



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 17<sup>th</sup> 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):	
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Surname	Reep	Surname	
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Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council

### Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy CSS, Development Policies A & D, and Policy HD1, Tables 4.1 & 4.2.
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 implications of the current economic situation need to be acknowledged, realistic delivery rates identified and clear phasing policies introduced. The RSS allocations should be phased in four 5 year tranches with a clear commitment to a review at the end of each tranche; the first being in 2011. The allocations for the first phase must take into account the critical downturn in the economy; subsequent phases must be realistic in terms of what is deliverable.
- Essential infrastructure must be delivered in step with, and where appropriate, ahead of development. A clear RSS policy commitment to the need for structured delivery plans is essential to the delivery of sustainable and mixed communities.
- Priority must be given on a sub-regional basis to the delivery of brownfield and urban infill sites before green field and Green Belt locations.

- At draft RSS stage, North Somerset reserved its position on the sub-regional growth agenda pending assurances on infrastructure requirements, delivery and phasing, Green Belt assessment, site appraisal and a comprehensive sustainability appraisal, and evidence that the Regional Assembly, the Government and national regeneration agencies could deliver the necessary infrastructure investment. The Council remains concerned that the ambitious housing allocations set out in the RSS remain unsubstantiated and, in the current economic climate, undeliverable. The Council would urge the Secretary of State to take a more precautionary approach to delivering new development based on phased 5 year tranches and regular reviews of the RSS.
- Given the economic circumstances, the proposed partial review of the RSS should review the period 2006-2011 and rigorously test and assess future housing allocations for subsequent phases.

## Section D1

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

Across the South West as a whole the Secretary of State's Proposed Changes include a 29% increase in housing provision to (up from 459,550 to 592,460 dwellings). This was higher than the Panel Report's recommendation of 569,450 dwellings. North Somerset shares the major reservations of the Regional Assembly on the region's capacity to accommodate this growth without further consideration of the possible effects on sustainability, the environment and quality of life. There appears to be a lack of sound evidence underpinning some of the Panel's recommendations and the Secretary of State's Proposed Changes, particularly the increase in housing numbers, and the lack of clarity in respect of the provision of essential infrastructure and services needed to enable and support the growth.

The proposed level of growth is also predicated on an ambitious level of economic development, the deliverability of which over the plan period must be questioned in the current economic climate. The current economic crisis emphasises the importance of clearer phasing and monitoring of development, and the need for phasing to be related to infrastructure delivery.

The RSS Proposed Changes document starts with a letter from Baroness Andrews to the Chair of the SW Regional Assembly. In this she states that "the Government is committed to ensuring that development that delivers sustainable communities is accompanied by the infrastructure and services that they need and that these are delivered at the right time". Unfortunately the Secretary of State deleted the sub-regional infrastructure priorities set out in the draft RSS. To do this the region will need clear and unequivocal assurances that the Government will support:

- i) Adequate investment in infrastructure.
- ii) Detailed assessment of delivery at regular intervals.
- iii) Commitment to the highest standards of development.

North Somerset requests that, given the economic situation and the undeliverability of the ambitious growth agenda, that the proposed partial review of the RSS examines detailed phasing on the basis of four 5 year tranches with a specific objective of testing and assessing the future spatial requirements post 2011. This would enable the 2006-2011 situation to be reviewed and, with a requirement for

review every subsequent 5 years, a precautionary approach to be taken to future phases, particularly in relation to proposed greenfield and Green Belt development.

Delivery remains a fundamental concern, and North Somerset will seek further reassurances that appropriate infrastructure is delivered in step with and, where appropriate, ahead of development. North Somerset is already suffering from inadequate investment in transport and community infrastructure from previous and current strategic residential allocations which, coupled with the loss of major employers, has resulted in a considerable imbalance and unsustainable development patterns. Despite work progressing on the Core Strategy and strategic masterplanning/delivery plans, it remains the view that this quantum of development is going to be virtually impossible to deliver, and to force the rate of development to unrealistic levels could severely compromise the overall quality of new development. The implications of the credit crunch and the significant downturn in the housing market further question the likelihood of this scale of development being delivered during the plan period. The current level of regional funding allocation on transport which is inadequate further adds to the doubt about government allocating sufficient funds to meet the infrastructure need between now and 2016.

The phasing and sequencing of strategic sites across the West of England needs to be clearly articulated within the RSS to ensure that priority is given to brownfield sites and locations which will address regeneration objectives. This requires a more sophisticated approach to creating a complementary package of strategic sites to ensure that a range of development opportunities are available, and where greenfield/Green Belt sites are generally accorded lower priority. Phasing by 5 year tranche would assist in this approach by ensuring that brownfield sites are prioritised, and the sequential principles as set out in PPS3 are followed.

Working with the West of England Partnership, North Somerset argued that the level of economic growth proposed in the draft RSS was ambitious and unrealistic. Regional economic growth has approximated national growth rates in the past with the West of England running about 0.2% above national forecasts which currently predict growth in 2008 at 1.7% GVA and 1.5% in 2009, then climbing to 2.5% pa for 2010 and 2011. The RSS is based on an assumption of 3.2% across the region. This translates to an extra 6,000 jobs pa arising in the West of England (or 12,000 2006-2026). These extra jobs imply a need for a significant increase in dwellings. However, this employment growth has been historically concentrated in Bristol and the North Fringe with North Somerset not meeting its employment goals. There is no evidence that this will change without major improvements in the highways and transport infrastructure being carried out ahead of more new development.

## **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:

RSS should be reassessed in response to current economic conditions and based on more realistic growth assumptions, include realistic phasing in 5 year tranches, a requirement for essential infrastructure to be delivered in step with, and where appropriate, ahead of development, and a commitment to a partial review of the RSS to test the scale and spatial implications of development post 2011. Phasing must take account of the need to prioritise brownfield and regeneration opportunities ahead of greenfield and Green Belt sites.

**Please ensure that you have written your name at the top of the page.  
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FOR THE SOUTH WEST

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### Section A

Comments submitted by:		Agent (if applicable):	
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Fax	01934 426678	Fax	

**Signature** M Reep    **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	HMA1, HD1, Development Policy D, Table 4.1 & 4.2
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 objects to the increase in the North Somerset housing allocations proposed in the RSS, and furthermore considers that the existing numbers and locations must be reassessed to take account of the economic situation, the need for realistic phasing, the delivery of infrastructure, and the need to prioritise brownfield and regeneration opportunities ahead of greenfield and Green Belt sites.

**Section D1**

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

The Secretary of State's proposed changes propose that the Panel Report's recommendation of 26,750 dwellings for North Somerset is confirmed (up from 26,000 in the draft RSS).

This is sub-divided as follows:

Weston urban extension	9,000
Weston urban area	3,000
SW Bristol urban extension	9,000 (plus 1,500 within Bristol City)
Remainder of NSC	5,750

This scale of growth represents a massive challenge in terms of delivery over the 20 year period, and raises major concerns over the market's ability to maintain this sustained rate of house building. This has been a consistent theme in this Council's response to the RSS agenda. When considering the draft RSS in July 2006 Executive Committee resolved that the Council reserves its position regarding both "the detailed Sub-Regional Strategy for the West of England, pending the provision of adequate information relating to infrastructure requirements, delivery and phasing, green belt assessment, site appraisal and a comprehensive sustainability appraisal" and "the deliverability of the growth strategy pending clear unequivocal evidence that the Regional Assembly, the Government and the national regeneration agencies could deliver the transport, employment and other infrastructure investment needed prior to development taking place, in accordance with the sustainable communities agenda". At that time the Council was "minded to object to the proposed dwelling requirement for North Somerset as, notwithstanding the absence of detailed evidence referred to above, the overall level of growth is unlikely to be deliverable within the Plan period and should be reduced from 26,000 to a maximum of 24,500 dwellings".

The Council remains unconvinced that the scale of growth envisaged has been robustly justified, will be supported by essential infrastructure, and, in the current economic climate, will be delivered – with the danger that what is delivered will be at the cost of reduced quality in terms of design, energy efficiency and developer contributions to support the sustainable communities objectives.

Within North Somerset, net housing completions are significantly down. Monitoring at 1<sup>st</sup> October 2008 indicate that large site completions (sites of 10+ dwellings) over the last 6 months totalled 416 dwellings. This compares with the last annual figure of 1185 dwellings 2007/08. However, what is significant is that much of the development activity which is going on relates to the elderly persons and affordable housing sectors; for example, a much higher proportion of these than normal (214 dwellings) were affordable. It is anticipated that the next half year will experience a further steep decline as new planning applications for residential units have all but dried up, and supply will take several years to build up to previous rates. The implications of the economic situation will affect RSS delivery, and the ambitious economic forecasts and housing numbers must be modified to take this into account.

Districts such as North Somerset with a massive proportion of overall growth in the form of urban extensions will quickly become vulnerable to appeals based on a lack of a 5 year supply of housing land if the economic situation further delays their delivery. This is likely to lead to pressure on less sustainable locations, potentially contrary to the overall objectives of the RSS spatial strategy. The RSS needs to provide clear policy guidance on how local planning authorities should deal with

these circumstances, to ensure that development takes place at the intended spatial locations.

At the draft RSS consultation stage the Council accepted the principle of investigating the potential of new urban extensions at Weston and SW Bristol (subject to the significant caveats set out above), but maintained that the NSC element of the latter should be no more than 7,500 dwellings – primarily on the grounds that this was unlikely to be delivered over the plan period. Given the current economic situation, North Somerset proposes that the partial review of the RSS fundamentally reassesses the appropriateness of the scale and form of development proposed at both urban extensions.

Despite representations to the draft RSS that this development should be phased and delivered in step with South Bristol regeneration, this was not supported in the RSS Proposed Changes. The SW Bristol Planning Together Stakeholder Workshops held in April 2008 and ongoing assessment through masterplanning, design coding and delivery plan work has demonstrated the complexity of issues surrounding this development and the importance of the sequential relationship with Bristol regeneration. Delivery of infrastructure in phase with the development remains critical; as is effective joint working with Bristol and the West of England Partnership. Brownfield development and regeneration opportunities should proceed first, unless infrastructure needs require otherwise.

It is understood that there is not sufficient capacity within Bristol to accommodate the 1,500 dwellings proposed as part of the urban extension. There is no scope for this reduction to be reallocated to North Somerset, and no reason why it should be.

At Weston, infrastructure provision is also critical to ensuring successful delivery, particularly transport improvements such as through the Weston Package, and flood management as much of the Weston Regeneration Area is within flood zone 3. Falling development values could have a significant impact on critical infrastructure provision. North Somerset would also like more flexibility in dealing with the Weston housing allocation as a whole (ie the urban area and urban extension combined) to ensure that brownfield and sequentially better sites are accorded priority. This should be tested and assessed as part of the proposed partial review of the RSS.

There appears to be little justification for the additional 750 dwellings allocated in the 'remainder' of North Somerset district. This appears to be a regional 15% uplift across the rural patch regardless of the geography and sustainability implications. The geography of North Somerset in relation to the SSCTs of Bristol and Weston means that the effect of this would be a requirement to locate this additional growth in settlements which already experience a high degree of out-commuting, and would increase the development pressure on towns and larger villages contrary to RSS objectives. North Somerset objects to this increased allocation; although if this increase is retained, then NSC should be permitted greater flexibility in terms of where this growth should be accommodated.

## 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 North Somerset housing allocation should be reduced to a level which is appropriate and deliverable. This should be undertaken as part of the proposed partial review of the RSS.

Clear policy guidance is needed to ensure that districts with high housing requirements tied up in large urban extensions can resist inappropriate development pressure justified on the basis of addressing a shortfall in 5 year supply – this should be undertaken through realistic phasing and regular review.

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### Section A

Comments submitted by:		Agent (if applicable):	
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Title/first name	Michael	Title/first name	

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Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

### Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1.
For comments on the Sustainability Appraisal – Paragraph Number	10.80
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 quantum of development proposed for North Somerset must reflect both a realistic employment-led strategy in terms of balancing jobs and homes (and, where appropriate, taking account of the existing backlog, particularly in Weston-super-Mare), and a realistic assessment of delivery given the state of the economy.

### Section D1

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

At Weston the RSS proposes 9,000 dwellings to be provided at the urban extension, with an additional 3,000 within the existing urban area, and 10,000 jobs including about 34ha employment land within the Weston Travel to Work Area. Each of these elements refers to a different geography which is confusing and reduces clarity.

Within SW Bristol the employment position is also unclear in that this area forms part of the wider Bristol TTWA. It would seem appropriate for development in this area to start with the twin objectives of self-containment in terms of the jobs/homes balance, and addressing the backlog in the wider South Bristol area. The RSS should identify the appropriate quantum of employment for this area.

Figures for Weston relate to the former Weston TTWA area which no longer exists, while the SW Bristol figures are part of the Bristol TTWA which now includes Weston. For clarity, and particularly monitoring purposes, current TTWA definitions should be used.

The RSS is unclear as to what the job numbers in Policy HMA1 refer to. The RSS reads as if the job numbers and land requirements relate to all employment categories, but North Somerset's assessment is that these are only jobs and land in B1/B2/B8. This needs to be clarified, and also how the numbers are derived and justified, and whether or not these figures take account of existing backlogs and policy objectives.

At Weston the phrase now used is that the town "will secure concerted employment-led regeneration" by providing for the "revitalisation of the town centre and sea front through improved retail, leisure & cultural facilities & public realm", a better balance between homes and jobs with "an emphasis on significantly improving the employment offer of the town & reducing the impacts of car based commuting" with "housing growth to be phased & linked directly to job growth".

The policy approach is clear that housing is linked to job growth and this is strongly supported. However, it is curious that a policy predicated on improving self-containment in fact allocates more houses than jobs, thereby potentially contributing to further reducing self-containment and worsening the current out commuting problems in the future. The South West RSS Sustainability Appraisal prepared for the Secretary of State in fact states that:

*"Car based commuting between Weston-super-Mare and Bristol is a significant issue in the Housing Market Area. The intention of the HMA strategy is to encourage Weston-super-Mare to become more self-contained, however, we think the lower provision of jobs (10,000) compared to homes (12,000) may in fact increase travel to Bristol. The Panel Report notes that due to existing trends in Weston-super-Mare, simply synchronising jobs and housing is unlikely to greatly improve self-containment." (Paragraph 10.80).*

In the Strategic Sustainability Assessment of the draft RSS (March 2006) Table 10.4 compared jobs to homes ratios within SSCTs. Weston was identified as having the second lowest ratio (1.15) in the region. Assuming that the jobs and homes provided for in the draft RSS were delivered, by 2026 this ratio was expected to fall further to 1.08. An additional 13,800 jobs would be required just to maintain a 1.15 jobs to homes ratio based on 12,000 dwellings. As job growth of this scale is extremely unlikely, a more realistic approach would be to reduce housing numbers from 12,000

to 8,700 to maintain the 1.15 ratio based on 10,000 jobs.

North Somerset 's monitoring of jobs and housing in Weston reveals that over the first two years of the plan period the self-containment situation has deteriorated significantly despite the adoption of the employment-led strategy in the Replacement Local Plan.

At April 2006 the baseline situation for Weston-super-Mare urban area (not TTWA) was as follows:

34,796 economically active  
32,981 households  
29,129 employment opportunities  
Imbalance = 3,852 jobs

Annual changes:

April 2006 – March 2007:  
220 job opportunities  
1132 net additional dwellings  
Imbalance = 5,052 jobs

Annual changes:

April 2007 – March 2008:  
445 job opportunities  
2606 net additional dwellings  
Imbalance = 6,321 jobs

This combination of existing residential allocations and slow employment growth has meant that the imbalance has already widened from an estimated 3,852 jobs in 2006 to 6,321 jobs in 2008.

It also remains unclear as to what happens if the required quantum of employment fails to be delivered. Can additional housing growth then be resisted? North Somerset needs reassurance that residential completions will be firmly linked to employment generation (proposed 1.5 minimum jobs created per dwelling built) in order to reduce existing out-commuting. A strong policy statement is required in the RSS to make it clear that housing will not be permitted without complementary employment growth, otherwise developers will seek to promote residential sites in an absence of 5 year supply, regardless of the need to relate this to jobs. This again emphasises the importance of phasing and regular review in relation to economic conditions.

## **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:

Proposed new development areas must be employment-led with realistic employment land and job targets established which will address self-containment objectives. Through regular monitoring, housing releases must be closely related to job growth.

Clarify TTWA figures.

Clarify definition and derivation of job and employment land figures.

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**Section B**

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RSS Reference – Policy or Paragraph Number	Policy HMA1
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 flexibility is required to enable North Somerset to locally determine the most sustainable locations for growth within the district.

**Section D1**

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

Most new development will be at Strategically Significant Cities & Towns (SSCTs) such as Bristol & Weston. Provision for more limited development will be made at 'market & coastal towns' defined as those with an existing concentration of employment, facilities and services that meet the needs of the settlement & surrounding area, and with sustainable transport modes. Within these areas provision will be made for housing, employment, shopping & other services that increase their self-containment & enhance their roles as service centres". In 'small towns & villages' greater self-containment & stronger local communities will be promoted by making provision that supports an appropriate scale of economic activity, extends the range of services, and meets identified local housing needs. The Core Strategy will identify which settlements fall into which category.

This approach continues the existing strategy of concentrating development at the larger urban areas with limited opportunities elsewhere, and then only where this leads to greater self-containment.

While there is no objection to the overall settlement strategy, more flexibility is needed to enable North Somerset to identify where the RSS housing allocation can be most sustainably accommodated – rather than the specific sub-district housing numbers contained in the RSS. This relates to for example, the allocation of the 'remainder' figure for the district, or the need to consider the Weston urban area as a whole, including the proposed urban extension.

## **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:

Provision of a single district housing figure for North Somerset.

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RSS Reference – Policy or Paragraph Number	Policy HMA1 (GB general)
For comments on the Sustainability Appraisal – Paragraph Number	
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**Section C**

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

RSS must more clearly articulate the reasons for Green Belt amendments and the definition of its general extent.

**Section D1**

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

In order to proceed efficiently with the Core Strategies and other relevant Development Plan Documents, there is a need for clear and unequivocal guidance from the RSS on the justification for the Green Belt amendments and clarity as to where the general extent has been altered. The Proposed Changes fail to articulate either clear justification or adequate guidance on the spatial changes.

## **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:

Need to fully justify the exceptional circumstances relating to Green Belt changes, and a clear spatial indication of their extent.

**Please ensure that you have written your name at the top of the page.  
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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

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**Please send all responses to:**

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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	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
Address Line 1	Somerset House	Address Line 1	
Address Line 2	Oxford Street	Address Line 2	
Address Line	Weston-super-Mare	Address Line 3	

3			
Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1 (SW Bristol Green Belt)
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:

Need to more clearly articulate in spatial terms the proposed change to the Green Belt at SW Bristol and to set out the exceptional circumstances justifying the change to the general extent. Include a mechanism to enable phased release of Green Belt as development proceeds.

**Section D1**

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

Policy HMA1 states that the Green Belt will be removed to accommodate urban extensions, but as the SW Bristol urban extension remains an area of search, no clear indication of the boundary of the general extent is proposed. The RSS Key Diagram shows 14 grey squares clearly within the existing Green Belt, and a symbol to represent 'change to the general extent of the Green Belt'. This doesn't provide the necessary clarity and certainty. However, there is still no certainty as to what is the detailed form and extent of the development, and therefore the change required to the general extent of the Green Belt. North Somerset would like a mechanism in place to ensure the phased release of Green Belt as the urban extension develops – this is particularly important considering uncertainties over delivery in the current economic climate.

## **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:

Clarify justification for, and extent of, the proposed change to the general extent of the Green Belt at SW Bristol. Include mechanism for phased release in step with development.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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**Section A**

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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
Address Line 1	Somerset House	Address Line 1	
Address Line	Oxford Street	Address Line 2	

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Address Line 3	Weston-super-Mare	Address Line 3	
Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1 (Royal Portbury Dock – Green Belt)
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 is no further scope for Green Belt amendment at Royal Portbury Dock. This issue was resolved through the North Somerset Replacement Local Plan (adopted March 2007).

**Section D1**

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

Removal of land between Royal Portbury Dock and M5 – this is not required following confirmation of the Replacement Local Plan (adopted March 2007), and reference should be deleted from the RSS. The Replacement Local Plan clarified the potential further development area of Royal Portbury Dock in relation to Green Belt issues by removing land at Court House Farm (17ha) from the Green Belt, and no further Green Belt release is appropriate. The small strip of land referred to in Policy HMA1 between the Port and M5 is highly constrained and was not identified as developable by the Port in the context of the Local Plan Inquiry. Paragraph 4.1.3 fails to set out the exceptional circumstances why the Green Belt boundary needs to be altered in this location given in particular, opportunities to the north of the Avon.

## **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:

Delete reference to Green Belt release at Royal Portbury Dock. Remove symbol on Key Diagram.

**Please ensure that you have written your name at the top of the page.  
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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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#### Section A

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Surname	Reep	Surname	
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Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

### Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1 (Bristol International Airport – Green Belt)
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:

Deleting further land at Bristol International Airport in advance of any clarification of whether any additional Green Belt land will be required or from where it is proposed to be deleted is premature, fails to meet the exceptional circumstances test, and prejudices future decisions.

### Section D1

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

Removal of land at Bristol International Airport – this is premature and would commit this Council to further Green Belt change before the longer term spatial requirements of the airport have been determined. The Replacement Local Plan identified land requirements to cater for 9 million passengers pa which it is anticipated that the Airport will achieve in 2019, and deleted 45ha of Green Belt to accommodate this. The master plan only considered the development implications of further expansion beyond this period in outline. The spatial implications of longer term development within the RSS plan period have yet to be determined, and the RSS proposed Green Belt deletion pre-judges this debate. Paragraph 4.1.3 fails to set out the exceptional circumstances whereby further change is required to the Green Belt at BIA.

## **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:

Delete reference to Green Belt change at Bristol International Airport.

Remove symbol on Key Diagram.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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#### Section A

Comments submitted by:		Agent (if applicable):	
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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1
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:

Oppose the deletion of the proposed Green Belt extension to the SW of Nailsea.

**Section D1**

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

The Council objects to the deletion of the proposal to extend the Green Belt to the SW of Nailsea. Given the proposed deletion of Green Belt at SW Bristol, compensatory Green Belt should be created in this location to retain its effectiveness in meeting the purposes of the designation.

## **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:

Reinstate proposed Green Belt extension to the SW of Nailsea.

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GOVERNMENT OFFICE  
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#### Section A

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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Retain affordable housing provision of at least 30%.

**Section D1**

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

Affordable housing - in the context of the North Somerset housing market and the Council's desire to balance the increasing demands placed on developer contributions, the Council wishes to maintain the established policy of seeking 30% affordable housing on new development. It therefore objects to the Secretary of State's proposal to increase this to 35%.

## **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:

Replace 35% with 30%.

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#### Section A

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Surname	Reep	Surname	
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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy H2
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:

Object to the hierarchy of densities, particularly the requirement for urban extensions to be 50 dwellings per ha or more.

**Section D1**

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

Density – the RSS target is 40 dwellings/ha, 40-50dwellings/ha within SSCTs such as Weston, and 50 dwellings/ha in urban extensions. There is concern that the latter is unrealistically high when considered across a large urban extension which will contain a wide range of housing types, and could prove a constraint on delivering a high quality sustainable development that meets objectives of place shaping and creating mixed and balanced communities. The policy implies a hierarchy of density, whereas in fact the opportunities for higher density housing are likely to be within existing city and town centres. The RSS should set out a single density target of 40 dwellings/ha, whilst acknowledging that this could be more where circumstances permit.

## **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 should state that the aim is to achieve a target net density of 40 dwellings per ha, with higher densities where the potential exists such as at more accessible locations.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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#### Section A

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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy SD1
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:

Object to revised wording in relation to demand management within SSCTs, as this would now apply to Weston, potentially discouraging the employment-led objectives.

**Section D1**

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

Bullet point relating to minimising the need to travel now refers to improved public transport and a strong demand management regime applied in the region's "Strategically Significant Cities and Towns" instead of "main centres in particular".

Increased emphasis on demand management now drawing in towns. Historically North Somerset has argued that demand management in WsM is not appropriate; the key is to encourage employment to reduce out-commuting and demand management could discourage potential employers.

## **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:

Delete reference to a strong demand management regime applied in SSCTs.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Need to strengthen policy given importance of infrastructure provision.

**Section D1**

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

Infrastructure provision is a critical component of new development. Development at urban extensions must not commence in advance of agreement of infrastructure requirements, priorities and mechanisms for delivery and funding. Policy should be strengthened by replacing 'should' with 'must'.

## **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:

Strengthen policy by replacing 'should' with 'must'.

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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Need to strengthen policy given importance of good design.

**Section D1**

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

The aim is to raise design quality, but 'must deliver' rather than 'should deliver' is stronger.

## **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:

"All development must deliver the highest possible standards of design, both in terms of urban form & sustainability criteria"

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

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**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	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
Address Line 1	Somerset House	Address Line 1	
Address Line 2	Oxford Street	Address Line 2	
Address Line	Weston-super-Mare	Address Line 3	

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Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Concern about impact of the approach on loss of employment land.

**Section D1**

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

Policy continues to emphasise the need to take account of the full potential of previously used land whilst recognising that it might not always be in the most sustainable locations.

Where loss of employment land is being proposed, need to have significant evidence that the land is not required for employment purposes. Also, developers should be required to submit evidence that they have considered re-development for employment purposes before other uses are considered.

## **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:

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GOVERNMENT OFFICE  
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## Draft South West RSS – Proposed Changes

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#### Section A

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Surname	Reep	Surname	
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Postcode	BS23 1TG	Postcode	
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Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HMA1 (transport outcomes)
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:

Reference to demand management measures at Weston could adversely affect employment-led regeneration.

**Section D1**

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

The emphasis is on removing 'local' trips off M4/5 between WsM and Bristol and providing orbital links to/from South Bristol. Infrastructure provision will be critical if out-commuting in North Somerset is to be addressed and the historic trend towards job provision in the North Fringe reversed.

Demand management measures at Weston could detract from the objective of employment-led regeneration.

## **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:

Delete reference to demand management measures at Weston.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

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Date Received:

Acknowledged:

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#### Section A

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Surname	Reep	Surname	
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Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy HD1
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:

Object to the reference to not treating housing figures as ceilings.

**Section D1**

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

Reference in the policy to 'a flexible approach to delivery' and not treating the housing figures as ceilings is potentially damaging to the objective of creating high quality sustainable developments. It does not appear to be any flexibility in the under provision of RSS allocations. Where higher numbers are appropriate, then North Somerset should be empowered to redistribute housing numbers accordingly within the context of the overall district 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:

Delete the reference to not treating housing figures as ceilings.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

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Respondent No:

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#### Section A

Comments submitted by:		Agent (if applicable):	
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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Concern about policy interpretation in the context of the Weston-Bristol transport corridor.

**Section D1**

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

The policy expands the emphasis of removing 'local' trips off routes of national importance (M4/5); measures to achieve this include "access control measures" but also improvements to local highway networks and public transport that could remove trips from the routes of national importance. Interpretation is to provide alternatives to the M5 between WsM and Bristol. North Somerset does not regard trips between Weston and Bristol as 'local'.

## **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:

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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#### Section A

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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Address Line	Weston-super-Mare	Address Line 3	

3			
Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Comment
RSS Reference – Policy or Paragraph Number	Policy RTS2
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:

No objection provided that local authorities can identify the appropriate range of measures for a specific SSCT.

**Section D1**

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

Emphasis on progressive demand management accompanied by “step change” in alternatives at a level appropriate to each SSTC. It is not clear what the implications of this approach will be for Weston.

The policy refers to ‘consideration’ being given to a range of measures – it is welcomed that this is not prescriptive given the ‘congestion/road pricing’ bullet point, and concerns that this approach could have on employment-led regeneration at Weston.

## **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:

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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#### Section A

Comments submitted by:		Agent (if applicable):	
Organisation	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Address Line 2	Oxford Street	Address Line 2	
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Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy RTS4
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:

Clarification required on definition of the primary route network.

**Section D1**

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

The 'primary route network' should be promoted for use by HGVs in preference to other routes. The inference is that a primary route should be available for use by HGVs; in North Somerset, primary routes include A368, on which we are promoting a weight limit. If this limit is confirmed, we may have to remove A368 from the primary route network and accept a lower level of LTP capital maintenance funding.

Clarification needed on definition of the primary route network in the policy – is it national primary or all primary routes?

## **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:

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GOVERNMENT OFFICE  
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## Draft South West RSS – Proposed Changes

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#### Section A

Comments submitted by:		Agent (if applicable):	
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Address Line 3	Weston-super-Mare	Address Line 3	
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Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep    **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Comment
RSS Reference – Policy or Paragraph Number	Policy RTS5
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:

Support for policy approach, but objection to proposed Green Belt deletion between Royal Portbury Dock and M5.

**Section D1**

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

North Somerset supports the preparation of a comprehensive port masterplan for Bristol Port to incorporate land in both Bristol and North Somerset.

The Replacement Local Plan clarified the potential further development area of Royal Portbury Dock in relation to Green Belt issues by removing land at Court House Farm (17ha) from the Green Belt, and no further Green Belt release is appropriate. The small strip of land referred to in Policy HMA1 between the Port and M5 is highly constrained and was not identified as developable by the Port in the context of the Local Plan Inquiry.

## **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:

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GOVERNMENT OFFICE  
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**Section A**

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Fax	01934 426678	Fax	

**Signature** M Reep    **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

No objection to policy framework, but objection to proposed further deletion of Green Belt to accommodate additional airport expansion at Bristol International Airport.

**Section D1**

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

No surprises in terms of the policy framework for the potential development of Bristol International Airport as set out in the RSS, and the role of masterplans and surface access strategies.

Object to the proposal in Policy HMA1 to delete further Green Belt land at Bristol International Airport to meet development needs of the Airport. The Replacement Local Plan identified land requirements to cater for 9 million passengers pa which it is anticipated that the Airport will achieve in 2019, and deleted 45ha of Green Belt to accommodate this. The master plan only considered the development implications of further expansion beyond this period in outline. The spatial implications of longer term development within the RSS plan period have yet to be determined, and the RSS proposed Green Belt deletion pre-judges this debate.

## **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:

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

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#### Section A

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Organisation	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first name	Michael	Title/first name	

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**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Policy should be strengthened by requiring 15%, and should apply to all dwellings.

**Section D1**

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

Policy sets the context for decentralised energy targets. An interim target of 10% is proposed; the North Somerset Replacement Local Plan already expects 15% of energy requirements will be generated through on-site renewable energy generation systems, and this should be the interim target across the SW. Policy should apply to all new dwellings, not just 10 or more. Also clarity needed on whether these figures are net or gross, and how mixed use developments should be treated.

The RSS should set the standard for renewable energy targets to provide support for individual authorities seeking to drive standards up.

## **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 should be strengthened by requiring 15%, and should apply to all dwellings.

**Please ensure that you have written your name at the top of the page.  
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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

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**Please send all responses to:**

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Government Office for the South West  
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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	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
Address Line 1	Somerset House	Address Line 1	
Address Line	Oxford Street	Address Line 2	

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Address Line 3	Weston-super-Mare	Address Line 3	
Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy W1
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 should be amended by the addition of 'subject to the consideration of up-to-date assessments of the amount and type of waste arising' at the end of the first paragraph.

**Section D1**

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

Policy W1 concerns the provision of waste sites. It is proposed to include indicative allocations for sub-regions, including the West of England, taken from the Regional Waste Strategy published in 2004. While the recent work undertaken in the West of England pointing to a reduction of 2% per annum in waste growth is highlighted, the indicative nature of the allocations should be acknowledged and more recent studies taken into account when planning strategic waste facilities. It is suggested that Policy W1 should be amended by the addition of 'subject to the consideration of up-to-date assessments of the amount and type of waste arising' at the end of the first paragraph.

## **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:

Amend policy by the addition of 'subject to the consideration of up-to-date assessments of the amount and type of waste arising' at the end of the first paragraph.

**Please ensure that you have written your name at the top of the page.  
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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes Comments Form

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**Fax:** 0117 900 1914

**Section A**

Comments submitted by:		Agent (if applicable):	
Organisation	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first	Michael	Title/first name	

name			
Address Line 1	Somerset House	Address Line 1	
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Address Line 3	Weston-super-Mare	Address Line 3	
Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy W2
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:

Delete the words “accord with the following sequential approach” from the first sentence of Policy W2.

**Section D1**

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

Policy W2, relating to the spatial distribution of waste facilities, is proposed to be amended to avoid repetition of Government Policy and to focus on the sequential approach to the provision of new waste management facilities. In order to improve clarity, it is suggested that the words “accord with the following sequential approach” be deleted from the first sentence of Policy W2.

## **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:

Delete the words “accord with the following sequential approach” from the first sentence of Policy W2.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

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#### Section A

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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Address Line	Weston-super-Mare	Address Line 3	

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Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Concern at how the phrase “switch from employment-led to productivity-led growth” could be interpreted in respect of the employment-led regeneration strategy at Weston.

**Section D1**

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

Support the proposed measures listed. However, the phrase “switch from employment-led to productivity-led growth” could be misinterpreted by those wanting to develop in Weston where the local policy context is clearly set out in terms of employment-led regeneration.

## **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:

Amend the phrase “switch from employment-led to productivity-led growth” as this could be misinterpreted by those wanting to develop in Weston where the local policy context is clearly set out in terms of employment-led regeneration.

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes Comments Form

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### Section A

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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Address Line 2	Oxford Street	Address Line 2	
Address Line 3	Weston-super-Mare	Address Line 3	
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E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep    **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy ES2
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:

Concern that mixed use development (last bullet) could be used by developers as justification to provide more housing and less employment.

**Section D1**

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

Need to be clear that mixed use development (last bullet) should not be used by developers to provide more housing and less employment – using PPS3 as justification.

## **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:

Clarify that mixed use development (last bullet) should not be used by developers as justification to provide more housing and less employment.

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GOVERNMENT OFFICE  
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## Draft South West RSS – Proposed Changes

### Comments Form

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#### Section A

Comments submitted by:		Agent (if applicable):	
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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
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Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy ES3
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:

Concern that the sequential approach is open to interpretation, especially the inclusion of “including residential use” in the second bullet point.

**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:

Amend second bullet point as follows:

“For mixed use re-development (only where lack of demand for purely employment development can be strongly evidenced), taking account of the potential for higher employment densities; and”

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes

### Comments Form

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#### Section A

Comments submitted by:		Agent (if applicable):	
Organisation	North Somerset Council	Organisation	
Surname	Reep	Surname	
Title/first name	Michael	Title/first name	
Address Line 1	Somerset House	Address Line 1	
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Address Line	Weston-super-Mare	Address Line 3	

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Postcode	BS23 1TG	Postcode	
E-Mail	Michael.reep@n-somerset.gov.uk	E-Mail	
Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	Policy ADD1
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:

By only referencing Weston under 'regeneration and neighbourhood renewal' the policy fails to acknowledge the significant levels of employment provision proposed. Its role as a SSCT and in delivering economic development benefits through employment-led regeneration should also be recognised.

**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:

Add Weston-super-Mare to the first bullet point so that it reads:

“Economic development – harnessing the economic potential of Bristol (city centre and north fringe), Swindon and Exeter as well as Bournemouth/Poole and Cheltenham, Gloucester and Weston-super-Mare.”

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GOVERNMENT OFFICE  
FOR THE SOUTH WEST

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**Section A**

Comments submitted by:		Agent (if applicable):	
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Surname	Reep	Surname	
Title/first name	Michael	Title/first name	

Address Line 1	Somerset House	Address Line 1	
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Tel. (day)	01934 426675	Tel. (day)	
Fax	01934 426678	Fax	

**Signature** M Reep **Date** 24.10.2008

**Comments from** North Somerset Council.

**Section B**

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

Objection to depiction of urban extensions, transport outcomes, changes to the general extent of Green Belt, existing Green Belt boundary, and deletion of proposed extension to Green Belt.

**Section D1**

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

Area of search notation for urban extensions has been amended from circles to squares, and the overall shapes have been subtly altered – it is unclear what implications this has. Need for a more diagrammatic notation. In addition, by using squares within the Green Belt this fails to demonstrate that Green Belt will be removed to accommodate the SW Bristol urban extension.

Transport outcomes notation is unclear what is being represented, and the notation used is misleading in terms of the extent of the area highlighted.

The existing Green Belt should follow the northern edge of Nailsea, and west of Clevedon.

Reference to Green Belt deletions at Royal Portbury Dock and Bristol International Airport should be removed.

The draft RSS proposal to extend the Green Belt to the SW of Nailsea has been deleted. Given the proposed deletion of Green Belt at SW Bristol, compensatory Green Belt should be created in this location to retain its effectiveness in meeting the purposes of the designation.

## **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:

Revise Key Diagram to:

Amend notation of urban extension areas of search to be more diagrammatic, and to clearly show that Green Belt is to be deleted.

Amend transport outcomes notation to make it clearer what is being represented and the area to which it relates.

Correct existing Green Belt to the northern edge of Nailsea, and west of Clevedon.

Remove proposed Green Belt deletion at Royal Portbury Dock, and Bristol International Airport.

Reinstate proposed Green Belt extension to the SW of Nailsea.

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