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Your ref:

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The Rt Hon Hazel Blears MP
Secretary of State for Communities and Local Government
c/o Regional Planning Team
Government Office for the South West
2 Rivergate
Temple Quay
Bristol
BS1 6ED

Dear Ms Blears

Bath and North East Somerset Council response to Regional Spatial Strategy for the South West, Secretary of State's Proposed Changes

Bath & North East Somerset Council considered its response to your Proposed Changes to Regional Spatial Strategy for the South West (RSS) at its meeting on 11th September. Set out below is the Council's resolution and enclosed with this letter is the Council's full response using the Comments Form issued by the Government Office for the South West and also an Executive Summary outlining the key areas of concern.

At its meeting on 11th September the Council resolved that:

Bath and North East Somerset Council strongly disagrees with the Government's Proposed Changes to RSS and urges the Secretary of State to reconsider her proposals. Whilst the Council is committed, with its partners, to delivering growth across the sub-region, it does not accept the scale or distribution of growth set out in the Proposed Changes. Specifically the Council is deeply concerned that:

- The levels of growth set out in the proposed changes can not realistically be delivered within the timeframe, particularly bearing in mind the current economic slow down and consequent impact on house building.
- The Proposed Changes are more about meeting unrealistic projections than delivering sustainable communities as they increase the pressure to build new homes in advance of necessary infrastructure such as improvements to health services, education facilities, waste and transport- such a situation could not be accepted in any circumstances.
- The Government has failed to demonstrate that the growth can be supported by deliverable infrastructure and there is little evidence the Government can guarantee the funding needed to provide it.

- The proposals will have an unacceptable impact on the integrity of the Green Belt, and considers that the principles of the Green Belt, the AONB and the World Heritage Site status must be maintained.
- The Council's proposed level of growth (up to 15,500 homes) was evidenced to be sustainable via a business plan developed by Ernst and Young. This figure was increased by the Examination in Public Panel's recommendation to 18,800 homes and has now been further increased to 21,300 by the Secretary of State. Neither of these substantial increases is supported by a sufficient evidence base and the Council believes that they will lead to unsustainable development which will seriously damage the environment, economy and communities of the area.

As you are no doubt aware this Council along with its sub-regional partners has adopted a Vision that seeks to ensure that the West of England is a prosperous sub-region where growth is facilitated and supported by government backed infrastructure improvements. The Council and the West of England Partnership has sought to work with the government in planning for and delivering sustainable growth. The Council is therefore very disappointed that the rates of growth set out in the RSS Proposed Changes are far removed from those supported by technical work within the sub-region and expressed in the draft RSS. It is also disappointed at the lack of acknowledgement in the Proposed Changes that growth needs to be phased to reflect delivery lead-in times and that no government commitment is outlined to support specific and necessary infrastructure improvements. As such it is considered that the RSS Proposed Changes place at risk the collaboration between the local authorities in the sub-region and central government that has been established. Given these fundamental concerns the Council therefore, strongly requests that you reconsider your Proposed Changes to RSS.

Yours sincerely

Charles Gerrish

Cllr Charles Gerrish
Cabinet Member Customer Services