

## **Section 4 Sub Regional policies and housing distribution (2 – response to HMA policies)**

### **Policy/paragraph reference**

### **Policy HMA1: West of England HMA**

#### **1 (of 7) Overall summary including district level housing allocations**

*Please note that our response for this HMA is arranged in seven sections to parallel the sections of the policy: (1) Overall summary including district level housing allocations; (2) Bristol SSCT, (3) Bath SSCT, (4) Weston-super-Mare SSCT, (5) Trowbridge SSCT, (6) Green Belt, and (7) Transport outcomes.*

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions, including deliverability of infrastructure, that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### **Summary**

- The wording *at least* for homes should be deleted and the housing figures for each district at the beginning of the policy should be adjusted to those in draft RSS (and lower in some instances, for example Bath). The total for South Gloucestershire should, for example be reduced to 23,000 from 32,800.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

- Development across the HMA should be phased and implemented sequentially. A plan, monitor and manage approach should be adopted to ensure that urban brownfield land is used first. See our comments on Sections 3 and 4 for a number of overarching policy improvements needed re coordination, a sequential approach and phasing.
- We are **strongly opposed** to the substantial increase in development proposed for the West of England HMA above that in draft RSS, and its further increase beyond the Panel recommendations. The particularly high pace and scale of development proposed would be likely to adversely impact on both the environmental and regeneration prospects for the area - for both urban and rural areas.
- West of England is a diverse area with distinct contrasts between urban and rural areas. The ability for urban dwellers to readily access the countryside and areas of outstanding natural beauty (AONBs) make it an attractive place to live. The changes proposed endanger the city landscapes of both Bristol and Bath and could destroy the reasons that draw people to the area.
- Despite many in the West of England having a high standard of living we also have two of the most deprived areas in the Region. The proposals not to give them priority in terms of regeneration will lead to a much wider divide between the 'rich and poor'. The essential focus should be the targeted regeneration of certain urban area of Bristol and Weston-super-Mare providing local jobs and services to improve the quality of life.
- The single policy recommended for the West of England HMA providing strategic policy, housing distribution, employment land and jobs figures for the sub-region requires a co-ordinated approach across the HMA. Joint working between Bristol, South Gloucestershire, Bath & North East Somerset and North Somerset councils would achieve more efficient use of land and reuse of previously developed land.
- The loss of Green Belt to development would have a severe impact on the health and well-being of country and urban dwellers. The Green Belt on the edge of the city provides an easily accessible unique open space for leisure. The lack of development of sub-regional green infrastructure policy adds to the concern. It is vital that any structure plan policies are rolled forward where they might assist in the interim before partial review. In many instances increased housing levels proposed would be best assessed in tandem with development of green infrastructure policy.
- The West of England needs a comprehensive assessment of the likelihood of flooding BEFORE agreement is reached on the areas designated for development. This is particularly relevant for the proposed Weston-super-Mare development, South West Bristol Urban Extension and at Avonmouth/Sevenside.
- We are **strongly opposed** to the proposed housing and employment provision without the associated infrastructure, such as public transport, schools and

health services to provide sustainable communities and a step change to more sustainable transport outcomes.

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## **Policy HMA1: West of England HMA**

### **2 (of 7) Bristol**

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions, including deliverability of infrastructure, that has resulted in excessive HMA housing allocations.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### **C. Summary**

- We generally support the wording of this part of the policy with the exception of the scale of development proposed and the resulting number and scale of urban extensions required.
- Both housing and job figures should be revised to more realistic projections in view of the issues we raise. The job figures should be removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- We would welcome additional policy wording to encourage the identification of areas for redevelopment in the city in order to increase urban capacity – ie a new area(s) of search to encourage use of previously developed land.
- We are particularly concerned at the additional development levels proposed over that in the Panel report for the Northern Fringe – and remain concerned at the proposals for urban extension in South Bristol.
- We would like additional wording (as recommended by the Sustainability Appraisal para 10.113) to ensure that development locations proposed at Yate are subject to the findings of the South Gloucestershire Strategic Flood Risk Assessment which is currently underway.
- Several of our comments below on the individual extensions relate to Green Belt (see our comments under (6)) – and to the lack of development of sub-regional green infrastructure policy in tandem with housing proposals. We recommend that sub-regional green infrastructure policy be included in the partial review and that any housing proposed in excess of that in draft RSS awaits consideration in tandem with sub-regional green infrastructure policy.

### **D1 Reason**

#### **A new Bristol city area(s) of search**

Bristol SSCT first bullet point says “*a better balance between homes and jobs to reduce the need to travel*” and we consider that Bristol City Centre has potential to continue to evolve in this respect. The existing built environment has the potential to provide new uses as housing needs and employment needs change. Re-use of land and existing premises can be more efficient, providing better use of land and existing facilities. See para. 4.1.10 in the Panel Report re the identification of areas for redevelopment in the city centre in order to increase urban capacity.

### **Area of Search 1A (South Bristol and North Somerset)**

We support regeneration of the urban area of South Bristol, but are strongly opposed to the proposals to develop outside the City of Bristol boundary in the North Somerset Green Belt, in parallel with the Bristol urban area development. Without prioritising, the RSS will fail to reach the objective of regenerating South Bristol. This is all the more important given that particular emphasis is given in the Proposed Changes identifying that “*regeneration of South Bristol is one of the most significant challenges facing the Region*”.

We consider that the disadvantages outweigh the advantages in relation to amendment of the Green Belt, both because urban regeneration will be undermined (one of the purposes of Green Belt) and because the landscape setting of the historic Suspension Bridge and the City of Bristol skyline will be impaired (protecting the historic character of a city or town being another Green Belt purpose). As noted in our previous submissions, this area has landscape continuity with the Mendips and no sub-regional green infrastructure policy has been developed in tandem with the housing proposal.

### **Area of Search 1B (BANES)**

We support the use of brownfield sites within the urban area of Bristol prior to any use of Green Belt land within Bath & North East Somerset. We are strongly opposed to development of Green Belt in parallel with development of previously developed land within the urban area. This would be contrary to *exceptional circumstances* (See (6)).

### **Area of Search 1C (South Gloucestershire)**

We strongly oppose the proposed change to Area of Search 1C to increase the proposed number of new homes to 8,000. The whole area is in the Green Belt, so increased numbers mean further encroachment into Green Belt, with consequent damage to the overall aim and individual objectives of Green Belt designation. We believe that the disadvantages outweigh any advantages (See (6)).

The disadvantages would include: loss of access to green spaces for residents in the East Fringe of Bristol (as the majority of green space is on the fringe of the

urban area eg Siston and Oldland Common); adverse impact on the Siston Conservation Area (an extensive conservation area that includes Siston village and its landscape setting); loss of integrity of villages and communities (such as Shortwood); possible adverse impacts on a number of sites of nature conservation interest (SA para 10.99); and wide-scale loss of local agricultural land (which undermines sustainability aims for local food provision for the City).

### **Area of Search 1D (South Gloucestershire)**

We welcome the reduction in the Proposed Changes to Area of Search D to reduce the number of houses proposed to 2,000 (previously 8,000 combined with Area of Search C). However we still consider this to be inappropriate development. Although loss of Green Belt and Grade 1 agricultural land could be less than anticipated, it is important to maintain the green corridor into Bristol protecting the green settings of the historic Stoke Park and Hambrook. There is a need for the development of sub-regional green infrastructure policy in tandem with any proposals for housing. This would provide green space for residents.

### **Area of Search 1E (South Gloucestershire)**

CPRE considers that no additional land should be provided in the plan period except windfall sites for the Yate/Sodbury area. We consider that sites already earmarked by South Gloucestershire Council across the district will provide sufficient growth for the plan period. We support the proposal to reduce the proposed new homes at Area of Search 1E to the north of Yate (to 3,000 from 5,000 recommended by the Panel) but do not believe it goes far enough and consider the infrastructure will still remain inadequate to cope with the reduced figure and there are serious concerns about transport, flooding and drainage. In addition the Sustainability Appraisal states:

*Para 10.81 New Proposed Changes supporting text states that the corridors linking Bristol (with Weston-super-Mare) and Yate (including proposed urban extensions) will experience growth in movement, and that **it is important to ensure these corridors work effectively to avoid local journeys taking place on the M4 and M5.***

*Para 10.91 At Yate, while the supporting text does seek the ongoing development of the advanced engineering/aerospace cluster, increased housing will also impact upon existing congestion problems to the north of Bristol. **We recommend that any further development at Yate be dependent on significant public transport improvements between Yate and Bristol.***

*Para 10.98 The Environment Agency has stressed that the RFA provides “very limited” information on certain areas where new concentrations of growth are highlighted in the Panel Report, including Yate. It is important that new development at these locations is accommodated in areas of lowest risk. A SFRA is underway in South Gloucestershire. However, this is yet to be completed. **We recommend that any proposed development locations in Yate should remain subject to the findings of this more detailed SFRA.***

*Para 10.110 .. development at Yate is likely to impact upon existing congestion problems to the North of Bristol.*

*Para 10.112 .. While much of the increased housing provision is to be focused within the urban areas of the HMA, development within the Areas of Search is potentially constrained by a number of environmental factors such as flood risk at Yate.*

**Area of Search 1F (Bath & North East Somerset – Keynsham)**

The Green Belt that divides and stops Keysham joining up with Bristol and Bath delivers a key purpose of the Green Belt in preventing coalescence of settlements. Development in this area would generate urban sprawl and would prevent Keynsham from maintaining its individual identity.

**D2 Revised wording suggested**

- See Summary.

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## Policy HMA1: West of England HMA

### 3 (of 7) Bath

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions, including deliverability of infrastructure, that has resulted in excessive HMA housing allocations.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### Summary

- The World Heritage status of the City of Bath makes it unique as a built environment and the landscape setting of the City, which contributes to its status, would be damaged by inappropriate development.
- We therefore **strongly oppose** the proposed increase for the urban extension of Bath from 1,500 to 2,000 dwellings in Area of Search 1G and remain deeply concerned at the ability to accommodate the original 1,500 dwellings without significant damage to the Green Belt (and its purposes including protecting the setting of the historic city), archaeological assets, green infrastructure and the surrounding AONB.
- We recommend that any proposals for urban extension should be excluded from this RSS and included in the forthcoming partial review in tandem with survey of the landscape setting of the city, full consideration of the relative advantages and disadvantages of Green Belt amendment and development of appropriate sub-regional policy on green infrastructure.
- We also have concerns that the proposed 6,000 new homes within the city are not achievable.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

### D1 Reason

Not only is the city a World Heritage Site, but much of its surrounding landscape is within or adjacent to the nationally designated Cotswolds AONB - which needs to be shown on the inset diagram. The Panel report failed to understand that amendment of the AONB boundary it is not within the remit of the planning system. The landscape

setting of the city (including Green Belt and non-AONB areas) is also an important part of its attraction to tourists, adding significantly to the prosperity of the area.

Further to our previous arguments, and the overarching issues we raise at the beginning of Section 4, we understand there are currently 1,772 student households in Bath and are aware that new student residences do not count towards the RSS housing figures. This distorts the housing requirement, particularly in a city like Bath with a high proportion of students. New student accommodation will release existing housing stock on to the market and should be offset against the RSS housing figures.

See our overall comments on the inappropriate economic assumptions at the beginning of Section 4 in relation to the over-ambitious plan for providing about 20,200 jobs in the TTWA. The policy deficit in relation to a sequential approach to development is particularly critical for Bath.

Full consideration needs to be given to the ‘*exceptional circumstances*’ of any Green Belt amendment and to AONB land around Bath. The Green Belt, for example, also serves an important function in retaining a gap between Bath and Bristol.

Because of the international and national designations affected as well as Green Belt, we recommend that proposals for urban extension is excluded from this RSS and awaits fuller landscape assessment and the development of strategic green infrastructure policy.

#### **D2 Revised wording suggested**

- Reduce the 6,000 new homes within the existing Bath urban area
- Delete area of search 1G and its housing allocation completely
- Delete wording on jobs and employment land.
- Show the AONB boundary on the key diagram.

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## Policy HMA1: West of England HMA

### 4 (of 7) Weston-super-Mare

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions, including deliverability of infrastructure, that has resulted in excessive HMA housing allocations.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### Summary

- We welcome the policy to secure concerted *employment-led regeneration* at Weston-super-Mare, whilst *safeguarding the integrity of environmental and habitat designations*.
- The recognition of the requirement to revitalise the town centre and sea-front through improved retail, leisure, cultural facilities and public realm is also welcomed. It is even more essential to do this following the temporary loss of the town's pivotal icon, the pier.
- We support the policy wording that housing growth to be phased and linked directly to job growth. However we oppose deletion of the supporting text which stated that "rigorous" policies will be required in LDDs to encourage a balance between jobs and housing. We support the Sustainability Appraisal recommendation (para 10.78) that this text should be retained and recommend five-year phasing is developed as part of the forthcoming partial review.
- Both housing and job figures should be revised to more realistic projections in view of the issues we raise. The job figures should be removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

### D1 Reason

We support the recognition in para 4.1.17 that there is a need to address the imbalance between employment and housing at Weston-super-Mare and that new development should be closely linked to job growth. Past housing development in the Weston-super-Mare SSCT has not found this easy to achieve, hence the recognised need to address the current imbalance. However - as pointed out in the Sustainability Appraisal - this will only be achieved if "rigorous" phasing policies are in place. At present Proposed Changes allows only for phasing in two 10-year tranches. See our

overall comments on the need for five-year phasing to be developed as part of the proposed partial review of the RSS housing numbers.

We have concerns that the planned 12,000 new homes and 10,000 new jobs will still not create the '*better balance between homes and jobs*'. We believe that the ambition to create 10,000 new jobs is unduly optimistic and that by providing the level of housing proposed the current scale of out-commuting would continue and might even increase and the aim would be missed of '*significantly improving the employment offer of the town and reducing the impacts of car-based commuting*'. See our further comments at the beginning of Section 4: *B Economic assumptions*.

With 9,000 of the homes scheduled for land close to the M5, this could only serve to exacerbate the current problem of car-based out commuting and have a direct negative impact on the regeneration of central Weston-super-Mare. These residents will shop and have their social connections where they work taking them away from Weston-super-Mare so reducing the prospects of building 'sustainable communities' there.

There is presently regular commuter gridlock at J21 (Weston-super-Mare) of the M5 and limited alternative public transport by road or rail. A commitment is required for considerable improvement in public transport to both reduce the current car use and any future increase developments bring to the area.

**D2 Revised wording suggested**

- See Summary.

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**Policy HMA1: West of England HMA**

**5 (of 7) Trowbridge SSCT**

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions, including deliverability of infrastructure, that has resulted in excessive HMA housing allocations.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**Summary**

- Both housing and job figures should be revised to more realistic projections in view of the issues we raise. The job figures should be removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

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## Policy HMA1: West of England HMA

### 6 (of 7) Green Belt

#### Summary

- See our comments under Section 4: Green Belt for our concern that, as Proposed Changes is currently worded (the inappropriate use of projections, expression of the housing numbers as a minimum, parallel use of green and brownfield land, and a policy deficit on a coordinated and orderly approach to development) there can be no justification for ‘*exceptional circumstances*’ and alteration of the *general extent* of Green Belt. The policy wording proposed here in relation to the Bristol and Bath Green Belt would, in this context, constitute a departure from national policy set out in PPS2.
- We also set out under Section 4: Green Belt our recommendation that each proposed amendment of the general extent of the Green Belt be based on assessment of the relative advantages and disadvantages, taking into account the material disadvantage of loss of Green Belt land - and that this assessment should be published as an appendix to the final RSS, or within each HMA policy as appropriate, where it is proposed to proceed with any general amendment of the Green Belt.
- Our comments on the relative advantages and disadvantages are included with our comments on the individual extensions under Bristol and Bath respectively and for the Airport under (7) Transport outcomes.
- In relation to the Airport and Dock we welcome Proposed Changes’ acceptance (under Section 8) of the Panel's recommendation (para 8.1.16) that: *Most other economic activities that are linked to ports and airports can be accommodated in the land supply of the adjoining conurbation.*
- We would also want to see appropriate rewording of the supporting text (para 4.0.15).
- We support the consideration of Green Belt extension in the proposed partial review of RSS. We particularly think that there is a case for extension, based on the purposes of Green Belt (PPS2) in the Thornbury, Severnside and Yate/Sodbury areas.

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## **Policy HMA1: West of England HMA**

### **7 (of 7) Transport outcomes**

- We are strongly opposed to the removal of Green Belt at Bristol International Airport - and to the removal of Green Belt between the Royal Portbury Dock and the M5.
- We are greatly concerned that the development levels proposed for this HMA will not be accompanied by the appropriate measures and necessary investment to achieve a step change to more sustainable transport modes. We support the Sustainability Appraisal recommendations for amendment to the policy to achieve this. Ambiguity in relation to *pinch points* and specific reference to, and support for, *orbital movement* in South Bristol except through public transport and cycling, should be removed
- A commitment is required for considerable improvement in public transport at Weston-super-Mare to both reduce the current car use and avoid any future increase developments bring to the area.

### **D1 Reason**

#### **Bristol International Airport**

We support the recommendation of the Sustainability Appraisal that policy HMA1 should not support any expanded role for the airport. There would appear therefore to be no justification for amendment of the Green Belt - as clearly more sustainable transport alternatives exist.

This recommendation should only be pursued further subject to consultation at a local level (through the LDF process) following a full strategic assessment of Green Belt. Bristol International Airport (BIA) is in an exceptional position to be able to utilise its permitted development rights - Green Belt status has not inhibited development to date.

We are therefore also opposed to the proposed wording at 4.0.15 '*Changes are also made to the general extent of the Bristol and Bath Green Belt to provide for regionally significant development at Bristol International Airport...*'

#### **Other transport issues**

See our comments under Section 5 and Section 3 Policy F for further over-arching policy required to achieve a more sustainable outcome for transport. It should include meeting the Sustainability Appraisal recommendation (para 11.8) to ensure that housing growth is conditional on the successful prior implementation of demand management and travel reduction measures. Policy is also required to create similar standards for urban extensions re sustainable transport to that being proposed for the Government's eco-town initiative.

*‘To improve access for all to and from South Bristol and to provide for orbital movement’.....and ‘if necessary, targeted new infrastructure investment to unlock pinch points’* could be interpreted as supporting the provision of additional road space. This is highlighted in the Sustainability Appraisal 10.83, 10.84, 10.85, 10.86, 10.87, 10.88, 10.89 and in its recommendations in para: 10.113.

We also therefore strongly oppose the proposed new text (para 4.1.4) referring to the need to *‘work effectively’* and *‘improving orbital movement’*. (*The corridors linking Bristol with Weston-super-Mare and Yate (including proposed urban extensions) will experience growth in movement and it will be important to ensure that these corridors work effectively.....The Greater Bristol Transport Study concluded that accessibility would be enhanced by improving orbital movement around South Bristol,.....*)

Development on the northern fringe also raises the issue of the inability of the Avon Ring Road (A4174) to take the additional traffic as it is already at capacity and suffers traffic congestion at peak times. Again we consider the challenge of achieving a more sustainable outcome for transport, with reduced reliance on the car, is not clearly addressed in Proposed Changes.

**D2 Revised wording suggested**

- See Summary plus revisions to supporting text as indicated above.

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**Policy/paragraph reference**

Policy HMA2: Swindon

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- We recommend changes are made to this plan rather than wait for an early revision. For Swindon District the housing requirement should be reduced to 1,620 a year and for North Wiltshire to 535 per year. The number of new homes for the existing urban area of Swindon should be reduced from 19,000 to 17,800. Together, this should enable Area of Search C for extension of Swindon by 3,000 homes into North Wiltshire to be deleted and to protect Coate Water from development.
- Elsewhere in the HMA we cannot support the higher rates of growth in Proposed Changes and recommend that the housing figures in particular are returned to those proposed in the draft RSS for Chippenham, Kennet District and for the remainder of North Wiltshire District outside the Swindon SSCT.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3. The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

- Care is required in considering whether any structure plan policies should be rolled forward to assist in protecting countryside. The Swindon Rural Buffer should be retained until sub-regional strategic green infrastructure policy is developed for consideration as part of the proposed partial review of RSS.
- The transport element of the policy should be reworded to ensure pinch points are addressed only by genuinely sustainable transport options. After “*pinch points*” add “*which does not in practice provide extra capacity to accommodate traffic growth, especially car commuting.*”

### **D1 Reason**

The high scale and pace of development proposed for this HMA is illustrated in the Sustainability Appraisal Tables 10.6 and 10.7: for example, a 50% increase in dwellings from the current number in Swindon SSCT over the 20 year period ; a 38% increase in homes for Chippenham and a 25% increase in homes for North Wiltshire.

Given the changed circumstances and the likely low rate of growth in the first years of the Plan with the consequent inability to meet targets, the housing figures should be revised downwards. There needs to be: a brownfield first approach to help achieve revitalisation of Swindon centre; and a reduction in the overall housing figures with reduced housing growth.

There are over 50,000 signatures on the petition to save Coate Water (1,800 new homes proposed). Further housing to the west of Swindon in North Wiltshire (3,000) would erode the separate identities of existing communities, impact on the flood plain and overload the road systems. The sewerage system is already overloaded.

It is unclear how targeted infrastructure, to unlock pinch points to improve the reliability and resilience of journey times, will fit with maximising opportunities to achieve reductions in the growth of road traffic. There is no indication as to what infrastructure to unlock pinch points will consist of or where it will be, other than it will be new and will be an investment. It is not clear how impact on corridors of national and regional importance will be avoided.

We strongly support Para 5.1.19 in Section 5 - Transport:

*The SSCTs are where there is the greatest scope for efficient public transport and more use of walking and cycling. Improvements in public transport, walking and cycling and specific measures to encourage sustainable travel behaviour should be coupled with further traffic management, to reduce the rate of growth of road traffic. Transport at the urban extensions should be focused on sustainable links with the rest of the SSCT and not simply connections to the road network.*

However it is not clear how Policy HMA2 for Swindon will achieve this.

### **D2 Revised wording suggested**

- See Summary \*\*\*\*\*

**Policy/paragraph reference**

Policy HMA3: Gloucester and Cheltenham  
and supporting text

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- We strongly support a focus of development at Gloucester and Cheltenham.
- We welcome the intention to maintain the overall integrity of the green belt and maintain the separate identities of Gloucester and Cheltenham.
- A far more cautious approach to development is required based firmly on Plan, Monitor and Manage. We do not support the higher housing numbers proposed by the Secretary of State and recommend a return to the levels of development proposed in the draft RSS.
- The wording *at least* should be removed from the housing growth numbers.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- The proposed urban extensions should only be brought forward after all opportunities for redevelopment of previously developed land have been exhausted, and then extensions should be brought forward sequentially.

- We have particular concerns about a number of the proposed urban extensions, in addition to our points about phasing and a sequential approach. In particular, at the Gloucester SSCT we oppose development within area of search 3B and are concerned about possible flood risk within area of search 3D. At the Cheltenham SSCT we are concerned about the impact of development within area of search 3E, and phasing and possible flood risk within area of search 3F. The policy and key diagram should be modified accordingly.
- At the Gloucester SSCT we see no need for further urban extensions in the early years of the strategy. There is a risk of undermining the regeneration being led by the Gloucester Heritage Urban Regeneration Company. LDFs should require phasing of already agreed urban extensions and a sequential bringing forward of any further extensions. The challenge of making full use of underused and derelict land in Gloucester should be reflected in para 4.1.26.
- In considering growth in movement in the corridors identified in para 4.1.29 an aim should be to minimise journeys by car.
- The removal of any reference to the Gloucestershire Parkway Station proposal is supported.
- Sub-regional strategic green infrastructure policy should be developed as part of the proposed partial review of RSS.

### **D1 Reason**

We agree that a focus of development at Gloucester and Cheltenham will provide homes closest to where most jobs are likely to arise, encourage public transport use and support regeneration. Any policy of greater dispersal of development would add to traffic movements and congestion as well as creating excessive new market housing in villages and the market towns.

We accept that the most sustainable location for any new development that cannot be met within the existing urban areas is well designed and compact urban extensions. However, in this period of economic uncertainty a far more measured and cautious approach to development is needed based firmly on “Plan, Monitor and Manage.”

We do not support the higher housing numbers proposed by the Secretary of State, either for the SSCTs or for the remainder of the HMA where the proposed uplift in provision has not been justified and would undermine the focus of the Strategy.

The proposed urban extensions should only be brought forward after all major opportunities for redevelopment of previously developed land have been exhausted, and then extensions should be brought forward sequentially. The RSS should require urban extensions at Gloucester and Cheltenham to be brought forward sequentially: the order of bringing forward should be addressed in the LDF Core Strategy where we note the intention of Gloucester City, Cheltenham Borough and Tewkesbury Borough

Councils to work jointly, with the assistance of Gloucestershire County Council on infrastructure matters.

We had supported the Regional Assembly's proposals for extensions to the Gloucester and Cheltenham Green Belt south of Gloucester and north of Bishops Cleeve and remain of the view that such extensions would be justified. We note that the issue of green belt extensions is to be considered in the proposed partial review of the RSS (Para 4.1.93).

### **Gloucester SSCT**

At Gloucester SSCT major development is underway at Kingsway (Quedgeley) and has planning approval at Longford and Hunts Grove. We see no need for further urban extensions in the early years of the strategy beyond those currently being developed given the extent of redevelopment opportunities within the Gloucester urban area.

In a period of economic uncertainty, to secure effective regeneration of the city centre and docks area and to fully exploit other regeneration opportunities, it will be vital to carefully phase release of land for the already agreed urban extensions to avoid undermining the regeneration being led by the Gloucester Heritage Urban Regeneration Company. The proposed further urban extensions should be deferred until regeneration work has been largely completed and should then be brought forward sequentially. The order of bringing forward the extensions should be determined as part of LDF joint Core Strategy.

We oppose any development within area of search 3B because of its impact on the Cotswolds AONB and on Robinswood Hill. Development at this location was rejected by the Joint Study Area team because of its impact on the setting of the Cotswolds AONB and Robinswood Hill (the land is defined as SLA in the County Structure Plan Second Alteration) and an extension to the green belt had been proposed for the area in the draft RSS to curtail the further southwards sprawl of Gloucester and safeguard it from development in the longer term. Development at this location would also be inconsistent with RSS Policy ENV3 which requires that particular care be taken to ensure that no development is permitted outside AONBs which would damage their natural beauty, character and special qualities or otherwise prejudice achievement of AONB purposes.

Given its location in an area where flood risk is a significant issue, the scale and form of any development within area of search 3D must be informed by the Environment Agency Regional Flood Risk Assessment and by more detailed local flood risk assessments.

### **Cheltenham SSCT**

Development within area of search 3E has implications for the setting of the Cotswolds AONB and would be inconsistent with RSS Policy ENV3 which requires that particular care be taken to ensure that no development is permitted outside AONBs which would damage their natural beauty, character and special qualities or otherwise prejudice achievement of AONB purposes. The EiP Panel was concerned

about harm to the AONB and the outlook from Leckhampton Hill and concluded that the area of search did not imply that all of the land should be developed for housing. Given the sensitivity relating to development at this location, the final version of the RSS should make that clear too. Joint working between Cheltenham and Tewkesbury Boroughs will be necessary to determine the most appropriate form of any development at this sensitive location. The key diagram should denote the boundary of the AONB and the area of search drawn to make it clear that the AONB will not be affected.

Development within area of Search 3F, the proposed major north-west extension to Cheltenham, should be deferred and then carefully phased to avoid undermining regeneration of previously developed land within the Cheltenham urban area. It will also be important to retain the separate identities of Elmstone Hardwick and Uckington. There may also be a flood risk issue at this location and the final form of any development must be informed by the Environment Agency Regional Flood Risk Assessment and more detailed local flood risk assessments.

### **Transport issues**

The scale and location of growth will inevitably lead to greater movement in the corridors identified. As well as avoiding local journeys taking place on the M5, paragraph 4.1.29 should indicate an aim to minimise journeys by car through enhanced quality in public transport provision and provision for cycling, coupled with demand management measures.

The proposal for a Gloucestershire Parkway Station was not supported by CPRE because of concerns about location, traffic generation and implications for services to both Gloucester and Cheltenham stations. We therefore support the removal from the RSS of any reference to this proposal.

### **D2 Revised wording suggested**

See Summary plus:

- Para 4.1.26 Add to the second sentence ...*“and to make full use of underused and derelict land.”*
- Add new paragraph after paragraph 4.1.28 requiring that LDFs provide for the sequential bringing forward of urban extensions after all major opportunities have been exhausted for redeveloping previously developed land.
- Para 4.1.29 Add additional sentence. *“An aim should be to minimise journeys by car through enhanced quality in public transport provision and provision for cycling, coupled with demand management measures.”*
- Add new paragraph after 4.1.31 to reflect the need for phasing of already agreed urban extensions for Gloucester and a sequential approach to further extensions.

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### **Policy/paragraph reference**

Policy HMA4: Exeter

- |                                                                                                                                                                                                                                                            |    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| <ul style="list-style-type: none"><li>• See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local</li></ul> | 21 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|

### **C. Summary**

- We are concerned at the substantial increase in development proposed for the Exeter HMA above that in draft RSS, and its further increase beyond the Panel recommendations. The particularly high pace and scale of development proposed is likely to adversely impact on both the environmental and social strands of sustainability - given the local circumstances of an equitable climate and coastal and rural character that make the area attractive for life-style moves, together with related issues of housing affordability and local regeneration needs, such as at Exmouth. In addition, there is a need to avoid undermining regeneration efforts of the adjacent Torbay HMA. We therefore recommend a return to the draft RSS levels of development.
- We oppose the designation of Newton Abbot as a SSCT and the associated increase in housing provision. These changes appear to be associated with the new Growth Point status and should therefore be subject to due process and only considered as part of the forthcoming partial review of RSS with further consideration of its potential interaction with the regeneration of Torbay. The proposals would be highly likely to result in unsustainable traffic growth. See also our detailed comments below on the reasons given for SSCT designation being inappropriate.
- We are opposed to the new areas of search and/or increased development levels proposed for them, both to the south west of Exeter and to the east of the motorway. The environmental assessment of the JSA study is inadequate in relation to the increased scale of development proposed. Again therefore we recommend a return to draft RSS levels of development and that higher figures

are only considered as part of the forthcoming partial review in tandem with the development of parallel sub-regional green infrastructure policy.

- We are opposed to the proposed increased pace and scale of development for Cranbrook - particularly given its attractive rural location close to the coast, its potential to undermine regeneration in for example both Exeter and Exmouth and its current 'frozen' development status.
- We are opposed to the 15% uplift for housing in the rural parts of the HMA - the increased environmental impact of what would be likely to be largely road-based transport has not been assessed, nor has service provision.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- Particular care is required in considering whether any Structure Plan policies should be rolled forward to assist in protecting countryside, safeguarding rural services and the provision of affordable homes.
- The transport element of the policy and its emphasis on accessibility and pinch points should be revised in accordance with the recommendations of the Sustainability Appraisal.

### **D1 Reason**

The particularly high scale and pace of development proposed for this HMA is illustrated in the Sustainability Appraisal Tables 10.6 and 10.7: a 30% increase in dwellings in Exeter District over the 20 year period; 28% in both of East Devon and Teignbridge; and 23% for Mid Devon. Within this the proposal is for a 57 % increase in the number of homes over the 20 year period for the SSCT of Exeter.

We think this scale and pace of growth is both undesirable and unachievable for the reasons we set out at the beginning of Section 4 and particularly for this HMA because of its location in an attractive rural and coastal area attractive to lifestyle in-migration and with both housing affordability and localised regeneration problems.

### **Exeter**

We object to the proposed increase in development over that in draft RSS for this historic cathedral city, characterised by its rural and estuary/near coastal setting. As Proposed Changes points out (para 4.1.39) the setting of the city is a key contributor to the strong economic growth that has been achieved over recent years. The proposals in draft RSS were already ambitious and would themselves result in considerable expansion of the city. We believe that the pace and scale of development

now proposed would threaten this setting and its contribution to the city's economic driver.

### **Cranbrook**

The current economic situation highlights the inappropriately high economic assumptions behind the proposals for Cranbrook: the plans for the original Cranbrook New Community, approved by Government in 1999, have recently been put on hold by the developers. Further, the process to date illustrates the difficulties in negotiating with developers to achieve appropriate levels of affordable homes and sustainable construction.

It is also vital for this HMA that the final RSS includes improved policy guidance on a sustainable and co-ordinated approach to development - to avoid cherry picking of greenfield sites and undermining urban regeneration, and to ensure that development is orderly and focused in order to be make most efficient use of what seems highly likely to be inadequate infrastructure provision.

Allocating 7,500 houses for Cranbrook, instead of the 2,900 with outline planning approval, is likely to attract life-style immigration, place increased leisure pressure on the coast, estuary and pebble-bed heaths and undermine local attempts to regenerate towns like Exmouth.

### **Development east of Exeter**

Area of search 4B East of Exeter is unsuitable for further development in that it would spread development to the rural area to the east of the motorway and in an area where there is considerable flood risk (with much low-lying ground adjacent to and on flood plains). It is also in close proximity to environmental assets such as the National Trust's Killerton Estate. The area was not fully assessed as part of the JSA study and has been newly proposed by the Panel. Furthermore the Reasons Schedule indicates that the availability of sites was a consideration in its selection – but we understand that site consideration is not appropriate to the regional plan process. Any development in this area should only be considered as part of the proposed partial review of RSS and in tandem with more complete environmental assessment and development of sub-regional green infrastructure policy.

### **Teignbridge District**

Teignbridge seems to have suffered especially badly within the proposals to increase housing provision. The housing numbers have gone up to 15,900. The original draft RSS target for about 8,600 new dwellings was regarded by us as too ambitious: we regard this further increase as wholly unjustified and unsustainable.

The proposals cannot be justified in terms of any identified local need, or even within a reasonable level of in-migration (see our overall critique at the start of Section 4) and appear to be based largely on inappropriate proposals to both further expand Exeter and promote Newton Abbot as an SSCT.

### **Area of search 4C South West of Exeter**

We oppose additional expansion of Exeter into this area (2,000 of the homes proposed out of the 2,500 would fall into Teignbridge district) as this is a critical landscape area providing an important rural setting and buffer for the historic city of Exeter, the Haldon Hills and Exe Estuary. Development here would damage the continuity of green infrastructure from the city centre (south along the river) to the estuary and its adjacent countryside at the foothills of the Haldon escarpment. (See paras 10.194 and 10.196 of the Sustainability Appraisal for the numerous important environmental assets in this area).

Some assessment of the environmental values of this area has been carried out (ref the Urban Extension Evidence Based Review and the comment in the Reasons Schedule derived from it that environmental assets are *notable* rather than significant) but this assessment is incomplete and inadequate for the scale of development now proposed. We are not aware of any assessment, for example, of the potential increased leisure impact on the Exe Estuary and adjacent coastline, or of any more detailed landscape character work for this part of Devon.

In addition, no sub-regional green infrastructure policy has been developed to accompany the proposals for development. We therefore believe that the final RSS should reject urban extension into this area. It should only be considered further as part of the proposed partial review of RSS, in tandem with more complete environmental assessment and development of sub-regional green infrastructure policy.

## **Newton Abbot**

### **a) Growth-point status**

We contributed to the arguments against Newton Abbot becoming an SSCT at the EiP in June 2007 and the idea was rejected in the Panel Report. Bringing the proposal back now coincides with Teignbridge Council having applied for and been awarded Growth Point status. Since Teignbridge Planning Department made the strongest case at the EiP for Newton Abbot remaining a Policy B market town, this appears to be a dramatic change of local policy. It is also not supported by any public consultation within its LDF process.

The LDF issue is significant, as the LDF is in a state of limbo since Teignbridge's proposed LDF Core Strategy, based on the levels of development in the draft RSS, was rejected as unsound and withdrawn in autumn 2007. It has not been replaced yet.

It would seem inappropriate therefore for the final RSS to pre-judge increased development based on Growth Point status. As indicated in the RSS, the forthcoming partial review is intended to consider new initiatives such as eco-towns and new growth points to ensure they are considered properly through the planning process.

We consider it is therefore premature to both increase the housing levels and designate Newton Abbot as an SSCT - particularly when both proposals are contrary to Panel recommendations.

## **b) Justification in the Reasons Schedule**

We also do not think that the Reasons Schedule justifies either the increased housing provision or the SSCT designation. While PPS3 requires housing demand to be taken into account, there is no Government guidance to indicate that the household projections must be fully met. Rather, Government guidance requires a wider evidence-base to be considered - including local information. SSCTs were not selected purely on the basis of the scale of employment growth expected, but on a combination of issues - including regeneration needs. There are many other settlements in the South West, and in the HMA itself, that are main employment and retail centres in their own right, but are not designated as SSCTs. Furthermore, the inclusion in the Reasons Schedule of '*scale and the availability of sites available for development*' is also highly questionable. It is our understanding that the RSS should not give consideration to individual sites.

## **c) Sustainability, self-containment and transport issues**

Proposed Changes indicates that about 6,500 new jobs are to be created in the Newton Abbot TTWA. This is - as is pointed out by the Sustainability Appraisal (para 10.182) - no change from the job forecasts in draft RSS, whereas it is now proposed to double the housing numbers over those proposed in draft RSS.

Both the SA and Reasons Schedule refer to the fact that Newton Abbot has a high level of out-commuting and *the need to increase self-containment*. The SA draws attention to this in para 10.185: *The development of 8,000 dwellings without a corresponding increase in job provision could have consequences for out-commuting*. Our overall analysis is that job assumptions are already based on inappropriately high GVA assumptions for the 20 year period (See our comments at the beginning of Section 4) so that achieving even higher job growth to balance the housing proposed is most unlikely. Proposed Changes for Newton Abbott would therefore seem highly likely to exacerbate unsustainable travel patterns.

There is a further difficulty in that the history of local development has led to a prevalence of dormitory/commuter small towns and villages. With some development still certain to take place at such locations it will probably not be possible to contain the trend, and some of the jobs created in the Newton Abbot TTWA will still be taken up by commuting within its TTWA. A lot of the remainder, plus much of the new housing, is likely to be taken up for lifestyle reasons rather than economic reasons because of the attractive rural and coastal location of the area.

Section 5 includes many fine concepts (improve connectivity, reduce congestion, rate of traffic growth and negative impacts on environment, etc), but it is hard to see how they can be met in Teignbridge with the very high levels of growth proposed. Our area is already suffering from these problems which will be unlikely to be eased by what is proposed. Lip service is paid to improving public transport, but without seemingly much practical progress.

In both sections 3 & 4 there are statements that much work remains to be done to see how necessary infrastructure can be funded and implemented to match the proposed development. This seems to be an admission that the cart has been put before the

horse in stating ambitious growth targets without having thought through such practicalities.

Finally we draw your attention to a key question raised in the SA (para 10.183) as to *whether classification of Newton Abbot as an SSCT will help regenerate the neighbouring SSCT of Torbay or compete* and its recommendation (para 10.211) on *re-examining whether a significant increase in housing at Newton Abbot is based on sound evidence of the role and function that Newton Abbot plays and its relationship with Torbay and Exeter*. Our fear is that a focus on Newton Abbot, as a result of classification as an SSCT, might attract types of development which might be better placed supporting regeneration efforts in Torbay.

### **Transport elements of the HMA policy**

We welcome the recommendations in the second bullet point of the Sustainability Appraisal para 10.211 concerning the rewording needed in relation to pinch points to ensure that these are addressed through sustainable transport modes in line with seeking to achieve a reduction in road-based traffic not simply a reduction in its growth rates.

### **D2 Revised wording suggested**

- See Summary.

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### Policy/paragraph reference

Policy HMA5: Torbay

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions, including deliverability of infrastructure, that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### C. Summary

- We welcome continued emphasis on regeneration, but strongly oppose the increased housing allocation for this HMA policy. Increased housing would undermine regeneration and we recommend a return to the draft RSS allocation.
- We welcome the Sustainability Appraisal's identification of the need to *further explore the relationship between Torbay, Newton Abbot and Exeter* and suggest this is included in the forthcoming partial review of the RSS. Any increase in housing allocation above that in the draft RSS is inappropriate in advance of this work.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- More emphasis should be given to the importance of training and education in the text and policy. The job figures should be revised to more realistic levels and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

- Sub-regional green infrastructure policy needs to be developed. We support the Panel's recommendation for inclusion of this in the proposed early review of the RSS. Consideration of housing levels above those in draft RSS is particularly inappropriate in advance of the development of sub-regional green infrastructure policy in view of the important environmental assets closely adjacent to the urban area that could be adversely affected by any urban extension.
- The wording of the policy needs to be amended to ensure that *targeted new infrastructure investment to unlock pinch points* is addressed by sustainable transport solutions.

### **D1 Reason**

We are totally opposed to the excessively high levels of house building proposed. Although Torbay's housing target has been scaled back to 15,000 from 20,000, the original draft RSS target had been 10,000.

No evidence has been produced to justify local need for such a high level of development and the levels of development proposed appear to be based on provision for in-migration. It is a recognised fact that residential development in Torbay caters mainly for the in-migration of retired people from other parts of the country, putting pressure on medical services, social services and mental health services.

It is also a well recognised fact that for many years no adequate provision has been made for training and employment in Torbay. There is significant loss of young people searching for employment in other parts of the UK, so that Torbay has to cope with extraordinary pressures on care for the elderly. We argue that any surplus land that is available should be allocated for education, training and employment.

It is also vital that applications for 'Change of Use' from 'Residential' premises to 'Business,' 'Commercial' and 'Office' development should be resisted so that the existing Torbay housing stock is not further eroded.

The Sustainability Appraisal for this HMA includes an important recommendation hidden within the text (para 10.217): *We suggest that the relationship between the Exeter and Torbay HMAs and the SSCTs within them (including Newton Abbot) should be examined further to ensure that the alignment between jobs and homes in the settlements takes account of commuting patterns.*

However the Sustainability Appraisal assumption, that projections of past trends represent *need*, makes the conclusions of its jobs: homes analyses misleading. A typical example is in para 10.234: *it appears that the Proposed Changes would be less likely to meet projected housing need in the HMA than the Panel recommendations.* See our comments above re the lack of any evidence of local need for increased levels of housing, except in relation to the provision of affordable homes.

Similarly the final recommendation of the SA in para 10.241 - *a potential undersupply of housing in Torbay ... needs to be addressed* - is again based on the projections and the assumption that they represent need, not on local evidence.

We welcome the Sustainability Appraisal comments on the substantial number of important environmental designations in this attractive rural and coastal HMA and the importance that any urban extension *minimise the loss of best and most versatile agricultural land, and ensure there are no detrimental effects on the AONB* (para 10.232). The global context in relation to food supply has changed over the development of the RSS. We consider that there is insufficient land in Devon to meet the needs of agriculture. It would be short-sighted to allow further residential development on greenfield sites.

We also welcome the SA reference in para 10.224 to the need for the policy to encourage more sustainable travel patterns. It refers to the Panel report suggestion *that there is a need for strategic rail network improvements to track, signalling and capacity ... and notes that the reopening of a rail station at Kingkerswell would assist with a modal shift to public transport.*

**D2 Revised wording suggested**

- See Summary.

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### **Policy/paragraph reference**

Policy HMA6: Taunton

### **C. Summary**

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### **C. Summary**

- We recommend a return to the draft RSS levels of development - this already being very ambitious for this HMA – and a clearer policy requirement that housing growth should be phased and not exceed that required by job growth.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- We welcome the recommendations of the Sustainability Appraisal in relation to improvements needed in the transport aspects of the policy.
- Sub-regional strategic green infrastructure policy should be developed to accompany this scale of development - and should in particular take account of the need to conserve areas of Grade 1 agricultural land adjacent to Taunton.

**D1 Reason**

The high scale and pace of development proposed for this HMA is well illustrated in the Sustainability Appraisal Tables 10.6 and 10.7: a 67% increase in dwellings from the current number in Taunton SSCT over the 20 year period; and 47% for Bridgwater SSCT. This is a well over 20% increase on the housing proposed for Taunton Deane and Sedgemoor district in comparison to draft RSS - which was in itself an ambitious rate of growth. It appears to require additional areas of search from those in draft RSS for both Bridgwater and Taunton.

While we continue to support the urban focus, we strongly question whether this level of development is either deliverable or needed, given our overall critique of the use of the household projections and inappropriately high GVA assumptions (See our comments at the beginning of Section 4).

**D2 Revised wording suggested**

- See Summary.

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### **Policy/paragraph reference**

Policy HMA7: Bournemouth and Poole

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### **C. Summary**

- We strongly support para 4.1.52 that recognises the value of the heathland habitats in South East Dorset. They have been reduced, degraded and fragmented considerably since the area started to grow in the 1960s. In recent years this degrading has been halted and is being gradually reversed.
- We therefore particularly strongly oppose the changes to increase the housing numbers. We already opposed, and continue to oppose, the draft RSS proposed urban extensions into the Green Belt in the HMA. We believe the justification given for 'exceptional circumstances' for removal of land from the Green Belt is invalid (See our overall comments on Green Belt at the beginning of Section 4) and that the disadvantages outweigh the advantages for each individual urban extension amendment proposed.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be

removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

- Housing levels proposed for the HMA should be reduced to those in the draft RSS and below this where needed to avoid incursion into the Green Belt (as per the figures we set out in detail below). We are concerned at the housing levels proposed both for the Bournemouth/Poole area and its surrounding countryside and for the remoter rural parts of the HMA such as North Dorset district.
- Strengthening the overarching policies in the final RSS on an orderly and sequential progression to development and to ensure appropriate phasing of development is essential to support appropriate conservation management of the heathlands, including any mitigation measures.
- We are strongly opposed to the proposed change to the new title *South East Dorset SSCT*. We agree that there are functional relationships between the various settlements, but it masks the acute traffic congestion issues and dormitory relationships within the area.
- The transport element of the policy should be modified in line with the Sustainability Appraisal recommendations to achieve more sustainable outcomes for transport - particularly in relation to 'pinch points' and to require action to improve sustainable accessibility for all on the corridors linking the communities in the north and west of the SSCT with Bournemouth and Poole town centres.
- Sub-regional strategic green infrastructure policy and plans needs to be further developed before any higher development levels than at present are considered.

## **D1. Reason**

### **1. Housing and economic assumptions**

We strongly oppose the Sustainability Appraisal conclusion (para 10.302 ) that *higher jobs and homes provision in the Proposed Changes ... should help to meet the projected need for both within this HMA*. See our overall comments at the start of Section 4 on the inappropriate use of both household and economic projections, unfortunately compounded by the assumption in the SA that they represent realistic assessments of future *need*. (Otherwise we strongly welcome the Sustainability Appraisals comments on this HMA and in particular its reference to strategic flood risk assessments.)

Para 4.0.5 says that the future growth in employment is based on a regional growth in GVA of 3.2% per annum. The proposed housing figures are partly based on this growth. CPRE commissioned, from Chris Elton Consultancy, an economic analysis of the assumptions behind the draft RSS. He advocated that 2.6% GVA growth per annum was more appropriate to the model used (See our overall comments at the start of Section 4 on the economic assumptions).

Currently the economy is under some stress. The HM Treasury review of UK Economic Forecasts (July 2008) shows that the average of independent forecasts for growth in 2008 is 1.5%, and for 2009 goes down to 1.1%. The latest news (August 2008) from the Treasury suggests growth next year could drop to zero. The IMF has cut their forecast to 1.4% this year, down from 1.8%. They forecast a drop in growth in 2009 to 1.1%. The Bank of England Governor Mervyn King is mentioning a possible recession in 2009, and with the ONS showing zero growth for the last quarter (April-June), we may already have descended into recession.

This downturn in economic growth lowers the number of jobs, the in-migration to the UK and sub-region, and thus the number of houses required. The SA in para 18.17 questions the growth of 3.2 GVA, they: *'question whether this level of growth will be either achievable or environmentally sustainable.'* They suggest the current downturn will impact on the Region's economy, and high fuel and commodity prices will also influence it. *'This suggests that the high levels of economic growth upon which the Proposed Changes RSS is based is now unlikely, especially in the early years.'*

In regions such as East Dorset where drastic inroads into the Green Belt have been proposed, and where the effects of large scale house building on surrounding heathland and SSSIs needs further study and validation, this sharp lowering of immediate housing requirements should be used to buy time for further evaluation of the effects on the environment before any increase in housing levels is accepted.

## **2. Potential impact on the South East Dorset heathlands**

No part of South East Dorset is over 5km from a fragment of lowland heath. These flora and fauna rich areas are protected by the European Habitats Regulations. A mitigation strategy was introduced last year (Interim Planning Framework 2006-2009) and our local authorities are currently working together on the Joint Heathland DPD.

Locally there is much hard work and dedication going into the protection and management of these heathlands, improving them and creating new areas to encourage people onto alternative green spaces (SANGS). However, according to Dr Phil Sterling, Natural Environment Manager, Dorset County Council, there is still much to be done in reaching an understanding of why people are attracted to certain areas. It is necessary to understand what draws people to an area, and then to provide a new area that they will perceive as equally attractive.

The size of an alternative area is also difficult to assess. SANGS will need to vary in size. The precise size will depend on the proximity of proposed developments to heathland as well as the scale of the development. One example of this is in the Western Sector of South East Dorset where a proposed urban extension of 2,750 homes may take place. How do you plan for an alternative space to attract people away from Wareham Forest and Upton Heath? Both are barely a few kilometres, on either side, of the proposed site.

There is only so much that can be done to protect the heathlands. We are gravely concerned that the vast increase in house building proposed will put the heathlands under intolerable pressure. Organisations such as Natural England (NE) are fully

aware that if human pressures increase then the number of nesting birds will be decreased. They try to assess the condition of each SSSI every 6 years and survey the bird population every 3 years. At the moment bird populations are improving. Whilst NE are satisfied that monitoring is in place, Dr Sterling is not quite so satisfied on this point.

Much work has been done on the public's access patterns, but it is not yet complete and a baseline is not in place to cover both the impact on birds and all the sites the public visit. As the majority of new homes would be urban infill, monitoring will not be easy. Dr Sterling estimates 5 – 10 years before mitigation can clearly be judged to be working or otherwise. The assumption in the Proposed Changes, para 4.1.53, is that this proposed mitigation is sufficient and will be monitored and measures taken if required. If the mitigation does not work it will be *too late* and the damage to our heathland environment *may not be reversible*.

The Sustainability Assessment (SA) (Page 231: Protect and enhance habitats and species) states that it is: *'not possible to state with confidence'* that there will be no negative impact on our heathlands. There is concern over potential damage in the SA. To quote: *'This is particularly so given the significantly increased levels of development in the Proposed Changes and the often close proximity of some of the major locations of growth (e.g Bournemouth, Exeter, Plymouth) to sensitive habitats.*

### **3. Lack of infrastructure**

The vast increase in housing proposed is unlikely to be accompanied by the necessary infrastructure. The Proposed Changes (New Supporting Text – Providing Key Infrastructure to support the spatial strategy) refers to the infrastructure needed to support the delivery of RSS as *'a key challenge for the region.'* It says *'the region needs to further improve its understanding and assessment of regionally and sub-regionally significant infrastructure requirements and the priorities and mechanisms for funding delivery.'*

It goes on to say that previous growth, particularly housing, has not always been accompanied by the necessary infrastructure. The Secretary of State for Communities and Local Government recognises the weakness of draft RSS in planning for infrastructure and so proposes that the RSS should not, at this stage, include specific proposals for infrastructure provision.' This is in case *'those may be found to be undeliverable.'*

In the absence of this funding it will be down to the developers to provide what infrastructure they can. They will have to provide 35% affordable housing, heathland mitigation charges (currently approximately £1,500 per house and £949 per flat), or in a large development provide SANGS. In addition they will have to pay the proposed Community Infrastructure Levy to provide all on and off site infrastructure (both 'hard' and 'social'). This is highly aspirational in an economic 'boom': in a downturn it is quite unobtainable.

### **4. The Green Belt and exceptional circumstances**

Para 4.1.53 states '*However, necessary provision for new homes and to fulfil the SSCT's economic potential cannot be met within the existing urban areas ... To address these exceptional circumstances, the RSS makes changes to the general extent of the green belt.....*'

Our objections above already suggest that *exceptional circumstances* both in relation to the level of housing and economic assumptions cannot be justified. See also our overall discussion on this at the beginning of Section 4.

By removing land from the Green Belt, building will also be taking place on land that was most accessible from the urban areas and could have been used to provide mitigation for our stressed heathlands. As a result the heathlands will be under additional pressure from both housing and potential loss of SANGS.

There appears to be a general failure to understand the benefits of some of the Green Belt land. One of the reasons Natural England gives (Paper No: NEB P07 28 Oct 2007) is that: '*Much land within the green belts appears under used or neglected.*' This misses the whole point of Green Belt: it is land that is not built on. It may not be of high environmental value, but in many cases such green open space creates that special sense of place which is so important to local residents and visitors providing a quiet and restful outlook. Indeed it is widely recognised that green is the most restful colour (ask any interior designer!) Direct access by the public is not necessary for these green areas to be of value - as evidenced by the private gardens in some of London's residential squares.

The Green Belt in South East Dorset was introduced in 1980 in order to contain the urban area. It is now doing the job for which it was designed and in all cases we consider that the disadvantages outweigh any proposed advantages for amending the Green Belt:

**Search Area 7A to the North of Bournemouth** - This stretch of Green Belt prevents North Bournemouth from reaching the Stour and so helps to contain urban sprawl. It also supports regeneration: parts of Bournemouth are in need of regeneration and this proposed extension may draw developers away from the more difficult town centre development. A further disadvantage is that additional run-off so close to the Stour could be a problem and could lead to an increase in flooding further downstream.

**Search Area 7B at Lytchett Minster** - Para 4.1.54 excludes the market town of Wareham in the Western Sector which suggests that the proposed Poole urban extension is separate from the main SSCT and therefore in the rural area. It is a rural area and the green belt principles of containing urban sprawl would be broken. It is likely the approach to and view of these historic settlements would be destroyed and they may almost be joined, so breaking the green belt principle of the separation and individuality of settlements. The area is also on the edge of a flood zone which could worsen existing flood problems in Lytchett Minster.

**Search Area 7C to the North of Christchurch** - Not only would Christchurch sprawl further into the countryside, it would also reduce the narrow green spaces between Christchurch and Burton.

**Search Area 7D/7E/F within East Dorset District** *NB Inset 7 is incorrect – west of Ferndown is included in 7D/E/F but it should be in 7G as this is the area for industrial expansion – only south and east of Ferndown should be included in 7D/E/F.* - Due to the environmental constraints in the south of East Dorset District, the availability of development land is limited in these Search Areas. The precise sites that are ‘suitable’, ie that do not encroach on the heathland and are not actually on the flood plain, are well known – the final RSS should not promote sites. In south East Dorset District, there is either heathland or river valleys subject to flooding. (See Appendix 1 on the original South West Region CPRE response to DRSS: RSS South East Dorset sub-regional Strategy.)

**Land to the south at West Parley** - the proposed urban extension is for 900 houses. This location would shrink the separation of East Dorset District from North Bournemouth to just the width of the active flood plain. The houses would be built on the river terrace of the Stour, adjacent to the flood plain. This has the additional disadvantage that development could cause an increase in the possibility of flooding as surface run-off into the Stour would be increased.

**Land to the North of Wimborne** – the proposed urban extension is for 600 houses. This would have the disadvantage of destroying the setting of the historic town of Wimborne. It is one, of only two historic approaches left. It would also lead to a further outward sprawl of Wimborne. Run-off into the River Allen would be increased – this would feed into the River Stour. The small proposed urban extension on Green Belt, but within the town, could increase flooding, again due to surface water run-off.

**Land to the North West of Poole, the proposed urban extension of 700 houses at Corfe Mullen** - This adjoins such a lovely rural area. It would take the sprawl of Poole even further into the countryside to a vast residential area of few facilities, and would be so unsustainable. Again, development at this location would cause additional run-off into a stream that feeds the Stour.

It is also important to retain the seed bank of native flora that is found on unimproved and semi-improved pasture. Grazing and ‘poaching’ of the soil by animal hooves encourages germination of plant species not seen for decades. With the pressures of climate change on our biodiversity and the need for landscape scale habitat conservation, it is essential that such a resource is not wasted. The same is also true of our hedgerows that would be at risk were the revision of the Green Belt to be implemented

## **5. Development levels for rural North Dorset and Purbeck**

Much of these parts of the HMA is beautiful and tranquil countryside with AONB protection and we strongly oppose the proposed increase in housing made by the Panel and in Proposed Changes over that in draft RSS. Draft RSS would already provide for an 18% increase in the number of homes in North Dorset district - Proposed Changes would increase this to 24%. We think this is inappropriately high - and as per our overall comments note that sustainability appraisal of the increased levels of dispersed development (transport and service implications, etc) has not been carried out.

All three of the towns mentioned in North Dorset have sprawled into the countryside in recent years, Shaftesbury and Gillingham are growing ever nearer to one another. A further 7,000 homes around Blandford Forum, Shaftesbury and Gillingham is inappropriate.

We also hope the Government will take note of The Taylor Review on Rural Communities, 2008: '*current planning practices which are too often ringing country towns with anonymous housing estates, business and retail parks*'. This goes onto say that some local authorities have created attractive new neighbourhoods and extended communities. We hope any further development is more sympathetic to the settlements and the countryside.

## **6. Transport issues**

We strongly support the statement in para 4.1.54 and the three bullet points. However, we challenge its deliverability.

The South East Dorset Transport Study includes building a multi-modal transport model for the Bournemouth/Poole/Christchurch conurbation and the surrounding settlements. Unfortunately this will not be ready in time to inform the local authorities' response to Proposed Changes. However, there is considerable doubt over raising the necessary funding to even reduce the existing number of cars on the road, let alone to ameliorate the expected increase of 60,000 thousand cars and 5,000 vans/lorries as a result of the proposed housing and employment increase.

Our original evidence thoroughly reviewed the availability, frequency and journey times of public transport outside of the Bournemouth/Poole urban areas (See Appendix 1 of the original CPRE response to draft RSS: RSS South East Dorset Sub-regional Strategy). There has been very little change since then - except to reduce some services. Unless public transport is improved and subsidies provided, then it will not offer a viable alternative to the car.

### **Revised wording suggested**

- para 4.1.53 should be amended to: *The green belt will continue to maintain the separate identities of the settlements that form the SSCT and to this end the general extent of the green belt will not be amended. Even with the amount of development within the urban areas, monitoring of the delivery and effectiveness of the heathland mitigation measures will be needed and, if necessary, should trigger review of the phasing and/or scale of housing provision.*

- *Policy HMA7: Bournemouth and Poole HMA*

*In the Bournemouth and Poole HMA provision will be made for:  
 Growth of ... 37,150 homes distributed between the local authorities as:*

Bournemouth	14,600
Poole	9,500
Christchurch	2,850 ( 3,450 less 600 on green belt )
East Dorset	3,000 (5,400 less 2,400 on green belt)
Purbeck	2,100
North Dorset	5,100

Retain middle section

*Provision for sustainable housing growth will comprise:*

- *14,600 new homes within the existing urban area of Bournemouth*
- *9,500 new homes within the existing urban area of Poole*
- *2,850 new homes within the existing urban areas of Christchurch*
- *delete Area of Search 7A to the north of Bournemouth*
- *delete Area of Search 7B at Lytchett Minster (Purbeck)*
- *delete Area of Search 7C to the north of Christchurch*
- *2,800 new homes within the existing urban areas in East Dorset District*
- *200 new homes in the rural areas of East Dorset District*
- *delete Area of Search 7D/E/F within East Dorset District*
- *5,100 new homes within North Dorset*

Remove wording on jobs and para ‘*Planning for employment....*’ from policy and amend to reflect more realistic job forecasts and any associated modifications to the hectares required for employment.

- No amendment to paragraph on Ecological Integrity
- South East Dorset Green Belt Amend to: *The South East Dorset Green Belt will be maintained.* There will be no alterations. Delete bullet points.

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### Policy/paragraph reference

Policy HMA8: Plymouth

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

### C. Summary

- We continue to support the identification of Plymouth and its regeneration as the main focus for development for this HMA, but are concerned at the high level of development proposed and the risk of it undermining regeneration programmes. We strongly welcome the Sustainability Appraisal recommendation (para 10.348) that *growth levels should be re-examined ... to ensure that the future of Plymouth is based on quality rather than quantity.*
- The wording *at least* in relation to the housing numbers should be removed and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3. The phasing of development in two 10-year tranches also needs to be developed into five-year phasing, if the risks referred to in the Sustainability Appraisal are to be avoided.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- Structure plan policies should be examined carefully to determine if any should be rolled forward, particularly to assist in protecting strategic green infrastructure at the sub-regional level until early review for sub-regional green infrastructure policy is carried out.

- The wording on 'pinch points' should be adjusted as recommended by the Sustainability Appraisal to ensure only sustainable transport options are considered.

### **D1 Reason**

The creation of a new combined policy makes sense and is supported as reflecting the realities on the ground. The accent on retaining Plymouth City Centre as the main centre for retail uses and services is supported, as is the attempt to ensure that development at both Derriford and Sherford is constrained to meeting local community needs only.

The housing numbers however are unrealistic in present circumstances and the economic growth forecasts largely aspirational. The developers of the Sherford New Town/Community, for instance, are on record as saying that they have no intention of building houses that they cannot sell in the present financial climate. This will make the proposed targets appear increasingly unreal as the plan period rolls forward.

We are concerned at the further increase in the housing levels in Proposed Changes over that in the draft RSS and support the Panel report recommendation that there should be no growth in the figure of 45,000 homes for the HMA for the reasons set out in paragraph 4.8.17 of its report.

We note that much of the increase in Proposed Changes is achieved by assuming extra housing within the existing urban area of Plymouth. Whilst we generally support increased density, we emphasise that this must take place in tandem with improved design, a significant shift to more sustainable modes of transport, and the retention and improvement of appropriate green infrastructure.

We are concerned therefore that there appears to be no evidence base for the increase in housing proposed, and that there is no green infrastructure element to the HMA policy. We recommend that sub-regional strategic green infrastructure policy is included in the proposed partial review of RSS (in line with the Panel Report recommendation) and that the housing figures should not be adjusted upwards from the draft RSS in advance of this.

In Caradon 'District', Cornwall's recently completed landscape character work should be incorporated into consideration of green infrastructure for this area.

We welcome the reduction of new housing (from that proposed by the draft RSS and the Panel) for Saltash/Torpoint from 1,000 to 500 - but note that it is effectively replaced by an additional 500 new homes for Sherford in South Hams.

### **Rural part of the HMA**

We remain concerned at the Panel's recommended uplift by 15% in the housing provision for the rural parts of this HMA (incorporated into Proposed Changes), for example the increase for West Devon from 3,800 new homes to 4,400 over the plan period. Many of the issues that we raise under our submission for HMA9: West

Cornwall are equally applicable to Caradon 'District', West Devon and South Hams in view of their coastal and/or rural nature, their attractive environment and the associated issues of second homes and lack of affordable housing.

South Hams is, for example, an essentially rural district where the provision of affordable housing has always been very difficult. South Hams District Council has, quite rightly, tended to focus on the larger market towns where the opportunities for providing affordable housing are greatest and the scope for building easier. However, the areas of greatest difficulty remain the smaller villages and rural communities.

It also remains important to ensure that development of industrial areas avoids rural locations. It will be important, for example, to ensure that Sherford provides a scale of employment opportunities appropriate only for this new community and that the Langage Business Park should focus on providing modern commercial and industrial opportunities not just for Plymouth but also for the South Hams and West Devon.

### **Joint working and the current boundary review**

Proposed Changes requires local authorities to combine to achieve this policy. In Cornwall, Caradon 'District' is in the process of becoming part of a Cornwall unitary authority. In Devon the South Hams, the Dartmoor National Park and West Devon are currently covered by the Boundary Committee's latest proposals which will potentially create a unitary authority that covers Exeter and the whole of rural Devon, leaving the boundaries of the Unitaries of Plymouth and Torbay unchanged.

The current Boundary Review proposals for Devon therefore will not make joint working any easier to achieve - and will potentially make it less manageable. In contrast, throughout Devon, the most supported submission to the Boundary Committee has been to have a new Unitary consisting of South Hams, West Devon and the Dartmoor National Park where a large but manageable Rural Unitary could have worked almost seamlessly with Plymouth. Indeed the present district councils of South Hams and West Devon already share a common chief executive. Sherford is divided between Plymouth and the South Hams at present in terms of housing allocation and in other areas - this is currently working well.

### **Transport**

We agree that a modern transport system will be crucial to the success of the Plymouth HMA and we therefore support the Panel's recommendation 4.8.5 as incorporated into the policy. We support the Sustainability Appraisal comments however in relation to ensuring that only sustainable transport solutions are achieved to address pinch points.

### **D2 Revised wording suggested**

See Summary.

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**Policy/paragraph reference**

Policy HMA9: West Cornwall

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- In view of the particular circumstances of Cornwall, in terms of housing affordability, its rural character, the limited availability of brownfield land and the rising number of second homes, it is vital that the housing figures are reduced. We recommend a return to the figures in the draft RSS. The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- An additional policy element should be added in relation to thresholds to require that all development contributes to the provision of affordable housing, to encourage the use of vacant properties and to encourage local authorities to use the powers to limit the sale of council houses. This is vital as an interim measure - given the delay in development of LDF policies due to the creation of a unitary authority for Cornwall.

- Particular care is required in considering whether any Structure Plan policies should be rolled forward (especially as the Plan is so recent) to assist in protecting countryside, safeguarding rural services and in the provision of affordable homes. See also our comments under the HMA covering Polycentric Devon and Cornwall.
- Cornwall's recently completed landscape character work should be used to test whether housing can be allocated to the areas of search without unacceptable damage to environmental assets. Similar testing will be required for the substantial urban extensions that are proposed around other smaller towns. We recommend this work is undertaken as part of preparing sub-regional strategic green infrastructure policy for Cornwall – and as part of the proposed partial review of RSS - and that the draft RSS housing figures should not be exceeded in advance of this being carried out.

### D1 Reason

The high scale and pace of development proposed for this HMA is well illustrated in the Sustainability Appraisal Tables 10.6 and 10.7: a 32% increase in dwellings from the current number in Kerrier district over the 20 year period; 25% for Carrick; 26% for Penwith; 34% for Restormal; and 52% for the joint SSCT (which masks the even higher scale of growth proposed for Truro). The increase over the draft RSS proposed housing figures is particularly startling: for example 76% for Kerrier and 83% for Resormal.

Combined with previous years of high growth, this is clearly not a sustainable approach for the longer term for a peninsula which is internationally valued for its coastal and other cultural landscapes (making it an important contributor to the region's economic Environment Driver).

We are experiencing a downturn in the economy and particularly in the housing market, which certainly will not be corrected before 2010. Even without this downturn the targets for Cornwall were unrealistic, now they are fatuous.

Proposed Changes is dominated by changes to the housing provision, which to a large extent follow the recommendations of the Panel Report. In the case of Cornwall this represents an increase of 53% over that proposed by the Regional Assembly, by far the largest increase for any county in the region.

This level of growth is well above past development rates including the boom period of the 1980's and within a county which has been showing very high housing growth rates over the last 30 years.

House building rates, source Cornwall County Council

<u>1976 – 2001</u>	<u>2280 dwellings pa.</u>	
<u>1986 – 1991</u>	<u>3069 dwellings pa</u>	<u>Boom years</u>
<u>2006 – 2026</u>	<u>2250 dwellings pa</u>	<u>draft RSS</u>
<u>2006 – 2026</u>	<u>3435 dwellings pa.</u>	<u>Proposed Changes</u>

Total Provision of dwellings 2006 -2026.

-	<i>Draft RSS recommendation</i>	<u>45,000</u>
-	<i>currently proposed</i>	<u>68,700.</u>

The basis for the present recommendation follows the Government's 2004 DCLG-projections, which indicate that the population of Cornwall will increase by 6,400 pa through in-migration, less 1,100 through more deaths than births. These projections are overly prescriptive in the case of Cornwall. Far more flexibility needs to be observed in the distribution of the housing provision to take account of local conditions. A centralised approach does not address specific housing needs in Cornwall.

### **Previously developed land**

It is estimated that in Cornwall 75% of the housing provision will be built in the countryside on greenfield sites as the amount of previously developed land is limited. This would create increasing urbanisation of the countryside, a loss of local distinctiveness and raise issues over sustainability. All are contrary to Government guidelines and avowed intentions.

### **Rural areas, services and jobs**

A high proportion of Cornwall is designated as AONB. This will result in most new housing being focussed on non-designated rural areas and the surrounding of our market towns and larger villages with yet more bland housing estates with a resulting further loss of local distinctiveness.

According to DEFRA, Cornwall has the most densely populated rural areas in the SW region, which means that the residents are heavily dependent on private transport - as their dispersed nature renders it difficult to provide adequate public transport. A major increase in housing would overburden the infrastructure and distribute excessive and inappropriate levels of growth to unsustainable locations.

The population of Cornwall is growing as a result of net in-migration. The majority of incomers are within the age brackets of 30 – 44 and 45 – 59 dispelling the idea that the County is primarily a retirement location. In order to support this level of in-migration there would be a need for a major growth in employment, but the projection of 3.2% annual growth in GVA is well above past rates and so is regarded as unrealistic. Indeed, given the present downturn in the economy this figure is wildly optimistic and should be adjusted accordingly. Similarly, the housing provision needs adjustment or there will be a mismatch between the population increase and the availability of employment.

### **Affordability and affordable homes**

In spite of recent relatively high housing growth, the local population in Cornwall has one of the worst housing affordability problems in the U.K. Past experience has shown that merely building more houses does not ameliorate this problem, which is getting worse year on year with the County now having the biggest mismatch between earning levels and house prices in England.

The present fall in house prices will not resolve the housing affordability problem as market mortgages are more expensive and larger deposits are required. As 60% of affordable homes are on commercial development sites the drying up of house building is impacting on the

supply of affordable homes. Increasing the proportion of affordable homes in a development is welcome, but past experience has indicated that it is undeliverable owing to funding falling short of need, to developers working the system against the provision of affordable homes, to policy guidance being too open to interpretation and to the planning inspectorate favouring the developer on appeal. Between 2003 – 2006 just 1,030 affordable homes were built in Cornwall and the waiting list for rented social housing is now over 20,000.

### **Second homes**

The massive increase in the housing provision proposed for some of our most rural districts is manifestly unsustainable and would encourage the building of yet more second homes in pristine countryside far from sources of employment. Unless far more employment opportunities are introduced into our larger villages the demise of village life will continue as they become retirement communities with a high proportion of part time residents. As it is there were, according to official figures, 9,230 second homes in the County in 2000 and 14,427 in 2006. Parish councils consider the official figures as a gross underestimate.

### **Countryside and tourism**

The protection of the countryside for its own sake seems to have become a low priority and the urbanisation of yet more countryside of no consequence. We appear to be expected to accept increasing urban sprawl around our market towns leading to ever more congestion.

The fact that tourism is the bulwark of our economy is disregarded despite the fact that tourists flock to Cornwall to enjoy not only our beaches, but also our countryside. Farming is still an important part of our economy, but it hardly rates a mention.

### **Conclusions**

We appreciate the problem that GOSW has in determining the distribution of housing across the Region given the demands of Central Government, but the provision for Cornwall is manifestly inequitable. We accept that in-migration will continue and in some respects benefits the economy, but the needs of local residents should take priority and if funding is hard to come by then a range of new initiatives should be examined and adopted where appropriate. At present we have a dysfunctional market in which the available housing supply does not relate to the needs of the local community.

The threshold for the number of affordable housing in any development should be reduced. Developers should not be permitted to avoid their obligations to provide at least 35 % affordable housing in any development. The inspectorate should be empowered to insist on this obligation.

Increased powers should be given to local authorities to reduce the number of empty homes. The sale of existing council houses should either be terminated or at least ensure that they are reserved for local people in perpetuity. Planning authorities should use planning obligations to require any new housing to be limited to full time occupation and planning permission should be required to turn a full time home over to part time occupation or holiday letting.

Over the last 40 years plan after plan has come up with targets, which have never been remotely realized. Given the current depressed housing market and the fact that we are

already nearly 3 years into the plan period the housing provision is equally undeliverable and enough flexibility should be incorporated to bring a touch of realism into the system.

The Government prides itself over its intentions to consult stakeholders then appears to blithely ignore the recommendations of those consulted, prompting us to question the relevance of the whole system and the worth of devoting so much time to try and change or modify predetermined policies.

**D2 Revised wording suggested**

See Summary.

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**Policy/paragraph reference**

Policy HMA 9a: Isles of Scilly

**C. Summary**

- The largely undeveloped remote ‘wilderness’ coastal landscapes, seascapes and cultural landscapes of the Isles of Scilly are outstanding and it is essential that their special and unique qualities are conserved.
- We welcome the policy commitment to housing for local needs only - and would hope to see maximum use made of existing redundant and vacant buildings.
- There appears to be no Sustainability Appraisal of this policy and there could be potential conflict between the protection of the high-quality environment and, for example, *improvements to air and sea links*. Improvements to air links could in particular adversely impact on the tranquillity and wilderness quality of the islands. We recommend adjustment to policy wording here in the light of our comments under Section 5, Policy RTS6 Airports and Heliports and the inappropriateness of including Tresco Heliport in that policy and on Map 5.1.

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**Policy/paragraph reference**

Policy HMA10: Polycentric Devon and Cornwall

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- In view of the particular circumstances of this HMA (housing affordability, coastal and remote rural character, the limited availability of brownfield land, the rising number of second homes, limited availability of sustainable travel options and the lack of full Sustainability Appraisal for higher levels of dispersed development, we recommend a return to the draft RSS housing allocations.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- It is vital that any structure plan policies are rolled forward where they might assist in protecting countryside, safeguarding rural services and in the provision of affordable homes in the interim before partial review.

- Work is required on both urban capacity and strategic green infrastructure for Barnstaple and should be included in the partial review before any increase in the level of housing is proposed for Barnstaple.
- Cornwall's recently completed landscape character work should be used to test in further detail whether housing can be allocated in more rural areas given the substantial urban extensions that will be required around smaller towns. Similar more detailed landscape character work for Torridge and North Devon should be progressed as a matter of urgency.
- Consideration should be given to sustainable transport options and we recommend this is included in the proposed partial review of RSS.

### **D1 Reason**

NB See also the Torridge case study (p 42-44) in the CPRE report *Planning for housing affordability* (Green Balance, 2007) that we refer to in our overall comments on Section 4.

This HMA coincides with a remote rural area under the DEFRA rural: urban definition and methodology and one of the largest remaining tranquil and dark skies areas in England (see our previous submissions). It also includes nationally valued, but not designated, landscape on the Culm Measures and early county-based designations of Areas of Great Landscape Value (the designated areas being of historic interest) in addition to AONB and heritage coast designations.

The Areas of Great Landscape Value owe their existence, at least in part, to the recommendations from an early CPRE survey carried out for the Devon branch of CPRE by W Harding Thomson: *Devon - A survey of its Coast Moors and Rivers with some suggestions for their preservation*, 1932 University of London. We are therefore greatly concerned that this historic landscape protection value should be retained - particularly as more detailed landscape character work has not yet been prepared for the Devon part of the HMA.

We are also concerned at the potential adverse impact of the increased development proposed for this rural and coastal HMA. The particularly high scale and pace of development proposed is well illustrated in the Sustainability Appraisal Table 10.6: a 31% increase in dwellings from the current number in North Cornwall over the 20 year period; 37% for Torridge; and 25% for North Devon. The increase over the draft RSS proposed housing figures is particularly startling: 76% for North Cornwall and 122% for Torridge. This reflects the particularly inappropriate use of the Cambridge Econometric job forecasts for this HMA, when the draft RSS already included an allocation to provide for lifestyle moves above reasonable job forecasts.

We welcome the Sustainability Appraisal findings, but some of its comments are misleading due to the inappropriate use of the Cambridge Econometrics job forecasts - which it was clearly not in a position to comment on - while some of its important recommendations are not included in the *Conclusions and recommendations* section.

We welcome, for example, the recommendation within para 10.392: *The urban extension evidence-base review did not consider an urban extension to Barnstaple. Options for an urban extension to the town should go through a SA process at the LDF level to determine the most suitable option.*

No evidence appears to be cited as to why the number of homes for Barnstaple, previously to be accommodated partly within an extension, is now thought to be capable of accommodation within the built area itself, with each increased number now to form an extension. Whilst we generally welcome increased efficiency in the use of brownfield land and higher densities, we are concerned at the lack of a local evidence base - particularly since it would appear from the comment above that no work has been carried out to consider requirements for strategic green infrastructure.

In this situation it is vital that any structure plan policies are rolled forward where they might contribute to the conservation of environmental assets, and that any increase in housing on that in the draft RSS is avoided until partial review has been carried out and green infrastructure policy has been developed at the sub-regional level.

Furthermore, we point out that no Sustainability Appraisal has been carried out on the the increased housing levels proposed for dispersed development across the more rural parts of this HMA - the only analysis apparently being to look at the relationship of homes to jobs. We refer to our comments for West Cornwall HMA and the particular need here as there for assessment in relation to the increased road-base leisure travel likely to be generated and the increased demand for rural services.

Full Sustainability Appraisal is required to assess whether such a high level of dispersed development can be realistically provided for through sustainable transport options. Again, therefore, our view is that the draft RSS housing figures should not be exceeded until partial review has further explored this issue.

## **D2 Revised wording suggested**

See Summary.

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**Policy/paragraph reference**

Policy HMA11: Salisbury

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- Our particular concern for this HMA is the increased level of housing proposed for Salisbury, when initial work on the LDF has already revealed that the additional housing could not be accommodated in the city itself and would be likely to impact on adjacent villages. This is in a situation where no assessment of the surrounding environmental assets has been carried out for the RSS and no sub-regional green infrastructure policy has been developed.
- We recommend that for Salisbury the new housing requirement is reduced to 500 per year/ the draft RSS proposed development levels, with any higher figure and green infrastructure requirements considered in the forthcoming partial review of the RSS proposed for 2009/10.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

- Care is required in considering whether any structure plan policies should be rolled forward to assist in protecting green infrastructure, rural services, etc.

### **D1 Reason**

The high scale and pace of development proposed for Salisbury in particular is well illustrated in the Sustainability Appraisal Table 10.7: a 31% increase in dwellings over the plan period (with a 35% increase in the housing proposals over those in draft RSS for the HMA as a whole). This results in part from discussions at the EiP in relation to an additional [1,000 houses for Salisbury itself](#). However, in the [latest LDF proposals](#) the planning authority [admits it cannot reach its brownfield target by as much as 50%](#) - with the potential for adverse knock-on effects to adjacent villages in the latter part of the plan period.

However, as the Sustainability Appraisal indicates, Salisbury is highly constrained by environmental assets and this was not assessed for RSS in any joint area study. Proposed Changes has not therefore - welcome - identified an area of search around Salisbury (a 360° area of search, as for Yeovil and Barnstaple, being indicated). Clearly such a study needs to be carried out before any higher housing levels are considered - the landscape setting being critically important to the historic city - and sub-regional green infrastructure policy should be developed in parallel.

The Sustainability Appraisal also highlights the importance of avoiding flood-risk areas, including that development should not be allowed within Flood Zone 3 areas of the recent Flood Risk Assessment. It points to difficulties with increased volumes of discharge water from sewage treatment and with the inability to require sustainable drainage due to the less stringent requirements now proposed for Policy G – Sustainable Construction. Again this suggests that the higher housing levels for Salisbury should be considered only when a more detailed environmental assessment has been compiled.

In addition, the [jobs forecast](#) are [over-optimistic](#). We consider [growth](#) based on [3.2%](#) pa GVA to be [totally unobtainable](#) for the HMA, [especially in the light of the current economic situation](#). In these circumstances, strengthened overarching policy in the final RSS to ensure a co-ordinated and sustainable approach to delivery, in line with the Plan, Monitor and Manage requirements of [PPS3](#), is critical. The overall policy for [affordable houses](#) should be helpful for this HMA.

We continue to oppose the Brunel-Harnham Link road as a means of reducing non-essential traffic on the A36 through Salisbury. It would do nothing to relieve the traffic on the A36. The District Council oppose the scheme and it was taken out of the regional priority list. We therefore welcome the removal of mention of specific [road schemes](#), but we remain concerned that the scheme should not be brought forward again through the Implementation Plan and/or Regional Funding Allocation Round 2 process.

### **D2 Revised wording suggested**

- See Summary. \*\*\*\*\*

**Policy/paragraph reference**

Policy HMA12: Weymouth and Dorchester

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- Our concern in this HMA is the excessive housing allocation in terms of local conditions of housing affordability, the attractive rural and coastal character of the area, and the rising number of second homes. This is in a situation where no assessment of environmental assets has been carried as part of the RSS process and no sub-regional green infrastructure policy has been developed.
- It would be virtually impossible to meet the scale of development proposed without adverse impact on the Dorset Area of Outstanding Natural Beauty and excessive infrastructure costs. In this situation, it is vital that the housing figures are reduced to a more reasonable level and that any higher levels should be tested as part of the forthcoming partial review of RSS alongside the development of sub-regional green infrastructure policy.
- We therefore recommend a return to the draft RSS housing levels for both the SSCT and rural parts of West Dorset and that the wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be

removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.

- We strongly welcome the Sustainability Appraisal recommendations for amending the policy to support reduced road-based commuting between the two settlements, ensuring sustainable travel options are available and seeking to avoid the need to travel, by more closely relating jobs and homes.

### **D1 Reason**

NB See also the Poundbury and West Dorset case study (p 27-33) in the CPRE report *Planning for housing affordability* (Green Balance, 2007) that we refer to in our overall comments on Section 4.

The high scale and pace of development proposed for this HMA is illustrated in the Sustainability Appraisal Tables 10.6 and 10.7: a 27% increase in dwellings from the current number in West Dorset District over the plan period (a 62% increase in the housing allocation proposed in draft RSS); and a 37% increase in dwellings for Weymouth and Dorchester (a 41% increase on draft RSS proposals, with no change to the figure for Weymouth and Portland local authority area, the emphasis hence being on urban extensions).

This has resulted from the inappropriate use and combination of the 2004-based household projections and Cambridge Econometrics job forecasts, with no modification to reflect the local situation. In addition, the higher housing figures have been put forward without the benefit of environmental assessment as part of an RSS process joint study and have not therefore been tested properly in relation to the full range of environmental assets/limits.

Local assessment of job growth is that it will occur at a much lower rate and result in out commuting to Bournemouth/Poole, while we understand that work recently commissioned for West Dorset District Council indicates that the housing allocation could only be accommodated either by incursion into the Dorset Area of Outstanding Natural Beauty (adjacent to Weymouth) or with excessive infrastructure costs in the Dorchester area.

The Sustainability Appraisal also raises a large number of issues in relation to achieving balanced growth for Dorchester and Weymouth as separate communities - including the need for modified policy with an aim of reducing road-based commuting between the two settlements and ensuring that investment is aimed at sustainable transport options. We consider that the higher housing figures proposed undermine the original policy intention of achieving balanced growth. The proposed Weymouth Relief Road would totally break with this policy, increasing, as is forecast by the promoter, both car traffic and carbon emissions and encouraging the very opposite of the desired reduction of car commuting.

The 15% increase in the housing allocation for the rural part of West Dorset also gives rise to concern. The towns and most larger villages are totally within the AONB and are incapable of further expansion beyond present development

boundaries, whilst not having capacity for providing local employment or sustainable transport links to employment centres.

**D2 Revised wording suggested**

- See Summary.

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**Policy/paragraph reference**

Policy HMA13: South Somerset

- See our overall comments at the beginning of Section 4 on the use of unjustifiably high housing projections, unrealistically high economic and job growth assumptions and lack of consideration of local conditions including deliverability of infrastructure that has resulted in excessive HMA housing allocations.
- See our overall comments at the beginning of Section 4 and under Policy HD1 (and its associated housing tables) on the need to remove wording that implies that the housing allocations should be regarded as a minimum.
- See our overall comments on the lack of consideration of the adverse impact on the environment and service provision of the higher levels of development proposed for rural areas, which is particularly out of kilter with realistic projections of job growth.
- See our overall comments on the need for improved policy to ensure a coordinated and orderly progression to development.

**C. Summary**

- In view of the rural character of this HMA and the lack of assessment of environmental assets surrounding Yeovil, we recommend a return to the draft RSS housing levels. Any higher allocation for Yeovil should only be considered in tandem with such an assessment and development of sub-regional green infrastructure policy.
- The wording *at least* should be removed from the housing growth numbers and replaced with wording more appropriate to the Plan, Monitor and Manage approach required by PPS3.
- The job figures should be revised to more realistic projections and removed from the policy itself. Employment land provision should similarly be removed from the policy and adjusted to a more realistic level. The wording *about* is welcome.
- We support the Sustainability Appraisal recommendations for improvements to the policy in relation to sustainable transport.

**D1 Reason**

The high scale and pace of development proposed for this HMA is illustrated in the Sustainability Appraisal Tables 10.6 and 10.7: a 59% increase in dwellings from the

current number in Yeovil over the 20 year period; and a 28% increase for the South Somerset district/ HMA as a whole.

This is an additional 5,000 homes for Yeovil and a 45% increase in the number of new houses for South Somerset as a whole compared with that proposed in draft RSS. We note that the original 6,400 new homes for Yeovil in draft RSS would now be required to be accommodated entirely within the existing area of the town, with the additional 5,000 forming the urban extension.

These figures are based on inappropriate adherence to the household projections and inappropriately high assumptions of economic growth. They do not properly take into account the local evidence-base, particularly the need to diversify Yeovil's economy. Our overall comments on the need to ensure an orderly progression and properly phased approach to development that does not undermine urban regeneration or run ahead of job growth are particularly pertinent.

We strongly welcome the Sustainability Appraisal comments on the range of environmental assets in the landscape surrounding Yeovil - including the importance of conserving grade 1 and 2 agricultural land and the rich historic landscape (para 10.480). There should be a presumption against the use of best and most versatile agricultural land (see our comments on this under Section 7).

We welcome the 360 degree 'area of search', given that Yeovil was not covered by one of the Joint Study Area studies to consider environmental assets in preparation for draft RSS - let alone the scale of urban extension now being proposed.

We are also opposed to the proposed uplift in the housing allocation for the remainder of the district over that in draft RSS (the 15% uplift for rural areas proposed by the Panel). Again the sustainability of this has not been assessed. We would be particularly opposed to the idea of any redistribution of any proposed housing for Yeovil to the remainder of the district. Many of the towns in the district have been subject to considerable extension already in recent years and such an approach would add to traffic movements.

We therefore recommend that the housing allocation should not exceed that proposed in draft RSS. Any further increase proposed should await consideration in tandem with proper assessment of environmental assets and the parallel development of sub-regional green infrastructure policy.

We welcome the Sustainability Appraisal's recommendations on including improvements to the policy to provide for improvements in public transport interchange at Yeovil Junction and improved sustainable transport linkage between the proposed urban extensions and the town centre.

## **D2 Revised wording suggested**

- See Summary.

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