

## **Regional Spatial Strategy (RSS) Proposed Changes:**

- **Key strategic issues arising in the West of England**
- **Draft Response**

### **1. Purpose**

1. To set out the key strategic issues arising in the West of England from the Regional Spatial Strategy Proposed Changes; and,
2. To consider the responses of the Partnership to the Proposed Changes, to be submitted to the Secretary of State.

### **2. Background**

- 2.1 The Secretary of State for Communities and Local Government has announced her response to the Recommendations of the Panel following the Examination in Public of the Regional Spatial Strategy (RSS). These are referred to as the **Proposed Changes**. The government has invited views on the Proposed Changes, to be submitted by the 24<sup>th</sup> October 2008. Appendix 1 sets out the changes in dwelling allocations for the West of England which in total are as follows: Draft RSS – 92,500; Panel Recommendations – 106,350; Proposed Changes – 117,350.
- 2.2 The following report sets out the key strategic issues arising in the West of England from the Proposed Changes. The report is based on responses from the executive planning members of the four local authorities, members of the Joint Scrutiny Committee, and through work with relevant officers and the reports on the Proposed Changes considered within the individual authorities.
- 2.3 It is proposed that the Secretary of State be asked to take into account:
  - The summary of responses below; and
  - The fuller account attached as appendix 2.

### **3. Regional Spatial Strategy (RSS): Proposed Changes**

- 3.1 The Proposed Changes maintain the general approach of Draft RSS in providing a broad and long-term development strategy for the region. In particular:
  - It carries forward the Regional Economic Strategy aspirations for growth and greater prosperity amongst all communities;
  - It seeks to manage development in ways that improve the quality of life for all and help to create and maintain sustainable communities;
  - It maintains the spatial priorities of Draft RSS including giving recognition to the economic potential of the West of England, focusing development on the main urban areas of the sub-region and promoting the regeneration of south Bristol and Weston-super-Mare.
- 3.2 The Proposed Changes in many respects is consistent with the 'vision' of the Partnership. However, significant differences in emphasis compared with the priorities of the Partnership are evident. In summary, these are as follows.

#### **4. Summary of responses to the Proposed Changes**

- The scale and impact of the overall level of growth proposed is very challenging, especially to current and planned investment in strategic and local infrastructure.
- The constant (rather than the profiled) annual rate of housing completions proposed at sub-regional and district levels is unrealistic given the start-up periods involved in bringing forward the major developments proposed; the annual rate of house building proposed should be linked with meeting requirements for key infrastructure and the need to prioritise brownfield over greenfield development.
- The dwelling provisions for several key locations exceed assessed development capacities, especially when taking account of the mix of uses required by mixed and sustainable communities, and are not consistent with the spatial strategy; the proposals for such locations identified by the authorities should be reviewed; and, greater locational flexibility should be provided by RSS;
- There is insufficient clarity about requirements and arrangements for delivering the considerable new infrastructure required to support the long-term development of the sub-region; the list of transport schemes included in the draft RSS should be re-instated; and,
- The proposal for an immediate Partial Review of the RSS following its approval and ahead of the Integrated Regional Strategy, will distract from the effective and comprehensive planning of the sub-region.

#### **5. Responses to the Proposed Changes given emphasis by Executive and Joint Scrutiny members and reports considered within the individual councils**

- The importance of securing an agreed West of England response on the wider issues and concerns raised by the Proposed Changes.
- The need to welcome the continuing recognition given by the Proposed Changes to the economic potential of the West of England and in this respect its importance to the region, and to the emphasis given to regeneration.
- The need to object strongly to the uplift in the level of growth, in particular the number of additional dwellings and emphasise that the scale of development proposed is not deliverable in the context of the financial crisis and the development capacity of several key locations across the West of England.
- The need to request a reduction of the dwelling target for the sub-region in acknowledgement of the difficulties referred to above; an adjustment to the phasing provision that takes account of development opportunities and constraints; greater emphasis on local employment provision; and, recognition of the need to monitor and amend dwelling targets and phasing provisions in response to progress with delivery.
- The need to prioritise the development of brownfield over Greenfield sites.

- The need to express concern about the adverse implications of the higher dwelling provisions for the Green Belt and the lack of clarity about its general extent in the context of the spatial strategy of the RSS.
- The need to give strong support to reinforcing the emphasis given by RSS towards promoting more sustainable development in recognition of the commitment of West of England local authorities to delivering a sustainable future; the approach of the draft RSS towards promoting more sustainable development and energy generation should be reinstated.
- The need to highlight the specific changes to RSS required to address sub-regional concerns, in particular, the infrastructure requirements of growth and the investment needed from government to enable the West of England to realise its potential contribution to overall regional performance.
- The need to continue to press government for timely investment in social, economic and physical infrastructure that matches the level and pace of growth already committed.

## **6. Detailed responses to the Proposed Changes**

- 6.1 The responses to the key strategic issues and other technical issues arising with the Proposed Changes are set out in more detail in attached appendix 2.

## **7. Recommendation**

- 7.1 The Partnership is recommended to agree:

the comments and views set out by the report and the attached appendix 2 as well as incorporating any further views expressed at the meeting which receive support; and,

that the report and the appendix are forwarded to the Secretary of State as representing the response of the Partnership to the Proposed Changes to the Regional Spatial Strategy.

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 West of England Partnership

## APPENDIX 1

### Housing Figures for the West of England

Dwelling allocations by District and locations: Draft RSS compared with Panel Modifications and the Secretary of State Proposed Changes.

<b>2006-2026</b>			
<b>Area</b>	<b>Draft RSS Allocation</b>	<b>Draft RSS Panel Recommendations</b>	<b>Secretary of State Proposed Changes</b>
	2006-2026		
<b>B&amp;NES</b>	15,500	18,800	21,300
<b>Bristol</b>	28,000	30,000	36,500
<b>North Somerset</b>	26,000	26,750	26,750
<b>South Gos.</b>	23,000	30,800	32,800
<b>West of England Sub-region</b>	<b>92,500</b>	<b>106,350</b>	<b>117,350</b>

<b>Annual allocations</b>		
<b>Draft RSS Allocation</b>	<b>Draft RSS Panel Recommendations</b>	<b>Secretary of State Proposed Changes</b>
2006-2026		
775	940	1,065
1,400	1,500	1,825
1,300	1,338	1,338
1,150	1,540	1,640
<b>4,625</b>	<b>5,318</b>	<b>5,868</b>

<b>Locations</b>	<b>Draft RSS allocations</b>	<b>Draft RSS Panel Modifications</b>	<b>Secretary of State Proposed Changes to the RSS</b>
<b>Bristol City</b>	<b>28,000</b>	<b>30,000</b>	<b>36,500</b>
Bristol urban area	26,500	28,500	33,500
Urban extension (part of area of search A)	1,500	1,500	1,500
Bristol urban extension (area of Search B)			1,500
<b>South Gloucestershire</b>	<b>23,000</b>	<b>30,800</b>	<b>32,800</b>
Urban Area	13,000	15,500	17,500
Urban Extension (areas of search C)	8,000	8,000	8,000
Urban Extension (areas of search D)			2,000
Areas of Search at Yate	0	5,000	3,000
Remainder of District	2,000	2,300	2,300
<b>North Somerset</b>	<b>26,000</b>	<b>26,750</b>	<b>26,750</b>
WsM urban Area	3,000	3,000	3,000
Bristol Urban Extension (part of area of search A)	9,000	9,000	9,000
WsM Urban Extension (area of search F panel mods) (area of search H proposed changes)	9,000	9,000	9,000
Remainder of district	5,000	5,750	5750
<b>B&amp;NES</b>	<b>15,500</b>	<b>18,800</b>	<b>21,300</b>
Bath Urban Area	6,000	6,000	6,000
Bath Urban Extension (Area of Search E)	1,500	1,500	2,000
Bristol Urban Extension (Area of Search B)	6,000	6,000	8,000
Area of Search at Keynsham (listed as area of search 1F in proposed changes)	0	3,000	3,000
Remainder of District	2,000	2,300	2,300

## APPENDIX 2

### RSS Proposed Changes: Key issues arising

Key issues	Recommended response of the Partnership
<p><b>Overall level of job growth</b>            The Proposed Changes provide for levels of job growth in the West of England broadly in line with the draft RSS and economic projections that assume that regional GVA growth would rise by 3.2% per annum between 2006 and 2026. This corresponds broadly with the rate of growth recorded over the last 10 years.</p>	<p>The continuing recognition given by the emerging RSS to the economic potential of the West of England and its significance to the region should be welcomed by the Partnership. Similarly, the Partnership should acknowledge its commitment to the vision and support for the sustainable growth of the West of England.</p> <p>The Partnership however, should also indicate that while it supports manageable and deliverable growth, the levels of job growth shown by the Proposed Changes, rely on an optimistic and arguably unrealistic assumption about the general economic outlook. The levels of job growth shown imply a continuation of the exceptional, favourable economic conditions of the last 10 years or so that are most unlikely to be maintained over the long-term future, as demonstrated by the current financial crisis. The level of job growth shown assume that regional growth will proceed at 3.2% per annum with by implication, the national economy expanding at a similar rate. However, more recent and independent economic forecasts show national economic growth standing at 1.5% in 2008, falling to 1.3% for 2009, then rising to 2.2% for 2010 and 2.6% for 2011 and 2012. (Forecasts for the UK economy: A comparison of independent forecasts. HM Treasury. August 2008). These forecasts may be optimistic in the context of the continuing financial crisis. Recent forecasts have successively lowered their expectations of future growth.</p> <p>The Secretary of State should take account of these more recent projections, the financial crisis and the uncertainties arising as a result, for the general economic outlook and adopt a more realistic assumption about economic prospects when finalising the RSS.</p>
<p><b>Overall level of housing provision, the implications for the spatial strategy and the green belt.</b>            The Proposed Changes include significantly higher dwelling provisions</p>	<p>The levels of additional dwellings shown by the Proposed Changes are based on the same broad indications of housing need and demand as underlying the dwelling provisions of Draft</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
<p>than shown by Draft RSS. Some 117,300 additional dwellings are identified for the sub-region compared with 92,500 identified by Draft RSS (and 106,350 recommended by the Panel).</p> <p>In order to accommodate the additional dwellings, provision is made for additional new dwellings at Keynsham and Yate as well as at the urban extensions with implications for the loss and general extent of the green belt land. The justification for some of these changes is not evident.</p>	<p>RSS. These include more recent government policy statements, in particular the housing green paper (Homes for the future: More Affordable, More Sustainable), and other more recent evidence, notably the revised 2004 based household projections. These recent projections show the level of households in the West of England rising by 120,000 between 2006 and 2026.</p> <p>In approving the RSS, the Secretary of State should:</p> <p>Take account of the current financial crisis, the economic uncertainties arising and the implications for housing delivery, in particular the additional difficulties and delays likely to arise in bringing forward the major urban extensions proposed and recognise that these difficulties should not be allowed to justify the release of smaller sites at a range of locations elsewhere;</p> <p>Give more recognition to the supply-side constraints to be overcome in delivering the additional dwellings put forward for the West of England, in particular brownfield regeneration priorities and infrastructure requirements, the timescales likely to be required in seeking to overcome these constraints and the implications for public resources, development phasing and hence completion rates; concerns about these issues arise across the sub-region, particularly within the urban area of Bristol, the urban extensions proposed for B&amp;NES, urban extensions 1C (east of the urban area) and 1E (Yate) proposed for South Gloucestershire and urban extension 1A (SW Bristol) proposed in North Somerset.</p> <p>Give more consideration to the implications of seeking to deliver the proposed larger number of additional dwellings for the sub-regional spatial strategy - the inclusion of Keynsham and Yate as locations for major housing development in particular must be judged as not consistent with the spatial strategy;</p> <p>Give more weight to the Green Belt and the prospect of harm to the underlying considerations, in seeking to accommodate larger number of additional dwellings in the West of England, provide opportunity for mitigating this harm by allowing opportunity for compensatory extensions to the Green Belt and provide greater clarity about the general extent of the green belt in the context of the spatial strategy of the RSS.</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
	<p>These issues arising with the higher dwelling provisions of the Proposed Changes as well as the evidence submitted by the local authorities to the Examination in Public, should be acknowledged in approving the RSS by identifying a lower level of additional dwellings in the West of England and by amending phasing provisions to reflect the lower dwellings target and opportunities and constraints arising at the local level.</p> <p>Any amendments to the draft RSS, in particular to the distribution of additional dwellings within the West of England, should be clearly linked to the supporting evidence.</p>
<p><b>The locational specificity of the spatial strategy</b>  The Proposed Changes maintain and in some instances increase the locational specificity of Draft RSS, in particular about the levels of additional dwellings to be provided at specific proposed urban extensions.</p>	<p>There are many uncertainties about development capacities across the sub-region, in particular about infrastructure requirements and timescales, and the implications for development trajectories. These uncertainties should be acknowledged by reducing the locational specificity of the approved RSS.</p>
<p><b>The role of smaller towns in meeting development requirements</b>  The Proposed Changes continue to focus new development on Bath, the Bristol urban area and Weston-super-Mare, with Keynsham and Yate also allocated significant new development. Very limited scope for new development beyond these locations, in particular for changing the role of smaller settlements, is allowed for by the Proposed Changes.</p>	<p>The Proposed Changes do not allow sufficient flexibility to address longer- term development needs at Norton-Radstock, in particular arising through the regeneration of these settlements. This concern should be addressed in approving the RSS.</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
<p><b>Transport and the infrastructure requirements of growth</b></p> <p>The Proposed Changes do not specify the transport schemes required over the future and their relationship with major development proposals. Instead, reference is made to required transport outcomes in terms of tackling congestion and improving access on specified corridors by means of demand management, sustainable transport measures and targeted new transport infrastructure. Significantly, references to the key infrastructure investments shown by Draft RSS as required to enable the delivery of the proposed scale of growth consistent with the spatial strategy for the West of England have been deleted from the Proposed Changes to the RSS.</p>	<p>The list of investments in key infrastructure shown by Draft RSS should be reinstated in the approved RSS for the following reasons:</p> <ul style="list-style-type: none"> <li>- the deletion of the list of infrastructure investments ignores the considerable technical work undertaken through the Greater Bristol Transport Study and subsequent work, to clarify the need for transport improvements;</li> <li>- the deletion of the list leaves areas allocated for major development without any recognition given to the specific infrastructure investment required to enable development to go-ahead;</li> <li>- the deletion of the list potentially undermines the Partnership's position with the Regional Funding Allocation process.</li> </ul> <p>Greater recognition should be given to the wider infrastructure requirements of growth including schools, hospitals, GPs, shopping and public transport systems by linking provision for new development with the provision of the infrastructure required as identified by sub-regional and local delivery plans and Core Strategies.</p>
<p><b>Managing travel demand</b></p> <p>The Proposed Changes in respect of the transport policies do not refer to reducing the need to travel. Similarly, they do not include reference to congestion charging and the need for transport policies to be linked to Local Transport Plans.</p>	<p>The absence of references to congestion charging and linking transport policies to local transport plans potentially undermines the Partnership's existing funding bids for schemes and the opportunity to ensure that the Joint Local Transport Plan is firmly recognised by the RSS. References to reducing the need to travel, congestion charging and Local Transport Plans should be included in the approved RSS.</p>
<p><b>The role of the Highways Agency</b></p> <p>The Proposed Changes do not include</p>	<p>The significant role of the Highways Agency in bringing forward major development proposals</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
<p>any reference to the role of the Highways Agency in bringing forward major development.</p>	<p>should be acknowledged by RSS.</p>
<p><b>The phasing of housing delivery</b>  The Proposed Changes indicates that urban extensions to the south west and south east of Bristol ‘...can support and complement the regeneration of South Bristol.’ The Proposed Changes also states that development of Greenfield and brownfield land should not be sequentially phased and that this would put at risk delivery of the RSS.</p> <p>The Proposed Changes also indicate (Policy HD1) that provision should be made for a constant rate of housing delivery by district area across the West of England.</p>	<p>Whilst major Greenfield urban extensions need to be brought forward in a timely way in order to help ensure that development trajectories are met, there are significant risks that early progress with the release of major greenfield sites would endanger prospects for regenerating nearby outworn urban areas and delivering urban housing targets. The development of brownfield sites should be given priority over the development of Greenfield sites. These concerns should be addressed in approving the RSS.</p> <p>The proposed constant rate of delivery of additional dwellings by district is inconsistent with the spatial strategy. The importance of urban extensions to housing delivery, the need for major new infrastructure to the delivery of the urban extensions and the time required to provide this infrastructure, will lead inevitably to a slower pace of development in the shorter-term. This prospect should be taken into account in approving the RSS.</p> <p>Phasing of development should link delivery of new homes with new jobs.</p>
<p><b>Requirements for employment, office, retail and leisure floorspace</b>  The Proposed Changes identify the scale of employment land and numbers of additional jobs to be provided by travel to work area.</p> <p>The Proposed Changes however do not provide further guidance about the distribution of employment land and jobs within the travel to work areas, in</p>	<p>Travel to work areas and shopping catchments do not correspond with local authority areas. Determining requirements for employment land, office and higher level shopping floorspace will require a significant level of joint working in the West of England. This should be given fuller recognition, with the issues requiring joint working highlighted, in approving the RSS. The RSS should distinguish between requirements for industrial uses and for office floorspace in recognition of the significantly different locational requirements and job generating characteristics.</p> <p>The requirement for employment land shown by the Proposed Changes is drawn from the</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
<p>particular between district areas or strategic locations.</p> <p>Similarly, the Proposed Changes do not provide guidance about the scale of <b>additional</b> office, retail and leisure floorspace required and its spatial distribution beyond expressing the general priority to be given to the city and town centres.</p> <p>The Proposed Changes indicate that 352ha of employment land should be provided in the Bristol Travel to Work Area, 39ha in the Bath Travel to Work Area and 34ha in the Weston-super-Mare Travel to Work Area.</p>	<p>advice from consultants (DTZ Nov. 2006) commissioned by SWRDA to inform the EiP. The EiP did not have sufficient time to give full consideration to this advice and the Panel Report concluded that further work is required to identify the implications of the projected levels of job growth (para 8.1.7).</p> <p>Past employment land completion rates suggest that the employment land proposals of the Proposed Changes may under-estimate the requirement for employment sites arising in the Bristol area. Projecting these rates suggests a potential for about 500ha of new development between 2006 and 2026. In contrast, for the Bath area and Weston-super-Mare areas, the employment allocations shown by the Proposed Changes appear excessive when set alongside past completion rates. However, the allocations in the case of Bath may be consistent with the ambitious employment growth provisions of the Proposed Changes but insufficient for Weston given the priority given to regeneration and job growth by the RSS.</p> <p>Local employment land reviews being undertaken by the local councils in support of Core Strategy preparation and further work at the sub-regional level will clarify these issues arising in considering requirements for employment land and office floorspace. In recognition of the contribution of this work to reducing the uncertainties and deficiencies outlined above, the employment land allocations shown by the Proposed Changes should not be included in the approved RSS.</p>
<p><b>West of England Housing Market Area and housing delivery</b></p> <p>The Proposed Changes include Mendip and West Wiltshire in drafting policies for the sub-region, as set out by policies HMA1 and HD1.</p>	<p>The inclusion of Mendip and West Wiltshire within the West of England HMA reflects primarily linkages between these areas and Bath. It is important that these linkages are properly taken into account in planning for growth in the West of England. However, the influence of Bath extends over only a part of these areas and their inclusion in the sub-region does not significantly enhance the functional integration of the West of England as a whole. A definition of the sub-region that corresponds with the boundaries of the four local authority areas that comprise the area of the Partnership represents therefore, a practical and coherent geographical unit for sub-regional planning purposes.</p>

Key issues	Recommended response of the Partnership
	The inclusion of Mendip and West Wiltshire, especially with the imminent abolition of the local authority for the latter area, creates an unnecessary risk of administrative complexity without creating the potential for significantly enhanced planning outcomes. The Secretary of State should give recognition to this concern in approving the RSS.
<p><b>Strategic flood management solutions</b></p> <p>The Proposed Changes do not include any regional acknowledgement of the specific flood risk issues arising with the major development proposals of the RSS. It does not specify the need for strategic flood management solutions in response to these risks, in particular to ensure that Bristol, central Bath, Weston-super-Mare and Avonmouth/Sevenside, remain economically buoyant.</p>	Flood risk issues and the need for strategic flood management solutions to accompany development proposals should be highlighted in approving the RSS.
<p><b>Waste</b></p> <p>The regard to be given to the ‘indicative’ waste capacity allocations shown by policy W1 of the Proposed Changes.</p>	<p>Policy W1 should take into account circumstances where more recent studies of waste capacity requirements are available compared with those underlying the allocations shown by the Proposed Changes. Suggest the following additional wording to policy W1 as follows:</p> <p>‘Waste Planning Authorities should make provision in their Local Waste Development Frameworks... to provide the capacity to meet the indicative allocations for their area, <b><i>subject to the consideration of up-to-date assessments of the amount and types of waste arising.</i></b>’</p>
<p><b>Affordable housing</b></p> <p>The Proposed Changes increase the affordable housing target from the 30%</p>	The implications of raising the affordable housing target for the development viability should be recognised in finalising the RSS by acknowledging:

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
<p>shown by Draft RSS to 35%. This will increase the requirement for contributions from new development unless additional public funding is available with implications for the viability of some developments.</p>	<ul style="list-style-type: none"> <li>• the need for significant, additional funding through the Regional Housing Programme; and,</li> <li>• the need for flexibility in setting local affordable housing targets.</li> </ul>
<p><b>Housing densities</b> The Proposed Changes (policy H2) indicate that new housing should achieve an average density of 40 dph at the housing market area level, that net densities within the SSCTs should be between 40 and 50 dph and that net densities of 50 or more should be promoted in urban extensions.</p>	<p>A minimum density of 40 dph, as shown by the Proposed Changes, would be restrictive on development decisions at the local level. Achieving the higher densities (40-50 dph) at urban extensions, as proposed, would lead to difficulties in delivering mixed and sustainable communities. Setting a net density target at SSCTs is too prescriptive. It does not acknowledge the potential for considerably higher densities to be achieved at the SSCTs.</p> <p>These concerns should be addressed in finalising the RSS by acknowledging the need to achieve a range of planning outcomes in providing new housing including a mix of housing type and high quality design.</p>
<p><b>Mix of housing</b> The Proposed Changes include a new policy (H3) that requires the needs of all groups to be considered in planning the development of mixed communities.</p>	<p>The RSS in requiring provision to be made for all groups should acknowledge the implications for density and design considerations.</p>
<p><b>Sustainable construction</b> The Proposed Changes offer a more flexible approach to promoting sustainable construction compared with draft RSS but suggests reverting to national standards rather than the</p>	<p>The Secretary of State should be urged to reinforce higher standards of sustainable energy construction in approving RSS, in particular to ensure consistency in planning developments that straddle local authority boundaries. The policies proposed in draft RSS and subsequently updated by the South West Regional Assembly should be reinstated.</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
<p>higher standards being sought by the South West Regional Assembly in preparing draft RSS and subsequently when giving evidence at the EIP. It allows local authorities to set higher standards than required nationally where justified by local circumstances in accord with national policy.</p>	
<p><b>Renewable energy</b>  The Proposed Changes offer a more flexible approach to setting requirements for the use of sustainable or renewable energy by new developments. It sets an interim and flexible target of 10% of the energy to be used by new development of more than 10 dwellings or 1,000 sq m floorspace normally coming from decentralised and renewable low-carbon sources.</p> <p>The Secretary of State invites views on the 10% requirement.</p>	<p>The Secretary of State should be urged to include more ambitious targets for renewable and de-centralised energy generation in approving the RSS.</p>
<p><b>RSS Partial Review</b>  The Proposed Changes advise that the Secretary of State wishes to see a partial review of the RSS as soon as possible to ensure that the region maximises its contribution to the national house-building requirement.</p>	<p>The immediate commencement of a partial review of the RSS following its approval would create uncertainties about the context for the preparation of LDF work and potentially with infrastructure planning. In addition, a partial review may lead to ill-considered outcomes that constrain the subsequent preparation of the Integrated Regional Strategy.</p> <p>The prospect of an early review and the potential for a radical change in the location and pace of</p>

<b>Key issues</b>	<b>Recommended response of the Partnership</b>
The review will focus on sub-regional policies, infrastructure requirements and where relevant a green belt review.	new development in the West of England should not be advocated in the approved RSS.

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