

**Rt Hon Hazel Blears MP
Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU**

24 October 2008

Dear Secretary of State

South West Regional Assembly comments on RSS Proposed Changes

Thank you for the opportunity to comment on the changes you have proposed to the draft RSS submitted in April 2006 by the SWRA as Regional Planning Body. The Regional Assembly is composed of representatives of the region's 51 local authorities and regional stakeholders represented by Social Economic and Environmental Partners. The Regional Assembly is committed to a prosperous, growing and sustainable South West region.

The Regional Assembly in full session as Regional Planning Body and through its various specialist member groups has given very careful consideration to the Proposed Changes and how they measure against the Assembly's aspirations for the region, expressed in the draft RSS and reflected in the RES. This takes into account the consensus building activity and intense consultation across the region behind the submitted draft RSS. At its meeting on 10 October 2008, the Regional Assembly wished to draw the Secretary of State's attention to the following points about the implications of the proposed changes for the region.

The South West region has a clear commitment to delivering 460,000 dwellings (23,000 dwellings per annum (dpa) as previously agreed by the Assembly) through the RSS, meeting high standards of sustainability and a high proportion of affordable housing. The draft Regional Spatial Strategy (RSS) presented a regional consensus arrived at over two years of analysis, debate and consultation. The draft RSS was clear about responding to affordable housing needs in the region and the step change required to deliver higher proportions of affordable housing within the total proposed. SWRA recognises the importance of delivering housing to fulfil needs arising from economic and demographic change in the South West over the next 20 or so years. SWRA believes that the real requirement is to achieve the delivery of this already agreed growth with a focus on delivering a sustainable pattern of development and a higher proportion of affordable housing.

The SWRA is concerned that no clear evidence has been presented to justify the Secretary of State's proposal for 29,600 dpa. The SWRA has major reservations about the ability of the South West region to accommodate the scale of change proposed by the Secretary of State, without further consideration of the possible effects on sustainability, the environment and quality of life.

The SWRA is concerned that there are short-comings in the evidence base behind some of the Examination in Public (EiP) Panel recommendations and the Secretary of State's Proposed Changes for additional growth. There are specific concerns that infrastructure and services needed to enable and support development are not adequately identified in the Proposed Changes .

For the South West region to consider any delivery of development beyond the 23,000 agreed, we will require clearer phasing in the RSS of this development at the Strategically Significant Cities and Towns (SSCTs) in particular. This will enable further investigation and testing of longer term options, through the partial review process, without holding up development of proposals made in the draft RSS. This will enable progress to be made on production of LDFs without further delay.

We believe this response enables the South West to step up delivery of housing to meet the government's challenge in a regionally distinctive way and take forward the proposals in Baroness Andrews' letter, and to do so the region will need government to assist with the following:

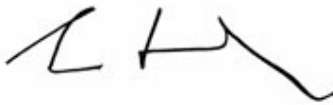
- (i) Significant additional investment in infrastructure throughout the region and recognition that the South West is making a major contribution to national housing targets in comparison with other regions;
- (ii) further detailed assessment of delivery of growth across the region in the post 2021 period;
- (ii) commitment to the highest standards of development in the region with regionally distinctive policies for sustainable construction and renewable energy in the RSS; and,
- (iv) identifying resources that can be released both nationally and regionally to achieve the government's target of 10,000 affordable homes per annum. We welcome the SoS's commitment to increasing the availability of more affordable homes each year, recognising that our region suffers severely from the affordability gap between house prices and wage level as well as the limitations of delivery through the planning obligation process.

We shall be seeking early meetings with Baroness Andrews and other Ministers to discuss how the RSS can best be taken forward and the points made above addressed.

Attached to this letter you will find an overview report of our comments on the Proposed Changes as agreed by the Regional Planning Body. This is accompanied by a Technical Annex which proposes revised wording for Policies G and RE5. A more detailed schedule of comment on each of the proposed changes which reflects the points made in the overview report is also attached.

I am copying this letter to Ben Bradshaw, the Regional Minister for the South West and Anne Snelgrove MP.

Yours sincerely

A handwritten signature in black ink, appearing to be 'S Day', written in a cursive style.

Sir Simon Day
Chairman SW RA

Cc Ben Bradshaw Regional Minister for the South West
Anne Snelgrove, MP