



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

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Section A

Comments submitted by:		Agent (if applicable):	
Organisation	West of England Partnership	Organisation	
Surname		Surname	
Title/first name		Title/first name	
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Signature..... **Date**.....

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Page 20 and Policy HMA1 in respect of the overall level of job growth for the region and the West of England.
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

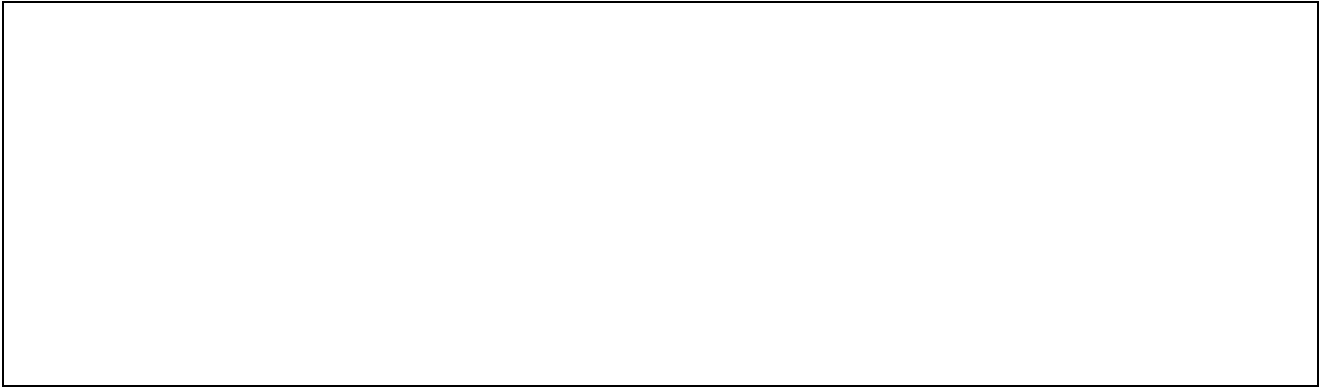
Section C

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

The continuing recognition given by the emerging RSS to the economic potential of the West of England and its significance to the region should be supported by the Partnership. Similarly, the Partnership should acknowledge its commitment to the vision and support for the sustainable growth of the West of England.

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 Partnership objects to the levels of job growth shown because they 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 assumes 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.

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.



Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1- Overall level of housing in the West of England.
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 Partnership objects to the levels of additional dwellings shown for some locations by the Proposed Changes because they are not fully justified by robust evidence .In approving the RSS, the Secretary of State should:

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;

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, including Whitchurch in B&NES, the urban extensions proposed for B&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.

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;

Give more weight to the preservation of the Green Belt and AONB and in exceptional circumstances allow for compensatory extensions to the Green Belt. Provide greater clarity about the general extent of the green belt in the context of the spatial strategy of the RSS.

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. 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.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1- The locational specificity of the spatial strategy for the West of England
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:

There are many uncertainties about development capacities in parts of the sub-region, in particular about infrastructure requirements and timescales, and the implications for development trajectories. In view of these uncertainties the Partnership objects to the degree of locational specificity and asks that this be reduced in the approved RSS.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1- The role of smaller towns in meeting development requirements in the West of England
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 Partnership objects to the absence of 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.

The Partnership objects to the level of growth proposed at Yate because it will have a harmful effect on local infrastructure and the local environment.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1- Transport and the infrastructure requirements of growth in the West of England
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 Partnership objects to the removal of the list of investments in key infrastructure shown by Draft RSS and asks that this be reinstated in the approved RSS for the following reasons:

- 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;
- 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;
- the deletion of the list potentially undermines the Partnership’s position with the Regional Funding Allocation process.

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.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1/Paras-4.1.1-4.1.17 Managing travel demand.
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 Partnership objects to the absence of references to linking transport policies to local transport plans since it 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, examining demand management and Local Transport Plans should be included in the approved RSS.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1/Paras-4.1.1-4.1.17 The role of the Highways Agency.
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 Partnership objects to the absence of any reference to the significant role of the Highways Agency in bringing forward major development proposals. This role of the Highways Agency should be acknowledged by RSS.

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HD1. The constant rate of housing delivery shown across the West of England.
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:

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 Partnership objects to the Proposed Changes failiure to give priority to the development of brownfield over the development of Greenfield sites. These concerns should be addressed in approving the RSS.

The Partnership objects to the proposed constant rate of delivery of additional dwellings by district; this 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.

Phasing of development should link delivery of new homes with new jobs; this work is already planned.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy ES2/Policy HMA1/Policy TC1. Requirements for employment, office, retail and leisure floorspace.
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

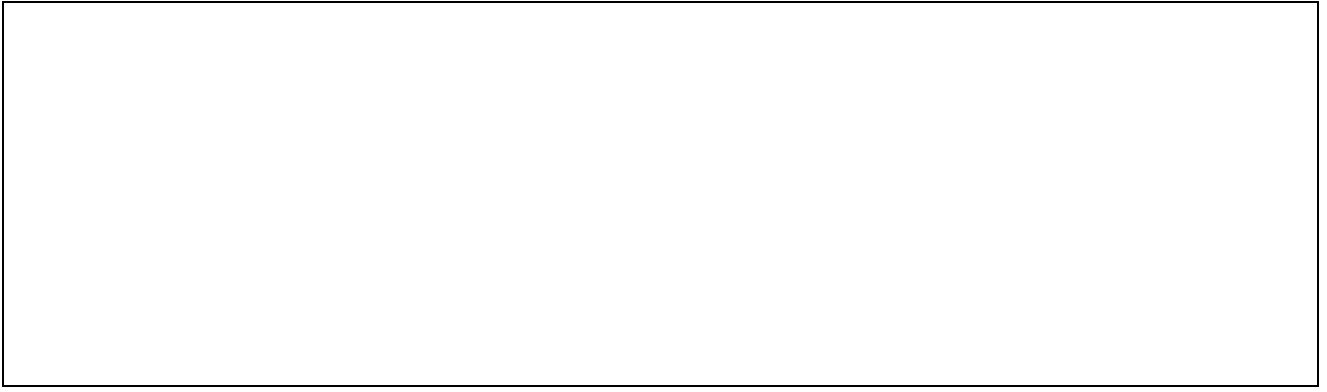
To help us process your response effectively please summarise why you support or oppose the Proposed Change:

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.

The requirement for employment land shown by the Proposed Changes is drawn from the 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).

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.

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.



Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1/HD1 West of England Housing Market Area and housing delivery
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 Partnership notes that 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.

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.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1 Strategic flood management solutions for the West of England
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 Partnership objects to the absence of any regional acknowledgement of the specific Flood risk issues, and the need for strategic flood management solutions to accompany development proposals should be highlighted in approving the RSS.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy W1 Waste capacity allocations
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 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:

‘Waste Planning Authorities should make provision in their Local Waste Development Frameworks... to provide the capacity to meet the indicative allocations for their area, ***subject to the consideration of up-to-date assessments of the amount and types of waste arising.***’

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Amend
RSS Reference – Policy or Paragraph Number	
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:

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Amend
RSS Reference – Policy or Paragraph Number	Policy H2 Housing densities
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 Partnership objects to a minimum density of 40 dph, as shown by the Proposed Changes, because this 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. 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.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Amend
RSS Reference – Policy or Paragraph Number	Policy H3: Mix of housing
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 Partnership requires an amendment to the text of the RSS.

The RSS in requiring provision to be made for all groups should acknowledge the implications for density and design considerations.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Amend
RSS Reference – Policy or Paragraph Number	Policy : Sustainable construction.
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 Partnership objects to the proposal which weakens sustainable construction compared with the Draft RSS.

The Secretary of State should 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 up-dated by the South West Regional Assembly should be reinstated.

Comments from (organisation, or surname).....West of England Partnership.....

Section B

Support / Oppose / Comment (please specify)	Amend
RSS Reference – Policy or Paragraph Number	Policy: Sustainable energy
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 Partnership objects to the weakening of the approach to setting requirements for the use of sustainable or renewable energy by new developments.

The Secretary of State should include more ambitious targets for renewable and de-centralised energy generation in approving the RSS.

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:

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00pm on Friday 17th October. Late responses will not be accepted.