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Dear Mr Everitt

South West Regional Spatial Strategy: Additional Schedule of the Secretary of State's Proposed Changes and Reasons

The Secretary of State is publishing an addition to her schedule of proposed changes to the South West Regional Spatial Strategy (which was published in July 2008). The additional schedule, which is accompanied by the Secretary of State's reasons, is being published to clarify her response to Recommendations 4.1.5, 4.1.6, 4.1.7 and 4.1.8 of the independent Panel that conducted the Examination in Public of the draft RSS in 2007. A copy of the additional schedule is attached.

As she is not proposing any further change to the draft RSS, Reg. 16 of the Town & Country Planning (Regional Planning)(England) Regulations 2004 does not strictly apply. However, we are publishing the clarification and consulting statutory consultees, and providing the opportunity to make representations.

The additional schedule will be published on 16th April 2009 for a 6-week period of consultation. Representations on the additional schedule should be submitted to the Government Office for the South West in writing, at the above address or by e-mail bathrssconsult@gosw.gsi.gov.uk and must be received no later than 28th May 2009. Any representations made may be accompanied by a request to be notified at a specified address of the publication of the revision to the RSS.

The Secretary of State is not re-opening for consultation the proposed changes to the RSS published in July 2008 and any representations received that relate to those proposed changes will not be taken into account.

I should be grateful if you would make copies of the additional schedule available for inspection during office hours and publish it on your website.

Yours faithfully

Tom King

South West Regional Spatial Strategy

Additional Schedule for clarification of the Secretary of State's Proposed Changes and Reasons published in July 2008

Note: the Secretary of State is not proposing further changes to the draft revision of the RSS, further to those published in July 2008. This Schedule is published as clarification of the issues set out below. It should be read in conjunction with the Schedule of the Secretary of State's Proposed Changes and Reasons published for consultation last year.

Draft RSS Reference	Panel's Recommendation/conclusions	Clarification of Secretary of State's position	Secretary of State's reasoning
SR5 Bath	**Recommendation 4.1.5** Delete Policies SR4, SR5, SR6 and SR23 in the draft RSS and replace with new Policy SR1.4 with the wording as indicated in Appendix C. [this wording includes *inter alia*: 5. Development at Bath will take the form of an urban extension to accommodate 1,500 dwellings to the south/south west of Bath (Area of Search E)]	Policy HMA1 (based on the Panel's recommended Policy SR1.4) refers to the area of search at Bath (area of search 1G, formerly area of search E) as being to the south west of Bath. This policy should have described this area of search as being to the south/south west of the city in accordance with the Panel's recommendation.	This was a drafting error in the proposed changes
	Recommendation 4.1.6 The supporting text and Inset Diagram 4.1 should be modified to reflect new Policy SR1.4	The Panel's conclusion set out in paragraphs 4.1.50 and 4.1.51, that the area of search at Bath	To clarify the Secretary of State's response to Recommendations 4.1.6 and 4.1.8. The Panel's

	Recommendation 4.1.7 Delete Policy SR3 in the draft RSS and replace with new Policy SR1.5 re-worded to deal with Green Belt Matters as indicated in Appendix C. **Recommendation 4.1.8** The supporting text and inset Diagram 4.1 should be modified to reflect new Policy SR1.5 **Paragraph 4.1.50 of the Panel's report states:** "During the discussions it was suggested by the BANES representative that the Area of Search should be widened to include land to the west of Bath, which had not been considered as available during the JSA work. It was also suggested by English Heritage that the special circumstances at Bath may justify a reconsideration of the AONB boundary as well as the Green Belt boundary. Other participants drew our attention to a location on the southern edge of the city which lies within the AONB and suggested that it should be	should be widened to include the location to the west and the location within the AONB to the east of the existing area of search are rejected. To the extent that recommendations 4.1.6 and 4.1.8 require modifications to the wording of the RSS or to inset Diagram 4.1 to extend that area of search, they are rejected.	conclusion that the area of search at Bath should be extended is inconsistent with the purpose of areas of search, set out in paragraph 4.0.11 of the Secretary of State's Proposed Changes to the RSS, published in July 2008. Areas of search are indicative of a broad direction of growth and do not provide a precise boundary within which development should take place. This is consistent with PPS11 paragraph 1.7 (which states that an RSS should be locationally but not site specific) and 1.17 (which states that an RSS may identify the 'broad location' of regionally and sub-regionally significant development and goes on to say that 'broad location' means an area of search suitable for the development in question, within which a number of suitable sites may exist). It is for the local planning authority to define more precisely the area for development through its Local Development Framework, taking account of all relevant policies and provisions of the RSS and national

	included in the area of search. This proposal generated a considerable reaction from neighbouring residents, but a Panel Tour visit found that the location concerned did not give the impression of being part of an Area of Outstanding Natural Beauty and was distinctly separate both physically and visually from the adjoining parts of the AONB. We do not wish to become involved in a local planning matter but we believe that, in the particular circumstances at Bath, the boundary of the AONB in areas such as this must not be regarded as inviolable. A suggestion was made that the area of search should be widened to take into consideration the whole environs of the city, but that in our opinion would negate the JSA work that clearly pointed to the south side of the city as the most acceptable. We conclude therefore that the area of search should be widened to include the location to the west and the location within the AONB to the east of the existing area of search." **Paragraph 4.1.51 states:**		planning policy, including that concerning areas of outstanding natural beauty, set out in PPS7. The notation on the Key Diagram Inset is intended to be diagrammatic only and is not set out on a map basis, in accordance with PPS11 paragraph 1.18 and Regulation 9(4) of the The Town and Country Planning (Regional Planning) (England) Regulations 2004

	"We have already concluded that there is a need for additional employment land and the draft RSS indicates a requirement for 1,500 dwellings. It is clear from our strategic assessment of demand against the draft RSS provision that there is a need for additional provision around the SSCTs. In those circumstances we conclude that provision for 1,500 dwellings should be sought within the widened area of search". **Paragraph 4.1.73 states**: "We did accept that opportunity should be taken for sustainable and sensible additions to the capacities of Areas of Search". .	The Panel's conclusion in 4.1.73 that opportunity should be taken for sustainable and sensible additions to the capacities of the Areas of Search is rejected. To the extent that recommendation 4.1.7 is intended to reflect this conclusion it is also rejected.	