South Gloucestershire but a very lengthy discussion regarding the scope for growth in and around Bath with very little agreement regarding either future locations or additional work required to guide decision making.
- **Matter 5 “Transport”** – The West of England led the discussion on transport and it was clear that the sub region has comprehensive evidence to support investment in transport, particularly for the first part of the RSS period.
- **Matter 6 “Housing”** – These sessions dealt with affordable housing and housing densities where it was clear that national policies are critical and the role of the RSS is less certain. The provision of affordable housing, for example, is influenced by financial provisions as much as by planning policies.
- **Matter 7 “The Environment & Resource Management”** – Again, these sessions tended to be general discussions about issues which are heavily influenced by other legislation and policies. The flooding discussion, for example, identified the need to take flooding into account in plan preparation, with similar high level debates on waste management and energy. There was a common thread that the RSS should provide a supportive context for other, more detailed, work elsewhere.
- **Matter 8 “Economy & Employment”** – The Panel was critical of the level of detail and guidance contained in the draft RSS and it is likely that they will

recommend additional studies (see paragraph 5 above). The tourism session was again led by West of England and there was general support for amended policies and text submitted by the Assembly. This emphasised the tourism potential of cities as well as more traditional resorts and other destinations.

- **Matter 9 “Implementation & Monitoring”** – This was an animated session with developers and their consultants pressing for a more positive approach from local authorities and with authorities explaining the complexities of managing growth. There was concern about the operation of the planning process and the anticipated time it will take to prepare Local Development Frameworks. This timing did not fit well with the growth trajectory proposed by the draft RSS.

Additional work will clearly be required to identify infrastructure needs and the West of England delivery plan was identified as a key mechanism for progressing this essential work in the sub region.

Monitoring will need to improve and to be focussed on key aspects of the RSS.