



GOVERNMENT OFFICE
FOR THE SOUTH WEST

Draft South West RSS – Proposed Changes Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South West Regional Spatial Strategy please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office for the South West before **5.00pm on Friday 17th October 2008**.

Please send all responses to:

Regional Spatial Strategy Team
Government Office for the South West
2 Rivergate, Temple Quay
Bristol
BS1 6EH

E-Mail: rssconsult@gosw.gsi.gov.uk

Telephone: 0117 900 1705

Fax: 0117 900 1914

Section A

Comments submitted by:		Agent (if applicable):	
Organisation	Bath & North East Somerset Council	Organisation	
Surname	Gerrish	Surname	
Title/first name	Cllr. Charles (Cabinet Member for Customer Services)	Title/first name	
Address Line 1	The Guildhall	Address Line 1	
Address Line 2	High Street	Address Line 2	
Address Line 3	Bath	Address Line 3	
Postcode	BA1 5AW	Postcode	
E-Mail		E-Mail	
Tel. (day)		Tel. (day)	
Fax		Fax	

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1 (housing numbers and job growth)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council, along with its sub-regional partners, remains committed to delivering growth within the District. However, the level of job growth and housing that policy HMA1 states is required in Bath & North East Somerset is inappropriate for the following reasons:

1. The Secretary of State has based the increased housing requirement on insufficient evidence and incorrect analysis of the evidence available.
2. Assumed economic growth of 3.2% GVA can not be sustained over a 20 year period. This level of job growth is well above that which has been achieved recently and over the longer term and is also significantly above national economic forecasts.
3. The current global and national economic crisis means that economic growth rates and associated housing delivery rates will need to be revised downwards.
4. Job losses that have taken place in Bath & North East Somerset recently and are planned to take place will make growth rates difficult to deliver.
5. House building rates achieved since 2006 are well below those required meaning that even higher rates will be needed to catch up.
6. The development industry and housing market is unable to deliver and absorb the rates of supply required for Bath & North East Somerset, particularly given proposals elsewhere in the West of England.

Section D1

If you wish to expand your response please use the space below.

Draft policy HMA1 requires that provision is made for 137,950 new homes and job growth of 137,200 over the period 2006 to 2026 in the West of England Housing Market Area (HMA). For Bath & North East Somerset it requires the provision of 21,300 new homes over the same period. This compares with the figure of 15,500 new homes in the draft RSS (representing an increase of about 37%) and 18,800 recommended by the EiP Panel. It equates to a proposed average annual requirement of 1,065. Job growth figures are not set out at a local authority level, but continue to be expressed for Travel to Work Areas (TTWAs) which makes assessment of the implications of the planned growth on the jobs – homes balance in the District very difficult (see also separate comment). The proposed changes require that job growth of 20,200 in the Bath TTWA should be provided (equivalent to growth of 3.2% GVA).

The increased housing requirement appears to be primarily based on:

- Updated and increased household projections
- Objective of matching forecast job growth with provision of an approximately equivalent amount of housing
- Higher than average annual completions in 2006/07 (greater than draft RSS requirement)

With regard to the housing figures in policy HMA1 reference is made in the SoS's reasons accompanying the proposed changes, to a number of sources of information that post-dated the EiP Panel Report, including updated 2004 Household Projections. It appears from her reasoning concerning demographic evidence that the SoS has assumed that the EiP Panel proceeded on the basis of a projected annual increase in households of 26,400 based on the 2003 Household Projections. It is quite clear from paragraphs 2.14, 2.20, 2.34, 2.39 and Recommendation 2.1 in the EiP Panel Report that in fact the Panel adopted a figure of 28,000 (28,192 to be exact), which is much closer to the 2004 Household Projections figure of 28,600 dwellings per annum preferred by the SoS. In the circumstances it is doubtful whether the updated 2004 Household Projections are as significant a change as the SoS makes out. This error in analysis of available evidence and the conclusions of the EiP Panel raise questions about the increase in housing requirement proposed for the West of England as well as the reliability of other aspects of the Proposed Changes.

In addition to demographic projections, the predicted rate of economic growth was also a significant factor in the SoS's proposed changes. On this issue, whilst the Council accepts the importance of promoting growth in the sub-region and understands the sustainability benefits of seeking to achieve a greater balance between new jobs and new homes the likelihood of the assumed high economic growth rates (3.2% GVA) and associated house building rates being sustained over the twenty year period is seriously questioned.

The Council does not consider that the economic forecasts underpinning the proposed changes are realistic and they should not be used as the basis for determining the level of job growth or associated housing provision. In the business plans produced for the District in 2006, Ernst & Young noted that the ultra long term trend for UK growth has been 2.38% and concluded that while the South West has outperformed the UK average, the RSS range of 2.8% to 3.2% appear optimistic. An updated view from Ernst & Young has been sought and is submitted alongside the Council's response. Forecast growth at 3.2%GVA is well above recent growth (which nationally is about 2.5%). As stated in the EiP Panel Report at paragraph 2.19:

"It is clear that the achievement of the 3.2% level of economic growth would require higher levels of economic-led migration. These higher levels of net in-migration would also be consistent with the higher levels of provision proposed by certain participants. These higher levels would be well above past trends and therefore we take the view that the draft RSS should not adopt such assumptions."

In her reasons for the proposed introduction of policy HMA1, the SoS states that she does not consider it prudent for the RSS to be predicated on two differing economic assumptions (2.8 and 3.2% growth in GVA per annum), but if, as appears to be the case, she prefers the figure of 3.2% she does not explain why. Furthermore, there does not appear to be any more recent material that

undermines the view of the EiP Panel set out above. On the contrary, the forecasts need revisiting in light of the recent economic downturn which may indicate a longer term slow down (average forecasts of national economic growth from HM Treasury in August show growth of 1.5% in 2008, falling to 1.3% in 2009 and then rising to 2.2% in 2010 and 2.6% in 2011 and 2012. These levels of growth are well below the assumptions made in the SoS's proposed changes). In addition within Bath & North East Somerset there have been and are planned significant job losses through the closure of major businesses since the base date of projections. This will make achieving forecast job growth equivalent to 3.2%GVA even less likely.

Delivery of the required 21,300 new homes by 2026 at 1,065 per annum is also unrealistic, particularly when in recent years housing completions in the District have been less than a third of this level. In her reasoning on deliverability, the SoS states:

“Historically, the supply of housing in the South West has been lagging behind demographic-based need/demand and the affordability of housing has been worsening. However, the 2007 Annual Monitoring Report for RPG10 indicates that there were 25,146 net completions in the region in 2006/07. This is in excess of both RPG10 and draft RSS figures although there are considerable geographic variations.

The Secretary of State is of the view that the RSS needs to allow for the consolidation and augmentation of this increased level of supply.”

In the Council's view it is unrealistic to predicate substantially increased delivery in the District to 2026 on one year's above average completions across the region. Moreover, in light of the current slump in house building which is expected to continue for some time, it is likely to be several years before completions return to a more 'normal' level. The House Building statistics for the June 2008 quarter, recently issued by the DCLG, show a significant annual fall in starts and completions in the South West of England, with the trend very much downward. If, nonetheless, the proposed housing requirement is retained, an even higher (and more unrealistic) delivery rate will be needed in the medium and longer term in order to 'catch up' with the overall rates set out in policy HMA1 and expressed uniformly across the 20 year period (at 1,065 per annum) in table 4.1 of the Proposed Changes. The Council considers it very unlikely that the market will be able to deliver and absorb the necessary rate of supply. Ernst & Young have been commissioned to provide an economic and property market view and this is submitted alongside the Council response.

With regard to the issue of affordable housing, it is obviously the case that the greater the policy provision for housing the greater the scope for the delivery of affordable housing, thereby helping to address the serious affordability problems that exist in Bath & North East Somerset. Given the Council's current policy of seeking 35% affordable provision this would mean, on the figures put forward by the SoS, a maximum of 373 affordable homes per annum could be provided (if all development took place on sites meeting the size/capacity threshold). This number may increase if the West of England Strategic Housing Market Assessment supports raising the proportion of affordable housing that could be sought, subject to the impact on development viability and delivery. However, whatever the potential contribution ultimately fixed on, the Council does not consider that the inclusion of unrealistic housing requirements in the RSS, creating unrealisable expectations in the District, is to anyone's benefit.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

The Council considers that housing and job growth requirements in the approved RSS should be based on the soundly evidenced levels of sustainable growth set out in draft RSS.

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1 (Spatial Strategy)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council continues to support a spatial strategy that focuses most of the growth on the Strategically Cities and Towns within the West of England. The increased amount of development set out in the Proposed Changes means that this spatial strategy is compromised and the Council considers that the proposed distribution of development in policy HMA1 is unacceptable for the following reasons:

- Significant increases in development in the A4 corridor will threaten the fundamental principles of the Green Belt, will have substantial transport implications and will cause significant environmental harm
- The proposed significant expansion of Keynsham by 3,000 new homes conflicts with the overall spatial strategy and (as it will not be matched by equivalent job growth) will reinforce existing commuting patterns
- The proposed distribution of growth will not enable longer term needs to be adequately met in the Norton-Radstock area, thereby making it difficult to deliver economic led regeneration and a long term sustainable future for this area

Section D1

If you wish to expand your response please use the space below.

In line with the draft RSS the broad spatial strategy for the West of England HMA set out in policy HMA1 remains one of focussing most of the development within or adjoining the SSCTs as they are the locations where economic growth will be concentrated and where sustainable transport opportunities can be maximised. However, the strategy now includes promoting the expansion of two smaller towns (Keynsham and Yate) as service centres.

The Council's response to the implications of the individual elements of the spatial strategy, namely increases in dwelling provision at the urban extensions to south east Bristol and Bath and the provision of substantial levels of new development at Keynsham is set out in more detail in separate sections below. However, as a fundamental point the Council considers that the proposed significant expansion of Keynsham through the provision of 3,000 additional homes is contrary to the overall thrust of the spatial strategy. Keynsham primarily functions as a commuter town (for Bristol and Bath) and expansion of the housing stock by 3,000 dwellings is unlikely to be matched by equivalent job growth. The planned closure of the Cadbury factory at Somerdale with the loss of about 500 jobs will have a severe impact on the town and the homes/jobs balance. The proposed expansion will not lead to balanced growth and will serve to reinforce existing commuting patterns.

Delivery of the amount of job growth and housing in the locations set out in HMA1 will also have a significant impact on the integrity of the Bristol-Bath Green Belt in the area where it serves its primary strategic purpose of separating the two cities, as well as major environmental impacts (reference to Council's Environmental Capacity Appraisals submitted to the EiP) and transportation impacts. It will require substantial investment in transport and other infrastructure needed to support it and is unlikely to be deliverable over the period to 2026. The Council's previously expressed concerns about the capacity of Bath and the urban extensions to Bath and south east Bristol remain and are heightened given that the figures attributed to these locations have increased (see more detail in sections below).

At the EiP the Council also outlined the opportunities for pursuing a strategy of economic led regeneration in the south of the District (i.e. focussing on the towns of Midsomer Norton and Radstock and the surrounding villages) which could support and may need to be supported by the delivery of additional housing in this area.

The Proposed Changes do not make reference to such a strategy for the Norton-Radstock area. The increased housing figure for the rest of the District set out in policy HMA1 appears to provide greater scope for additional housing in that area. In the draft RSS the housing figure for the rest of the District of 2,000 new homes included provision in Keynsham. Whilst the equivalent figure has only increased slightly to 2,300 it no longer includes provision at Keynsham. However, it should be noted that the total number of new homes that have either been completed since 2006 or are already committed on sites with planning permission or allocated in the Local Plan is 2,100 across the rest of the District (including about 1,700 in the Norton-Radstock area). These existing commitments might reasonably be expected to be delivered by the middle of the RSS period.

From the above it is clear that in the medium term there is likely to be a significant number of new homes provided in the Norton-Radstock area. In order to be sustainable this additional housing development needs to facilitate and be supported by the provision of new jobs and necessary infrastructure that will need to be delivered in parallel with new housing. The Council's Business Growth & Employment Land Study (due to be published in October 2008) suggests that job growth is likely to be steady in this area comprising an element of indigenous business growth, but mainly non-business jobs (primarily from local service/facility provision). However, new housing development in the recent past has not been matched by the delivery of necessary infrastructure (including services and facilities, as well as transportation improvements) and as such there is also an element of 'catch-up' that needs to take place. In addition to new services and facilities, improvement in transportation infrastructure is needed to enhance access and connections to the area. Whilst further assessment of the infrastructure requirements is needed the request is made to the Government that once infrastructure requirements and improvements are known sufficient

funding is made available to assist the Council in implementing necessary improvements.

The provision of new housing in the Norton-Radstock area will also help to address affordable housing needs which are currently higher than those in Keynsham and second only to the City of Bath within the District. However, as a greater number of homes are directed towards Bath and Keynsham the housing needs in the District will be met more in relative terms in these areas than in the Norton-Radstock area.

In the longer term it is clear from the figures set out in paragraph 3.7 above that there is little flexibility for further provision in the Norton-Radstock area associated with economic-led regeneration. In addition there is also limited scope for the provision of more new homes elsewhere in the rural parts of the District to help support village communities. The Council therefore remains concerned that the strategy set out in the Proposed Changes provides inadequate scope to address the needs of these communities in the longer term.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1 (South East Bristol Urban Extension)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council wishes to raise the following concerns in relation to policy HMA1 and its proposals for the urban extension to south east Bristol:

- Increased capacity of the urban extension to south east Bristol does not appear to be based on sound evidence
- Delivery of the urban extension is dependent on provision of stage 3 of the South Bristol Link Road and this link needs to be made clear in approved RSS
- Delivery of 8,000 homes (within B&NES) in the RSS period will be very challenging and will probably require funding and construction of stage 3 of the link road before 2016 – Government commitment to earlier funding is needed
- Increased capacity of 8,000 homes will lead to very significant environmental impacts (see Environmental Capacity Appraisal)

Section D1

If you wish to expand your response please use the space below.

Proposed policy HMA1 increases the size of the SE Bristol urban extension from about 6,000 homes to about 9,500. This figure is mainly attributed to Bath & North East Somerset (8,000) with an element (1,500) allocated to Bristol. The area of search for the urban extension remains as set out in draft RSS.

The rationale behind the proposed increase in the size of the urban extension to 9,500 homes is unclear. In the schedule of the SoS's proposed changes and reasons reference is made to the increase being made to 'respond to representations including with regard to the programming of development areas submitted in relation to Panel Note 2'. However, no single representation suggested a total capacity of 9,500 new homes could be delivered within the area of search. The increase in capacity may have emerged through an amalgamation of representations by development interests, but taking the relevant representations they appear to total 9,000 dwellings. The evidential basis for the total capacity of 9,500 homes is therefore, questioned, particularly given the difficulties of delivering development in this area allied to the provision of strategic transportation infrastructure and the severe environmental impacts (see below).

The south east Bristol urban extension is required to help meet the growth (principally housing) needs of the city. Bristol City Council is also seeking to regenerate south Bristol and the proposed changes (policy HMA1) support a 'focused programme of regeneration initiatives'. It is vitally important that the urban extension complements the regeneration initiatives and therefore, the Council will need to work closely with Bristol City Council in planning and delivering its development. The Council supports paragraph 4.0.9 of the proposed changes to RSS which emphasises the importance of and encourages such joint working. In addition part of the south east Bristol urban extension housing figure is attributed to Bristol city (1,500) and this strengthens the need to work with the city council to plan development comprehensively.

The development of an urban extension to south east Bristol is crucially dependent on the provision of strategic infrastructure to support it. The relationship between development and transportation infrastructure is particularly important and through its response to the draft RSS the Council resolved that the urban extension could not be delivered without stage 3 of the South Bristol link road. This position is supported by the Greater Strategic Transport Study (GBSTS). Reference in proposed policy HMA1 to transport outcomes including improving access to and from south Bristol and actions to provide for orbital movement are supported. The SoS's proposed changes state that 'This should comprise:

- demand management measures;
- sustainable travel measures; and
- if necessary, targeted new infrastructure investment to unlock pinch points.'

The Council has commissioned further transport modelling work and feasibility studies to assess the impacts of urban extension development with the following potential transport interventions:

- Radial BRT route: Whitchurch to Central Bristol;
- Orbital BRT route: Keynsham to Hengrove employment area, via Whitchurch;
- South Bristol Link Road Phase 3;
- Improvements in the Bristol-Bath corridor;
- Whitchurch Bypass; and
- Whitchurch Park & Ride

This assessment work will now need to test the impact of developing mixed use urban extension(s) to south east Bristol accommodating about 9,500 dwellings and will also need to

confirm how much, if any, development can take place before stage 3 of the link road is in place.

The Council is concerned that stage 3 of the link road is currently programmed for funding via the Regional Funding Allocation post 2016 subject to a business case being established. If development is to be delivered within the timeframe set by the proposed changes the provision of the link road will need to be brought forward more quickly. The Council is therefore, seeking re-assurance from Government that, subject to establishment of a business case, there remains a commitment to funding this vital infrastructure and such funding can be brought forward sooner than current indications. It is requested that explicit reference to the south Bristol link road is made in policy HMA1 (See also section 8 below on infrastructure requirements and provision).

With regard to other infrastructure required to support development, the Council notes that plans to provide a new secondary school south east of Bristol (in the Whitchurch area) are strengthened by the proposed increase in the capacity of the urban extension to 8,000 dwellings within Bath & North East Somerset. Development of the urban extension will need to improve the provision of local services and facilities as well as job opportunities to ensure that existing and future residents do not have to undertake long, expensive and potentially unsustainable journeys (see also comments under the infrastructure section 8).

As set out in its response to the draft RSS and reiterated in the Core Strategy Launch document the Council does not consider that development should take place within the Stockwood Vale area as this is an important landscape feature that forms the strategic gap between the Bristol urban area and Keynsham which must be maintained. Therefore, the main options for development are in the Whitchurch and Hicks Gate areas.

In its response to the draft RSS the Council commented that development of 6,000 dwellings within the area of search would have significant environmental impacts, particularly in the Whitchurch area in terms of the setting of Maes Knoll (Scheduled Ancient Monument) and on the Chew Valley skyline. Environmental Capacity Appraisal work suggested that the development capacity in the Whitchurch area was closer to 3,500 dwellings (at an average residential density of 50 dwellings per hectare). The increase in the housing figure for the area of search (i.e. 8,000 homes within Bath & North East Somerset) will result in development that will adversely affect these important environmental assets and these concerns are again raised by the Council.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

The capacity of the south east Bristol urban extension within Bath & North east Somerset is revised to reflect the environmental capacity issues.

Policy HMA1 must clearly identify and list stage 3 of the south Bristol link road as being necessary infrastructure to enable development of the urban extension.

Signature... *Cllr. Charles Gerrish* **Date...** 23rd October 2008.....

Comments from (organisation, or surname)... Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1 (Keynsham – area of search 1F)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The proposed significant expansion of Keynsham by 3,000 new homes conflicts with the overall spatial strategy and will reinforce existing commuting patterns

Whilst it is functionally linked to Bristol, Keynsham is a town and community in its own right which is physically separate from the Bristol SSCT and its sustainable future should be planned within this context. The development strategy for Keynsham should promote greater self containment (as it does for other equivalent policy B settlements).

Section D1

If you wish to expand your response please use the space below.

Policy HMA1 proposes the expansion of Keynsham to strengthen its role as a service centre by providing 3,000 new homes within and on the edge of the town. Ass has already been stated above the Council considers that this expansion of the town conflicts with the overall thrust of the strategy set out in RSS and will perpetuate and reinforce existing commuting patterns as this amount of housing development is very unlikely to be matched by job growth.

In order to ensure that the town is not classified as a policy B settlement and the development strategy does not need to meet the ‘greater self containment’ objective of the policy, Keynsham is shown as part of the Bristol SSCT on Key Diagram Inset 1 West of England Housing Market Area. In the reasons for the SoS’s proposed changes it is stated that whilst the town is a service and employment centre “it is considered to be a functional part of the Bristol SSCT.”

It is the case that Keynsham has strong functional links to the Bristol urban area in terms of commuting patterns and the use of services/facilities. However, the town also enjoys functional links with Bath and acts as a service and employment centre in its own right as recognised in the SoS’s reasons for the Proposed Changes. As such treating it as a functional part of Bristol SSCT is

questionable. Under the strategy within the RSS it would then be regarded as a policy B town where development should promote greater self containment. The proposed expansion by 3,000 homes will not achieve and greatly exceeds the level of housing development appropriate at this type of settlement. Even if Keynsham is regard as being functionally part of Bristol it is important to note that it is and should remain a physically separate town and community. Therefore, the Council requests that the approved RSS make it clear that Keynsham is not a physical part of the Bristol SSCT.

Expansion of the town by 3,000 new homes is very significant and represents an increase of about 38%. These additional new homes include those currently committed and a number of spatial options both within and adjoining the town to accommodate and deliver them could be considered through the Core Strategy. However, this level of expansion will clearly have major infrastructure implications for the town, particularly when combined with development of the south east Bristol urban extension (see above) and the urban extension to south west Bath.

The implications of expansion for service and facility provision in the town require further consideration. The Council's recently published strategy for secondary education provision recognises that currently there are only sufficient pupils to support one Secondary School in Keynsham and that the very large numbers of pupils travelling from Bristol to the two Keynsham schools should be addressed. The strategy of one Secondary School serving Keynsham will be stretched by the proposed expansion of the town and therefore, there will need to be a reassessment of school capacity as the proposed level of housing would push the Planned Admission Number (PAN) for a single school to 300 which the Council regard as the absolute maximum for a secondary school. In terms of primary healthcare the PCT consider that the resulting population growth could be accommodated by the 3 existing practices. 2 of the practices have the physical space to accommodate an increase in list size should additional demand be generated. This includes Keynsham Health Park which opens in June 2009 and has ample consulting rooms.

The transport implications of development will also need to be assessed in combination with other substantial areas of development in the A4 corridor. Transport modelling work has been commissioned to look at the impacts of expansion and possible intervention measures. Areas of search close to the A4 corridor could be more sustainable in transport terms, with better opportunities for developing high quality public transport to Bristol and Bath and a subsequently higher share of trips. However, areas of search further from the A4 corridor would be more difficult to serve effectively by public transport and would risk being more car dependent; against the thrust of the RSS. Public transport interventions could include enhanced rail services and a Bath to Bristol BRT.

In order to accommodate housing growth at Keynsham and deliver high quality public transport, it will be necessary to consider the need for capacity improvements for both buses and general traffic on the A4 at Saltford. The RSS will need to explicitly link development with the provision of necessary infrastructure (see below).

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature... *Cllr. Charles Gerrish* **Date...** 23rd October 2008.....

Comments from (organisation, or surname)... Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1 (Bath)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council wishes to raise the following concerns regarding the amount of job growth/new housing that the Proposed Changes suggest should be delivered within Bath:

- In Bath planning for job growth equivalent to 2.8% GVA (as opposed to 3.2% in Proposed Changes) is more sensible than the 3.2% suggested in Proposed Changes.
- Planning for a more realistic level of job growth would reflect the fact that Bath does not exhibit the same economic or physical characteristics as Bristol and would help to achieve a better balance between new jobs and housing
- Delivering 6,000 new homes within Bath and accommodating job growth (at 2.8% growth, let alone the higher level set in the Proposed Changes) will be extremely challenging given the context of the city and its status as a World Heritage Site (WHS)
- The Government needs to be aware that even getting close to delivering the level of development required in the Proposed Changes will be dependent upon the release and redevelopment of MoD land
- Job growth requirements should be set out on a local authority basis as this would give greater flexibility in planning for job growth within Bath & North east Somerset where Bristol and Bath TTWAs are inter-related
- Job growth requirements should be equated to a floorspace requirement rather than employment land

Section D1

If you wish to expand your response please use the space below.

Policy HMA1 in the proposed changes refers to the need to make provision for 6,000 new homes within the existing Bath urban area, 2,000 new homes in an urban extension to the south west of the city and planning for employment to provide about 20,200 additional jobs in the Bath Travel to Work Area (TTWA) including 39 ha of employment land.

It should be noted that whilst the housing requirement is expressed by local authority area job growth figures continue to be expressed by TTWA. The Council's Business Growth & Employment Land Study has produced a forecast for Bath & North East Somerset and the Council's consultants Roger Tym & Partners have also been commissioned by the SWRA to produce local authority area forecasts for the whole of the south west region. Given the geography of the West of England sub-region and the closeness of Bristol and Bath the use of these forecasts would have provided the Council with the opportunity to plan more flexibly for job growth. In addition expressing housing and job growth requirements on a consistent local authority basis within RSS would enable a more accurate assessment of the implications of growth (as set out in RSS) on the jobs - homes balance. It is therefore, requested that in the approved RSS job growth figures are expressed at a local authority level informed by the Roger Tym & Partners study undertaken for the SWRA.

The need to make provision for 6,000 new homes within the city remains unchanged from draft RSS and as set out in its response to the draft the Council considers this will be very challenging, particularly in combination with the job growth that is also proposed in policy HMA1. The World Heritage Site status of the city means that delivering major growth presents unique challenges and must be handled very sensitively. Recent experience illustrates the considerable difficulties of bringing forward and delivering the redevelopment of major sites. The Council therefore emphasises the limits that this context places on the capacity of the city to accommodate additional development; the type of development that can be accommodated; and the pace at which it can be delivered.

Initial capacity work undertaken to inform the EiP suggested an approximate capacity of 5,500 homes and up to about 9,000 jobs within the city. The figure of 5,500 homes assumed the potential re-use of some MoD sites. A more detailed assessment of housing capacity (through a Strategic Housing Land Availability Assessment) is currently being undertaken. Early conclusions confirm the previous estimate of residential capacity. If capacity is to be increased there will need to be the release of further MoD land. This release of additional MoD land and its redevelopment might enable the capacity of the city to increase to nearer the 6,000 figure. These sites, owned by a Government Ministry, are significant areas of land that through current under use constrains the ability of Bath to accommodate growth. It is therefore requested that Government notes the importance of these MoD sites in terms of housing delivery and that the necessary connections between the strategies of different departments are made so that the future of these sites is determined quickly and efficiently enabling delivery of their redevelopment.

It should also be noted that in looking at the potential capacity of the city to accommodate additional housing the assumptions made in respect of the redevelopment of existing employment land (having regard to the job growth figure) and the assessment of potential impact on the World Heritage Site are of critical importance. The development of existing employment land would displace existing businesses. There would therefore be a need to find land to accommodate this displacement in a sustainable manner. Expansion of the urban extension to accommodate about 2,000 homes (as opposed to 1,500 in draft RSS) is addressed below.

In the draft RSS job growth for the Bath TTWA is expressed as a range of between 16,000 to 20,200 jobs (from a base date of 2006) equating to economic growth of 2.8% to 3.2% GVA. In the proposed changes policy HMA1 requires that provision is made for job growth in the Bath TTWA of 20,200 jobs i.e. the top end of the range. The Secretary of State's reasoning is, that in accordance with the Panel's Report, this would be consistent with employment growth forecasts for sub-regional areas which are at or close to 3.2%. This means that consistency across TTWAs is achieved e.g. provision is made for the same level of economic growth in both the Bristol and Bath TTWAs.

For the reasons given above in the comments on overall economic growth rates the need for and benefits of planning for job growth at this higher level in the Bath TTWA is challenged. The EiP Panel concluded (in paragraphs 2.9 and 2.10 of their Report) that planning for a growth rate of 2.8% is consistent with the Regional Economic Strategy (prepared by the South West Regional Development Agency). The RES sets a more ambitious target of 3.2% growth which is appropriate given it deals with a shorter time period of 10 years.

Planning for economic growth of 2.8% GVA is supported by an analysis of past trends. Whilst

growth in the West of England sub-region has been above average for the past decade of global economic expansion, the longer term trend suggests a figure nearer 2.2% is more appropriate. More recently national economic growth has stood at 2.5% and is forecast to fall to around 1.5 – 1.7% until 2011 before recovering to current levels. Previously the West of England economy has broadly mirrored the national position which makes it highly unlikely that 3.2% growth can be sustained over the RSS 20 year period. In addition assuming uniform economic growth rates across the sub-region is not prudent. Bath does not exhibit the same physical or economic characteristics as Bristol.

Planning for the higher rate of job growth in the Bath TTWA (and at Bath in particular) will also lead to a greater imbalance between jobs and housing provision, putting increased pressure on commuting and potentially house prices. More specifically in Bath the need to identify and protect sites for the higher level of employment growth may well mean that land remains under used whilst the pressure to release green field sites for housing increases. The Panel conclude that economic growth will not be inhibited in the short term by planning for housing based on the lower level of job growth (2.8%). The Council therefore consider it more sensible to also plan for job growth for the Bath TTWA at the lower end of growth forecasts.

Most of the forecast job growth within the Bath TTWA will be focussed on the city as the main economic centre. Assessments of capacity suggest that, due to the particular limitations of Bath, even accommodating and delivering job growth equating to 2.8% GVA will be very challenging. The Bath & North East Somerset Business Growth and Employment Land Study (undertaken by Roger Tym & Partners) notes that growth at 2.8% (let alone 3.2%) would be well above recent trends. Achieving this rate of growth will require the key business sectors in Bath, ICT, Financial & Business Services and Digital Media together with the non-business sectors such as Retail, Tourism and Education to perform very well.

The proposed changes also equate forecast job growth to an employment land figure (39 hectares). This approach is ill advised and irrelevant particularly in relation to an economy such as Bath's. The density of employment per hectare will vary greatly according to the type of business space and consequently the type of economic activity that it accommodates. The Council's 2003 Business Location Requirements Study, which is highlighted as best practice by the government, concluded that job growth is more accurately translated into a floorspace (in square metres) requirement: *"the traditional yardstick – site area of employment land – is not a good enough measure because the ratio of employment land to floorspace is hugely variable and we need to take account of space lost as well as space gained – increasingly important as more development is brownfield regeneration"*. It is therefore, suggested that if a spatial requirement is to be set out in RSS this should be articulated as a floorspace rather than a land area figure.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

- Policy HMA1 should set out a job growth requirement for Bath TTWA of 16,000 (equivalent to 2.8% GVA)
- Job growth requirements should be set out at a local authority level and should be equated to a floorspace requirement

Signature...*Cllr. Charles Gerrish* **Date**...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1 (Bath urban extension)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

- The area of search for the Bath urban extension needs to be extended northwards towards the A4 to give the Council greater flexibility in considering location options in its Core Strategy
- Not extending the area of search into the AONB to the south of Bath is welcomed by the Council, although greater certainty on this issue is sought
- The increased size of the urban extension is poorly evidenced and will lead to greater harm to international and national environmental assets, including the setting of the World Heritage Site

Section D1

If you wish to expand your response please use the space below.

The EiP Panel concluded (in paragraph 4.1.50 of their principal Report) that the area of search for the urban extension to Bath should be widened from that shown in the draft RSS to include land to the west of Bath up to the A4 (i.e. area to the west of Twerton) and land in the Cotswolds Area of Outstanding Natural Beauty (AONB) to the south of the city (i.e. the Odd Down/South Stoke plateau area). The Panel also concluded that provision for 1,500 dwellings (as per the draft RSS) should be sought within this widened area of search (paragraph 4.1.51).

The Council supported by the SWRA suggested to the EiP that the area of search should be extended to include land to the west of the city towards the A4. Land to the south of Bath within the AONB was promoted by the Hignett Family Settlement for inclusion within the area of search. The Council objected to inclusion of this land supported by an assessment of development cells around the entire periphery of Bath, which concluded that potential areas for development of an urban extension outside the AONB were closely matched in sustainability terms with areas of land within the AONB. Therefore, given the highest level of protection for AONBs and the criteria set out in PPS7 for the consideration of major development proposals, extending the area of search into the AONB south of Bath is not justified.

Policy HMA1 in the proposed changes refers to an 'urban extension (area of search 1G) to the south west of Bath', as opposed to reference in the draft RSS and the Panel's recommended policy to 'an urban extension to the south/south west of Bath'. No further textual description of the area of search for the urban extension is set out in the proposed changes. The only other illustration is that set out in Key Diagram Inset 1 West of England Housing Market Area. Whilst the inset diagram is clearly diagrammatic the area of search shown has not been widened in either area suggested by the Panel.

The Council's interpretation of the above changes is that the area of search does not include land to the south of the city within the AONB and, if this is the intention of the Secretary of State, this is welcomed by the Council as it accords with the evidenced position it presented to the EiP. However, given the diagrammatic nature of the Key Diagram and the lack of any textual reference to the AONB the Council is seeking greater certainty and clarity on this issue from the Secretary of State. Clarity is needed in order to inform the process of preparing the Council's Core Strategy.

The area of search shown on the key diagram is, in any event, narrow in its extent and options for an urban extension (particularly given the proposed increase in capacity to 2,000 homes) appear to be limited. Therefore, in order to give the Council greater flexibility in looking at options for the urban extension through its Core Strategy, it is requested that the area of search (1G) illustrated in Inset Diagram 1 is amended to clearly show that the area to the west of the city up towards the A4 (which would provide opportunities for taking advantage of sustainable transport linkages) is included within it (as concluded by the EiP Panel).

As noted above the capacity or size of the urban extension has been increased to 2,000 homes in policy HMA1. The evidence and justification for increasing the capacity to this figure is seriously questioned by the Council. The SoS schedule of decisions makes it clear that the increase is made partly in response to representations at the EiP, including those relating to the programming of development. Other than the Council's evidenced position regarding environmental harm and the need to limit capacity to 1,000 homes (see also below) the only other relevant representation was that received from the Hignett Family Settlement (HFS). The HFS suggested that an area of land to the south of Bath (including land within the AONB) had a deliverable capacity of 2,000 dwellings. This represents the only evidence supporting a capacity of 2,000 dwellings. Whilst the SoS appears to have had regard to it in increasing the capacity of the urban extension the land in question has not been included in the area of search defined on the Key Diagram Inset 1. Therefore, the evidential basis for increasing the capacity to 2,000 homes is unclear and is questioned.

The Council in its response to the draft RSS accepted the benefits of providing an urban extension to Bath e.g. in terms of reducing the need to travel and opportunities to provide additional affordable housing, but through environmental capacity studies showed that it would cause significant environmental harm. Therefore, it considered that it should be limited to about 1,000 dwellings in size.

The proposed increase in capacity of the urban extension to about 2,000 dwellings can only be achieved either through increasing development densities or by increasing its land take. For example at an average density of 50 dwellings per hectare (in line with RSS policy H2) a mixed use urban extension of 2,000 dwellings would occupy an area about 20 hectares (or about a third) larger than one of 1,500 dwellings. Whilst further assessment is needed either a larger urban extension and/or higher density development will have greater environmental impacts in terms of the landscape setting of the city, historic environment and ecology.

Given the increased environmental harm and the lack of clear evidence behind the proposed increase to 2,000 homes it is requested that the urban extension to Bath be reduced in size.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

The area of search for an urban extension to Bath be extended northwards to include land to the west of the city up towards the A4.

The capacity or size of the urban extension be decreased from the 2,000 homes set out in the Proposed Changes.

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	D and HMA1 (Infrastructure)
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council is extremely concerned that the RSS Proposed Changes fail to demonstrate that the growth proposed can be supported by deliverable infrastructure. Whilst the draft RSS listed strategic transport infrastructure required to support development in the West of England the Proposed Changes fails to do this. In order to help ensure that the planning and delivery of development provides for new or improved infrastructure (as required by proposed policy D) the Council considers that strategic infrastructure measures must be identified in RSS or an accompanying Infrastructure Delivery Plan, as well as a commitment to Government funding to support its provision where necessary.

Section D1

If you wish to expand your response please use the space below.

In the West of England section of the draft RSS the individual policy relating to each SSCT in the sub-region (Bath, Bristol and Weston-super-Mare) makes reference to the need for investment to be made in key infrastructure to enable delivery of development. Each SSCT policy is supported by text making reference to the key infrastructure required being listed in the Implementation Plan, with transportation infrastructure listed in the text of the draft RSS itself.

The infrastructure requirements associated with development across the South West were debated at length at the EiP. The Panel expressed concerns that infrastructure requirements identified in the sub-regional sections are inconsistent in the draft RSS (some such as the West of England focusing on large-scale strategic transport schemes and others on more local measures). The Panel was also concerned that references to infrastructure are found in different parts of the draft RSS and that no clear identification of Regional priorities and action/funding programmes has been achieved. The Panel considered that this needed to be addressed and that key infrastructure requirements should then be more clearly expressed in RSS policy (rather than the text).

Whilst the EiP Panel expressed the overall concerns outlined above they still recommended that the infrastructure list in the draft RSS for the West of England sub-region be retained in the RSS and carried over into the Implementation Plan (Recommendation 4.1.9). They recommended that

the separate lists for the individual SSCTs be brought together in one place covering the whole sub-region.

The SoS's Proposed Changes do not list the infrastructure required to enable delivery of the growth in the West of England. The reason given for this is that the SoS considers that the lack of a systematic and rigorous assessment, prioritisation and testing of infrastructure proposals across the Region (highlighted by the EiP Panel) means that there would be a lack of certainty and clarity if they were listed in the RSS at this stage, exposing the RSS to a substantial risk that, on further testing, they may be found to be undeliverable (an observation that might just as well apply to the SoS's housing requirements). Therefore, the sub-regional policies including policy HMA1 outline desired transport outcomes which subsequently identified infrastructure measures will deliver.

The desired transport outcomes for the West of England identified in policy HMA1 include outcomes related to south Bristol that are supported. However, given the significant level of growth that is proposed within the Bristol-Bath-Trowbridge corridors (principally in the south east Bristol urban extension, at Keynsham and at Bath) the Council suggests that reference should be added to tackling congestion within this road/rail corridor. This would be consistent with policy RTS1 on corridor management (see also below) and statements made in paragraphs 4.1.4, 4.1.14 and 4.1.18 of the proposed changes relating to strong commuting patterns between Trowbridge, Bath and Bristol.

However, identifying transport outcomes in the sub-regional policies is insufficient. Whilst further work is needed across the Region on identifying and prioritising key infrastructure requirements the Council is extremely concerned that the links are not adequately made in the RSS proposed changes. Through its LDF the Council is required to demonstrate how development is supported by the timely and viable delivery of necessary supporting infrastructure. The same requirement must also relate to the RSS in relation to strategic infrastructure and this is clearly not achieved through the proposed changes. This is a major flaw in the Proposed Changes that must be addressed in the approved RSS. The Council is willing to meet with the Government Office and/or the Department to explore this matter further.

Through the West of England Partnership the Council is committed to undertaking further work on identifying infrastructure measures required to support and deliver growth. This work is being facilitated and supported by the Multi Area Agreement process with GOSW. However, in the sub-region significant work has already been undertaken related to infrastructure (particularly transportation), much of which fed into the EiP.

The transportation infrastructure requirements and measures identified in the draft RSS and supported by the EiP Panel were identified through the Greater Bristol Strategic Transport Study. Many of these measures are also progressing through the RFA process. Given the evidence that supports these measures and the certainty attached to them they should be clearly identified in RSS policy HMA1. The Council considers that development can not be achieved without the timely delivery of infrastructure, including specifically the South Bristol link road in relation to the south east Bristol urban extension.

In addition to transportation infrastructure a range of other infrastructure will be required to support development e.g. education, health, cultural, utilities etc. Some of this infrastructure provision will need to be funded through developer contributions. However, given the range of infrastructure required, along with the need to provide affordable housing and the costs of sustainable construction methods it may not be realistic to expect development to fund its provision. This is particularly true in the current economic climate.

The Proposed Changes include Development Policy D which states that planning and delivery of development should provide for new or improved infrastructure in step with development, and as also set out in draft RSS states that the public sector (including central government and local authorities) and developers will work in partnership to identify solutions, including funding. This approach continues to create uncertainty as to whether the infrastructure needed to support growth can be delivered and funded. It is requested that further work is done before RSS is approved to confirm that necessary strategic infrastructure can be provided and that policy D is amended to confirm that strategic infrastructure can and will be provided. Identified strategic infrastructure

requirements should be listed either in the approved RSS or an accompanying Implementation Plan.

Not only do the RSS proposed changes fail to grapple with the issue of whether the infrastructure that is needed to support the growth proposed can be delivered viably, they also fail to make any commitment to the Government supporting the phasing of development to ensure the timely provision of infrastructure (either in the West of England HMA policy or elsewhere) as required in policies D and HD1. This is a particular problem stemming from the expression of the housing requirement as a uniform annual rate (see separate comment below). The Council requests that clear references are included in RSS to the Government supporting the phasing of housing development/infrastructure provision and the availability of Government funding to support the provision of infrastructure if and where it is needed. Without adequate infrastructure investment, either growth will not be delivered or, if it is, it will create an unsustainable pattern of development.

A further point worth noting is that in order to plan some infrastructure provision information on population changes, rather than the number of additional homes is needed. For example with regard to primary healthcare services the Bath & North East Somerset Primary Care Trust (PCT) does its service planning on the basis of ONS projections of population growth. The increase in housing requirements in the Proposed Changes are believed to be broadly consistent with household projections which in turn are based on ONS population projections. However, it is not currently clear what the impact of the requirement to provide an additional 21,300 dwellings within the District on the size and age profile of the population might be as much of the housing requirement is generated by falling household sizes rather than inward migration. Further information in or supporting the approved RSS on these issues would assist infrastructure planning.

On the basis of an increased housing provision requirement of 1,065 per annum and assuming that approximately 25% of this provision might be taken up by inward migration, the PCT do not foresee any difficulties in terms of primary healthcare provision in any parts of the District. The current provision and accessibility to primary care services across Bath & North East Somerset is good. All 27 practices currently have open lists and the capacity to take on additional patients. A number of practices have the physical space to increase list size and the number of GPs should additional demand be generated.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Policy HMA1 should be amended to include reference to tackling congestion in the Bristol-Bath corridor as a key transport outcome and stage 3 of the south Bristol link road should be identified as a key strategic transportation infrastructure measure.

Policy D should be amended to make it clear that (as result of assessments) strategic infrastructure need to support the growth proposed can and will be provided in step with the delivery of new homes.

Strategic infrastructure measures to be listed in approved RSS or accompanying Implementation/Infrastructure Delivery Plan.

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Table 4.1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Expressing the housing requirement as a uniform annual rate in table 4.1 does not reflect the reality of planning strategic growth and needs to be differentiated, starting at a lower rate and increased over time in order to allow necessary supporting infrastructure to be planned, funded and delivered alongside housing development (in line with the aims of proposed policy HD1).

Section D1

If you wish to expand your response please use the space below.

The Council is concerned that pressure to meet house building rates caused by expressing the housing requirement for Bath & North East Somerset at a uniform annual rate could lead to development taking place before the necessary infrastructure to support it is delivered. This outcome would be contrary to the aims of proposed policy HD1 that seeks to ensure that local planning authorities co-ordinate the release of housing land with infrastructure provision. This is particularly relevant in relation to major transport infrastructure associated with strategic development in the south east Bristol urban extension and at Keynsham.

The Council will make every effort to plan additional housing and the co-ordinated provision of necessary infrastructure through its Local Development Framework (LDF). However, for strategic sites such as urban extensions both the planning of development (e.g. through a Core Strategy and supporting documents such as Master Plans) will take some time, and it will also take time to fund and provide the necessary strategic infrastructure e.g. south Bristol link road to support development. Given the lengthy lead in times for delivering these strategic areas of development it is likely, that in order to keep up with the housing delivery rates as currently expressed in table 4.1, there will be increasing pressure to either develop allocated sites in advance of infrastructure provision or potentially unallocated and unsustainable sites (i.e. planning by appeal).

In order to assist in managing development pressure and to ensure that infrastructure provision and also job growth take place in parallel with housing development it is requested that annual rates of housing provision expressed in table 4.1 are differentiated, starting at a lower rate (but greater than current development plan rates) and then increasing or 'stepping up' over time to take account of and reflect the reality of the lead in times needed to achieve the step change in delivery sought by Government and provide the necessary supporting infrastructure. Further discussion should take place between the Government Office and the local authority to determine an acceptable and realistic development trajectory.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Table 4.1 should differentiate housing delivery rates starting with a lower rate between 2006 and 2016 and increasing to a higher rate between 2016 and 2026.

Signature...Cllr. Charles Gerrish **Date...23rd October 2008.....**

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	GT1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council is disappointed that transit pitch provision is set by policy GT1 at a unitary authority level in advance of sufficient long stay accommodation being available and in the absence of negotiation between the Districts.

Changes are sought to the text in RSS to refer to the need to Development Plan Documents to allocate transit sites and to provide greater flexibility in applying RSS development policies A, B and C in looking to provide gypsy and traveller accommodation.

Section D1

If you wish to expand your response please use the space below.

Residential Provision

The provision for residential pitches in Bath & North east Somerset set out in policy GT1 accords with the West of England GTAA undertaken and is therefore supported.

Transit provision

The Council is disappointed that the SoS has concurred with the Panel in including 20 transit pitches for Bath & North East Somerset. The Council's position was clearly made at the EiP as follows:

- The WoE GTAA suggests the primary need identified across the WoE is for residential provision although there is a relatively high degree of travelling across the study area;
- Consultants came up with a sub-regional figure of 55 pitches and for the purpose of the GTAA disaggregated it between the 4 UAs;

The Council would reiterate that whilst it acknowledges there is a need to provide transit pitches within the sub-region, it is premature to estimate transit needs until sufficient long-stay

accommodation is available and that transit provision is best approached by negotiation between districts and at a sub-regional level in line with WoE GTAA Recommendation 3: "...location of transit provision/stopping places should be negotiated at a study level by the authorities." This approach is borne out in the guidance *Preparing RSS reviews on Gypsies & Travellers by Regional Planning Boards* (DCLG, 2007) which states that it might be appropriate for the RSS to identify and broadly allocate a number of transit pitches where a need is clearly established and that a sub-regional level might be appropriate.

However, the Council supports the new paragraph following 6.1.12 which provides introductions to both Policies GT1 (Gypsies and Travellers) and GT2 (Travelling Showpeople). This ensures compliance with ODPM Circular 1/2006 *Planning for Gypsy and Traveller Caravan Sites* and Circular 04/2007 *Planning for Travelling Showpeople*.

Requirements of Circular 1/2006

Whilst clarification in paragraph 6.1.13 of the requirements of Circular 1/2006 in relation to GTAA's is supported, the wording of the fourth sentence is misleading in referring just to 'residential sites and temporary stopping places' without including reference to 'transit sites' in this context. Paragraph 13 of Circular 1/2006 clearly recognises the need to provide '*transit sites and emergency stopping places where gypsies and travellers may legally stop in the course of travelling*' in addition to permanent residential pitches.

As the site requirements for permanent, transit and emergency stopping places are different (cf. '*Designing Gypsy and Traveller Sites Good Practice Guide*' DCLG May 2008), revisions (set out in section D2 below) to the fourth sentence of 6.1.13 is requested in order to better reflect the requirements of both the Circular and other relevant guidance on the particular accommodation needs of Gypsies and Travellers.

Identifying Sites for Gypsies and Travellers accommodation

Revised paragraph 6.1.14 states that in identifying sites for Gypsy and Traveller accommodation local planning authorities should apply the locational policies set out in RSS Policies A, B and C. These policies are principally intended to guide the location of development in terms of the needs of the settled community. They also set out what would be acceptable in relation to the particular role and function of SSCTs, market and coastal towns and small towns and villages respectively in terms of the scale of development acceptable to each.

Circular 1/2006 already gives clear advice on the location of sites for Gypsies and Travellers which takes account of specific needs and lifestyle of this community group. Whilst it is appreciated that site provision for Gypsies and Travellers '*should be related to policies A, B and C in Section 3 of the RSS, to further the Government's objective to create and support sustainable, respectful and inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision*' (cf. Reason for SoS Proposed Change), the proposed wording to paragraph 6.1.14 is too prescriptive as presently drafted. It is suggested that either this sentence is deleted or amended as set out in section D2 of the form below.

Requirements for Gypsies and Travellers accommodation post 2011

Draft Policy GT1 relates to the time period 2006 – 2011. The Council had previously recommended that the Panel considers how the issue of provision for accommodation needs of gypsies and travellers in the Region will be addressed in the RSS beyond 2011. Absence of such a commitment in the RSS was likely to cause difficulties at a local level when addressing the future accommodation needs of gypsies and travellers through the Local Development Framework after 2011.

The Council supports the inclusion of new paragraph 6.1.14 which allows for a 3% compound growth per annum to be applied post 2011. It agrees that this provides more clarity and certainty about provision beyond 2011. This approach reflects the recommendations in the WoE GTAA which applies 3% per annum growth to the identified population, in accordance with DCLG

recommended practice.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Requested change to the fourth sentence of 6.1.13:

*The Circular requires Local Planning Authorities to identify in Development Plan documents specific sites allocations for Gypsy and Traveller residential sites and **transit and or** temporary stopping places sufficient to meet the need identified by the RSS.*

Requested change to the last sentence of revised 6.1.14:

Either delete last sentence or replace with the following:

~~*In identifying sites for Gypsy and Traveller accommodation, Local Planning Authorities should apply the locational policies set out in Policies A, B and C in Section 3.'*~~

Identification of sites for Gypsy and Traveller accommodation through the Local Development Framework should be in accordance with Circular 01/2006 within the context of Policies A, B and C in Section 3.

Signature...*Cllr. Charles Gerrish* **Date...**23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Support
RSS Reference – Policy or Paragraph Number	GT2
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council supports the inclusion of policy GT2 and the accompanying text. The requirement for travelling showpeople plots identified by the West of England GTAA will need to be provided through the relevant Development Plan Document.

Section D1

If you wish to expand your response please use the space below.

At the Partial Review EiP in March 2008 the West of England sub-region, amongst others, made the point that draft Policy GT1 did not address the requirements of Travelling Showpeople as set out at paragraph 21 of Circular 04/2007 *Planning for Travelling Showpeople*. To conform to the Circular it would be necessary for the Regional Planning Body to significantly amend Policy GT1. The four Councils stressed that site provision should be identified for Travelling Showpeople separately from that for Gypsies and Travellers in accordance with Circular 04/2007 in recognition of their very different accommodation needs.

Hence acknowledgement in the RSS of the need to provide pitches for travelling showpeople through the inclusion of new Policy GT2 now accords with the RSS's higher level requirement to ensure sufficient provision is made to meet the accommodation needs of all communities and in line with the requirements of Circular 04/2007.

The Panel Report explains that it has not attempted to divide the total of 94 plots across the region by local authority although it acknowledges that this information is available in the case of the West of England. This interim figure is based on the findings of a Report on Travelling Showpeople commissioned by the Regional Assembly and includes the recommended figure of 51 plots for the West of England from the WoE GTAA. The SoS has accepted this figure in Table 4.4 which accompanies Policy GT2.

The four West of England authorities previously informed the Panel that where accommodation needs are identified, it should be the responsibility of each local planning authority to make suitable provision through its LDF. The number of plots estimated for Travelling Showpeople for Bath & North East Somerset (2006-2011) in the West of England GTAA is one plot and provision will need to be made accordingly through the relevant Development Plan Document. This approach is reflected in the wording of new Policy GT2.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature... *Cllr. Charles Gerrish* **Date...** 23rd October 2008.....

Comments from (organisation, or surname)... Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Support
RSS Reference – Policy or Paragraph Number	RTS1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

More specific identification of the Bristol/Bath-South Hampshire Corridor in policy RTS and the range of measures set out to facilitate modal shift are supported.

Section D1

If you wish to expand your response please use the space below.

Policy RTS1 amalgamates several policies recommended for inclusion in the RSS by the EiP Panel. Of particular relevance to Bath & North East Somerset it identifies with greater specificity the Bristol/Bath – South Hampshire corridor (formerly referred to as Bristol/Bath – South Coast corridor that also included the less significant corridor between Bristol/Bath and Dorset). The policy identifies a range of measures that should be used to facilitate modal shift within the corridor and manage the demand for long distance journeys.

This change helps to support capacity improvements on the rail network between the South Coast and Bristol and capacity improvements between Bristol and Bath in particular by rail, bus and road. The Council will need to work with Wiltshire County Council to manage traffic on the A36/A46 and A350 corridors in order to reduce the impact of HGVs on Bath and other settlements.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature... *Cllr. Charles Gerrish* **Date...** 23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Comment
RSS Reference – Policy or Paragraph Number	RTS6
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Policy RTS6 in the Proposed Changes promotes the expansion of Bristol Airport in line with national policy. The Council supports improved surface access by public transport, including a BRT link to Bristol city centre.

Section D1

If you wish to expand your response please use the space below.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature...Cllr. Charles Gerrish **Date...23rd October 2008.....**

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Support
RSS Reference – Policy or Paragraph Number	H1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council welcomes the increase in the proportion of all housing that should be affordable to 35% in the Proposed Changes and the flexibility the policy gives for Councils to seek a higher proportion where it is supported by a Strategic Housing Market Assessment.

Section D1

If you wish to expand your response please use the space below.

Policy H1 on Housing Affordability in the proposed changes increases the proportion of all housing that should be affordable from 30% in the draft RSS to 35%. This is in line with the EiP Panel recommendation. Given the level of affordable housing need in the District this increase in the proportion sought is welcomed by the Council. It is worth noting that this proportion applies to all new housing. The Council currently seeks 35% affordable housing on development schemes meeting site size or dwelling number thresholds set out in the Local Plan. This effectively means that less than 35% of all housing developed is affordable as some is provided on sites lower than these thresholds.

The EiP Panel recommended that in areas of greatest need local authorities could specify affordable housing rates of 60% or higher. Policy H1 in the proposed changes does not include this reference and instead states that local authority Development Plan Documents should include policies to deliver a substantial increase in the amount of affordable housing reflecting the outcome of Strategic Housing Market Assessments (SHMA). A SHMA is currently being undertaken for the West of England HMA. Through its Core Strategy the Council will need to determine its approach to affordable housing provision, including the proportion that might be sought in different parts of the District and the site size/capacity thresholds to be applied. It is considered that the proposed RSS policy H1 would give the Council the remit to seek a higher proportion of affordable housing if supported by the SHMA, whilst also providing the flexibility to consider the impact of seeking greater affordable housing provision on development viability particularly in the light of various other requirements (e.g. infrastructure and sustainable construction methods).

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Support
RSS Reference – Policy or Paragraph Number	GI1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Policy GI1 (Green Infrastructure) has been amended in the proposed changes to provide a clearer definition of the roles, purposes and functions of Green Infrastructure and set out in greater detail how it should be incorporated and integrated into development proposals. The policy has also been strengthened through reference to requiring the ‘identification, development and management of new areas of open space, not just more intensive use of existing areas’. The proposed policy provides a robust framework for the Local Development Framework (LDF) in seeking to ensure appropriate levels of open space are provided in association with major development and is therefore supported by the Council.

Section D1

If you wish to expand your response please use the space below.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature... *Cllr. Charles Gerrish* **Date...** 23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Support
RSS Reference – Policy or Paragraph Number	ENV1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Policy ENV1 has been amended to refer to protecting the integrity of Natura 2000 (N2K) sites and the need for further assessments of these sites associated with the Habitat Regulations at plan making levels subsequent to the RSS. Included in the list of N2K sites that are vulnerable and may require further protection depending on the impacts of development proposed in the LDF is the Bath-Bradford-on-Avon SAC. The SAC lies close to the area of search for the urban extension to Bath and therefore, in looking at options through the Core Strategy the effect on the SAC will need to be assessed. The proposed change to policy ENV1 brings it into line with the regulations and is welcomed by the Council.

Section D1

If you wish to expand your response please use the space below.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Support
RSS Reference – Policy or Paragraph Number	ES1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Policy ES1 as the overarching policy on achieving sustainable economic prosperity will set the broad framework for the RSS and Council's LDF policies on economic development. Of particular relevance to this District is reference to the need to promote innovation and the development of the knowledge driven economy by harnessing the potential of Higher Education Institutions. This aspect of the proposed policy supports and reflects the Council's Vision and Priorities and actions and is therefore, welcomed by the Council. In addition conclusions of the Future for Bath work highlight the importance of harnessing the economic benefits of the Universities in Bath and this will need to be planned for and taken forward through the Council's Core Strategy.

Section D1

If you wish to expand your response please use the space below.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Signature... *Cllr. Charles Gerrish* **Date...** 23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	RE5
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The proposed change to policy RE5 has removed the requirement for large scale new developments that renewable and decentralised energy sources should be provided on site. This is a missed opportunity and will not assist in meeting national targets.

Section D1

If you wish to expand your response please use the space below.

Policy RE5 on Renewable Energy and New Development in the Proposed Changes retains the same requirement as draft RSS that all new development of more than 10 homes or 1,000 sq. metres use decentralised and renewable energy sources to reduce carbon emissions by 10%. However, in the Proposed Changes there is no longer a requirement that this should be provided on-site on large scale developments. Whilst this might give greater flexibility in planning new development it is a missed opportunity and will not assist the delivery of national policies to deliver zero carbon development by 2016. Large scale new development areas provide some of the best opportunities for creating and providing renewable energy as it is easier and cheaper to plan and install it from the outset. In addition setting targets for large scale development to provide on-site renewable energy may also help to drive developers to provide a more sustainable development overall.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Reference to providing decentralised and renewable energy sources on-site in large scale new development should be reinstated in policy RE5.

Signature...Cllr. Charles Gerrish Date...23rd October 2008.....

Comments from (organisation, or surname)...Bath & North East Somerset Council

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	G
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Policy G on sustainable construction in the draft RSS sought to deliver stepped implementation of the Code for Sustainable Homes in order to ensure that the government target of all development reaching code level 6 (zero carbon) by 2016 is met. In order to achieve this, the draft RSS suggested that levels 4 and 5 should be introduced more quickly than currently advocated by the government. The Proposed Changes no longer refer to the quicker move to levels 4 and 5 and without this it is very unlikely that the government target for level 6 will be met. The Council's Vision and Priorities refer to addressing the causes of climate change and moving towards carbon neutrality. Therefore, it is requested that the references in policy G in the draft RSS should be reinstated in the approved RSS. However, the potential impacts on developer contributions towards meeting other requirements e.g. affordable housing and infrastructure are noted by the Council.

Section D1

If you wish to expand your response please use the space below.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

References to quicker introduction of levels 4 and 5 of the Code for Sustainable Homes (than currently advocated by the government) should be reinstated in the approved RSS.