

Statement to B&NES Cabinet 12 September 2012 by BATH PRESERVATION TRUST

Item 16 Core Strategy

I am still Alan Langton and speak as a Trustee of the Bath Preservation Trust. For your information I might also declare that I am a professional planner, now retired from practice in England, with extensive experience of public inquiries and examinations in public. At the Trust we have read the various items coming from the Inspector with interest.

We believe the most important point for the Council to note is that determining housing supply is a 2-stage process. First it is important to establish the NPPF compliant housing NEED as your report tonight rightly makes clear. The second stage, however, refers to how you are going to meet that need. It is possible, as tonight's report acknowledges (Appendix para 3.2) to fall short of meeting the need, if you can provide evidence to show that fully meeting the housing need would result in adverse impacts which would significantly and demonstrably outweigh the benefits (NPPF, 14). The two stage process substitutes for the previous 'top down' process of having to meet a figure in the Regional Spatial Strategy. The rationale is that this two stage process will either result in the assessed number being met or quantify the shortfall so that the slack may be taken up elsewhere. It is important not to carry forward the mindset of the RSS approach in which the allocated figures simply had to be accommodated.

This is absolutely central for Bath, and we are concerned that the phrasing of Appendix para 3.2 of your report suggests it is merely something of a last resort. For Bath at least, given its unique status as a city-wide World Heritage Site in a landscape setting, there are very significant constraints with a strong evidence base. These constraints cover both heights of developments and spatial allocation beyond the City boundary. We would suggest that once the housing numbers are determined, a robust argument should be developed in relation to the limitations on Bath's development, and then consider the impact which this has (positive or negative) on housing allocations in the rest of the district or indeed elsewhere in the region.

I should emphasise that the Trust recognises the need for housing development in Bath and supports the building out of Western Riverside and development of the 3 MOD sites for this purpose, as well as encouraging windfall development and increased purpose-built student housing.

We are happy to act as a 'critical friend' on any preparatory work on housing numbers before and of course during the consultation phase.