

# **RESPONSE OF BATH & NORTH EAST SOMERSET COUNCIL TO THE SOUTH WEST REGIONAL SPATIAL STRATEGY – SECRETARY OF STATE’S PROPOSED CHANGES**

## **EXECUTIVE SUMMARY**

### **1.0 Introduction**

1.1 The Council’s full response to the Regional Spatial Strategy (RSS) Secretary of State’s Proposed Changes has been submitted using the comment forms issued by Government Office for the South West. This Executive Summary outlines the key messages in the Council’s response and focuses primarily on policy HMA1 which sets out the growth requirements and spatial strategy for the West of England Housing Market Area.

### **2.0 Housing and Job Growth**

2.1 Bath & North East Somerset Council is committed, along with its sub-regional partners, to delivering growth in order to work towards achieving the West of England Partnership’s Vision of being ‘one of the fastest growing and most prosperous sub-regions in western Europe’. As such it has signed up to the significant levels of growth set out in draft RSS. However, the Council does not accept the level of growth set out in the Secretary of State’s (SoS) Proposed Changes to RSS and considers that it is based on unrealistic forecasts; can not be delivered within the RSS timeframe; and will not result in sustainable development.

2.2 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. 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.
2. The current global and national economic crisis means that economic growth rates and associated housing delivery rates will need to be revised downwards.
3. 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.
4. House building rates achieved since 2006 are well below those required meaning that even higher rates will be needed to catch up.
5. 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.
6. The rates of housing and job growth set out in the Proposed Changes will lead to unsustainable patterns of development.

2.3 Evidence from economic consultants Ernst & Young supporting the points outlined above is being submitted alongside the Council’s response.

### **3.0 Infrastructure**

- 3.1 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 and the accompanying Implementation Plan, along with a commitment to Government funding to support its provision where necessary.
- 3.2 The Proposed Changes include policies encouraging the co-ordination of housing development with the necessary improvements to infrastructure. However, expressing the housing requirement as a uniform annual rate militates against achieving this objective. The Council requests that the housing requirement is phased, starting at a slower rate and then increasing over time in the approved RSS. Without this change the pressure to meet house building rates is likely to lead to development taking place before necessary infrastructure is delivered.

### **4.0 Spatial Strategy**

- 4.1 The spatial strategy set out in policy HMA1 continues to focus development on the Strategically Significant Cities and Towns (SSCTs) as per the draft RSS. However, the Proposed Changes distribute the increased amount of development in a way that conflicts with this overall strategy; is difficult to deliver; and results in impacts that are unacceptable to the Council. The key points are set out below:

#### A4 corridor/Keynsham

- Significant increases in development in the A4 corridor will threaten the fundamental principles of the Green Belt and will have substantial transport implications
- 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
- 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 future should be planned within this context

#### South East Bristol Urban Extension

- 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)

#### Bath and its urban extension

- In Bath planning for job growth equivalent to 2.8% GVA is more sensible than the 3.2% GVA 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 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 delivering the level of development required in the Proposed Changes will be dependent upon the release and redevelopment of MoD land
- 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
- The increased size of the urban extension is insufficiently evidenced and will lead to greater harm to international and national environmental assets, include the setting of the WHS