

INFORMATION NOTE 6

Strategic Sustainability Assessment

South West Regional Assembly
January 2007

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SOUTH WEST REGIONAL ASSEMBLY
PANEL INFORMATION NOTE 7
STRATEGIC SUSTAINABILITY ASSESSMENT

1. Background

- 1.1 Planning Policy Statement (PPS) 11 on Regional Spatial Strategies describes Sustainability Appraisal (SA) as an integral part of producing a draft revision of a RSS, which should be started as soon as a revision is first considered, and so able to provide input at each stage when decisions are taken. According to PPS11 findings from the SA as it evolves should be available to partners and the community in considering options, further developing the revision in advance of formal publication and submission to the Secretary of State.
- 1.2 PPS1 - Delivering Sustainable Development states that development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy, '*Securing the Future*'. According to PPS1 Regional Planning Bodies should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.
- 1.3 Under Section 39(2) of the Planning and Compulsory Purchase Act 2004 Sustainability Appraisal is mandatory for RSS revisions, in order to promote sustainable development. In addition, when preparing RSS revisions Regional Planning Bodies must also conduct an environmental assessment in accordance with the requirements of European Directive 2001/42/EC "*on the assessment of the effects of certain plans and programmes on the environment*" (the Strategic Environmental Assessment or 'SEA Directive'), transposed by the Environmental Assessment of Plans and Programmes Regulations 2004. '*A Practical Guide to the Strategic Environmental Assessment¹ Directive*' (ODPM et al, 2005) gives guidance on the application of the SEA Directive.
- 1.4 Guidance has also been produced to ensure that the requirements of Sustainability Appraisals and the SEA Directive can be met through a single process, which in the South West was termed Strategic Sustainability Assessment (SSA). The relevant guidance is '*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*'², ODPM (2005), which supersedes the Interim Advice Note on Frequently Asked Questions (April 2005); the *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks Consultation Paper*

1

http://www.communities.gov.uk/pub/290/APracticalGuidetotheStrategicEnvironmentalAssessmentDirective_id1143290.pdf

2

http://www.communities.gov.uk/pub/346/SustainabilityAppraisalofRegionalSpatialStrategiesandLocalDevelopmentDocuments_id1161346.pdf

(September 2004) and *The Environmental Assessment Directive: Guidance for Planning Authorities* (October 2003).

2. Introduction

- 2.1 The purpose of the SSA was to assist the South West Regional Assembly (SWRA) to prepare the draft RSS by identifying the key sustainability issues facing the region, to determine what would be the likely effects of the draft RSS on these issues, and put forward recommendations to improve it. The aim was to ensure that the draft RSS has as many positive effects as possible, and that any negative effects are avoided when the policies in the draft RSS are turned into development on the ground.
- 2.2 The purpose of this note is to provide an overview of the approach taken to conducting the SSA of the draft South West RSS. It summarises:
- the key sustainability issues in the region
 - the baseline evidence used
 - the stages involved
 - the process followed
 - how the SSA influenced the draft RSS.

3. State of the Region

- 3.1 The South West Observatory report '*State of the South West*' (available at www.swo.org.uk) provides a useful summary of regional issues and intelligence. The Integrated Regional Strategy, *Just Connect!*³ is also a useful starting point as it provides a jointly agreed set of five key aims and crunch objectives for the region, which have been used as chapter headings in the submission draft RSS. This helps to clarify the relationship that the RSS is the spatial interpretation of the IRS aims.
- 3.2 Appendix 3 of the SSA Scoping Report⁵ provides a detailed description of baseline information and evidence available under each of the SSA high level objectives and detailed questions. It also lists potential sources of information and indicators ranked in order of importance and highlights obvious gaps in available data.
- 3.3 Appendix 2 of the SSA Scoping Report⁵ is the Review of Relevant Plans, Programmes and Strategies, which covers relevant local, regional, UK and European documents with a South West perspective. This includes a brief description of the overall purpose of each document, its objectives and the implications the document has for the RSS and the SSA process. The plans, programmes and strategies are organised against each high level SSA objective.

4. Key Sustainability Issues

- 4.1 These were identified by the SSA consultants in the first phase of the SSA process, based on the analysis of baseline data and the review of policies,

³ http://www.southwest-ra.gov.uk/media/SWRA/IRS/Just_Connect.pdf

programmes and plans. They are further detailed in the SSA Scoping Report⁵, issued for consultation in September 2004, and can be summarised as below.

4.2 The South West offers a high quality of life for most people in the region. Its natural and built environment is generally very attractive, and its economy is strong particularly in the north and east of the region. The region has also been experiencing some very positive trends. For example, economic performance in Cornwall has improved markedly in recent years. The condition of nationally important wildlife sites has been getting better. The quality of rivers and coastal waters is now generally excellent. But some unsustainable trends, often not always very noticeable, continue to exist:-

- People's incomes, educational qualifications and skills, and the wealth that the economy generates, all tend to reduce significantly as distances from London and the South East increase.
- Levels of deprivation and social exclusion that affect certain communities in both rural and urban areas are proving very persistent, even in the more prosperous north and eastern parts of the region.
- There are many people who cannot afford to buy a home on the open market, and there is a backlog of residents whose housing needs are not being met.
- Traffic continues to increase as car ownership rises, and because people are using their cars to travel more frequently and often over longer distances.
- Despite being rich in wildlife, the region continues to experience loss and fragmentation of habitats and species.
- Some of the historic assets of the region are at risk, either from development or from a general lack of care and attention.
- Parts of the region, particularly in the north and east, are becoming more urbanised in character, as a result of increased development, infrastructure, with an increase in noise and light pollution leading to a loss of tranquillity and dark skies.
- The amount of materials consumed in the region continues to increase, as does the amount of waste, despite improvements in recycling.
- The region's greenhouse gas emissions are too high, and climate change is likely to lead to a range of challenges, such as increased risk of flooding from rivers and along the coast, especially where sea level is rising, and there may be issues in some parts of the region over the amount of water available to meet the needs of homes, business and farming.

4.3 Many of these sustainability issues are common to all parts of the UK but because the South West is seen by many to offer a high quality of life relative to many other parts of the country, it has experienced the highest rate of population growth of all regions, primarily from in-migration. This trend of high growth is forecast to continue, which makes it all the more important that the RSS tries to grapple with the sustainability issues for the benefit of the region as a whole. One of the key challenges for the RSS is to decide how much and what sort of development is needed and where this should be located, in order for people to feel that their quality of life is being improved in the years to come.

5. Process

- 5.1 The SSA was conducted in accordance with latest guidance and was undertaken independently by Land Use Consultants (LUC) in association with Collingwood Environmental Planning and Levett-Therivel Sustainability Consultants. Appointed in February 2004, the SSA consultants provided advice to the SWRA throughout the preparation of the draft RSS. In addition to the formal SSA reports produced, there was regular dialogue between the SWRA officers and the SSA consultants, who provided sustainability commentary throughout the development of the draft RSS in the form of background papers and presentations at key meetings of the SWRA's Regional Spatial Planning and Transport Group (RSPTG). The work was overseen by an SSA Steering Group (SSASG), representing various stakeholders, including officers from the SWRA, South West Regional Development Agency, the Government Office, statutory environmental bodies, other agencies and local authorities.
- 5.2 The SSA consisted of three main phases of work, as detailed in section 2 of the final SSA report⁶ :-
- 5.3 ***Phase 1: Deciding the scope of the SSA, context and sustainability issues.*** The consultants decided what the SSA should cover by reviewing a wide range of policy documents (including Government policies) and other plans and programmes (such as the Regional Economic Strategy, Regional Housing Strategy, and Regional Environment Strategy), and by examining baseline data and information to help identify what the key sustainability issues are in the region. Particular reference was made to the Regional Sustainable Development Framework (adopted by the SWRA in 2001) in terms of agreeing sustainability objectives. These six headline objectives take the form of questions supported by a set of more detailed criteria and formed the sustainability framework, which was the main tool for assessing sustainability performance of the draft RSS. The headline objectives are :-
- 1) Will the RSS improve health?
 - 2) Will the RSS support communities that meet people's needs?
 - 3) Will the RSS develop the economy in ways that meet people's needs?
 - 4) Will the RSS provide access to meet people's needs with least damage to the environment?
 - 5) Will the RSS maintain and improve environmental quality and assets?
 - 6) Will the RSS minimise consumption of natural resources?
- 5.4 SSA Guidance for Sub-Regional Studies⁴ was also produced by the SSA consultants at this stage (June 2004) and provided to the strategic planning authorities in nine Joint Study Areas (JSAs) to help them do their own SSA of the work they carried out to inform the sub-regional strategy statements in Section 4 of the draft RSS.

⁴ P:\Regional Assembly\SEA & sustainability appraisal\SSA of RSS\JSA SSA work\GUIDANCE on SSA of JSA work/ SSA guidance for sub-regional studies submitted 4 June 04_FINAL.doc

- 5.5 The end result of this first phase was the production of a Scoping Report⁵, which was issued for consultation in September 2004. Comments on the Scoping Report were taken on board during the SSA process.
- 5.6 **Phase 2: SSA of possible development strategies.** In the Autumn of 2004, the SSA was used to identify the sustainability advantages and disadvantages of different options for the spatial distribution of development and the level of growth to be accommodated by the region. The spatial options considered were :
- **Possible Development Strategy 1:** ‘No change’ – Continue with RPG10 focussed on 11 Principal Urban Areas (PUA s) and other centres for growth.
 - **Possible Development Strategy 2:** Variation on RPG 10 based on strengthening RPG10 / concentrate more growth on a smaller number of urban centres to maximise economies of scale.
 - **Possible Development Strategy 3:** Differential Approach recognising the role of strategically and functionally important settlements in different parts of the region.
 - **Additional Development Strategy 4:** Options including one or more substantial freestanding new towns.
 - **Additional Development Strategy 5:** Going with past development trends (previously referred to as ‘Going with past markets’).
- 5.7 The SWRA decided that the public should be consulted on three Possible Development Strategies for the Region, as detailed above. Following a simple level of testing by the SSA consultants the additional development strategies above were not considered further. The Growth Scenarios considered were :-
- A.** Growth lower than planned for in RPG10 (c. 25% below current RPG10 Growth Rates i.e. 15,000 net new dwellings per annum).
 - B.** Growth as planned for in RPG10 (20,000 net new dwellings per annum).
 - C.** Growth higher than planned for in RPG10 (c. 25% above current RPG10 Growth Rates i.e. 25,000 net new dwellings per annum).
 - D.** Growth substantially higher than planned for in RPG10 (c. 50% above current RPG10 Growth Rates i.e. 30,000 net new dwellings per annum).
- 5.8 The SSA consultants tested these scenarios using the same assessment matrix to determine the relative performance of each against sustainability objectives. Detailed findings are reported in ‘*Possible Development Strategies for the Region : Final Report*’ (August 2004)⁶.
- 5.9 **Phase 3: SSA of the draft RSS and consultation.** Having taken on board consultation responses and the findings of the SSA of the possible development strategies, the SWRA began to prepare the draft RSS for submission to the Secretary of State during 2005. The SSA consultants

⁵ http://www.southwest-ra.gov.uk/media/SWRA/Sustainable%20Development/Scoping_Report_Sept_04_2.pdf

⁶ P:\Regional Assembly\SEA & sustainability appraisal\SSA of RSS\Stage 2 papers\Final SSA Options Report\Stage 2 Final Report 25 August 04 (Final).doc

commented on early versions of the draft RSS and emerging thematic policies and gave presentations to officers and Members on their findings and recommendations, many of which were taken on board as the draft RSS neared completion.

- 5.10 The Final SSA Report - *Strategic Sustainability Assessment of The Draft South West Regional Spatial Strategy*⁷ reflects the final submitted version of the draft RSS (March 2006). This is supported by three technical appendices:-
- A - Supplementary Information to the SSA⁸
 - B - Detailed Appraisal Matrices for Draft RSS Policies⁹
 - C- SSA of Sub Regional Strategy Statements in Draft RSS ¹⁰

6. Coverage in the RSS

- 6.1 **How did the SSA influence what the draft RSS says?** The draft RSS is the outcome of a large amount of research, a series of consultations with key stakeholders, and a number of refinements to thematic policies and both the amount of development (particularly housing) and the way that development is planned to be distributed across the region, many of which resulted from the SSA process. SWRA's view is that the draft RSS represents the most appropriate approach to accommodating growth in the South West over the period 2006- 2026, taking into account a wide range of economic, environmental and social factors. In particular, the SWRA have sought to accommodate a level of housing, economic and service development that also allows for the protection and enhancement of the environment, and that can be supported by existing and planned infrastructure (e.g. transport networks, sewage treatment works, schools and hospitals, etc.)
- 6.2 The SSA consultants recognise that the SSA has had a significant influence on the preparation of the draft RSS. In their opinion this was mainly because the SWRA used the SSA right from the very beginning of the process, and because the SSA team had direct access to both those preparing the draft RSS and also to the Members and other stakeholders appointed to agree the version of the draft RSS to be submitted to the Secretary of State. This meant that the SSA had a high profile and that the findings and recommendations received good and thorough consideration.
- 6.3 SWRA officers produced a schedule of changes following each RSPTG Member meeting which considered different versions of the draft RSS. Whilst some changes result from Member and officer comments and consultations a large number result from recommendations made by the SSA consultants. For example, the schedule of changes reported to the RSPTG meeting of 22nd February 2006 details a large number of wording changes made in sections 1, 2, 3, 6 and 7 as a direct result of the SSA process. See the

⁷ <http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/Final%20Draft/ssainreport1.pdf>

⁸ http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/Final%20Draft/SSA_Appendix_A.pdf

⁹ http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/Final%20Draft/SSA_Appendix_B.pdf

¹⁰ http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/Final%20Draft/SSA_Appendix_C.pdf

table below for a timeline which details the main stages at which changes were made to the wording of the draft RSS. Table 2.3 and Chapter 6 of the SSA Final Report⁶ also give further details of SSA inputs to the RSS process and how the SSA influenced the drafting of RSS.

- 6.4 The SSA consultants consider that there are a number of major areas where the draft RSS was improved in sustainability terms as a result of the SSA process. One example is the inclusion of the high level, upfront sustainable development policies SD 1-4, which were initially much weaker and only formed part of the text. In their opinion the most significant influence was with respect to carbon dioxide emissions. The need to reduce carbon dioxide emissions generated by the region was rightly recognised as perhaps the most pressing sustainability issue facing not only the South West, but the world as a whole. As a result of the SSA process, the draft RSS now includes some very ambitious and challenging policies, that if implemented, will mean that the South West is taking a huge step towards grappling with climate change. One such policy which was strengthened by SSA recommendations is Development Policy G, requiring all large scale development to be carbon neutral. This was included with the support of Members following a presentation by the SSA consultants at RSPTG – previously the standard required was compliance with the Eco-homes very good standard (equivalent to level 3 of the proposed Code for Sustainable Homes.)
- 6.5 As part of a linked piece of work to determine the carbon dioxide emissions that are likely to result from different RSS policy options, the SSA consultancy team identified a range of suggestions for ‘tightening up the RSS’ which would specifically result in reduced greenhouse gas emissions.
- 6.6 **What alternatives to the draft RSS were considered?** The full range of spatial and growth options assessed by the SSA consultants are detailed above in section 4 – phase 2. In addition a combination of internal sustainability testing and ongoing commentary and formal reporting from the SSA consultants led to different iterations of thematic policies. Indeed the thematic policies present in the final submission draft RSS are significantly different to those present in earlier drafts. Many of the wording changes made to policies resulted directly from recommendations by the SSA consultants in order to improve the positive impacts of the RSS and reduce negative ones from a sustainability perspective. A timeline of different RSS versions is given below :-

VERSION	MEMBER MEETING	REPORTING ON SSA
First draft RSS – version 1.91 (no thematic policies)	4 th October 2005 RSPTG	
Version 2.1 (no section 5 on transport)	19 th December 2005 RSPTG	LUC gave presentation on emerging SSA findings and recommendations based on key questions document
Version 2.2	12 th January 2006 RSPTG	SSA Summary of Initial Findings tabled at meeting

VERSION	MEMBER MEETING	REPORTING ON SSA
Version 2.3	27 th January 2006 Full Assembly	Paper on SSA Summary of Initial Findings
Version 3.1	22 nd February 2006 RSPTG	Accompanied by draft final SSA report and LUC presentation
Version 3.2	10 th March 2006 Full Assembly	Paper on SSA report presented by Chair of RSPTG
Version 4.1	Final amendments made in light of Full Assembly comments	
Version 4.2 submission draft		Final SSA report received 17 th March 2006

6.7 The final SSA report and draft RSS recognise that there are still some remaining tensions, which are difficult to resolve in the light of either existing national policy, for example around aviation and airport expansion or external trends, such as continuing increases in traffic volume. These existing tensions were summarised in a letter¹¹ to Ruth Kelly which accompanied the submission draft RSS. In this letter the Assembly (SWRA) states that, *“the achievement of a more sustainable region is highly conditional upon changes in individual behaviour and upon government policy. The Draft RSS can make only limited progress based on its effect on the scale and distribution of growth. Re-configuring the region so that a higher proportion of people live at the 21 identified Strategically Significant Cities and Towns in 2026 will have a major effect in sustainability terms especially if all local public services are of a consistently high quality.”* As a result of the SSA process SWRA requested that the Government consider whether the national strategy of providing for increased air travel is sustainable in the long term and whether the resourcing of public transport in the South West is adequate to achieve modal shift and hence reduce carbon dioxide emissions. SWRA also called for the Government to set a much higher national mandatory standard than 2006 part L for energy performance in new housing and for this to be extended to all other building types and major renovation in order to achieve the highest practicable energy standards and at least 50% improvement in energy efficiency.

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¹¹ <http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/Final%20Draft/Submissionletter.pdf>