

**Parishes Liaison Meeting  
Wednesday 22<sup>nd</sup> February 2012**

This briefing note sets out an update on the Core Strategy Examination and Placemaking Plan.

**B&NES Core Strategy – Progress of the Examination**

Examination Hearings

- 1.1 Parish and Town Councils will be aware that the Core Strategy Examination is currently taking place. The hearing sessions commenced on 17/1/12 and the final session of the main body of the hearings closed on 1/2/12. The hearings sat for 9 days covering a range of issues identified by the Inspector. The key issues discussed are summarised in paragraph 1.3 below.
- 1.2 There is one outstanding hearing session that will take place on 15/3/12 to consider whether the Council has met the 'Duty to Co-operate' requirement of the Localism Act. Legal advice taken by the Council (corroborated by the advice of the Planning Inspectorate) is that the duty does not apply to the B&NES Core Strategy as it was submitted before the Act came into effect. However, the Council asked the Inspector to consider the issue in light of the threat of a legal challenge to the adoption of the Core Strategy from objectors.
- 1.3 For information set out below is a brief summary of some of the key issues discussed at the hearings.
  1. **Level of growth.** Objectors argued that the Council should be planning for a much higher level of economic and housing growth based on the Draft RSS (15,500 additional homes) or ONS household projections (16,000 homes). The case was made by the Council that the Core Strategy is planning for a high level of economic and housing growth, higher than has been achieved in the recent past, and that economic recovery has been slower than was envisaged at the time of preparing the Draft Core Strategy. In addition the Council also presented evidence that the ONS projections are not sufficiently reliable to be the sole basis for deciding housing numbers.
  2. **Housing shortfall:** The Council has explicitly set out that it is not seeking to meet the fully identified 'technical need' for new housing because of the particular environmental constraints in the District and the objective of resisting unsustainable development (e.g. perpetuating and worsening the dormitory role of Keynsham and Midsomer Norton/Radstock). The Council is meeting over 90% of the new homes needed. However, in addition to the shortfall against the 'technical need' there is still a backlog of unmet housing need arising from the Local Plan which was also the subject of discussion at the hearings.
  3. **Spatial Strategy:** The spatial strategy for accommodating new housing and employment development across the District was discussed. The Inspector explored whether the spatial strategy was the most appropriate for B&NES focussing on the balance between homes and jobs in different areas and whether it was capable of delivery. With regard to the rural parts of the District discussion focussed on whether the level of new development directed to the rural area was appropriate and whether the strategy establishes a clear framework in directing this development to the most sustainable villages.
  4. **Delivery:** The Council's plan for sites delivery was also examined and discussed in detail. The Council outlined its evidence supporting the delivery assumptions. The

limited flexibility in the housing supply in case delivery does not proceed as planned was one of the areas focussed on at the hearings.

5. **Other Issues:** Other key issues discussed related to the likely delivery of the upstream flood compensatory storage facility and how this affects delivery of development in the river corridor in Bath; whether the sustainable construction policies are too aspirational; and whether the affordable housing policy approach accords with the conclusion of the evidence base.

#### Informal Changes to the Core Strategy

- 1.4 In the lead up to the hearings and during the hearings themselves a number of changes to the Core Strategy have been informally suggested by the Council for consideration by the Inspector. These changes principally arose from issues raised by the Inspector and objectors or through discussion at the hearings. These changes can be found in a schedule on the Council's website at:  
<http://www.bathnes.gov.uk/SiteCollectionDocuments/Environment%20and%20Planning/Planning/planning%20policy/Core%20Strategy/Schedule%20of%20Rolling%20Changes%20February%202012.pdf>

The changes include amendments to the rural area chapter in respect of policy RA1 (see pages 12 – 16 of the schedule). These changes were suggested in advance of and were therefore, discussed at the hearings.

- 1.5 The changes set out in the schedule have not been approved by the Council and are informal at this stage. The Inspector (via the programme Officer) has invited examination participants and other interested parties to submit comments by 22.02.12 so that he has access to the full range of views in considering the changes. Those changes which he considers need to be made to ensure soundness of the Core Strategy would be included as recommended 'main modifications' in his Report. They will then need to be formally considered by the Council prior to public consultation (see next steps below).

#### Next Steps

- 1.6 Following the last hearing session on March 15<sup>th</sup>, the Inspector will issue his Report to the Council and the Examination remains open until then. Whilst he has not given a date, the Report is usually issued around 2 to 3 months after the last session. However, this period may be lengthened by the potential publication of the National Planning Policy Framework. The Inspector can recommend 'main modifications' to rectify soundness issues, but if he considers there are substantial issues of unsoundness e.g. the need to plan for a higher number of additional homes or an inappropriate spatial strategy, he cannot recommend the solution via modifications. All he can do is recommend the steps the Council must take to rectify the problem. This is because substantial modifications to the Strategy will need to go through statutory processes including Strategic Environmental Assessment, Habitat Regulations Assessment and public consultation.
- 1.7 If the Inspector recommends the plan is sound (with certain changes/modification), the Council will need to formally consider the recommended modifications and publish them for public comment. This would be followed by the Council considering comments received, amending the plan and adopting it.

#### **The Placemaking Plan**

- 2.1 The Placemaking Plan will take forward the strategic and high level planning framework of the Core Strategy and consider how development can and should be delivered on identified sites.

- 2.2 The Placemaking Plan will comprise three main elements:
- Site Allocations: Identifying development sites and providing clear development expectations
  - Development Management Policies: a key instrument for determining planning applications
  - Local Designations: Providing protection for valued assets as well as allowing certain kinds of development.
- 2.3 The Placemaking Plan will provide clarity and greater certainty for the development industry. Crucially it will be produced collaboratively with the communities of Bath and North East Somerset. This will include working closely with town and parish councils in assessing future development opportunities and policy approach in towns and villages (within the context of the Core Strategy policy framework). Preparation of the Placemaking Plan represents a key opportunity for communities to be involved in the planning process. This is in addition to opportunities that will arise through Neighbourhood Planning (see item 5 below).
- 2.4 Work on the Placemaking Plan remains in its early stages, principally due to the resources required to progress the Core Strategy through examination. However, work is now anticipated to progress quickly. It is intended that formal public consultation (the 'issues and options' stage) will take place in autumn of this year. The Council's Planning Policy team will be in touch before then with more details of how town and parish councils can be involved in preparation work. Work on the MoD sites in Bath, as part of the Placemaking Plan) is being accelerated in light of the imminent release of the sites