

## SCHEDULE OF DETAILED COMMENTS OF BATH & NORTH EAST SOMERSET COUNCIL ON DRAFT RSS AND IMPLEMENTATION PLAN

### 1. COMMENTS ON THE DRAFT REGIONAL SPATIAL STRATEGY.

Chapter	Policy/Para number/(RSS page number)	Subject	Comment	Changes Sought – <i>New wording in italics</i> . Deleted wording shown as crossed out.
Foreword	Foreword para 2	Resources needed to deliver the spatial strategy	The comments on the importance of ensuring that resources are made available by central Government to deliver the levels of development envisaged in the spatial strategy, are strongly supported.	
1. A Sustainable Future for the South West	Para 1.3.1 (page 5)	Summary of Regional Future	Bath TTWA is expected to contribute between 16,000 and 20,200 jobs, more than the Weston-super-Mare TTWA. Whilst this is considered too high (see comments on West of England Sub-Regional Strategy), nevertheless the City should be included as an important focal point for economic growth.	Amend sixth bullet point to read:  Swindon, Exeter, Cheltenham/Gloucester, Bournemouth/Poole, <b>Bath</b> , Weston-super-Mare and Taunton develop as important focal points for economic growth
	Para 1.3.1 (page 5)	Summary of Regional Future	Paras 1.4.2, 1.4.3 and 1.5.1, among others, specifically identify the region's environmental quality, diversity and distinctiveness as a key asset and driver of economic change. This needs to be reflected in the statement in para.1 3.1.	Insert an additional bullet point:  <b><i>“ensuring that the region remains a place people wish to live in and visit, by conserving and enhancing its landscape, natural and historic environment”.</i></b>

	Para 1.4.3 (pages 6 & 7)	Environment under pressure	This statement is of particular significance to Bath & North East Somerset where proposals for development, especially urban extensions, are in areas of environmental sensitivity with potential for damaging the World Heitage Site of Bath, Cotswolds Area of Outstanding Natural Beauty and other important Ancient Monuments and Special Areas of Conservation on the edge of Bath and Bristol.	
	Paras 1.6.1 – 1.6.13 (pages 9 – 12)	Sustainability Principles	Amend paras 1.6.1 to 1.6.13 to make them more focused and precise. They should set out a clear description of what “sustainable development” means in the context of the RSS, thus providing a context for the rest of the document. The concepts of “environmental auditing” and “environmental capacity “should be introduced in this section, to underpin subsequent policies.	To reflect comment
	Policies SD1, SD2, SD3 and SD4 (pages 11-16)	The Ecological Footprint	<p>The overall approach of Draft RSS is supported, as are the principles covered by Policies SD1-SD4. However, the rationale for separating these principles out into separate policies is not understood, given the importance of treating them as inter-related.</p> <p>The policies as worded fail to provide clear guidance which can be effectively translated into local policies in Local Development Documents, and in making development control decisions, or be monitored. They could usefully be revisited to set out a more ordered series of precise requirements. For example, the term “ecological footprint” is not generally understood and needs</p>	To reflect comments

			<p>clarification. "Carbon neutral " in the context of new development should be defined- see Development Policy G.</p> <p>There are also some overlaps and apparent contradictions between these higher order policies and more detailed policies which need to be addressed. For example the need to address climate change and respect natural resources conflicts with growth at Bristol International Airport and para 1.6.11 refers to "major development" being carbon neutral while Development Policy G refers to all new and refurbished buildings.</p> <p>The supporting text should be more focused and concise, to provide a clear introduction and essential context for later material on the prudent use of resources.</p>	
	Policy SD1 (page 11)		<p>Policy SD1 contains clauses relating to minimising the need to travel and sustainable modes of travel but the supporting text does not explain and justify these. The supporting text actually appears in para 1.6.11 under 'Climate Change'.</p> <p>Policy SD1 should additionally refer to energy conservation within new development.</p>	To reflect comments
	Policy SD3 (page 14)	The Environment and Natural Resources	<p>In Policy SD3, it is unclear what is meant by "landscape and ecological thresholds of settlements". The policy should also be revised to clarify how, and to what level, mitigation of environmental impact should be achieved; and to refer to national and local, as well as regional,</p>	<p>The Environment and Natural Resources The region's environment and natural resources will be protected and enhanced by:</p> <ul style="list-style-type: none"> <li>• Ensuring that development</li> </ul>

			<p>biodiversity action plan targets.</p> <p>In addition it is important that the first clause refers to the need to for development to respect the historic environment thresholds as well as landscape and ecological thresholds. This should apply in rural areas as well as in settlements. As it stands clause 5 seems to suggest that it will always be acceptable to set development within the landscape of the historic environment. This will not always be possible and the policy should be amended to reflect this.</p> <p>In policy SD3, it is not sufficient to be “reducing environmental impact”; mitigation measures and levels should also be addressed.</p>	<p>respects landscape, <b>historic environment</b> and ecological thresholds of settlements <b>and rural areas</b></p> <ul style="list-style-type: none"> <li>• Reducing the environmental impact of the economy, transport and development</li> <li>• Positively planning to enhance natural environments through development, taking a holistic approach based on landscape or ecosystem scale planning</li> <li>• Planning and design of development to reduce pollution and contamination and to maintain tranquillity</li> <li>• Positive planning and design to set development within and to enhance local character (including setting development within the landscape of the historic environment <b>if appropriate</b>), and bringing historic buildings back into viable economic use and supporting regeneration</li> <li>• Contributing to regional biodiversity targets through the restoration, creation, improvement and management of habitats</li> </ul>
	Para 2.3.2 (page 22)	Economic Change	The implied link between the economic and population forecasts is central to the strategy of the RSS. If the growth anticipated in the RES fails	See attached 12 <sup>th</sup> July Council Executive Report

			<p>to materialise, what implications will this have for the strategy and levels of growth set out in the RSS?</p> <p>The RES sets out the general priorities and approach to facilitating the development of the regional economy. The impacts appear to be uncertain and the relationship with the level of employment growth unclear. Further justification is required of the high economic growth assumption in the RES and the ability of the RSS and key agencies to deliver the level of growth proposed.</p> <p>The figures for employment growth in the sub-region, including in particular the very high figures projected for Bath, are not supported by work done for the West of England Partnership and this Council. Further detail on Council's concerns regarding employment forecasts is set out in the Council's representation on the sub-regional spatial strategy.</p>	
2.The Context for the Spatial Strategy	Para 2.3.7 (page 24)	Population Change	The basis for the population forecasts should be clarified and the associated uncertainties identified. Reference should be made to ODPM 2003 based projections which show the population of the region rising by 667,000 between 2006 and 2026.	
	Para 2.3.13 (page 25)	Regional Housing	The scale of growth proposed for the region as a whole is very challenging. The draft RSS does not	

		requirement	<p>set out a sufficiently robust justification for RPG10 plus 25% being the start point for determining the level of growth proposed for the South West.</p> <p>This section needs to be updated to reflect the most up-to-date information. Further work needs to be undertaken on the implications on demographic and economic trends prior to the EIP, in conjunction with local authorities and other agencies.</p> <p>DCLG 2003-based household projections imply a requirement for an additional 28,000 dwellings pa across the region between 2006 and 2026. The spatial implications of the latest projected changes across the region are significantly different to those on which RSS relies. In particular, there should be greater recognition of the housing needs arising at existing population centres to meet changing patterns of household formation.</p>	
	2.4.2 (page 27)	Resources and Infrastructure Availability	The paragraph should be revised to recognise the need to fund major green and environmental infrastructure, including funding to mitigate the environmental impact of large scale development, and the need for flood infrastructure.	To reflect comments
	3.1.3 (page 32)	Spatial strategy Statement	Final bullet point seems can be interpreted to mean that managing growth within identified environmental limits is more important in the south eastern part of the region. This conflicts with the approach set out in policy SD1, clause 1. Bath, as a World Heritage site also experiences high	Managing growth within identified environmental limits, particularly <del>in the south eastern part of the region</del> where development pressures are high and future outward expansion and

			development pressures and outward expansion is also heavily constrained by environmental designations including the WHS with the need to protect its setting, Cotswold Area of Outstanding Natural Beauty, Special Area of Conservation, and Scheduled Ancient Monuments. In addition the RSS identifies much of the area surrounding Bath's urban area on the 'Nature Map' for which policy ENV4 gives priority for biodiversity enhancement. This para needs to reflect that all growth needs to be managed within environmental limits.	development <del>of the South East Dorset conurbation</del> is heavily constrained by environmental designations
3. Spatial Strategy	Development Policy A (page 35)	Development at the Strategically Significant Cities & Towns	<p>The identification of Bath as one of the Strategically Significant Cities and Towns which will be the primary focus for development is supported.</p> <p>There is a need to re-calibrate the overall spatial strategy to reflect the latest projections of household and economic growth – in particular, to recognise that, although economic growth will be concentrated around the SSCTs, changes in household formation patterns mean that more substantial levels of housing in particular may also be required at other existing population centres, including smaller towns, rural areas and, more generally, towards the western peninsular part of the region. This may require that the overall jobs and housing figures for the SSCTs should be revised.</p> <p>Para 2 of the policy should be amended to</p>	<p>Development Policy A Development at the Strategically Significant Cities and Towns (SSCTs) The primary .....2026</p> <p>Provision will be made to maintain and enhance the strategic function of these SSCTs through the development of a wide range of commercial and public services, community and cultural facilities, <b>green infrastructure</b> and non-car links to the communities they serve.</p> <p>For.....over the period 2006 to 2026.</p>

			recognise the need for environmental / “green” infrastructure, as well as the listed economic, social, transport and other requirements.	
	Para 3.3.4 (page 36)	Reviewing the Green Belt	<p>The paragraph fails to recognize the sustainability benefits of green belts, including in particular their importance in retaining open countryside accessible to urban residents, which is an important aspect of their quality of life.</p> <p>The statement that <i>“the studies conclude there are exceptional circumstances to justify revisions to the general extent of the green belt to deliver the most sustainable, longer term, development options”</i> is incorrect. Appraisal of areas against PPG2 purposes is not the sole determinant of what changes should be made to green belt areas.</p> <p>The studies made reference to the First Detailed Proposals work and subsequent work in the JSA, and set out methodologies for green belt appraisal (against PPG2 purposes) and for further work on sustainability and infrastructure considerations, before the general extent of the green belt is changed. That work has now been completed for Bath &amp; North East Somerset and recommendations on changes to the Green Belt are set out in evidence.</p>	
	Development Policy B (page 37)	Development at Market Towns	The term ‘market towns’ is misleading as the policy seems to apply to a wide range of types of settlement. Should just refer to ‘Other Places’ in	Development Policy B Development at <del><b>Market Towns</b></del> <b>Other Places</b>



			<p>line with the policy.</p> <p>The application of Development Policies B and C to the West of England area is not addressed in a coherent way. It is uncertain whether the 8 smaller towns in the area (Yate / Chipping Sodbury, Thornbury, Clevedon, Nailsea, Portishead, Keynsham, Midsomer Norton and Radstock Radstock) fall under Policy B or C. Although they appear on Inset Diagram 4.1, it is not clear whether this means that they are “identified in Section 4” in terms of Policy B; or whether the level of development at these towns is wholly a matter for LDDs, as one interpretation of para 3.4.1 might suggest. Clearer criteria need to be drawn up for identifying which settlements fall under each policy.</p> <p>Policy B should acknowledge opportunities to address local housing need which cannot be met, in a more sustainable way, at the SSCTs. The submitted West of England FDPs clearly identified that further development at such towns remains an option for more detailed consideration. In order to meet local needs for affordable housing, it should be recognised that open market housing will need to be provided at smaller towns and larger villages.</p> <p>Draft RSS fails to give sufficient recognition to the importance of smaller towns, within the sub-region and elsewhere, as major contributors to the</p>	<p>In addition to the SSCTs identified in Development Policy A and other towns identified in Section 4, those places which, based on an analysis of roles and functions, meet all of the following criteria, will be identified as the focal points for the provision of locally significant development:</p> <p><b><i>Where it would address local housing need which cannot be met in a more sustainable way at the SSCTs</i></b></p> <ul style="list-style-type: none"> <li>• Where there is an existing concentration of business and employment, or where there is realistic potential for employment opportunities to be developed and enhanced</li> <li>• Where shopping and cultural, religious and faith, educational, health and public services can be provided to meet the needs of the town and the surrounding area whilst minimising car dependence</li> <li>• Where there is potential to maintain and develop sustainable transport modes, including accessible local public transport services to meet identified community needs</li> </ul> <p>The scale and mix of development</p>
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			<p>region's economy and as attractive and relatively sustainable locations in which to live. It is essential that their vitality and viability should be maintained and enhanced. The policy should recognise the need to maintain and develop the employment and business capacity of smaller towns, to reduce the need to travel.</p> <p>The policy fails to make any reference to the scale of appropriate development in these settlements. Greater emphasis should be placed on the importance of local community involvement in determining the future of smaller towns and villages.</p> <p>There is a particular need to clarify the role of Bath in relation to surrounding towns, given its environmental constraints and the fact that the anticipated rise in employment will put conflicting pressures on land for homes and jobs. Additional housing provision in towns in Mendip and West Wilts., within the Bath housing market area, seems not to be supported by para. 4.2.16,. However, it is also stated that "<i>growth in nearby towns to meet local needs and a continuation of regeneration policies at Norton Radstock will be consistent with an urban extension to Bath</i>".</p>	<p>should <b>wherever possible</b> increase self-containment of the places identified, develop their function as service centres especially in terms of employment and service accessibility, and secure targeted development which can address regeneration needs.</p>
	Development Policy D (page 41)	Infrastructure for Development	<p>The Partnership supports this policy in principle. However, it needs to be stronger to ensure that essential infrastructure is provided in step with development. The West of England has identified</p>	<p>To reflect comments</p>

			<p>a significant shortfall in funding the infrastructure required to support the delivery of sustainable communities and maintain and improve quality of life.</p> <p>The policy should make specific reference to affordable housing, which is one of the biggest and most expensive demands on infrastructure investment (42% of the total , £1.9bn, in Roger Tym WoE Study).</p> <p>The policy should mention the requirement for LAs to produce delivery plans for the major development areas, essential for programming investment, and to more specifically identify the scale and timing of funding sources.</p>	
	Development Policy F (page 43)	Master Planning	There is concern at the requirement to require housing within existing urban areas or new urban extensions to be developed at a density of <i>'at least 50 dwellings/ha, and higher whether possible'</i> . See detailed comments on Policy H2.	To reflect comments
	Development Policy G (page 45)	Sustainable Construction	The principles of this policy are supported but it is much too detailed and should not contain the list of references to codes and standards which could rapidly become out of date, amended or superseded. It should be simplified to ensure development meets the most up to date standards. The standards and codes could be referred to in the supporting text.	To reflect comments
	Development	Re-using Land	This policy is weak, unclear, and ungrammatical.	To reflect comments

	Policy H (page 47)		It is unclear whether it proposes leaving brownfield sites vacant, or whether any development on a brownfield site is regarded as “sustainable”. Draft PPS3 states that “ <i>the priority for development is brownfield land</i> ”. However, there is also a need to keep some sites open because of their environmental or visual significance.	
	Development Policy I (page 47)	Release, Redevelopment or Disposal of Land	Reference is made here to “ <i>the sequential test</i> ” in respect of the release of public sector land - without any indication as to what this test is supposed to be.	To reflect comments
	Development Policy J (page 48)	Joint Working	Whilst the advantages of joint working are accepted it should be recognised that this will inevitably result in the need for increased resources and time to complete LDDs. From experience the setting up of joint meetings, carrying out joint studies and taking reports to more than one Council Executive will all lengthen the time for prepare Planning documents. The RSS or Implementation Plan should recognise this and the need for extra resources to support joint working.	
	Para 3.9.1 (page 48)	Strategic Priorities for Investment in Transport and Other Facilities to Support the Spatial Strategy	This overall approach is broadly supported. In particular, the Council endorses the short term priorities set out in the Regional Funding Allocation bid. However, identified shortfalls in infrastructure funding must also be acknowledged and addressed. In particular the funding for South Bristol Ring Road (Hengrove – Hicks Gate) will need to come forward as soon as possible if an urban extension to south east Bristol (Area of	To reflect comments

			<p>Search B) is to come forward during the Plan period.</p> <p>In areas of high levels of growth the difficulty in securing robust green infrastructure and environmental mitigation on a scale commensurate with the scale of development must be recognised. It should be given equal priority alongside other investment priorities. Without this, the quality of life and environment, for which the South West is valued, will be adversely affected.</p>	
	Policies SR2 – SR5 and figure 4.1 (pages 52 – 61)	West of England Spatial Strategy	Main comments on the spatial strategy for the Bath & North East Somerset are set out in the Council's representation on the sub-regional spatial strategy.	
4. Sub-regional Strategy	Para 4.1.3 (page 52)	Sub-Regional Emphases	This para should make reference to Development Policy A in respect of Strategically Significant Cities and Towns.	To reflect comments
	Para 4.2.2 (page 54)	Development at SSCTs	First sentence refers to the settings of SSCTs including sensitive assets of environmental and heritage importance. This should be extended to refer to the presence of assets of significant importance within urban areas e.g. Bath.	To reflect comments
	Policy SR1 (page 55)	The North and Centre of the Region	Whilst supporting the general approach the policy should recognise, as does the supporting text, that in meeting housing needs account must be taken	SR1 In the north and central part of the region, the strategic emphasis is to realise economic potential by

			of sensitive assets of environmental and heritage importance.	enabling the SSCTs to develop, maintain and improve their roles as service and employment centres, with a view to enhancing regional prosperity and addressing regeneration. Sufficient housing will be provided to complement this role and to meet the needs of a growing population <b><i>recognising and taking account of sensitive assets of environmental and heritage importance.</i></b>
	Inset Diagram 4.1 (page 55)	West of England	See comments set out in the Council's representation on the sub-regional spatial strategy. The Council seeks changes to the areas of search for urban extensions.  The existing Green Belt boundary should be corrected at Chew Valley Lake. The boundary of Mendip Hills AONB should be corrected around Winscombe.  The non-motorway road network shown is misleading. For consistency, "national primary routes" should be shown, including A4 E of Bath, Bath – Bristol, and Bristol – Avonmouth; A403 Avonmouth – M48 (Aust); A46 Gloucs border – M4 – E of Bath – A36 Wilts/Som border; A4174 ring road from M32 to A4; A37 Bristol – Som; A38 Bristol – Som ; A371 linking WsM with A38	See map showing amended area of search E

			<p>(Churchill); A370 WsM – M5; A4032 Bristol city centre. Of those roads shown in the current diagram, the A38 N of Almondsbury (parallel to M5) and A370 Bristol-WsM should <u>not</u> be shown</p> <p>The Bristol to Southampton rail line should be shown.</p> <p>The view of Bath &amp; NE Somerset Council is that the area for search for an urban extension at Bath should be drawn more widely, to include land immediately west of the city (but not within the AONB) .</p>	
Para 4.2.3 (page 55)	West of England Spatial Strategy Context	<p>Bath's population is about 84,000 and not about 90,000.</p> <p>The text should be revised to recognise the importance of the West of England's important and sensitive environmental assets, which contribute substantially to its economic attractiveness and so benefit the region as a whole.</p>	To reflect comments	
Policy SR2 (page 56)	West of England Spatial Strategy	<p>Although this approach is supported by the Council, it should be expanded and clarified.</p> <p>The West of England has identified a significant shortfall in funding the infrastructure required to support the delivery of sustainable communities and maintain and improve quality of life. The policy needs to be stronger to ensure that</p>	Reinstate Policy SR10	

			<p>essential infrastructure is provided in step with development. The policy wording in Draft RSS Version 2.3 policy SR10 (considered at the Assembly meeting on 27.01.06) – which was deleted from subsequent drafts – provided a basis for such an approach and should be reinstated.</p> <p>The policy places inadequate emphasis on the critical importance of infrastructure investment in the sub-region - in particular, the critical importance of the South Bristol Ring Road (A4-A38) for delivering the strategy for growth and regeneration within and around south Bristol. If the essential infrastructure fails to materialise when it is required, development should not be allowed to take place in an unsustainable way.</p> <p>The strategy for the West of England has been prepared in the absence of complete information relating to green belt assessment, sustainability appraisal, and is dependent upon the Regional Assembly, the Government and the national regeneration agencies delivering the transport and other infrastructure investment needed in the area prior to development taking place and as part of the sustainable communities agenda. While the Council supports the overall strategy, the detailed locational implications require the results of the further technical work carried out by Bath &amp; North East Somerset and the other Councils within the West of England area (see comments under SR2-5 above). There is therefore a need for a</p>	
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			continuing dialogue with the West of England Partnership beyond the close of the consultation period.	
	Policy SR3 (page 57)	Green Belt	See comments on urban extensions under policies SR2-5 above.  The policy on green belt should emphasise the importance of maintaining and enhancing green infrastructure around the sub-region's major urban areas, particularly in enhancing the quality of life of urban residents and its positive contribution to the overall attractiveness of the sub-region, and hence its economic importance to the region as a whole.	To reflect comments
	Policy SR3 (page 57)	Green Belt	The policy requires the West of England authorities, within a revised green belt, to make provision for significant urban extensions ' <i>to meet the longer-term needs</i> '. This last phrase needs clarification as to whether or not it refers to the period after 2026; the RSS is unclear about the need to identify safeguarded land.	
	Policy SR3 (page 57)	West of England Green Belt	Extension of the Green Belt set out in the fourth bullet point is not justified in the text. The rationale needs to be fully explained.	To reflect comments
	Policies SR4 and SR5 and paras 4.2.13 and 4.2.19 (pages 58 & 59)	Infrastructure provision associated with development at Bristol and Bath	The list of infrastructure needs seems to be focused around transport requirements. Other needs should be added, including green infrastructure, investment in community, health and education provision and affordable housing	Reinstate Policy SR10

			<p>There is a need for a much clearer and stronger policy statement of the infrastructure required in order to deliver the development opportunities set out in policies SR4 and SR5. This should be achieved by reinstating policy SR10 (from earlier drafts) or a similar policy. This concern is fully addressed in the Council's representation on the sub-regional spatial strategy.</p>	
	<p>Policy SR4 (page 58)</p>	<p>Bristol</p>	<p>The general approach towards developing the key regional and national role of the Bristol urban area (including those parts beyond the City Council boundary) is supported by the West of England Partnership. However, there are concerns, not yet fully resolved, over whether the scale of development proposed within the built-up area can be achieved in the RSS period, given competing demands for land use and transport, and the need for very substantial levels of investment.</p> <p>The Partnership is not committed to the suggested areas for urban extensions, or for extensions to green belt areas, until further work is completed.</p> <p>The position of Bath &amp; NE Somerset Council is that a study has been undertaken of the scope for an urban extension SE of Bristol, reported to the Council's Executive on 12th July 2006. The recommended approach is for development at Whitchurch totalling some 3,500 dwellings, plus any additional capacity identified at Hicks Gate (some of which may be within the Bristol City boundary and is subject to further joint studies).</p>	

			This would be subject to infrastructure being provided. Development in this area is subject to the completion of the Ring Road between Hicks Gate – Whitchurch – Hengrove, which in the RFA programme put forward by SWRA is proposed for delivery after 2021. Maintaining this timing would jeopardise the spatial strategy for the area. See also comments set out in the Council’s representation on the sub-regional spatial strategy.	
	Policy SR5 (page 59)	Bath	Reference should be made in policy SR5 to the need to carefully evaluate the implementation of an urban extension to Bath through the LDD process. This would reflect the statement made in the text (para 4.2.18). See further comments on this policy set out in the Council’s representation on the sub-regional spatial strategy.	To reflect comments
	Paras 4.2.14 – 4.2.19 and policy SR5 (page 59)	Bath	This section should recognise the importance of addressing (through focussing investment) the challenge of maintaining and improving the public realm and historic fabric of Bath. This is a key factor in sustaining the City as an attractive place in which to live and invest as a business centre, World Heritage Site and a successful tourist and visitor attraction. Such references are made in relation to Cheltenham in the relevant section.	To reflect comments
	Policy HD1 (page 101)	Sub-regional Distribution of Housing 2006-	The West of England Partnership has previously endorsed the level of housing in Draft RSS, which was in line with that proposed within the sub-	To reflect comments

		2026	<p>region in the “First Detailed Proposals”. However, the proposed distribution of housing development is locationally more specific than that agreed by the authorities and Partnership.</p> <p>Further work has subsequently been undertaken by the strategic planning authorities to test the level and distribution of development proposed in Draft RSS. In particular:</p> <ul style="list-style-type: none"><li>• in Bath and North East Somerset, Draft RSS did not take into account ongoing work on locational options, as described in the “First Detailed Proposals” (FDP). This has now considered alternative approaches which recognise the environmental issues within and adjoining Bath, and which include the option of further development elsewhere. Housing provision within and adjoining Bath over the period is now recommended to be 6,500 dwellings, with 3,500 adjoining SE Bristol (possibly with additional provision in the Hicks Gate area), and 3,000 in other towns and rural areas. Further work looking at options to accommodate the identified shortfall against the FDP figure needs to be undertaken (see Council comments on sub-regional spatial strategy);</li><li>• in South Gloucestershire, the Council has</li></ul>	
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			<p>serious concerns about the level of growth proposed due to concerns about infrastructure provision, Green Belt issues, deliverability issues and other constraints. The Council is minded to object to the proposed dwelling requirement for South Gloucestershire and suggests it should be reduced to 21,500 dwellings over the period 2006-2026. It is also suggested that the figure for Areas C and D be amended to a maximum of 2000 – 2500 in total and the figure for the remainder of South Gloucestershire be amended to 250 per year</p> <ul style="list-style-type: none"><li>• in North Somerset, the Council has resolved that, in the light of current information, the allocation for SW Bristol should be about 7,500 dwellings; the North Somerset housing requirement should therefore be reduced to a maximum of 24,500 dwellings.</li></ul> <p>The distribution of housing referred to in these policies, particularly the two 10 year requirements for each LA, provides little scope for a more co-ordinated approach to the provision and development of housing land across the sub region, despite this being advocated in HD2. It is conceivable that different parts of the sub region may contribute at different average rates in those two 10 year periods, depending on the phasing of particular urban extensions or the regeneration of</p>	
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			<p>existing urban areas.</p> <p>Draft PPS3 provides for local authorities to work in sub regional housing market areas to achieve this greater co-ordination, releasing land in the wider market area if necessary. Such arrangements need to be set out in the regional spatial strategy. There is a valid argument that policy HD2 should make explicit this option where it can be shown that there is a formal arrangement between local authorities to meet RSS targets albeit over a wider HMA for a particular period. The current wording of HD2 only refers to joint working and meeting provision in HMAs and LPAs, i.e. the LPA targets still have to be met for both 10 year periods. It is unclear as to which takes precedence – district figures or the housing market area figures – when assessing development options, particularly if proposals fail to come forward as anticipated.</p>	
	Policy HD2 (page 101)	Phasing of Housing Development and Ensuring Land Supply	See comments on HD1	To reflect comments
	Table 4.2 (page 105)	SSCTs: Housing Totals	See comments on HD1	To reflect comments
	Para 5.1.1 (page 108)	Transport and the Spatial Strategy	The point is made that the transport implications of accommodating growth will “inevitably drive the provision of infrastructure and services”. This has not necessarily been the case previously, particularly for major scheme bid expenditure. The link between accommodating growth and the	To reflect comments

			requirement for investment should be strengthened. Reference should be made to the RFA process.	
Section 5 Regional Approach to Transport	Para 5.1.4 (page 109)	Transport and the Spatial Strategy	The section outlines the context for the RSS transport policies including guidance on major strategic issues and a framework for LTP's. If this is the case reference should also be made to the RFA process	To reflect comments
	Paras 5.2.10 (page 113)	Transport and the Spatial Strategy	The sections talk about securing a "step change" in public transport provision whilst focusing upon bus and rail improvements. The commentary should be much more ambitious in this area and make reference to rapid transit proposals including LRT.	To reflect comments
	Policy TR1 (page 113)	Demand Management and Public Transport in the SSCTs	<p>There is a concern that the transport proposals for the SSCTs should be more fully integrated into the spatial policies which allocate jobs and generally locate future housing, particularly if this development cannot take place without such infrastructure. Failure to do so raises the question as to the commitment to such infrastructure in the longer term and therefore casts doubt on the achievement of the development targets. Some of these proposals are only flagged up in supporting RSS text and it is unclear what their status is. The opportunity should be taken to agree a package which could be incorporated into formal sub regional policies following the RSS consultation stage</p> <p>Policy TR1 is a "catch-all" policy that is simply too broad to reflect the problems and issues faced by</p>	To reflect comments

			<p>SSCT's. It is also out of keeping with other TR policies for example TR6 that focuses solely upon public transport. TR1 should be broken down into 2 policy areas for SSCT's;</p> <p>1 – Public transport policies and securing a step change in provision to enhance the social and economic environment of the SSCT's</p> <p>2 – Demand management policies that should be considered as part of a wider package of measures designed to improve the SSCT's</p>	
	Policy TR2 (page 116)	The M4 and M5	<p>Wording should include reference such as <i>“in conjunction with improvements to public transport which could reduce reliance on the car and the lorry”</i>.</p> <p>The effects of motorway management measures should always be assessed in conjunction with their effect on the local main road system.</p> <p>The policy should refer to the need to minimise the impact of motorway traffic on the environment, as is done in Policy TR10, for example by adding words such as <i>“The Highways Agency in the region should also develop proposals to reduce the impact of long distance traffic on the built and natural environment and improve the quality of life of communities seeking to improve air quality, and to reduce accidents, severance and the impact of noise.”</i></p>	To reflect comments



	Policy TR3 (page 116)	Second Strategic Route	There should be reference to the role of other modes in improving resilience and competitiveness, possibly at lower cost.	To reflect comments
	Policy TR4 (page 116)	Remainder of the Trunk Road Network	There should be reference to the role of other modes.	To reflect comments
	Policy TR5 (page 118)	Inter-regional Rail Network	<p>This policy should refer to the role of rail generally in reducing road user demand and lessening the need to spend on roads.</p> <p>The last bullet point should refer in particular to Bristol area re-signalling, to replace the existing system which is an increasing source of unreliability.</p>	To reflect comments
	Policy TR7 (page 120)	Ports	<p>Paragraph 5.4.2 recognises that <i>“land constraints will affect the ability of the Port to reach its potential”</i>, while Policy TR7 refers generally to the need for LDDs to facilitate the growth of ports (where appropriate) to provide <i>“land for port growth, marine sectors and related uses”</i>. However, there are no environmental caveats to this, and no reference to green belt. The policy should be redrafted to refer to environmental and green belt constraints.</p>	To reflect comments
	Policy TR9 (page 122)	Airports	The policy follows the approach set out in the Aviation White Paper which expects the region to meet an increasing proportion of regional demand from airports such as Bristol. This is an encouraging policy which seeks local authorities, airport operators and agencies to provide improvements to facilities and access to meet future development requirements consistent with	To reflect comments

			<p>transport strategies. However, there is no clear guidance as to how local authorities are supposed to meet the long term role.</p> <p>Much greater prominence needs to be given to the issue of surface access and the development of public transport opportunities to airports.</p> <p>The green belt policy (SR3) simply refers to the green belt inset proposed in the Replacement Local Plan (to 2011).</p> <p>There is also no cross reference to or explanation of how the airport policy relates to the sustainable development issues such as climate change.</p>	
	Policy TR11 (page 123)	Intra-regional Public Transport	The important roles of cross-country rail routes and branch lines, and bus services, in maintaining and improving rural access, and in providing access to the countryside, should be mentioned.	To reflect comments
	Para 5.7.2 (page 126)	Setting Parking Standards	<p>Developing car parking standards through the LTP process rather than through the LDD process does not allow for the same level of public scrutiny. Para 5.7.2 should clarify that car parking standards will also be developed through LDDs.</p> <p>The reasons for promoting reduced parking standards in the main urban areas should be highlighted to reflect government guidance in PPG13 to require reduced standards where there is good accessibility to non car modes. Also reference should be made to maximum car</p>	To reflect comments

			parking standards	
Section 6. Housing	Policy H2 (page 132)	Housing Densities	<p>There is concern at the requirement to require housing within existing urban areas or new urban extensions to be developed at a density of <i>'at least 50 dwellings/ha, and higher whether possible'</i>.</p> <p>It should be made clear that the proposed density figures are (presumably) net.</p> <p>While there is a requirement to make best use of urban land, environmental and local character issues need to be taken into account, and good urban design is essential. Policies on densities need to be properly integrated into a whole range of wider considerations governing the shape of any development, in particular design quality, environmental character, the need for green infrastructure, and accessibility.</p> <p>The location and character of an area, including its environmental character, need to be taken into account before it is assumed that densities of 50 dph can be achieved. Achievement of such densities in urban extensions without very frequent daytime/evening public transport may simply increase the number of car journeys and leave those without cars isolated. It needs to be clarified that these are net densities.</p> <p>High densities within existing urban areas will inevitably restrict the range of accommodation it is possible to provide, particularly family housing.</p>	To reflect comments

			<p>This may work against the regeneration of urban areas as balanced communities providing a wide range of housing types, and may also fail to take account of the land needed to provide for other uses, e.g. open spaces, community facilities, some of which may be needed to substitute for living space saved by higher density housing.</p> <p>The blanket requirement that densities at the SSCTs, including the urban extensions should be at 50 dwellings/ha or more is inappropriate. Uniform density requirements are unlikely to provide the best solution which should be urban design led and should take account of the local context. In addition such a requirement is unlikely to assist in the integration of an extension with the existing settlement and again may also restrict the range of housing types which can be provided, contrary to the objective of creating balanced communities.</p> <p>In areas of particular sensitivity e.g. valued historic environments, new development should not adversely affect character and should be urban design not density led.</p> <p>See also comments on Policy F</p>	
	Policy GT1 (page 133)	Assessment of Need for Gypsy and traveller Accommodation	The arrangements for preparing needs assessments and providing sites for Gypsies and Travellers are set out in Circular 1/2006 and the policy adds little to that guidance. There needs to	To reflect comments

		Requirements	<p>be a better justification and supporting evidence base.</p> <p>The authorities in the West of England are working together to assess unmet housing need for Gypsies and Travellers. It is intended to undertake a detailed survey of need during July - September 2006.</p> <p>The requirements would be better expressed in terms of public or private provision and distinguishing between permanent and transitory sites.</p> <p>It is not clear how the proposed regional provision of about 1,100 additional pitches for Gypsies and Travellers, which compares with existing provision of about 550, has been calculated. It is also not clear how a Regional "target", in the absence of an apportionment to each Unitary / District Authority area, can be used to monitor delivery in LDDs. This "target" should be deleted, leaving it to assessments of need to establish provision.</p> <p>The reference to "park homes" in the policy is not understood – such provision may not necessarily meet the needs of Gypsies and Travellers.</p>	
	Policy G11 (page 138)	Green Infrastructure	This policy is welcomed. However it omits reference to key types of spaces including views and vistas, those contributing to local character and identity, allotments and cemeteries. It should	To reflect comments

			<p>be amended to include the full list of Green infrastructure included in PPG17.</p> <p>It should also ensure that green infrastructure within existing urban areas is protected and integrated with new provision. It should state that GI is provided on a level that is accessible and in scale with the location and scale of development proposed. The requirement for environmental mitigation should also be stated.</p> <p>The policy and text should also recognise that some nature conservation sites are not multifunctional because of their sensitivity to change.</p>	
	Policy C1 (page 141)	Cultural Infrastructure	In line with the supporting text policy C1 should refer to provision of cultural infrastructure which is accessible to all.	
Section 7. Environment and Culture	ENV1 (page 144)	Protecting and Enhancing the Region's Natural and Historic Environment	<p>General support but object to statement '<i>and developments which support their positive management will be encouraged</i>'. This could be interpreted in many ways and even if a development does adversely affect a site it could be argued that the development still supports positive management. It is effectively encouragement to development which may have adverse impacts on a site or area of importance.</p> <p>The policy needs to be rewritten so it is clear that the development should not adversely affect sites, whether of national or local importance unless</p>	<p>ENV1 Protecting and Enhancing the Region's Natural and Historic Environment</p> <p>The quality, character, diversity and local distinctiveness of the natural and historic environment in the South West will be protected and enhanced, and developments which <b>do not adversely affect them but</b> support their positive management will be encouraged. Where development</p>

			<p>there are overriding reasons to allow it. It could then go on to say that developments which do not harm the site and support their positive management will be encouraged.</p> <p>As written the policy appears to suggest that local sites are not a priority and again is an encouragement for their development.</p> <p>The last part of the policy does not read correctly as tools such as characterisation and surveys will not enhance sites but are part of the process which may lead to proposals to enhance sites through development.</p> <p>The policy needs a radical rethink and rewording or it could enable inappropriate development in such areas or sites. Suggested wording is proposed.</p>	<p>and changes in land use are planned which would affect these assets, local authorities will first seek to avoid loss of or damage to the assets, then mitigate any unavoidable damage, and compensate for loss or damage through offsetting actions. Priority will be given to preserving and enhancing sites of international or national landscape, nature conservation, geological, archaeological or historic importance. <b>Local sites will also be given a high level of protection. Where development could <del>Tools such as characterisation and surveys will be used to</del> enhance local sites, features and distinctiveness <del>through development</del>, including the setting of settlements and buildings within the landscape and contributing to the regeneration and restoration of the area <b>then tools such as characterisation and surveys will be used to inform proposals</b> .</b></p>
	Policy ENV2 (page 144)	Landscape Character Areas	Landscape character assessment is important to ensure the conservation and enhancement of all areas, not just to identify priority areas. The policy should be amended to ensure delivery of local	To reflect comments

			<p>policies that will conserve and enhance the character of all parts of the region; and, where change is necessary; that landscape character is incorporated into design.</p> <p>It is not clear what is meant by undertaking landscape character assessments at a <u>strategic level</u>. This needs clarifying and the resource (financial and time) impacts of partnership working on these assessments needs to be analysed and taken into account.</p>	
	Para 7.2.9 (page 147)	Nature Conservation	Reference should be made to the list of Species of Principal Importance for Biological Diversity in Britain. The third sentence should also include “create new areas of particular types of habitat and regenerate populations of certain species”	To reflect comments
	ENV4 (page 148)	Nature Conservation	Wording should be clarified to refer to priority species and habitats in UK Biodiversity Action Plan.	To reflect comments
	ENV5 (page 149)	Historic Environment	It is unclear what the local authorities should do as a result of this policy. Para 7.2.13 implies only “important sites” should be subject to characterisation, but this is not made clear in the policy. Producing characterisation reports would involve committing substantial levels of local authority resources, yet it is not clear what benefits such an approach might bring. PPG15 and 16 make clear that assessments of the implications of development on the historic environment are the responsibility of the developer. However, Policy ENV 5 seems to be switching this responsibility to the local authorities.	To reflect comments



	Policy F1 (page 151)	Flood Risk	The last bullet point should refer to managed realignment contributing to UK Priority BAP targets.	To reflect comments
	Policy RE1 (page 155)	Renewable Electricity Targets	These policies should acknowledge the constraints imposed by environmental designations, eg the Severn estuary and AONBs, and also encourage technologies which could harness tides etc without significant environmental impact.	To reflect comments
	Para 7.3.17 – 18 (page 159)	Best and Most Versatile Land	These paragraphs need to better reflect advice in PPS7. Whether BMV should be subject to development as part of an urban extension may depend on whether this is consistent with other sustainability objectives. Whilst protecting BMV or not compromising its potential for food production is desirable it may not always be the most sustainable solution. Para 7.3.18 as it stands is ambiguous suggesting that there can be both development and protection of BMV.  The para should be followed by a policy.	To reflect comments
	Policy RE8 (page 160)	Woodlands and Forests	The reference to protecting ancient woodland should be strengthened to make clear that PPS9 specifically requires local authorities to protect this habitat, which is also on the UK BAP.	To reflect comments
	Policy RE9 (page 160)	Air Quality	There are no policies addressing noise and light pollution and this omission needs to be addressed.	To reflect comments
	Policy RE10 (page 162)	Supply of Aggregates and Other Minerals	Policy should promote beneficial re-use of aggregates extraction sites, restoration and aftercare.	To reflect comments

	Para 7.3.27 Policies W1 and W3 (pages 166 – 168)	Provision of capacity to Handle Waste	Text should be corrected to refer to LDFs (not Waste Development Frameworks) in unitary authorities.	To reflect comments
	Policy W3 (page 168)	Hazardous Waste	In making provision for facilities for disposal of hazardous waste the policy should refer to concerns relating to human health.	To reflect comments
	Paras 8.3.1 – 8.3.4 (pages 176 – 177)	Employment Land Provision and Review	<p>Reference should be made to the key spatial trends affecting the development of the regional economy, strategic economic development priorities, and the implications for land and property requirements.</p> <p>The encouragement being given to increasing housing provision within urban areas is likely to drive many low density industrial and related uses out of those areas to lower cost, greenfield sites offering good accessibility to HGVs and the strategic transport facilities. At the same time, there is strong demand, in some areas, for goods handling and distribution facilities, in particular for large warehouse facilities, close to the motorways on the edge of the City.</p> <p>Strategic economic development priorities include:</p> <ul style="list-style-type: none"> <li>• investment in key sectors, especially knowledge-based businesses, including aerospace and advanced engineering; ICT; media and creative; professional and business services; tourism; retailing; construction and environmental</li> </ul>	To reflect comments

			<ul style="list-style-type: none"> <li>technologies;</li> <li>realising the potential of key development sites and locations, including new opportunities for securing business investment that are consistent with the spatial strategy; expansion of port and airport facilities at Bristol;</li> <li>developing the economic potential of the rural areas whilst protecting the environmental quality of the countryside; and</li> <li>facilitating business start-ups and small business development.</li> </ul> <p>The advice in para 8.3.4 needs to be amended as necessary to take account of the approach to employment land allocations.</p>	
	Para 8.3.5 (page 177)	Strategic Sites	RSS should identify strategic employment sites and locations; in particular, Bristol City Centre, the North and East Fringe, South Bristol, Royal Portbury, Avonmouth / Severnside, Bath and Weston-super-Mare.	To reflect comments
Section 8. Employment	Policy E3 (page 179)	Review of Employment Sites	The proposed regular review of sites should take into account a wider range of factors than business requirements – specifically, the needs of occupiers; economic, planning and regeneration strategies; and transport and sustainability objectives.	Delete “ <del>the requirements of business, and will meet current or longer-term needs for economic development.</del> ” and insert: - “ <b>the needs of occupiers; economic, planning and regeneration strategies; and transport and sustainability objectives.</b> ”
	Policy TC1 (page 183)	City and Town Centres	The draft RSS fails to set out a clear strategy in relation to retail development and does not accord with PPS6. While it provides an estimate of the	To reflect comments

			potential scale of additional retail floorspace need across the Region, it does not give strategic guidance as to how this growth should be distributed. In addition it fails to identify a hierarchy of centres, does not deal adequately with the role of individual significant retail centres such as Bath and fails to address the relationships between such centres.	
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## 2. COMMENTS ON THE IMPLEMENTATION PLAN

Implementation Plan para no.	Draft text	Council view - support or oppose ?	Council comments and reasons	Changes sought
1.3.1		Support	As stated in the “First Detailed Proposals”, in order to implement the Vision for the sub-region, co-ordinated investment in physical and social infrastructure from local, regional and central government funds and the private sector will be required; and the extent, timing and phasing of such investment will be critical to the area’s ability to implement the spatial strategy. Further work is required on the funding and phasing of strategic infrastructure within the sub-region. Although institutional and policy changes are being introduced by Government which should influence the regional distribution of resources, investment in infrastructure in the sub-region will continue to rely largely on development funding.	
1.3.20	Para 1.3.20 proposes that sub-regional multi-disciplinary delivery teams, involving service infrastructure providers and the development industry, could be established to steer development	Support with reservations	The West of England Partnership, in the “Business Case to Government”, has stated:- <i>“Agreement has been reached in principle to a federated approach to delivery in the city region. This provides for the high level strategic role of the</i>	To reflect comments

	through from inclusion in the Draft RSS, to allocation in LDFs, masterplanning and delivery; and that sub-regional groups set up to provide technical evidence for the Draft RSS should provide a basis for these		<i>West of England Partnership to be complemented by a development board as necessary in each unitary authority area with responsibility for commissioning delivery vehicles most suited to the types of major development taking place. Where development warrants working across council boundaries this will be reflected in the arrangements made."</i>	
2.4.4	<i>"The RSS is at a stage when there are a number of other "unknowns" with regard to delivery of the sub-regional elements. Key areas where further research is required include the required infrastructure arising from major development, the level, availability and sources of funding and the timescales and phasing for delivery..."</i>		One difficulty in commenting on the current Implementation Plan is that much further work is needed to develop and test the proposals before delivery strategies can be clarified. The suggestion that the required infrastructure arising from major development, the level, availability and sources of funding and the timescales and phasing for delivery can be determined in the period between submission and publication of the Draft RSS is an implausibly optimistic assessment, given that much of the delivery of the RSS will depend on further work which will follow RSS, such as LDDs. There are also continuing uncertainties over future sources of finance, including the Revolving Infrastructure Fund and Planning Gain Supplement. Further progress in clarifying how the RSS is to be implemented will require, at least, a commitment to providing more locational	To reflect comments

			detail, together with assessing the implications for development land and infrastructure requirements, and phasing.	
2.4.7 SR4, SR5 and SR6			Implementing these proposals will require the determination of the implications for employment ('B' use class) land requirements, the broad spatial pattern to be followed in meeting these requirements, including the contribution of strategic employment locations and the infrastructure investment needed to deliver this contribution.	To reflect comments
2.5.2	Assembly's commitment to the short term priorities for transport investment set out in the Regional Funding Allocation programme.	Support		
2.8.2 E1, TC1			Implementation of E1 will require recognition of changing, sectoral location requirements and planning strategies. It will also require again, some acknowledgement of the role of strategic employment locations and the infrastructure required to maximise their contribution to the strategy. The economic performance of Bristol City Centre, the North and East Fringe, Avonmouth/ Severnside/ Royal Portbury, Bath and Weston-super-Mare will have implications for overall regional economic performance. The planning and transport and infrastructure requirements to be met to maximise their economic performance	To reflect comments

			<p>therefore, need to be identified in order to facilitate the delivery of the RSS.</p> <p>To deliver TC1, guidance is needed about the need for comparison shopping floorspace at the sub-regional level and the contribution to be made to meeting this need by the main centres. This should also clarify the scope for further out of centre comparison shopping development.</p>	
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