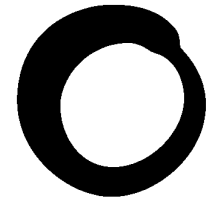


October 2008



**Friends of
the Earth**

Briefing

Ducking the carbon challenge

Standards lowered in South West Plan

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

Friends of the Earth is:

- the UK's most influential national environmental campaigning organisation**
- the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide**
- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland**
- dependent on individuals for over 90 per cent of its income.**

To join or make a donation call us on 0800 581 051

**Friends of the Earth, 26-28 Underwood Street, London N1 7JQ
Tel: 020 7490 1555 Fax: 020 7490 0881 Website: www.foe.co.uk**

Friends of the Earth Limited company number 1012357

♻️ Printed on paper made from 100 per cent post-consumer waste

The South West Regional Spatial Strategy (RSS) is a new planning blueprint for the whole region, to which all local councils will have to conform when designing their own local plans. The original draft was written by the South West Regional Assembly in 2005-6, and was debated at an Examination in Public (EiP) in 2007. For all its flaws and the controversial role of the Regional Assembly, the plan was at least an honest attempt to reconcile unprecedented levels of housing and economic growth with the overriding challenge of moving the South West to a low carbon economy.

But now, in a series of crude and heavy handed interventions, the Government proposes to:

- Increase massively the housing numbers across the region; while at the same time it would
- Water down or remove the high environmental standards that would have reduced carbon emissions from these new houses and helped kick-start a booming industry in household renewable energy in the region
- Strike out any requirement for “brownfield” sites in existing urban areas to be developed in preference to green field sites on the edge of towns and cities
- Destroy green belt land to promote the expansion of regional airports

And, absurdly in these times of uncertainty in housing markets and the economy generally, the government wants to:

- Instruct local councils that they can only ever move their housing land provision upwards, not downwards, in future.

The homes crisis

Market-led housing provision has failed. After a decade of sustained economic growth, the gulf between house prices and earnings in the South West is wider than ever before.

The Government’s response to the affordability crisis relies overwhelmingly on massive increases in the supply of housing land, but there is no guarantee that this will lead to an increase in affordable housing supply while market conditions remain unfavourable for developers to build new houses.

Even once house prices start to rise again, it will not be in the developers’ interests to build at such a rate as to suppress them. The Government likes to blame the planning system for the shortage of affordable housing, but the facts are that under the previous regional plan **more** houses were built than had been planned, but **fewer** affordable houses.

Wider still and wider

The main thrust of the strategy is to concentrate the projected new housing and economic development in and around a named list of 23 larger towns and cities, as these will in theory be the places where it is easiest to provide the infrastructure, social and educational facilities that will be needed without people having to travel long distances by car.

In practice some of these “strategically significant” settlements are places as small as Trowbridge, Dorchester, Newton Abbot, Falmouth and Penryn, and the level of growth proposed so large (at least 30% more houses in most cases) that there is no room to squeeze all the new development into the existing urban areas. A large number of “urban extensions” is therefore proposed: 39 in all totalling 148,000 houses, a quarter of the proposed new build over the next 20 years.

One of the recent successes of planning policy has been the “brownfield first” rule which led to an increased proportion of building on existing sites within urban areas. While not all such sites are automatically the best place to build, as a general rule the favouring of such land over greenfield sites or outward expansion has suppressed urban sprawl and led to more compact development where more of peoples’ needs can be met without having to travel long distances by car.

But now the government proposes to do away with this sequential approach. The risks are obvious, especially in tough market conditions. Developers will be driven to cherry-pick the most profitable sites on the edges of cities, towns and villages. Not only that, but they will naturally want to develop in the areas where least demands are placed on them to provide new social, physical and green infrastructure, and they can build to the least cost – which means to the lowest environmental standard.

Race to the bottom

The previous draft RSS was notable for the high standards it imposed on new development across the region. These included:

- Policy SD1, “requiring sustainable design and construction as the norm in all future development...” The government now proposes to downgrade this so that sustainable construction will merely be “encouraged”
- Policy G, giving more force to SD1 and requiring all larger scale new developments to be carbon neutral, ahead of national changes to building standards. The government proposes to delete this requirement, and make it purely voluntary for Local Authorities to move more quickly to carbon neutral development, and then only if they can show special reasons why they should. The independent Sustainability Appraisal described the original wording as “probably the single most important and valuable policy for sustainability in the whole Draft”
- Policy RE5, which required all new developments above 10 houses to meet at least 10% of their energy needs from on site renewable sources. The government proposes to water this down significantly, by making the 10% only an “interim” not a minimum target, and allowing Local Authorities to replace it with their own which could be weaker. The government also proposes to introduce weasel words such as “where feasible and viable”, inviting developers to back out of providing renewable energy at all.

The net effect of the government’s proposed changes is therefore to replace a firm, consistent uniform approach across the region, setting high standards which all development would have to respect, with a hotch-potch of different standards at different times, and plenty of get-out clauses.

Transport – a new direction?

Friends of the Earth argued strongly at the EiP that a new strategic direction for transport was needed in the RSS, to replace the “wish lists” of road schemes pushed by the region’s local authorities dominating the Assembly’s draft.

To a degree the Government’s proposed changes have improved on this, removing the outdated lists of schemes, and setting overall objectives for transport. The problem however remains that these objectives conflict with each other. The government is still trying to face both ways: planning to expand infrastructure to make journeys easier while at the same time reducing growth in travel demand and reliance on the car – an approach that is almost certainly doomed to fail.

“Demand management” is now proposed for each of the named towns and cities, but there are no clear goals stated, and the document remains riddled with contradictory policies to build “new infrastructure to unlock pinch points” – all too likely to have the exact opposite effect.

We believe the transport objectives need to be re-written, making it clear that the over-riding priority is to support the region’s climate change targets by rapidly reducing carbon emissions from transport. This will be essential as emissions from surface transport are around a third of the region’s total and are still growing.

In the case of air transport, the government does not even pay lip service to sustainability. The policies seem to have been drawn up in some parallel universe where rising fuel prices, climate change and environmental pressures on the urban fringe do not exist. Local Authorities are to be given a choice when it comes to sustainable buildings; when it comes to airport expansion they are to be given none.

Conclusions

So long as some underlying flaws in central government policy remain in place – most notably the reliance on market-led housing provision and the blinkered support for airport expansion – no regional strategy can hope to be truly sustainable. Nevertheless Friends of the Earth believes that there are changes to the South West RSS that can be made at this late stage that would considerably improve it and reduce its harmful influence on Local Authorities seeking to reduce their carbon footprint. Most of these changes are actually restoring policies that were in the draft before the government proposed to remove them.

Even if, as seems likely, the future rate of growth is lower than foreseen in this Regional Strategy, there will be pressure to build on land outside the existing urban areas. Friends of the Earth does not oppose urban extensions on principle, but we believe that much more rigorous standards need to be set, at least as good as those set for proposed “Eco-towns”, to ensure that mistakes of the past are not repeated. Attention also needs to be given to transforming existing edge of town sites. These grew rapidly in an age of cheap fuel, were designed almost exclusively for cars, and are not fit for a functioning 21st century economy.

While the basic principle of concentrating growth in urban areas is sound, the quality of life within them, the values of strong and self-contained local economies, and of thriving and productive countryside surrounding our towns and cities need to be given much more weight in planning at all levels.