

If you wish to comment on the Draft Regional Spatial Strategy for the South West, please follow these stages:

1. Complete your details in **Section A** of Page 1 of the representations form.
2. Include your organisation/name/page number in **Section B** on Page 2 and on additional completed pages.
3. Complete a separate Page 2 of the form for each part of the Draft RSS for SW you wish to comment upon.
4. Indicate which chapter/policy/paragraph you would like to comment upon also in **Section B**.
5. Provide a short summary, give reasons for supporting/objecting and set out your changes in **Section C**.
6. Email your completed forms to representations@southwesteip.co.uk by the end of the consultation period.

Additional representations forms are available from the EiP Website at www.southwesteip.co.uk or from the Panel Assistant at the Panel Secretariat Office. For any general enquiries please use the Office address below.

The Panel would prefer all responses to be typed in black and e-mailed to representations@southwesteip.co.uk - it would be helpful if your representations were submitted electronically and only once – unless requested there is no specific need to also send a hard copy response. To ensure your comments are taken into account the Panel would encourage those making representations to return, at the earliest opportunity, the completed forms to the Panel Secretary to arrive at the Panel Secretariat Office by **5.00pm on Wednesday 30 August 2006**.

Please note that all comments will be available for the public to read and therefore they cannot be treated as confidential. A summary of your comments provided on the form will be put on the EiP website in due course.

This consultation is being conducted in accordance with the 'Code of Practice on Written Consultation', issued by the Cabinet Office in November 2000. Any procedural observations or complaints about this consultation should be sent to Martin Bridgman, RSS Advisor, Office of the Deputy Prime Minister, Eland House, Bressenden Place, London SW1P 5DU.

Section A

Comments submitted by	Agent (if appropriate)
Organisation: Bath & North East Somerset Council Surname: Everitt Title/first name: Mr. John Address: Guildhall High Street Bath Post Code: BA1 5AW Email: john_everitt@bathnes.gov.uk Tel: 01225 477400 Fax:	Organisation: Surname Title/first name: Address: Post Code: Email: Tel: Fax:

Panel Secretariat Office South West RSS EiP 2, Rivergate Temple Quay Bristol BS1 6EH	Panel Secretariat Office General e-mail: enquiries@southwesteip.co.uk Telephone enquiries: 0117 900 1814 Responses e-mail: representations@southwesteip.co.uk
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Please do not return the representations forms to the South West Regional Assembly.

Signature: <i>John Everitt (Chief Executive)</i>	Date: 30/8/06
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Please ensure Section A is completed and e-mail all your completed representations forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Section B

Your comments by

Organisation Bath & North East Somerset Council	Name Mr. John Everitt (Chief Executive)	Page Number 2 - 12
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify): **Opposing**
Chapter (section): 4 (West of England Spatial Strategy)
Pages: 55-61 & 103
Policy Reference or Paragraph Number: SR2, SR3, SR4, SR5, figure 4.1 and table 4.1. Paragraphs 4.2.3 – 4.2.19

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number:

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

These comments relate to the sub-regional spatial strategy as a whole for the West of England. The various policies and paragraphs in this section of draft RSS are so closely inter-related that this approach is considered sensible. The summary has been approved by the Chief Executive in consultation with the relevant Executive Members and Administration Group Leaders and is subject to endorsement by Council in September.

- Bath & North East Somerset Council is committed to working with the West of England Partnership in seeking to meet the growth and development levels set out in its First Detailed Proposals. However, the Council has significant concerns regarding the delivery of this growth and the spatial distribution set out in the draft RSS.
- Delivery of the growth agenda must be linked to infrastructure provision and housing construction must also be linked to job growth. In particular completion of the Hicks Gate-Hengrove section of the South Bristol Ring Road is critical to delivering an urban extension at south east Bristol.
- Concerns that timing of infrastructure provision will hinder delivery of growth during the RSS period.
- Phasing policy needs to be included in RSS linking delivery to infrastructure/job growth 'trigger points' - housing development should not be expressed as a uniform rate across the 20 year period.
- Council studies show that the locations identified in the RSS are not capable of sustainably accommodating the scale of development envisaged in the RSS. Therefore, flexibility in the strategy is needed to accommodate the growth.
- The importance of the international status of Bath as a World Heritage Site must be recognised and the fact that this influences the acceptable scale of development.
- An ambitious but deliverable capacity for the Bath urban area is about 5,500 dwellings and 8,500 jobs. This represents a more balanced approach to growth than that set out in the draft RSS (which equates to about 6,000 dwellings and 13,200 to 16,700 jobs).
- The forecast job growth in the Bath Travel to Work Area set out in the RSS is too high at 16,000 – 20,000 and cannot be physically accommodated in the city.
- Studies show that an urban extension to Bath will cause environmental harm to the setting of the World Heritage Site and the surrounding countryside.
- The need to provide additional housing opportunities and job growth at Bath is such that the Council supports urban extension(s) within a broad area of search excluding land within the Cotswolds AONB, with a total capacity of up to about 1,000 dwellings plus additional jobs.
- At south-east Bristol environmental constraints limit the realistic capacity to about 3,500 dwellings in the Whitchurch area. Work is ongoing jointly with Bristol City Council to see if there is additional capacity at Hicks Gate.
- Strategy of pursuing balanced 'housing/jobs' development in the District's towns and larger villages suggests a capacity of around 3,000 dwellings in the rest of Bath & North East Somerset.
- Current shortfall of around 2,500 dwellings against First Detailed Proposals to be addressed by assessing potential for additional economically led development in the District's towns and/or sustainability appraisal of other options elsewhere in the District or outside.

Please use this space to explain to the EIP Panel why you support/oppose this particular part of the Draft RSS.

The comments set out below are taken from the Report considered by the Council Executive on 12th July 2006. They were approved by the Council Executive in July for submission to the EIP Panel and are subject to endorsement by Council in September. Please note that the maps referred to are attached to this representation form.

1.0 Representations on the RSS

1.1 In summary the Draft RSS submitted to the Secretary of State sets out the following spatial strategy for Bath & North East Somerset:

- Urban extension at South East Bristol about 6,000 dwellings (RSS Area of Search B)
- Bath Urban Area about 6,000 dwellings
- Bath Urban Extension (south/south west of Bath – RSS Area of Search E) up to 1,500 dwellings
- Remainder of Bath & North East Somerset about 2,000 dwellings
- Total Bath & North East Somerset 15,500 dwellings
- Job growth in the Bath Travel to Work Area of between 16,000 – 20,200 jobs.
- Extension of the Green Belt south of Bath toward Midsomer Norton and Radstock.
- The RSS contains a range of other policies and proposals which have previously been reported to Council Members covering sustainable development; Spatial Strategy and guidance for the scale and location of development; sub-regional strategy statements and housing distribution; transport; affordable housing and provision of services and community facilities; the environment and cultural infrastructure; the economy; deprivation; and equality.

1.2 Members should note that the proposed urban extension for south east Bristol in area of search B includes land within the District in the Hicks Gate area. However this land does not lie adjacent to the Bristol urban area and so an urban extension would need to include land within Bristol which is currently undeveloped.

1.3 The full text of the spatial strategy as it affects Bath & North East Somerset is contained in section 4, paras 4.2.1 – 4.2.18 – *Sub Regional Strategy Statements and Housing Distribution*.

1.4 The 11th May Council report indicated that to inform a response on the RSS spatial strategy required completion of a number of further studies. These are now nearly complete and are drawn upon in recommending responses to RSS policies and proposals.

Review of urban housing and employment capacity for Bath

1.5 This work is critical to assess whether there is capacity within the existing Bath urban area to accommodate 6,000 dwellings and the forecast job growth which the draft RSS is based on and suggests should be accommodated. Forecast job growth within the Bath Travel to Work Area and reasonable assumptions (that are in line with the draft RSS objective of focussing development at Bath) regarding the proportion of this growth which should be accommodated in Bath suggests the following number of additional jobs up to 2026: around 9,000 (trend based growth); 13,200 (West of England growth rate based on 2.8% GVA and reflected in lower figure in draft RSS); and 16,700 (South West Regional Development Agency growth rate based on 3.2% GVA reflected in higher figure in draft RSS).

1.6 The Urban Capacity Study work that has been undertaken seeks to estimate the potential of Bath to accommodate both residential and employment development. It has involved the assessment of a number of potential development opportunities across the city including those set out in the Vision for Bath. Its conclusions broadly reflect the delivery of the Vision for Bath, including significant housing and employment development at Western Riverside. As such it represents an ambitious but deliverable capacity which optimises the use of the sites assessed. The conclusions of the study suggest that around 5,500 dwellings

and 8,500 additional jobs (subject to further detailed work), which nearly equates to trend based job growth, can be accommodated. However, this would also result in loss of industrial space and jobs greatly in excess of forecast losses. In effect industrial floorspace and jobs would be displaced from the city.

- 1.7 The assessed deliverable capacity represents a more balanced approach to jobs/housing growth than that set out in the RSS giving a greater opportunity for people to live and work in the city. The figures in draft RSS (policy SR5) would result in approximately 0.45 – 0.36 dwellings provided per job. The assessed deliverable capacity results in approximately 0.65 dwellings provided per job. Using census and other data achieving a balance between jobs and homes equates to a ratio of 0.86 dwellings per economically active resident. The provision of an urban extension to Bath (see section 5 below) would give the opportunity to further improve this balance, as well as helping to ensure that economic growth, at least equivalent to the trend based scenario, could be achieved.
- 1.8 In addition there is a backlog of unmet housing need (Bramley West of England Sub-Region Housing Need and Affordability Assessment) of about 1,300 dwellings which needs to be met at 2006.
- 1.9 It is clear that the Regional Assembly's proposed housing growth as set out in the draft RSS (7,500 dwellings with the urban extension) is more aligned to meeting the trend based job growth for Bath (based on the ratio set out in para 4.8 above). It is therefore implicit that the number of jobs for Bath in the 2.8% and 3.2% GVA growth forecasts (as set out in the draft RSS) would result in substantial additional inward commuting for between 4,500 and 8,000 jobs. The Regional Assembly forecasts also assume Bath taking a much higher share of sub-regional growth than in the past which is a highly questionable assumption.
- 1.10 Whilst the West of England Partnership's First Detailed Proposals (FDP) prepared last year anticipate a 2.8% GVA growth across the sub-region, analysis of capacity within Bath shows that this rate is unlikely to be achievable and that trend based forecasts are more realistic.
- 1.11 However, in the context of striking a better balance between housing and jobs, meeting the needs of a growing economy (as set out in the FDP) and addressing the affordable housing backlog, additional dwellings and the scope for economic development needs to be considered in the form of an urban extension (see below).

2.0 Urban Extension at Bath

- 2.1 Policy SR5 of the Draft RSS proposes an urban extension to the south/south west of Bath to accommodate up to 1,500 dwellings in Area of Search E (as shown on draft RSS Inset diagram 4.1). It includes the requirement for investment in key infrastructure to enable achievement of the urban extension and development within Bath.
- 2.2 Officers have therefore carried out assessments of potential for the area around the City. At its 19th January meeting Council approved a District Strategy as a basis for submission to the Regional Assembly. For Bath it is to:
- "i. Optimise capacity of Bath existing urban area to accommodate deliverable and sustainable growth respecting the responsibility to protect its World Heritage value and enhance its economic base. The realistic capacity within Bath is currently considered to be c5,000 (2006-2026);
 - ii Subject to ongoing environmental impact studies, optimise the potential to implement a deliverable urban extension to the south of Bath which respects the responsibility to protect the setting of the World Heritage site and the surrounding AONB and Green Belt. The considered maximum capacity is 1,000 dwellings."

Cotswolds Area of Outstanding Natural Beauty (AONB)

- 2.3 The AONB around Bath extends from north of the River Avon to the west of the city, around the northern edge of the city, around Batheaston and Bathampton and stretching to the south of the City to Combe Hay Lane at Odd Down (see map at Annex 1). Only the Avon Valley between London Road West and Bathampton is not included and this area is largely within the flood plain. National Planning Guidance in PPS7 is clear that major developments should not occur in AONBs, except in exceptional circumstances. Considerations include whether it raises issues of national significance, the impact of allowing it or refusing it, upon the local economy; the cost and scope for developing elsewhere or meeting the need in some other way; and the impact on the environment, landscape and recreational opportunities.
- 2.4 The Draft RSS policy gives priority within AONBs to conserving and enhancing natural beauty, wildlife and

cultural heritage over other considerations.

- 2.5 In the context of both national and regional policies strategic levels of development are not justified in the AONB because of the adverse impacts on the AONB itself and also on the setting of the World Heritage site. This appears to be consistent with the consideration of AONBs in other parts of the South West Region.

Area south/south west of Bath

- 2.6 The RSS identifies an area of search in Policy SR.5 for the provision of an urban extension to accommodate up to 1,500 dwellings to the south/south west of Bath, which comprises land outside the AONB adjoining Bath between Odd Down and the Whiteway/Twerton area.
- 2.7 A study on the impacts of an urban extension on the setting of the World Heritage site concludes that development within this area and in the area to the west of the city (see map at Annex 2) would have a high adverse impact on the City of Bath World Heritage site, the landscape character, historic environment, including the Wansdyke and Englishcombe Village Conservation Area, and the ecology of the area. English Heritage, English Nature, Countryside Agency and Forestry Commission have expressed concerns over the impacts which they consider need further investigations.
- 2.8 Further more detailed assessments at Odd Down, and on the plateau area between Pennyquick and the A4 Bristol Road reinforce this conclusion.
- 2.9 Additional areas of concern are the presence of the Fuller's Earth mine workings at Odd Down; the impact of development on the Bath and Bradford-on-Avon Bats Special Area of Conservation, Combe Down (SAC); and the presence of high grade agricultural land in the Haycombe Farm area. Reports on impact of subsidence associated with Fuller's Earth mining suggest that given the right treatment surface development should be possible but more detailed studies would be needed to assess this.
- 2.10 With regard to the impact on the SAC, following procedures in the Habitats Directive an initial screening assessment carried out by officers has concluded that an Appropriate Assessment of impacts is necessary. This is the responsibility of the Regional Assembly and should be carried out before any conclusions are made on the suitability of development within RSS area of search E. Such a study will determine what impacts there are and whether mitigation is possible or whether an alternative location for development should be considered.
- 2.11 On high grade agricultural land PPS7 points to the need to use lower quality land in preference where significant development of agricultural land is unavoidable, except where this is inconsistent with other sustainability considerations. High grade agricultural land exists to the south of Whiteway Road, east of Haycombe Cemetery.

Strategic Sustainability Assessment

- 2.12 Whilst the environmental impacts are of major concern so also are the concerns relating to social and economic matters as described above (paras 4.6 – 4.10).
- 2.13 To assess overall impacts on sustainability a strategic sustainability assessment (SSA) has been carried out on possible development options and also the no development option.
- 2.14 The SSA assessed three options:
- 1) The RSS option with capacity of 1,500 dwellings between Twerton and Odd Down (RSS area of search E);
 - 2) Development with capacity of 1,000 dwellings within a broader area of search including land to the west of Bath (see map at Annex 2)
 - 3) Development south of Bath excluding areas with adverse environmental impact – results in all areas being excluded and therefore, no development;
- 2.15 The assessment brings out the clear conflict between options providing an urban extension which gives benefits to health, community, economic, and transport objectives but which causes major adverse environmental impacts, and having no development, the result of which is likely to contribute to unsustainable travel patterns and consequent social, economic and environmental impacts but which would protect international, national, regional, sub-regional and locally valued environmental assets.
- 2.16 However the no development option could also contribute toward long term climate change (more travel and

emissions) which could have consequences for some of the very environmental assets which would be initially protected.

- 2.17 The RSS option for an urban extension of 1,500 (option 1 above) would have the major environmental impacts described above.
- 2.18 However, development would contribute to provision of housing, including making a significant contribution to affordable housing needs, and the needs of those employed in the city and provide development with good access to facilities and services found in the City. In addition urban extension(s) could also provide additional economic development opportunities, thereby helping to ensure that Bath continues to play its role in the sub-regional economy and its growth as envisaged in the FDP.
- 2.19 Similar conclusions to option 1 emerge in relation to the second option of development of up to 1,000 dwellings within the broader area of search. However, environmental impacts would potentially be less and the potential for mitigation would be greater. Development on the plateau area north of the Pennyquick Road as well as impacting on the World Heritage site setting, has the greatest adverse impact on the Green Belt (particularly in terms of the fundamental purpose of maintaining the separation of Bristol and Bath). However, development adjacent to the Twerton area could contribute to the regeneration of Twerton which has suffered from greater decline and scores more highly on indices of multiple deprivation than other parts of the city. This benefit is most likely to result where close integration with the existing urban area can be achieved.
- 2.20 On balance it is considered that development offers a more sustainable option than no development. Given the significant environmental issues identified development providing up to about 1,000 dwellings and economic development opportunities potentially across more than one urban extension within the broader area of search is considered to be the more prudent and most sustainable option. Development of urban extension(s) will help to address the housing and economic needs of the city, providing (in conjunction with estimated urban capacity) a total of about 6,500 dwellings and 9,000 jobs. This development would also help to ensure a better balance between homes and jobs i.e. 0.72 dwellings per job (see also para 4.8 above).
- 2.21 Further detailed work will need to be undertaken in order to assess the best location(s) for urban extension(s) in this area. The urban extension(s) would need to be well integrated into the existing urban area in order to ensure that they function as part of (and fully benefit) the city rather than as self contained communities. However, development of urban extension(s) must be subject to:
- 1) Recognition of the impact on the setting of the World Heritage site and the need for a high quality of urban design;
 - 2) The results of an Appropriate Assessment under the Habitats Directive 92/43/EEC to establish what impact there would be on the SAC and whether this can be mitigated;
 - 3) Whether the effects of Fullers Earth mining can be mitigated to enable surface development;
 - 4) That development should not take place between Englishcombe village and the Odd Down plateau; and
 - 5) Further assessments of historic environment constraints in the area of search.
- 2.22 Even if these constraints can be overcome, development capacity would be limited by the need for appropriate mitigation likely for ecological and landscape purposes including mitigating the impact on the adjoining AONB.

3.0 Urban Extension South East of Bristol

- 3.1 Policy SR4 of the Draft RSS proposes an urban extension south east of Bristol for about 6,000 dwellings in Area of Search B (see draft RSS, Inset diagram 4.1 and map attached as Annex 3). It refers to the requirement for key infrastructure including public transport improvement and provision of the South Bristol Ring Road.
- 3.2 Previously the Council on the 11th January approved the following District strategy as a basis for submission to the Regional Assembly:

“Strategy Adjoining Bristol

- i. To ensure retention of Green Belt separation between the Bristol urban area and the Keynsham built-up area.
- ii. To accommodate mixed-use urban extension to the south east of Bristol to assist in the

regeneration of south Bristol and meeting Bristol's economic growth. Initial work indicates a capacity in Bath & North East Somerset of about 5,000 dwellings."

- 3.3. Since then environmental studies have been carried out which have identified a range of environmental constraints to development including:
- 1) The setting of the Maes Knoll and Wansdyke Ancient Monuments, Lyons Court Farm and St. Nicholas Church (Grade II* Listed) and the rural setting of Queen Charlton Conservation Area, impact on buried archaeological remains and medieval field patterns around Whitchurch. There is scope for mitigation but the suggested extent of a setting for Maes Knoll would greatly reduce potential development capacity.
 - 2) Loss of rural character and setting of Whitchurch village and its separation from Bristol. Impact on the Chew Valley.
 - 3) Impact on wildlife through habitat loss and damage. There is scope for mitigation.
- 3.4 At Hicks Gate concerns focus on impact on the landscape in the Stockwood Hill area and landscape and historic environment north of the A4. Impact on sites of nature conservation interest are also a concern. The Stockwood Vale area was not included in this study. It was eliminated as a potential development area because of its value as an important landscape feature, within the Green Belt separating Bristol and Keynsham.
- 3.5 The environmental studies conclude that capacity in the Whitchurch area is limited to around 1,600 dwellings. At Hicks Gate part of the potential area lies within the Bristol City boundary. Joint studies with Bristol City Council are continuing on the potential capacity. Further appraisal work alongside Bristol CC will be required to establish whether Hicks Gate represents a sustainable alternative in comparison with other locations (see also paras 3.8 – 3.12 below).
- 3.6 However there are some areas which overall have less environmental impacts than others. If such areas are included then the capacity could be increased to around 3,500 dwellings at Whitchurch. There may be additional capacity at Hicks Gate (west of the A4 roundabout) subject to further appraisal. This may help to narrow the gap between the RSS figures and those emerging from the work undertaken so far, but cannot be confirmed at this stage. If additional development capacity at Hicks Gate is acceptable expression of the capacity of the south east Bristol urban extension in the draft RSS (figure 4.1) may need to refer to an element being within the Bristol urban area similar to the urban extension to south west Bristol.
- 3.7 It is important to note these capacities are not just housing capacities and include provision for some employment land and all local services that would be expected e.g. schools, local shops, community facilities, parks and playing fields, and green infrastructure.

Strategic Sustainability Assessment (SSA)

- 3.8 The SSA assessed four options:
- 1) The RSS option with capacity of 6,000 dwellings at Whitchurch and Hicks Gate – see map at Annex 3;
 - 2) Development focussed at Whitchurch with capacity of 5,000 dwellings;
 - 3) Development at Whitchurch and Hicks Gate (west of the A4 roundabout) with areas of adverse environmental impact excluded – capacity 1,600 dwellings at Whitchurch plus possible extra capacity at Hicks Gate;
 - 4) Development at Whitchurch and Hicks Gate (west of the A4 roundabout) with some areas of less environmental impact included – capacity of 3,500 dwellings at Whitchurch plus possible for extra capacity at Hicks Gate.
- 3.9 The assessment again brings out the conflict between the options with the highest levels of development which achieve more social and economic objectives and Option 3 which achieves more environmental objectives. The latter however, is likely to result in development occurring elsewhere, possibly where in-commuting to Bristol will occur. This in itself can create environmental damage by resulting in additional travel which adds to atmospheric pollution thereby contributing to global warming.

- 3.10 Option 1 with the higher capacity would cause environmental problems at both Whitchurch and Hicks Gate and possibly impinge on the Stockwood Vale area which was omitted from the other options following recognition of its landscape and nature conservation merits in earlier sustainable development appraisal work. This level of development would also have greater adverse impacts on Green Belt objectives for the area by reducing the Bristol/Keynsham gap. Option 2 focusing on Whitchurch would better achieve community and Green Belt objectives but have major adverse impacts on the environment (Maes Knoll and historic environment setting) and take development closer to Queen Charlton than Option 4.
- 3.11 Option 4 is a compromise but has the disadvantage of the difficulties of dividing development between two areas both affected by major transport routes, with associated congestion and pollution and possible severance of communities issues, as well as greater harm to the Green Belt. However, if the integrity of the Maes Knoll schedule ancient monument is to be retained this is the preferred compromise. It would result in an overall capacity of around 3,500 + any capacity found at Hicks Gate.
- 3.12 Further work alongside Bristol City Council and North Somerset Council through the C21 initiative will be essential in ensuring that the urban extension which is delivered achieves the maximum contribution towards the regeneration of South Bristol. It should be noted that land use mix and therefore capacity figures are approximate at this time and may change as the work of C21 considering the future of South Bristol as a whole progresses.

4.0 The Remainder of the District

RSS Strategy

- 4.1 For the remainder of the District the 19th January meeting of Council approved the following strategy:
- i. In total the rest of the District could contribute the remaining 4,400 dwellings.
 - ii. A strategy for the rest of the District focussing on optimising the capacity of Keynsham and securing regeneration objectives for the south of the District.
 - iii. The delivery of necessary infrastructure must be an integral part of this strategy.
 - iv. To work with neighbouring Authorities to integrate growth strategies.
- 4.2 The strategy contained in the RSS does not envisage strategic levels of development at Keynsham, Midsomer Norton, Radstock or the villages and rural areas.
- 4.3 The focus of the RSS is to accommodate expected high levels of growth in the most effective and sustainable way by concentrating most new development at a number of key regionally and sub-regionally strategically significant cities and towns (SSCTs) and then more locally at service centres identified in Local Development documents by Local Planning Authorities. Policy B in the Draft RSS therefore allows for locally significant development in some market towns where it meets local needs and increases self containment. Elsewhere in the countryside small scale development meeting local needs and promoting self containment may be appropriate.
- 4.4 In Bath & North East Somerset, Keynsham, Midsomer Norton and Radstock are not identified as SSCT as strategic level of housing development would further increase commuting to Bristol or Bath and exacerbate imbalance between jobs and homes already in existence.
- 4.5 Overall the RSS estimates that the settlement in the remainder of the District will deliver about 2,000 dwellings.

The Vision and Housing Capacity studies for Keynsham, Midsomer Norton, Radstock and the Rural Areas

- 4.6 Members will be aware that Ernst & Young and David Lock Associates have been commissioned to undertake work on developing a Vision for Bath & North East Somerset, following a similar approach to the work undertaken in relation to Bath. This work is ongoing but its emerging conclusions have informed the strategy and capacity assessment described below.
- 4.7 The emerging Vision is based on achieving balanced growth, ensuring that housing development does not take place out of step with economic growth. It also seeks to build on the strengths of the various parts of the District in order to help deliver appropriate development meeting local needs. As such the approach accords with policy B of the RSS.
- 4.8 In relation to the southern part of the District the emerging strategy suggests that the towns and larger villages of Midsomer Norton, Radstock, Paulton and Peasedown St. John should act as a linked cluster of

settlements, each focussing on a different role. This results in a balanced approach across the settlement cluster. Work is ongoing but briefly Midsomer Norton (and in particular the town centre) is seen as having a retail/leisure focus, Radstock focussing on its major assets which may be based upon a tourism and heritage function, Peasedown to focus as an area of employment development (based around and building upon the Bath Business Park) and Paulton a mixed/balanced focus based around the redevelopment of the former Printing Factory.

4.9 Keynsham is a well located town with great potential that needs to be realised. Its demographic profile is likely to change and through improvements to the town centre and the provision of appropriate primarily office based employment opportunities can become an increasingly attractive free standing town. The provision of sufficient additional jobs is important to ensure that the high level of out-commuting to Bristol and Bath is addressed.

4.10 In terms of development capacity the assessment undertaken so far suggests the following during the RSS period:

- Keynsham – around 1,000 dwellings within the town (mainly achieved through mixed use redevelopment of town centre sites) and adjoining it at SW Keynsham (site coming forward through the Local Plan). Provision of additional employment opportunities mainly at Somerdale and town centre sites.
- Midsomer Norton and Radstock – around 900 dwellings on sites within the urban area (mainly on sites already committed either with planning permission or through the Local Plan) and provision of additional employment opportunities.
- Villages – around 1,100 dwellings based on implementation of sites identified through the Local Plan process and redevelopment of the Paulton printing factory site for mixed uses. This figure also includes an allowance for limited development in other large villages (significantly reduced from past development rates to reflect the RSS focus on urban areas) in order to help maintain their social and economic vitality.

4.11 The Vision work and associated evaluation of sites is ongoing and as such capacities are estimated at this stage and might change. Quantification of the number of additional jobs that are likely to be accommodated also still needs to be finalised. However, as stated above the housing capacity figures do take account of pursuing a balanced approach towards growth.

5.0 Transport Infrastructure

5.1 This Council has made it clear that delivering development at the urban extensions as recommended above is dependent upon significant investment in infrastructure, in particular that needed to meet transportation requirements. Transportation & Highways officers have indicated that the measures listed in the now deleted RSS policy SR10 (see para 11.6 below) would be sufficient to meet the strategic requirements of this development. In relation to south east Bristol this includes the ring road extension, major Park & Ride provision and the Whitchurch bypass. In relation to Bath delivery of all the elements of the Joint Local Transport Plan major bid, i.e. the 'Bath Package' and also those elements of the 'Greater Bristol Bus Network' major bid that improves transport links to and from Bath should be sufficient. Further work would be necessary in order to identify local transportation infrastructure measures that would be required.

6.0 Phasing and Delivery

6.1 The above sections of this Report assess and recommend development capacity figures for different parts of the District. This results in a total amount of development that can theoretically be provided between 2006 and 2026 (see section 10 below). However, it must be stressed that delivery of the homes is dependent upon provision of infrastructure and the forecast job growth being achieved. Whilst the RSS sets out a strategy for the next 20 years it is vital that the 'plan, monitor, manage' approach is used to ensure that development of homes is delivered when certain infrastructure and job growth 'trigger points' are met. It is therefore, suggested that a phasing policy is included in the RSS to that effect.

6.2 The draft RSS expresses housing distribution as a uniform annual figure, equating to 775 per annum for Bath & North East Somerset as a whole. It breaks this requirement down spatially, again expressing each area as a uniform annual rate of provision over the 20 year period (see figure 4.1 in the draft RSS). This is inappropriate. Initial analysis of the potential timing of delivery of housing suggests that the likely pace of delivery of urban sites within Bath and sites in the rest of the District means that the overall requirement of 775 per annum across Bath & North East Somerset can not be achieved from 2006 (the start of the RSS period). Therefore, in order to ensure these uniform average annual build rates are achieved one or more of the potential urban extensions would need to be brought forward for development quickly. Given the requirements for infrastructure provision to serve these urban extensions and the current position regarding

such provision (see section 8 above relating to transport) this appears to be unlikely.

6.3 Therefore, either the timing and funding of necessary infrastructure provision (e.g. south Bristol ring road extension between Hengrove and Hicks Gate – see paras 11.9 – 11.13 below) needs to change in order to ensure housing provision can be achieved to meet the average annual rates set out in draft RSS and/or the draft RSS needs to be amended to more accurately reflect the phasing of housing delivery rates that can be achieved in line with infrastructure provision and job growth. This is vital in order to ensure that pressure to develop housing ‘out of step’ with adequate infrastructure provision is avoided. Further work will be necessary during the lead up to the EIP to more accurately assess delivery rates so that a clear development programme (showing ‘trigger points’) across the 20 year period can be established and the corresponding development rates can be reflected in the RSS.

7.0 Conclusion on the Spatial Strategy for Bath & North East Somerset

7.1 The above sections outline the analysis of locations set out in the draft RSS. The strategy (but not development capacities) suggested above broadly accords with draft RSS. Should the Executive recommend this strategy and the capacities that are set out it would result in:

Bath urban area and south of Bath urban extension	6,500 dwgs	9,000+ jobs
South east of Bristol urban extension	3,500 + any capacity at Hicks Gate	Not known
Remainder of District	3,000 dwgs	Not known
Total	13,000 dwgs + any capacity at Hicks Gate	9,000+ jobs
RSS figure	15,500 dwgs	16,000-20,000 jobs in Bath TTWA

7.2 In order to accommodate this shortfall an alternative strategy for Bath & North East Somerset that would depart from RSS would be necessary. The SWRA officers have agreed that should the Council and the West of England seek such a strategy then it would need to be fully justified and represent the most sustainable alternative.

7.3 In order to accommodate the shortfall two broad options need further assessment as follows:

1. Seek to realise greater development capacity (than assumed in section 7 above) at Keynsham, Midsomer Norton and Radstock through ‘economic led’ regeneration. This would be dependent upon the provision of necessary infrastructure and would mean increasing the number of homes provided in these locations matched by a similar increase in jobs in line with RSS Development Policy B. Further analysis, including that being undertaken by Ernst & young in relation to the Vision, is necessary to ascertain the approximate number of additional homes that could result.
2. Sustainability Assessment of alternative locations including Bristol, locations within Bath & North East Somerset, as well as locations in Wiltshire and Somerset. Most of the shortfall in comparison to the draft RSS development figures relates to the south east Bristol urban extension. This development is principally linked to the regeneration of south Bristol and the city’s economic growth. Therefore, assessing alternative locations adjoining Bristol is likely to be necessary. A smaller proportion of the shortfall against draft RSS figures relates to Bath and therefore, assessment of the most sustainable alternative locations for meeting an element of Bath’s needs would be necessary.

7.4 Preliminary discussions with adjoining authorities have already taken place and if the Executive and Council approve the above Bath & North East Somerset strategy as a basis for the formal response to the SWRA then work on assessing an alternative can begin.

8.0 Comments on Other Policies in Draft RSS

Key Issues

8.1 As well as the concern over the Spatial Strategy noted by the 11th May Council a number of other issues were raised and outstanding concerns are set out below. These concerns need to be raised in the comments submitted to the EIP Panel.

1. Employment Growth

8.2 Policy SR5 of the Draft RSS proposes provision of job growth in the Bath Travel to Work Area (TTWA) of between 16,000 – 20,000 jobs. The Bath TTWA includes the eastern half of Bath & North East Somerset, including the Norton-Radstock area but excluding Keynsham; part of West Wilts including Corsham but not Chippenham or Trowbridge; and northern Mendip including Frome. The majority of jobs would be located at Bath. The Council and the West of England Partnership officers have continually questioned the assumptions made by the Regional Assembly on employment projections which appear to be too high. It is considered that the assumptions made on Growth Value Added (GVA) are too high; assumptions on output and jobs growth are too high; jobs growth capacity constraints and past trends not properly considered; and the ratio between jobs and need for housing too high.

8.3 The Regional Assembly have not revised their jobs growth assumptions despite evidence provided and the Council and West of England Partnership will need to continue to make detailed representations on these issues relating to job growth and the relationship with housing need.

2. Provision of Infrastructure

8.4 The SWRA have deleted Policy SR10 contained in Version 2.3 which specifically linked delivery of growth across the West of England with the need for significant investment in infrastructure:

“SR10 Delivering the scale of growth across the West of England’s three main urban areas will require significant investment in infrastructure to enable increased economic and residential development. Implementation of the proposals for the sub-region will require national and regional stakeholders including national, regional and local government, together with the private sector and appropriate agencies, to provide investment in infrastructure and services (including affordable housing) that is in phase with the demands of development and that addresses existing deficiencies, including:

- demand management measures;
- Greater Bristol Bus Network/showcase bus routes along strategic corridors;
- Bath public transport package;
- strategic rapid transit network (Hengrove/North Fringe, Ashton Vale/Emerson’s Green, Bath/Cribbs Causeway);
- selective additional strategic highway capacity to serve business investment and regeneration in South Bristol and Weston-super-Mare, improve access to the airport, including the South Bristol Ring Road;
- selective additional strategic links to motorways and other trunk route networks;
- Weston super Mare package including improvements to motorway junction;
- major Park and Ride improvements;
- significantly enhanced interchange facilities;
- increased walking and cycling provision;
- significant development of the heavy rail network;
- social and community infrastructure including provision of health, education, and sport, recreational and cultural facilities commensurate with an increase in the population;
- coastal defences expected to be necessary to enable the economic potential of Avonmouth and Severnside to be realised;
- new waste management facilities required to reduce landfill dependency, achieve greater local self-sufficiency and respond to economic and population growth. “

8.5 Whilst generic policies (SD4 – Sustainable Communities, Development Policy D – Infrastructure for Development and SI1 – Provision of Community Services) refer to ensuring that supporting infrastructure is delivered in step with development, it is considered essential that SR10 or similar be reinstated.

8.6 As it now stands as set out in policy SR5 of the draft RSS, the only key infrastructure necessary to enable the development of 7,500 dwellings and provision for around 16,000 – 20,200 jobs at Bath is “Bath public transport package including longer term Rapid Transit measures”. This is unacceptable in a sub-region which is expected to deliver the highest levels of growth in the South West Region and at a historic City expected to accommodate such substantial levels of development. Reference should be made to all the elements of the Joint Local Transport Plan major bid, the ‘Bath Package’ and also those elements of the ‘Greater Bristol Bus

Network' major bid that improves transport links to and from Bath (see also para 9.1 above).

3. South Bristol Ring Road

- 8.7 The draft RSS policy SR4 refers to investment in key infrastructure to enable the achievement of development within and adjoining Bristol. The list of infrastructure includes the need for improvements to the roads in South Bristol, including the South Bristol Ring Road. However this is considered to be ambiguous and the policy should be more explicit and clarify that its provision, and in particular the Hicks Gate to Hengrove section, is essential for delivery of the strategy for growth at south east Bristol and regeneration of south Bristol. The Hicks Gate to Hengrove section has been given a relatively low priority by the Assembly through the regional funding allocation (RFA) process. This is a process where the South West Regional Assembly provides advice to the Government on spending priorities for housing, transport and economic development.
- 8.8 The January 27th meeting of the SWRA agreed to advise the Government that the South Bristol Ring between the A38 and A370 and A38 to Hengrove should be in the RFA programme up to 2016, but that the link between Hick's Gate, Whitchurch and the Hengrove roundabout be categorised as being available for delivery beyond 2016. Given that this link will be essential if Bath & North East Somerset is to meet the proposed RSS development requirements adjoining south east Bristol, an urban extension is only likely to come forward in the latter years of the RSS period and it must raise doubts as to whether the RSS strategy for this area can be achieved.
- 8.9 The Final Joint Local Transport Plan approved by this Council for delivery to Government on March 31st 2006 recommends the construction of the Southern Ring Road from the A370 to the A4 at Hick's Gate to be delivered in a phased approach as recommended in the Greater Bristol Strategic Transport Study and as shown above. Phase 3 is the Hengrove to A4 Hick's Junction with the A4174 to be delivered in the medium to long term. As part of the development of the first two phases an appraisal of the full route of the southern ring road would be undertaken. Detailed route alignments for this 3rd phase would however not be undertaken until Major Scheme bids for phases 1 and 2 have been prepared and consulted on.
- 8.10 Thus the above sets out the agreed programme for the phasing of the schemes and resources for delivery of the Southern Ring Road. Should the Council wish to accelerate the later phase additional budget resources would be required.
- 8.11 Officers, in making representations to the SWRA and the consultants carrying out the GBSTS, have made it clear that development on urban extension at south east Bristol is dependent upon the provision of the section of the ring road between Hick's Gate, Whitchurch and Hengrove.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

Changes to reflect the comments set out above – principally amendments to the spatial distribution of the housing requirement for Bath & North East Somerset (as set out in policies SR.4, SR.5 and figure 4.1) to reflect the work undertaken so far and reflected in the above comments and further work to be undertaken during the lead up to the EIP (as referred to in the comments above); reinstatement of a robust infrastructure policy clearly linking the requirement for such provision for the development set out in RSS to be achieved and inclusion of a phasing policy linking the timing/quantity of housing development to both infrastructure provision and job growth.

Please ensure the name of your organisation is at the top of the page and e-mail the completed forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Section B
Your comments by

Organisation	Name	Page Number
Bath & North East Somerset Council	Mr. John Everitt (Chief Executive)	13-14

I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify): Supporting with request for further consideration

Chapter (section): 6

Page: 131

Policy Reference or Paragraph Number: H1 and para 6.1.9

Section C
Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: H1 and para 6.1.9

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- Policy H1 generally supported as it provides the opportunity to seek higher levels of affordable housing in areas of greatest need where it would not undermine development viability.
- Percentage of all housing that is to be provided as 'affordable housing' as set out in policy H1 needs to be reconsidered given the higher percentages that would need to be sought on sites meeting PPG3 size thresholds.
- Reference in para 6.1.9 to LDDs identifying division between affordable housing for rent and intermediate tenures is supported.

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

The comment below is taken from the Report considered by Council Executive on 12th July 2006. It was approved for submission by the Council Executive and is subject to endorsement by Council in September.

Affordable Housing

- 1.1 Policy H1 seeks 30% - 60% of all housing to be affordable. Given that under government guidance in PPG3 the site size thresholds above which affordable housing can be sought is currently 0.5 ha or 15 dwellings except where exceptional circumstances are shown, this would result in the need to seek 40% - 80% of affordable housing in qualifying sites. This aspect of the policy needs further consideration.
- 1.2 However the policy deserves general support and provides the opportunity to seek much higher levels of affordable housing in areas of greatest need within Bath & North East Somerset where this would not undermine development viability. Members will recall that the most recent study found a need for 600 affordable homes per annum for the next three years with nearly half required at Bath. Greenfield sites may particularly offer the opportunity to seek higher proportion of affordable homes as development costs are less likely to be abnormally high.
- 1.3 Also supported is the reference to local authority's Local Development Documents providing an appropriate division of affordable housing for rent and intermediate tenures (including forms of shared ownership). However, delivery of the whole approach needs to be underpinned by continued support and funding from the Housing Corporation and Regional Housing Body.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

As set out in paragraph 1.1 above reconsideration of the percentages of affordable housing that are to be provided as set out in policy H1 is necessary.

Please ensure the name of your organisation is at the top of the page and e-mail the completed forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Section B
Your comments by

Organisation Bath & North East Somerset Council	Name Mr. John Everitt (Chief Executive)	Page Number 15
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify)
Chapter (section): Various - see attached schedule
Page: Various – see attached schedule
Policy Reference or Paragraph Number: Various – see attached schedule

Section C
Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number:

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **See attached schedule of detailed comments on various policies/paragraphs in the draft RSS and the Implementation Plan**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

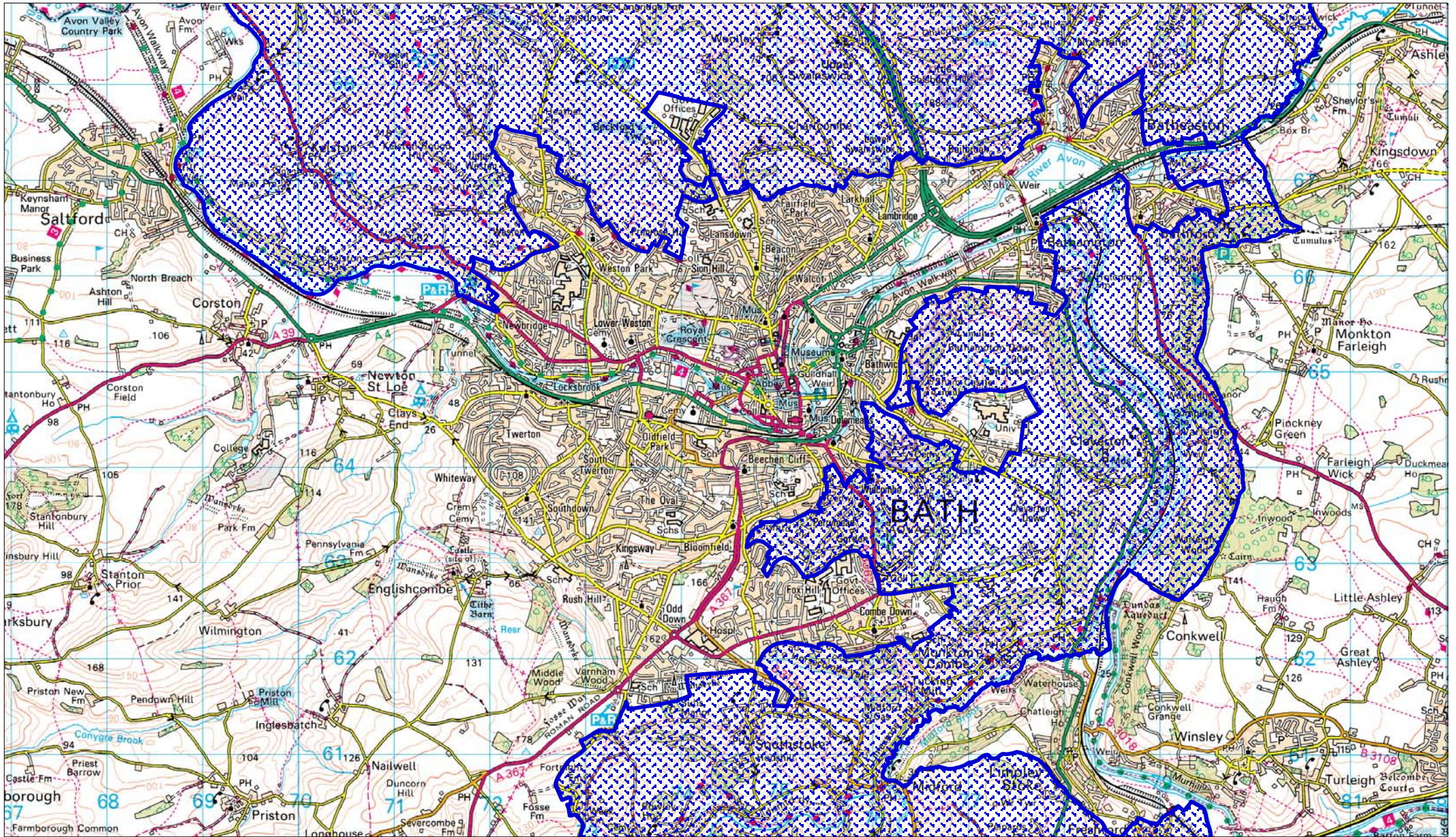
The comments in the schedule attached have been agreed by the Chief Executive in consultation with the relevant Executive Members and the Administration Group Leaders under delegated authority approved for by the Council Executive on 12th July. These comments are subject to endorsement by Council in September.

See attached schedule of detailed comments.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

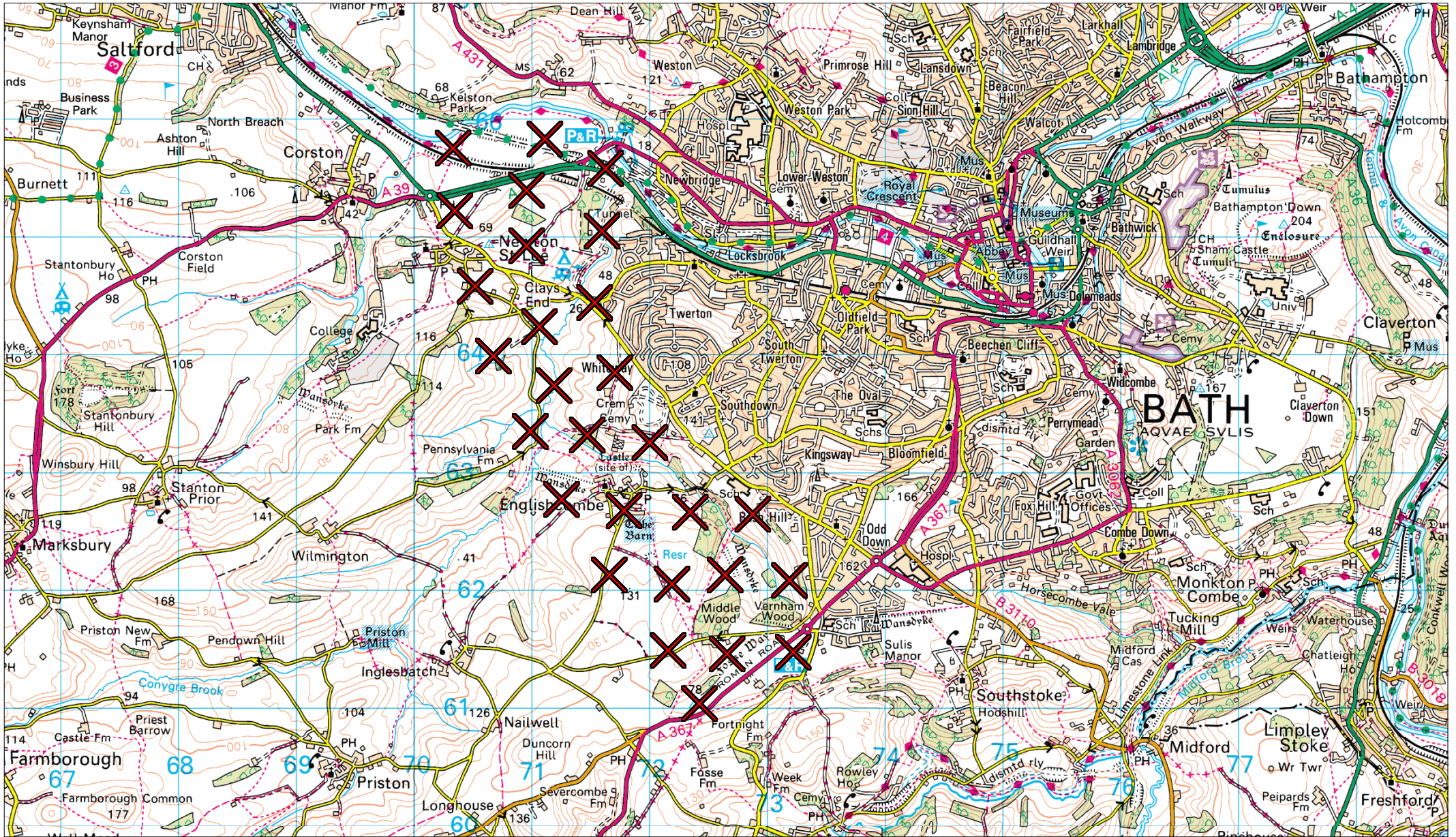
See attached schedule of detailed comments.

Please ensure the name of your organisation is at the top of the page and e-mail the completed forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk



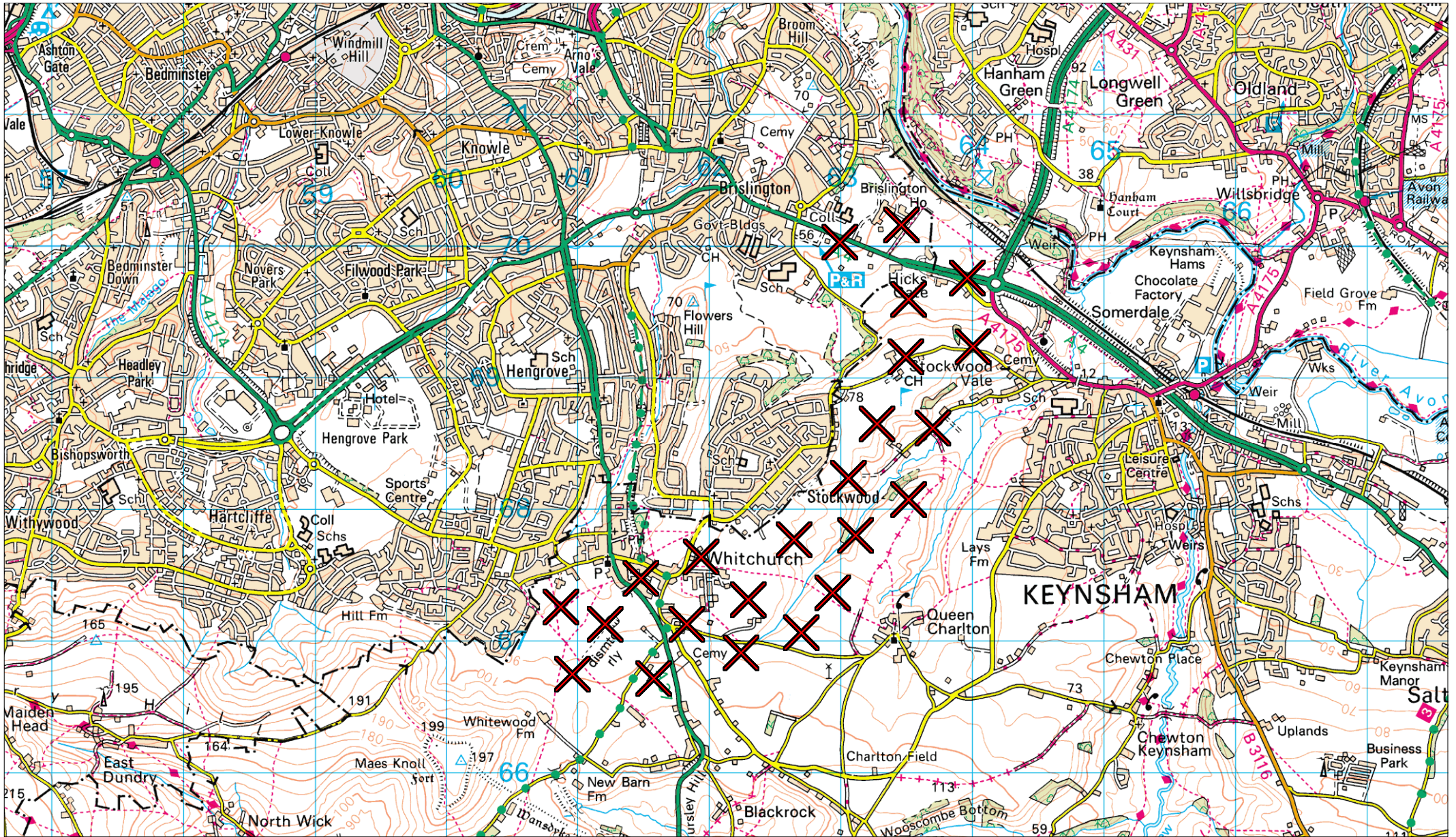
Cotswolds Area of Outstanding Natural Beauty around Bath

Prepared: 08.06.2006
By: Planning Policy
Scale: Not To Scale



Areas outside the Cotswolds AONB where strategic levels of development would have major adverse impacts on the setting of the World Heritage Site of Bath

Prepared: 08.06.2006
By: Planning Policy
Scale: Not To Scale



South East of Bristol Option 1, RSS Area of Search B, includes Whitchurch, Stockwood Vale and Hicks Gate areas Capacity: About 6000 dwellings

Prepared: 08.06.2006
By: Planning Policy
Scale: Not To Scale

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