

ATTACHMENT 2

Bath and North East Somerset

Schedule of Additional Modifications to the Submitted Core Strategy

Bath & North East
Somerset Council

Preface

This schedule sets out Additional Modifications to the Submitted Core Strategy that are necessary for 'soundness'. These modifications are expressed as changes to the Submitted Core Strategy.

The Additional Modification reference is set out in the first column as AM as supplied to the Inspector following the Hearings in April 2014. Where the Council has added further minor changes, no reference has been included in the first column.

The Inspector has recommended in his Report that some of the modifications are not required for the soundness of the Core Strategy. This Schedule also includes all those modifications not considered by the Inspector as Main Modifications but still relevant to the coherence and clarity of the Core Strategy. These are prefixed 'MM' in the first column.

The source of each change used in previous consultations is indicated in the second column of the schedule 'Origin of the Change'.

- Schedule of Proposed Changes (March 2011) used the prefix 'PC'
- Schedule of Significant Proposed Changes (September 2011) used the prefix 'FPC' or 'PC as amended'
- Schedule of Potential Changes arising from the Draft National Planning Policy Framework (September 2011) used the prefix 'NPPF'
- Rolling Changes (February 2012) were prefixed 'RC'
- Schedule of Proposed Changes to the Submitted Core Strategy (March 2013) used the prefix 'SPC'
- Schedule of Core Strategy Amendments (November 2013) used the prefix CSA

The third column indicates the Plan reference (policy, paragraph, diagram, table etc.) and page number in the Draft Core Strategy (December 2011).

The final column shows all changes to the Submitted Core Strategy (see explanation above).

Please note that deletions to existing text are shown as ~~strike-through~~ and additional text is shown as underlined.

Add Mod	Origin of the change	Plan Ref/ Page in Draft Core Strategy	Proposed Change
AM1	SPC0	Plan title	Amend the title of the Core Strategy as follows: Bath and North East Somerset Core Strategy <u>Part 1 of the Local Plan</u>
AM2	SPC1 (FM1)-	Contents	<p>Add the following to the Contents page:</p> <p>1d District Wide <u>Development of the Spatial Strategy</u></p> <p>2c The Central Area and Western Corridor <u>Enterprise Area</u></p> <p><u>The Central Area</u></p> <p>2dd <u>Development on the edge of Bath</u></p> <p>3cc <u>Development on the edge of Keynsham</u></p> <p>5cc <u>Development at Whitchurch</u></p> <p>6aa <u>Sustainability Principles</u></p> <p>6b Responding to a Climate Change</p> <p>Appendix 3: Proposals <u>Policies Map Revision - Bath City Centre Boundary</u></p> <p>Proposals <u>Policies Map Revision – geographic two-way split for affordable housing</u></p> <p><u>Policies Map Revision - Strategic Site allocation for Land adjoining Odd Down, Bath and the revised detailed Green Belt boundary</u></p> <p><u>Policies Map Revision - Strategic Site allocation for Land adjoining East Keynsham and the revised detailed Green Belt boundary and allocation of Safeguarded Land.</u></p> <p><u>Policies Map Revision - Strategic Site allocation for Land adjoining South West Keynsham and the revised detailed Green Belt boundary</u></p> <p><u>Policies Map Revision - Strategic Site allocation for Land at Whitchurch and the revised detailed Green Belt boundary</u></p>
AM3	SPC2 (FM2)	Index Policies	<p>B3 <u>Strategic Policy for Twerton and Newbridge Riverside</u> Strategic Policy</p> <p>Add the following:</p> <p><u>B3A Land adjoining Odd Down, Bath - Strategic Site Allocation</u></p> <p><u>B3C Extension to MoD Ensleigh</u></p> <p><u>KE3 Land adjoining East Keynsham - Strategic Site Allocation</u></p> <p><u>KE4 Land adjoining South West Keynsham - Strategic Site Allocation</u></p>

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	SPC3		<u>RA5 Land at Whitchurch - Strategic Site Allocation</u> <u>SD1 Presumption in favour of Sustainable Development</u> <u>CP8a Minerals</u>
AM4	SPC4 (FM3)	Index Diagrams	<i>Amend reference or new diagrams:</i> 6 The Central Area and Western Corridor <u>Enterprise Area</u> 8 The Central Area in 2026 <u>2029</u> 8a <u>Western Riverside</u> 18 Policy RA4 <u>Rural Villages</u> <u>District Heating Priority Areas (Keynsham)</u> <u>District Heating Priority Areas (Somer Valley)</u> 20 <u>Illustrative</u> Green Infrastructure Network 20a <u>General extent of the surface coal Mineral Safeguarding Area</u> 20b <u>Geographic two-way split for affordable housing (indicative)</u> 21 The Economy in 2026 <u>2029</u>
AM5		Index Tables	<i>Add the following:</i> 1A <u>Objectively assessed need for housing</u> 1B <u>Spatial Distribution of the housing requirement</u> 8A <u>Geographical Split for Affordable Housing</u>
AM6	SPC5	Para 1.03 (page 8)	<ul style="list-style-type: none"> Where we would like to be: The Spatial Vision and Strategic Objectives look forward to 2026 <u>2029</u>, setting out how we expect the district and its places to have changed and developed.
AM7	SPC6	Para 1.05 (page 8)	<p>The Core Strategy, <u>Part 1 of the Local Plan</u>, does not set out site-specific proposals; instead it looks at the broad locations for delivering new development. Policies in the Core Strategy do not overlap with each other and therefore the Core Strategy should be read as a whole. The Core Strategy is the primary document in the Local Development Framework (LDF). The LDF includes other documents, some of which are under preparation. Of note is tThe Placemaking Plan, <u>Part 2 of the Local Plan</u>, which will cover site allocations, detailed development management policies as well as local designations for the different places within the district, and the Joint Waste Core Strategy which is being prepared by the four West of England authorities</p>

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			and sets out a spatial strategy for dealing with waste including the allocation of sites. The LDF includes Details of other documents, some of which are under preparation <u>are set out in the Local Development Scheme.</u>	
AM8	-	Para 1.12 (page 8)	Demographic Change The total population of B&NES is expected to increase by 2026 <u>2029</u> due to increased life expectancy, natural increase and in-migration. We will have an ageing population (the number of over 80 year olds is....	
AM9	SPC7	Objective 3 (page 16)	The Council's Economic Development Strategy seeks to stimulate a more productive, competitive and diversified economy <ul style="list-style-type: none"> increasing the availability of modern office <u>and unit</u> space in Bath thereby enabling indigenous companies to expand and the city to better respond to external demand 	
AM10	SPC8 (RC1)	Objective 5 (page 17)	Amend first bullet point of objective 5 to read: <ul style="list-style-type: none"> enabling the delivery of new homes needed to respond to expected demographic and social changes and <u>as far as possible</u> to support the labour supply to meet our economic development objectives ensure that the development of new homes is aligned with the provision of <u>all</u> the necessary infrastructure 	
AM11	SPC9	Objective 6 (page 17)	Promoting and delivering <u>local employment, training and</u> regeneration opportunities that can contribute to a reduction in the health and social inequalities across the District.	
AM12	SPC10	Para 1.18 (page 18)	Proposals to abolish the Regional Spatial Strategy (RSS) <u>has necessitated a</u> have provided B&NES with the opportunity to move away from regionally imposed growth targets and the establishment of its own <u>growth requirements in accordance with the NPPF and in response to local circumstances .</u> Formulation of this <u>the</u> overarching policy framework for the District has entailed analysis of new <u>up-to-date</u> evidence, formulation of options to meet the objectives, engaging with local communities, testing these through the sustainability appraisal and assessing deliverability. Account has been taken of the District's functional relationship with neighbouring authorities. The process of developing a spatial strategy for B&NES has entailed the assessments set out below. Please note the evidence base supporting the Core Strategy is listed and is available on the Council's website at www.bathnes.gov.uk/corestrategy or on request.	
-	-	Table 1 Locational Strategy	Locational Policies	Core Strategy Policy
			<u>Paulton, Peasedown St. John</u>	<u>Policy SV1</u>
			<u>Paulton, Peasedown St. John, Timsbury, Camerton,</u>	Policy SV1, and RA1 or RA2

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		(page 20)	Hallatrow, High Littleton, Farrington Gurney
MM5	SPC12	Para 2.21	<p>Environmental capacity: The District is renowned for its outstanding environment. Bath is the only complete city in the UK which is inscribed as a World Heritage Site; the high quality of the landscape is recognised by the designation of two Areas of Outstanding Natural Beauty; there are over 50 Conservation Areas in the district and Bath has the highest concentration of Listed Buildings outside of Westminster. The District also enjoys a rich and diverse biodiversity resource, including many protected species and habitats and two <u>includes or is adjacent to a number of sites of European importance for bats and wetland birds. These European Sites are protected through the Habitat Regulations. In this context bats are a significant issue as the District supports important bat foraging areas, commuting routes and roots of importance to the integrity of up to 3 European Sites. For clarity, development likely to have a significant effect on a European site either alone or in combination with other plans or projects, and which cannot be adequately mitigated, would not be in accordance with the development plan.</u> The Council has assessed the impact of various policy proposals and alternative options on the Environment through the sustainability appraisal, the Habitats Regulation Assessment (HRA) and locational investigations.</p>
AM13	SPC34	Table 3 (page 24)	<p>Policy Framework and mechanisms for delivering the strategic objectives</p> <p><i>Replace all references to the Planning Policies Statements (PPSs) under the heading 'National Policy' in Table 3 with 'NPPF' (National Planning Policy Framework)</i></p>
AM14	SPC35	Para 2.01 (page 28)	<p>2a Setting the Agenda</p> <p>Historical Context</p> <p><i><u>"continuous development over two millennia" WHS Statement of Significance (2010)</u></i></p> <p>From its early history as a Celtic place of reverence and as a spa during Roman occupation, Bath evolved into a monastic settlement and subsequently a Norman cathedral town. During the Middle Ages it developed into a regional market and a centre of the woollen trade before becoming perhaps the most significant national health resort of Elizabethan and Stuart England. Thereafter rapid expansion in the Georgian period era created an enduring architectural legacy and made <u>saw Bath become the foremost fashionable resort of the 1700s, and created an enduring architectural legacy attracting increasing numbers of visitors.</u></p>
AM15	SPC36	Para 2.02 (page 28)	<p>For the next 150 years, the <u>The Victorian</u> city struggled to cope with its Georgian legacy. <u>At the beginning of Victoria's reign Bath was the 9th largest town in England with a population of nearly 50,000</u> The city experienced continued growth but relative decline, refining <u>Thereafter Bath lagged behind the national level of industrial urban expansion and instead Bath refined its image as a place of genteel residence and retirement. Many pinned their hopes of a social revival on the coming of Brunel's Great Western Railway in</u></p>

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			1841. However, but this did little to reignite the popularity of the city. though, together with the Midland Railway did Instead the railways served to crystallize an industrial zone strip of mills and foundries along the River Avon toward towards as far as Twerton. Bath remained one the great cities of England until 1851, with a population of over 50,000. Thereafter its rate of growth lagged behind the national level of urban expansion. A big effort was made † Towards the end of the Victorian period the Corporation sought to revive the city as a spa upon the rediscovery of its Roman origins. However, little came of efforts to revive <u>establish</u> Bath as a leading therapeutic centre.
AM16	SPC37	Para 2.03 (page 28)	The <u>pace of growth in Bath was slow during the early part of the 20th Century , a reflection of the depressed state of the national economy, but the aftermath of WWI resulted in a</u> can be characterized by economic depression alongside a great deal of inter war house building and a surge in the land coverage of the city. In the inter war period on the southern slopes part of the landscape bowl in which the city sits at Southdown and the Odd Down Plateau were colonised. Elsewhere, suburban development took place at Weston and Larkhall and such neighbourhoods were connected to the centre by the Bath Electric Tramway. After the Second World War Bath was caught up in the process of rapid socio-economic change that was at work in the country as a whole. Change within the city reflected many national trends, including the growth of private motoring, modernist reconstruction and the subsequent and popular rise of the conservation movement. In 1987, in recognition of its unique cultural value the city was inscribed as a World Heritage Site. This raised its international profile as a tourist destination and has sharpened debate about how Bath should change and develop <u>change and development should be managed</u> and what 'sustainability' means for the city and its future.
AM17	SPC38	Bath Strategic Issues 2 (page 29)	2. The conservation and enhancement of the World Heritage Site (WHS) and its setting and of the <u>Conservation Area</u> must be reconciled with contemporary socio-economic and environmental challenges, including climate change. Bath's WHS status and environmental quality is not an obstacle to economic growth - it is part of a strong 'brand', an incentive to and enabler of growth <u>prosperity</u> – however, it does require that contemporary change is managed sensitively and that high quality design is achieved.
AM18	SPC39	Bath Strategic Issues 7 (page 29)	7. There is a significant imbalance between the resident workforce and jobs <u>in the city</u> . The main place of employment for about 30% of the resident workforce is outside Bath and the city imports many workers from beyond its boundaries, <u>particularly from the market towns of West Wiltshire</u> .
AM19	SPC40 (FM4)	Bath Strategic Issue 12 (now 13)	42- <u>13</u> . The development of the University of Bath and Bath Spa University requires strategic policy direction in order to secure the future of each institution, and to ensure <u>ensure</u> that the student population does not continue to drive the student lettings market to the detriment of the normal private housing stock and existing

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		(page 29)	communities.
AM20	SPC41	Bath Strategic Issue 13 (now 14) (page 29)	43- 14. The Bath/Bradford-on-Avon Special Area of Conservation (SAC) is designated because of the presence of bats and their foraging areas. Bats are protected under European and UK legislation and care must be taken to ensure that the impact of change and development on bats is taken into account <u>avoid impacts to the integrity of the SAC.</u>
AM21	SPC42 (FM5)	Para 2.05 (page 30)	World Heritage, Regeneration, Enterprise and 'Place' In addition to enabling the delivery of the Sustainable Community Strategy, the Bath spatial strategy seeks to contribute to the actions proposed in the City of Bath World Heritage Site Management Plan (November 2010) that seek to protect the outstanding universal values value (OUVs) (OUV) of the site and its setting. The significance of the WHS is set out in the Statement of Outstanding Universal Value and can be summarised as derives from the city's Hot Springs, its Roman Archaeology; the Hot Springs; Georgian town planning; Georgian architecture; the green setting of the City in a hollow in the hills within a landscape bowl; and Georgian architecture reflecting 18th century social ambitions The Cotswolds AONB Management Plan is also important in this regard as Bath's townscape and landscape combine to form a total <u>special</u> composition of form and place town and country.
AM22	SPC43	Para 2.06 (page 30)	In 2006 the Council published 'The Future for Bath' which <u>in which it sought to</u> defines the essence of the city - its DNA. It articulates a suite of regenerative
AM23	SPC44	Para 2.07 (page 30)	The Bath spatial strategy has been prepared with <u>against the background of</u> this regeneration agenda in mind so that it contributes to the realisation of a distinctive and authentic development programme for the city. As an international cultural asset, well considered and high quality growth is a key principle guiding the overall level, type and design of new development. The strategy prioritises the creation of enduring developments, places and neighbourhoods over 'planning by numbers' in order to deliver relatively short term targets. It seeks to shape development that will be appreciated and used well into the future and <u>to</u> deflect ill-conceived proposals that might be rejected within a generation.
AM24	SPC45	Para 2.08 (page 31)	The Public Realm and Movement <u>Strategy</u> for the city centre has already Strategy responded to this agenda in order to shape investment in the city centre. It sets out a programme to reanimate the city centre by:
MM21 part	SPC46	Vision for Bath (page 32)	The Vision <i>What the spatial strategy is seeking to achieve,</i>

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			<p>Bath's natural, historic and cultural assets, which combine to create a unique sense of place of international significance, will be secured and enhanced to maintain the city's key competitive advantage and unique selling point as a high quality environment in which to reside, to live, locate and grow a business, visit and invest.</p> <p>The scope to further improve Bath's environmental quality will form the foundation of efforts to boost the city's profile as a more competitive and low carbon economic centre. The realisation of a range of development opportunities within the Central Area and Western Corridor Enterprise Area will greatly improve the city aesthetically and also enable Bath to position itself as a more entrepreneurial, innovative, creative and business friendly place. Economic development and productivity will therefore be stimulated and facilitated, whilst simultaneously upgrading inherited townscape.</p> <p><u>Where possible the built environment will evolve in a more energy and resource efficient manner and renewable and sustainable energy, appropriate to the Bath context will be introduced.</u> Alongside measures to mitigate and adapt to climate change <u>and to pursue a reduced carbon economy</u>, the diversification and growth of a low carbon economy are the key changes that are sought for Bath. The delivery of new housing <u>on brownfield sites is a vital component of the vision and will help to create a more sustainable relationship between the city's labour and job markets and support Bath's economic potential- whilst retaining the integrity of its landscape.</u></p>
-	-	Policy B1 Policies Map/Diagram	Amend the Policies Map to show boundaries of the Central area and Enterprise Area. Include a new Diagram to illustrate the Enterprise Area to reflect change to Policy B1 (MM23).
AM25	SPC58	Para 2.13 (page 37)	<p>The Core Strategy identifies strategic policy areas within the valley bottom of the River Avon. It sets out their roles, the scope and scale of change to be achieved and placemaking principles to shape change. The policy areas are:</p> <ul style="list-style-type: none"> • The Central Area (comprising the City Centre, South Quays and Western Riverside East) • Western Riverside, • Twerton Riverside and Newbridge Riverside (forming the Western Corridor).
AM26	SPC59	Para 2.14 (page 37)	The Core Strategy sets out a clear, firm and enduring vision of change for these areas upon which to base site specific delivery proposals.

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AM27	SPC60	Para 2.15 (page 37)	<p>To support the Core Strategy a Placemaking Plan will be prepared to set out a more detailed planning and design framework for specific sites within the Central Area, Western Corridor <u>the Enterprise Area</u> and elsewhere in the city. This will provide a vehicle for resolving possible contentious <u>planning</u> issues for key areas where the change is envisaged.</p> <p>The Placemaking Plan will:</p> <ul style="list-style-type: none"> • Establish the potential use of individual sites and set out sustainable design principles • Resolve conflicting objectives in areas subject to development pressures • Protect environmental assets particularly sensitive to change • Help to stimulate development and enable the delivery of planned growth and economic potential • Act as a focus and a catalyst for getting key agencies and landowners to work together
AM28	SPC73 (PC29)	Western Riverside (page 44)	<p><i>Amend final sentence as follows:</i></p> <p>In order to wholly <u>fully</u> deliver Bath Western Riverside, land remediation works to decommission and remove the Windsor Gas Holder Station will be needed.</p>
-	PC29	Western Riverside Policy Approach (page 45)	<p>The spatial strategy retains the planning principles that have been established for this area. Local Plan Policy GDS.1/B1 for Western Riverside continues to apply to the area shown in Diagram 6 and is saved as part of the Development Plan. For Riverside East, beyond the extent of the approved outline planning permission, <u>Policy GDS.1/B1 and the BWR SPD will apply alongside Policy B2 applies until CIL is adopted to supersede extant planning obligations guidance and the Placemaking Plan is adopted to supersede extant other guidance in the BWR SPD.</u></p>
MM28 part		Policy B2 (page 39)	<p>POLICY B2 Central Area Strategic Policy</p> <p>1. The Role of the Central Area</p> <p>Change within the Central Area should improve Bath's profile and performance as:</p> <ul style="list-style-type: none"> a: An important cultural asset for the world. b: One of the country's most desirable and beautiful places in which to live and work. c: A more dynamic place for business, enterprise, creativity and innovation. d: An attractive centre for shopping, leisure and recreation. e: A spa town that inspires, relaxes and entertains.

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	SPC65		<p>f: A visitor destination of international renown. g: A place that connects people to the natural environment. h: A place to, and in which people increasingly travel by walking, cycling or by using public transport.</p> <p>2. Placemaking Principles Change within the Central Area should reinforce and contribute to the City's unique character and identity.</p> <p>Assets of the Central Area The following characteristics combine to provide an exceptional urban environment. Development proposals must demonstrate that they have been inspired and shaped by these characteristics. <u>The Placemaking Plan will set out how the redevelopment of specific sites can respond to these characteristics:</u></p> <p>a: There are many areas of exemplary urban design where the relationship between buildings, streets and public spaces presents a high quality environment for people to enjoy. b: The urban landscape of streets, blocks and plots within the core of the city is of a fine and characteristic grain and contains a high proportion of listed buildings. c: There are extensive areas of high quality architecture where individual buildings (in terms of height, scale, massing and architectural treatment) combine to form a harmonious townscape ensemble. d: The limited palette of materials and the quality, detailing, skill of craftsmanship and authenticity of construction presents a coherent and high quality finish to the urban scene. e: Many buildings have a proven track record as being adaptable to a range of uses over time. f: There is a strong visual relationship between the built environment and its landscape setting providing many glimpses and views, out of, within and into the Central Area. g: The Central Area enjoys good proximity and connectivity to high quality urban parks and waterways for recreation. These also make walking and cycling to and from the Central Area an attractive option. h: The River Avon and its banks are of nature conservation value and provide <u>important bat foraging corridors and</u> opportunities to connect people to the natural environment. i: The compactness and continuity of the primary shopping area, high representation of independent, specialist and multiple retailers amongst high incidence of historic shop fronts are key strengths. j: The prevalence of active street frontages contributes to lively streets and public areas.</p>
	SPC66		

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	SPC66		<p>k: There are a wide range of uses and activities within a walkable distance from each other and the bus and rail stations.</p> <p>l: A series of public spaces allow for temporary uses such as festivals, markets and events which contribute to the cultural identity and local economy of the city. m The city centre maintains a 'lived in' feel due to the number of residences both within and adjoining the city centre.</p> <p>Risks to the Central Area</p> <p>The following issues are identified as key risks to enhancing the function and appearance of the Central Area. Development proposals must, where possible, address these issues:</p> <p>n: There are areas of poor quality post war development which have disrupted and fractured the urban grain. A number of these result in underutilised and poorly connected areas of riverside- <u>within or having a relationship with, the Central Area.</u></p> <p>o: There are areas where the river acts as a barrier to pedestrian and cycling desire lines <u>and further crossings would be beneficial in respect of enable sustainable transport choices and for the enjoyment of the city.</u></p> <p>p: The poor quality of much of the public realm has a negative impact on the experience of the city centre, the World Heritage Site and Bath's external image.</p> <p>q: The volume of traffic harms the environmental quality of a number of streets and spaces and impedes the movement of pedestrian and cyclists. It therefore acts as a barrier to the expansion of a walkable city centre.</p> <p>r: Whilst the incidence of independent and local retailers remains high compared to other centres, there has been a slow decline in their presence.</p> <p>s: There is limited capacity on the highway network to absorb increased motorised travel.</p> <p>t: Congestion reduces the reliability of public transport to and from the Central Area.</p> <p>u: Parts of the Central Area fall within flood zones 2 and 3a (See 'Infrastructure and Delivery') <u>and this affects a number of key development opportunities (see B1.3)</u></p> <p>v: A lack of flexible modern offices and other workspaces and an over reliance on Georgian office space impedes productivity, economic growth and diversification.</p> <p>w: The building stock of the Central Area is energy inefficient.</p>
MM31 part	CSA19 (SPC74)	Policy B3 (page 47)	<p>POLICY B3 Strategic Policy for Twerton and Newbridge Riversides</p> <p>2. Placemaking Principles</p>

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			<p>Assets of Newbridge and Twerton Riverside Development proposals must be informed and shaped by the following characteristics</p> <p>.....</p> <p>ð <u>b.</u> There are a number of heritage <u>and non-designated heritage</u> assets in the area pertaining to its industrial past, including Brunel's Great Western Railway <u>and the façade of the Bath Press</u>.</p> <p>e <u>c.</u> Views in and out of the area e.g. to Newbridge Hill and Bath City Farm are important.</p> <p>f <u>d.</u> The river including its banks and open land at the western section of the area are an important wildlife resource.</p> <p>g <u>e.</u> There is good, yet not fully realised connectivity with the city centre via the shared riverside walking and cycling route, which is narrow in places.</p> <p><u>f.</u> <u>The intensification of Twerton Riverside is an accessible location due to the proximity of Oldfield Park station</u></p> <p><i>Risks to Newbridge and Twerton Riverside</i></p> <p>The following issues are identified as key risks to the success of these areas that should be addressed in development proposals:</p> <p>a. An excessive loss of industrial space would harm Bath's mixed economic profile.</p> <p>b. Single storey and large footprint buildings result in the underutilisation of land with reasonably good accessibility credentials.</p> <p>c. <u>b.</u> There are areas of conflict between industrial activity and residential areas - particularly with regard to the movement of heavy goods vehicles in the Newbridge Riverside area.</p> <p>d. <u>c.</u> Much existing development has a poor relationship with the riverside. Pedestrian access is poor, crossing points are limited and open space is fragmented.</p> <p>e. <u>d.</u> There is a danger that redevelopment will fail to connect to the riverside and miss the opportunity to enhance its walking and cycling route.</p> <p>f. <u>e.</u> In places Twerton Riverside presents a poor frontage to the Lower Bristol Road, which is a key approach to the city centre.</p> <p>g. <u>f.</u> The Upper Bristol Road (A4) and Lower Bristol Road (A36), including the Windsor Bridge Road junctions become congested at peak times.</p> <p>h. <u>g.</u> Parts of this area are at risk from flooding.</p>

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-	-	Policy B3 Policies Map/Diagram	Amend the Policies Map to show boundaries of the Central area and Enterprise Area.. Include a new Diagram to illustrate the Enterprise Area to reflect change to Policy B3 (MM31).
AM29	SPC76	Para 2.19 (page 48)	While the Central Area and Western Corridor <u>Enterprise Area</u> is the headline delivery location for Bath, it is the outer neighbourhoods that make up the majority of the physical extent of the city and where the most people live.
MM34	SPC83	New Para 2.26B	<u>Bath City Football Club, who own Twerton Park football stadium has stated that site will be available for redevelopment during the Plan period. It intends to leave Twerton Park and sell it or facilitate a land swap elsewhere in B&NES on which it can build a new facility. The site will therefore be available for redevelopment as part of a residential/mixed-use scheme during the Plan period. The details of any such scheme can be determined through the Placemaking Plan. Any scheme should preferably benefit or at least not adversely affect the District centre at Twerton. The Council is endeavouring to assist the Football Club to identify a suitable alternative location and this can be progressed in the Placemaking Plan.</u>
AM30	SPC77	Para 2.20 (page 48)	The normal suburban workings of the city are important to the spatial strategy. During the 30 years before the First World War, Bath suburbs expanded.....
MM47	SPC92 (RC23, PC41)	Para 2.32 (page 52)	The setting of the WHS <u>World Heritage Site</u> , beyond its designated boundary, is important as inappropriate development here can <u>could</u> impact upon the Outstanding Universal Value of the site. The setting is the surroundings in which the World Heritage Site is experienced. It includes a range of elements such as views and historical, landscape and cultural relationships and has no fixed defined boundary. In relation to the protection of the setting, the <u>World Heritage Site Setting Study SPD provides the information needed to assess whether a proposed development falls within the setting, and whether it will have a harmful impact and to what extent. The Study is being taken forward as a Supplementary Planning Document. A formal buffer zone is not considered to be appropriate, as the assessment framework within the Setting Study presents a 'smarter' tool, offering the same degree of protection. The Green Belt, which closely surrounds the city, also plays an important role in protecting the setting of the WHS (see its purposes which are summarised in table 8). The general extent of the Green Belt is retained by the Core Strategy and its openness is protected from inappropriate development.</u>
MM48	SPC93 (PC42)	Policy B4 (page 53)	Policy B4 The World Heritage Site and its setting There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, including its authenticity or integrity. <u>This presumption applies equally to</u>

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			development within or to the setting of the World Heritage Site. Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against any <u>the level of harm</u> to the Outstanding Universal Value of the World Heritage Site.
AM31	SPC80	Para 2.24 (page 49)	The most characterful of the local centres have evolved from the centres of outlying villages that became absorbed during the 20th suburban century expansion of the city (e.g. Weston, Larkhall and Twerton) or are embedded within the Georgian city (e.g. Widcombe Parade). <u>Equally vibrant are Chelsea Road and Bear Flat situated within Victorian suburban development.</u> Elsewhere there are more modest post-war centres and standalone units (including supermarkets and petrol stations <u>associated convenience retail</u>) that contribute to the spatial coverage of local facilities. The network and extent of District and Local Centres is identified on the Proposals Map.
AM32	SPC81	Para 2.25 (page 49)	Moorland Road <u>district centre</u> and the local centres are shown on Diagram 10 and are listed in <u>Table 4.</u> Policy CP12. This policy sets out the strategic approach for managing change within and likely to
AM33	SPC82 (PC38)	Para 2.26A	The Council will support investment in the development of the hospital to meet the needs of health care infrastructure. The Council also acknowledges <u>observes</u> that part of the site may become surplus to the Trust's requirements and be available for other development <u>alternative uses</u> during the Core Strategy period.
AM34	SPC86	Para 2.30 (page 51)	Sustainable Transport Choices Improvements to transport infrastructure <u>pedestrian, cycling and public transport routes</u> will be made to enhance links between the neighbourhoods of Bath Oldfield Park Station, the city centre and western corridor <u>the Enterprise Area.</u> These improvements will have an emphasis on pedestrian, cycling and public transport facilities.
-		Policy B3A (Page 47)	2. Preparation of a comprehensive Masterplan , through public consultation, and to be agreed by the Council, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with neighbouring areas.
AM35	SPC91	Para 2.31 (page 52)	2e The World Heritage Site and its Setting The World Heritage Site status of the city is a key material consideration when making planning decisions. As a designated heritage asset of the highest significance there is a strong presumption in favour of the conservation of the Outstanding Universal Value of the World Heritage Site. The significance of the WHS is set out in the Statement of Outstanding Universal Value (OUV) (2010) and <u>is summarized in paragraph 2.05</u> can as be summarised: Roman Archaeology; the Hot Springs; Georgian town planning; Georgian architecture; the green setting of the City in a hollow in the hills; and Georgian architecture reflecting 18th

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			century social ambitions. The World Heritage Site Management Plan (2011-16) sets out the objectives and actions needed for the successful conservation and management of the Site. The Local Development Framework Plan has a key role in the implementation of the Management Plan.
AM36	SPC94 (PC45)	Paras 2.34 - 2.35 (page 53)	<p>2.34 To contribute to this process, a Building Heights Strategy for the area of Bath covered by the World Heritage Site designation has been prepared. The strategy provides area-based guidance on the appropriate height of new development to ensure the protection of the Outstanding Universal Values <u>Value (OUVs) (OUV)</u> of the Site.</p> <p>2.35 The overall purpose of the strategy is to provide a framework within which decisions can be made about the appropriate height of new buildings in Bath. It will be used <u>to inform the Placemaking Plan and will act as</u> a development management tool in the consideration of planning applications. The Strategy has been compiled in such a way that it can be used as the basis for a Supplementary Planning Document.</p>
AM37	SPC95 (PC46)	Para 2.38 (page 54)	The Council also understands that each institution needs to invest in its academic estate in order to continue to provide high standards. The approach of the ore Strategy is to enable the realisation of a better balance between the aspirations of each university, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting. The University of Bath's and Bath Spa University's work in preparing and consulting on estate and campus masterplans demonstrates the value of proceeding on a strategic basis and provides a framework for future development. <u>The Information Paper 3 on student numbers and accommodation</u> considers the issues in more detail, provides a full assessment of the evidence that has led to the following policy approach and its likely impact.
-	-	Policy B5 Policies Map/Diagram	Amend the Policies Map to show boundaries of the Central area and Enterprise Area. Include a new Diagram to illustrate the Enterprise Area to reflect change to Policy B5 (MM49).
AM38	SPC98	Para 2.39 (page 55)	It is anticipated that this policy will enable the delivery of new on-campus study bedrooms to 2020/21 at a rate which exceeds <u>broadly matches</u> the growth of the student population...
AM39	SPC99	Para 2.40 (page 55)	It is envisaged that this approach will could mean that 2040 <u>2012/13</u> levels of HMOs will represent the high watermark within the city. The Council has at its disposal the option of declaring an Article 4 direction in relation to Houses in Multiple Occupation (HMO) to manage the student lettings market in the south west part of the city and elsewhere. The council cannot apply HMO powers retrospectively.
MM50	SPC100	Para 2.41 (page 55)	Growth beyond 2020 will require additional on and off campus capacity to be identified. No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy

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			period. <u>However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will to consider such circumstances, on their merits, at the time they are presented.</u>
AM40	SPC101	Para 2.43 (page 56)	In order to successfully realise the development potential of the Central Area and Western Corridor <u>the Enterprise Area</u> , parallel enabling investment will be needed. Transportation and flooding and land remediation are three key areas requiring specific mention.
AM41	SPC104	Title (page 56)	Flood Risk Management for the Central Area and Western Corridor and <u>the Enterprise Area</u>
AM42	SPC108 (PC55)	Para 3.08 (page 61)	<p>The spatial strategy is also informed by the current Town Plan (now being refreshed), which aims to build on the towns positive characteristics and embrace the future, developing Keynsham into a thriving, sustainable and safe market town by:</p> <ul style="list-style-type: none"> • Enhancing the towns already considerable assets and unique identity • Promoting a sense of well-being and community for all, generating pride in the town • Ensuring all necessary services and infrastructure are maintained and enhanced • Regenerating the town centre <p>The Town Plan is currently being refreshed and will inform the Placemaking Plan. In 2012 the Town Plan was refreshed. Building on the bullet points above, the Plan incorporates the three priorities identified in the Sustainable Community Strategy which are:</p> <ul style="list-style-type: none"> • <u>Improving the Shopping Experience</u> • <u>Creating New Jobs</u> • <u>Improving the Park</u>
AM43	SPC109	Para 3.10 (page 61)	The emerging Joint Waste Core Strategy seeks to deliver, by 2020, diversion from landfill of at least 85% of municipal and commercial & industrial wastes through recycling, composting and residual waste treatment. A minimum of 50% of this total recovery target is intended to be achieved through recycling and composting, leaving 35% to be delivered through residual treatment capacity. To ensure delivery of the Spatial Strategy, a number of strategic sites have been identified as appropriate for development for the management of residual waste. The land at Broadmead Lane in Keynsham is identified as one of these strategic residual waste facilities sites. (Details can be found at www.westofengland.org/waste <u>http://www.westofengland.org/waste-planning</u>)
MM63	SPC116 (RC27)	Para 3.19(a) (page 68)	'English Heritage currently considers The historic characteristics of the town centre Conservation Area to be are currently undermined 'at risk' due to by unsympathetic post-war development, resulting in damage to the

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			historic grain and character, loss of traditional shop fronts and loss of small building frontages <u>and is therefore on the national Heritage at Risk Register.</u> Also at risk is the Dapps Hill Conservation Area, which is described on the Register as being in a poor condition and deteriorating.
-		Key to Concept Diagram for Land adjoining South West Keynsham	<i>Add notation for 'Additional Green Infrastructure' and 'Green Infrastructure Link' to the key to Concept Diagram for Land adjoining South West Keynsham</i>
MM70	-	Policies Map	<i>Amend the Policies Map to remove the Safeguarded Land at Whitchurch and Farmborough previously allocated in the Bath & North East Somerset Local Plan as both sites now have planning permission.</i>
AM44	SPC123	Para 3.23 (page 73)	<p>Delivery of the strategy and infrastructure required to support it will be facilitated by the planning framework summarised below:</p> <ul style="list-style-type: none"> • Planning Obligations Supplementary Planning Document (SPD) • Placemaking Plan • Community Infrastructure Levy • <u>Proposal by B&NES Council to r Redevelop the Town Hall / Centre site by B&NES Council.</u> • Keynsham Town Centre Regeneration Delivery Plan which will a basis for bids to national and sub-regional funds (for example the West of England Local Investment Plan <u>Revolving Infrastructure Fund</u>) that may become available to support development and enable the Council to maximise the potential of its physical assets.
AM45	SPC125	Para 4.04 (page 76)	Manufacturing industries including printing, binding and packaging continue to provide important local employment opportunities opportunities. Despite closures and relocations of some large scale manufacturing business, the area presents positive opportunities to increase economic competitiveness particularly with small and medium scale local business and highly skilled entrepreneurs.
-	-	Para 4.05 (page 76)	<u>For the purposes of the Core Strategy housing targets, the Somer Valley Area</u> includes Midsomer Norton, Westfield, Radstock, Peasedown St John, <u>and</u> Paulton, Shoscombe, Camerton, Timsbury, High Littleton and Farrington Gurney.
AM46	SPC133 (FM8)	Para 5.09 (page 93)	In the central part of the district, the extensive plateau from Hinton Blewitt <u>Blewett</u> to Newton St Loe includes the key villages of Clutton, Temple Cloud, High Littleton, Timsbury and Farmborough. The form of the

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			villages in this area tends to be either centred around a village core (such as Clutton) or in linear form (such as Temple Cloud). Edge of settlement development during the post war period lacked the well-integrated characteristic of the original villages and has had a significant impact on views.
AM47	SPC134 (RC28a)	Para 5.12 (page 93)	<p>Although rural Bath & North East Somerset is made up of a wide variety of settlements with locally distinctive character, there are a number of strategic issues (both challenges and opportunities) that are common across most of the rural area:</p> <ul style="list-style-type: none"> • Lack of affordable housing to meet local needs may impact on the social sustainability of the rural areas and exacerbate difficulties for an ageing population. • For much of the rural area poor access to public transport affects the functionality of the rural economy and leads to isolation for those without access to private transport. • Access to facilities, services and shops. • Reliance of the rural economy based on farming, the self employed and small businesses that require support to flourish. • <u>The urgent need to provide reliable broadband, with adequately fast access speed, to every home and business</u> • Potential opportunities to diversify the rural economy e.g. centred around local food production or renewable energy.
AM48	SPC142	Para 5.25 (page 96)	In villages washed over by the Green Belt with a housing development boundary as defined on the Proposals Map proposals for residential and employment development will be determined in accordance with national policy set out in PPG2 <u>the NPPF</u> .
AM49	FPC5 (duplicated PC76)	Para 5.29 (page 99)	<p>This policy will apply to all market housing developments across the District. Villages which meet the criteria of policy RA1 will benefit from this policy and sites will be allocated through the Placemaking Plan. Beyond this, local need for affordable housing across the rural areas will be primarily met through the rural exceptions policy. There may also be opportunities to convert rural buildings into affordable housing under the Government's emerging proposals for the 'home on the farm' scheme. <u>If there are rural buildings which are no longer required for local food production, there may also be opportunities to convert them to affordable housing under the Government's emerging proposals for the 'home on the farm' scheme.</u> Any development proposals coming forward under the Community Right to Build are to be considered separately from the rural exceptions policy.</p>

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AM50	SPC147 (RC36)	Para 5.43 (page 101)	Key transport infrastructure improvements that will support delivery of the strategy include the Greater Bristol Bus Network major scheme which will <u>has improved</u> two of the bus routes serving the rural areas.
-	-	Policy RA5	Preparation of a comprehensive Masterplan , through public consultation, <u>and to be agreed by the Council</u> , reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with the existing village and provides links to south Bristol.
AM51	FPC6	Para 5.49 (page 101)	Private developers will play an important role in bringing forward and developing small scale housing developments in the 'Policy RA1' villages and to the delivery of employment sites. Further assessment of the potential for development in Farmborough to help fund a sustainable transport link to local shopping facilities also needs to be undertaken through the Placemaking Plan.
AM52	SPC148 (RC37)	Para 6.01 (page 104)	The spatial strategies set out in the place based sections cover the different areas of the District. There are also a number of generic issues which need to be addressed through district-wide policies in order to implement the vision and spatial objectives. As well as providing the long term policy framework for the District, they will support the delivery of development and corporate actions, and they will guide the content of other policies in the Local Development Framework such as the Placemaking Plan. <u>After each of the core policies the main planning mechanisms by which the Council will seek to deliver the policy are set out. The delivery section is not part of the relevant core policy.</u>
AM53	SPC151	Para 6.03 (page 105)	Bath and North East Somerset's Sustainable Community Strategy (SCS) identifies climate change as the first of its six key themes. Climate change is also a cross cutting objective of the Core Strategy. In the context of national targets the SCS commits the Council to providing leadership for a reduction of the area's CO2 emissions by 45% by 2026 <u>2029</u> from 1990 levels.
AM54	SPC153 (RC39)	Delivery section related to Policy CP1 (page 106)	<p>Delivery</p> <p><i>1 Retrofitting will be encouraged through a range of mechanisms under the influence of the Council and its partners, including via Planning Services, information and advice services, community enabling and support projects and Housing Services</i></p> <p><i>2 This policy will provide a basis for Development Management and should <u>will</u> be supported by more detailed supplementary policy <u>the Sustainable Construction & Retrofitting Supplementary Planning Document</u>. The Sustainable Construction Checklist will be updated to include a section on sustainable refurbishment to raise awareness of the measures recommended in retrofitting existing buildings</i></p> <p><i>3 Specific opportunities and principles that should be considered at the masterplanning stage will be identified in the Placemaking Plan and potentially in the site specific SPD where existing buildings are present.</i></p>

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	SPC154 (RC40)		<i>4 Signposting of retrofitting information including Government financial initiatives and schemes, public awareness and demonstration events can <u>will</u> also be provided by the Council.</i>
-	-	Para 6.21 (page 109)	It is possible to vary the energy source to fuel district heating depending on cost and availability so the energy source can be changed over time; potential fuel sources include conventional fuels, biomass, and waste and other renewables. The emerging West of England Joint Waste Core Strategy provides a policy framework for energy recovery from waste.
AM55	SPC156	Policy CP3 (page 108)	<i>Amend first para as follows:</i> Development should contribute to achieving the following minimum level of Renewable Electricity and Heat generation by 2026 <u>2029</u> .
-	-	Para 6.25 (page 112)	The dominant flood risk affecting the district is flooding from <u>Main R</u> ivers. The principal rivers being the Lower Avon, River Chew, Cam Brook and Wellow Brook. The district also contains areas that are prone to flooding from a range of other <u>local</u> sources including sewers , <u>ordinary watercourses</u> , land <u>surface water</u> , and groundwater, as well as risks from artificial sources such as <u>sewers, canals and reservoirs</u> . Climate change impacts may increase the severity and frequency of storms and therefore <u>contribute to more frequent flooding</u> . Flooding from rivers, sewers and surface water is therefore likely to increase throughout the district in the future.
AM56	SPC159	Para 6.26 (page 112)	PPS25 <u>The NPPF</u> requires that new development is located in sustainable locations, at the least risk of flooding, taking into account vulnerability to flooding.
AM57	SPC160 (FM10)	Para 6.27 (page 112)	PPS25 <u>The NPPF and its associated Practice Guide</u> Technical Guidance provides the national requirements in terms of the Sequential and Exception Test, the need for planning applications to be supported by a Flood Risk Assessment, and the priority given to utilising sustainable drainage techniques in new development. The Council has published Strategic Flood Risk Assessments (SFRAs), providing detailed information on all sources of flooding across the district. Furthermore a subsequent Flood Risk Management Strategy (July <u>FRMS June</u> 2010) tested various flood risk management options for the district and provided recommendations in terms of both on-site and strategic flood risk management solutions. <u>The FRMS will be reviewed as new evidence become available.</u> The requirements and guidance offered in these documents should be followed applying flood risk policy principles, deciding on appropriate mitigation, and managing surface water by applicants when considering new development across the district.
AM58	-	Para 6.28 (page 112)	The Core Strategy sets out the broad locations for new housing, employment and other strategic development in Bath, Keynsham, Midsomer Norton and Radstock (Policies B1, B2, B3, B4, KM1, KM2, <u>KE1, KE2</u> , SV1,

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			SV2 and SV3). In some instances, development in flood risk areas has been unavoidable.
AM59	SPC162	Para 6.28b (page 112)	A sequential risk based approach was taken to formulate these policies and the high level Sequential / Exception Test report was prepared and agreed in partnership with the Environment Agency. However, flood risk should be taken into account at all stages in the planning process and the sequential approach should still be taken within these policy areas to minimise risk by directing the most vulnerable development to areas of lowest flood risk, matching vulnerability of land use to flood risk at a site level. (Table D-1 Flood zones and D-2 Flood Risk Vulnerability Classification of <u>the Technical Guidance to the PPS25 NPPF</u>) Therefore site specific Sequential/Exception Test reports should be undertaken when determining future site allocations in the Placemaking Plan or a planning application where necessary.
AM60	SPC163	Para 6.29 (page 112)	New developments can also increase pressure on sewer systems and urban drainage. It is therefore important to manage the impact of developments in a sustainable manner. <u>PPS25 The NPPF and its associated Technical Guidance</u> provides an opportunity for all those with responsibility for the drainage of new development to contribute to managing flood risk, improving amenity and biodiversity, and improving water quality. As a minimum the negative impacts of development on surface water runoff should be mitigated.
AM61	SPC164	Para 6.30 (page 112)	In addition to the concerns over flood risk, there is increasing pressure for efficient and sustainable use of water resources. This can be helped by incorporating Sustainable Urban Drainage Systems (SuDS) and grey water reuse systems into new developments (as per <u>PPS25 the NPPF</u> and the Building Regulations, Part H).
-	-	Para 6.31 (page 112)	SuDS aim to control surface water runoff as close to its origin as possible, before it is discharged to a watercourse or sewer. This involves moving away from traditional piped drainage systems towards softer engineering solutions which seek <u>aiming</u> to mimic natural drainage regimes. SuDS have many benefits such as reducing flood risk, improving water quality, encouraging groundwater recharge and providing amenity and wildlife benefits.
-	-	Para 6.32 (page 112)	Under the Flood and Water Management Act 2010 the Council will be <u>is</u> established as the a <u>a</u> Lead Local Flood Authority, going forward this will require the <u>and is currently developing</u> ment and implementation of <u>Local Flood Risk Management Strategy</u> . The Council will also be established as the SuDS Approving Body (<u>SAB</u>) with responsibility for the approval, adoption and maintenance of SuDS systems. In order to be approved, the proposed drainage system should meet <u>will have to be designed and constructed in accordance with the new</u> national standards for sustainable drainage <u>and WoE Regional and local guidance</u> . Where both planning permission and SuDS approval are required, the <u>application</u> processes will <u>run in</u>

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			parallel together. <u>No construction works can start on site until drainage approval is granted by SAB.</u>
AM62	SPC165 (NPPF3)	Policy CP5 (page 113)	<p>Policy CP5 Flood Risk Management</p> <p>Development in the district will follow a sequential approach to flood risk management, avoiding inappropriate development in areas at risk of flooding and</p> <p>Bath and North East Somerset Draft Core Strategy with Proposed Minor and Significant Changes incorporate directing development away from areas at highest risk in line with Government policy (<u>NPPF PPS25</u>). Any development in areas at risk of flooding will be expected to be <u>made</u> safe throughout its lifetime, by incorporating mitigation measures, which may take the form of on-site flood defence works and / or a contribution towards or a commitment to undertake such off-site measures as may be necessary. All development will be expected to incorporate sustainable drainage systems to reduce surface water run-off and minimise its contribution to flood risks elsewhere. All development should be informed by the information and recommendations of the B&NES Strategic Flood Risk Assessments and Flood Risk Management Strategy.</p>
AM63	-	Para 6.34 (page 114)	The benefit of high quality design is fundamental to the creation of high quality places by both enhancing appearance and functionality. It is the means by which corporate priorities such as an improved public realm and better quality housing can be delivered. Government guidance in PPS1 and its supplement, and PPS3 <u>the NPPF</u> , as well as best practice including the Manual for Streets, By Design, the Lifetime Homes Standard and CABI's Building for Life <u>12</u> (BfL) programme provide guidance on the approaches to be taken as well as providing advice on the assessment of schemes.
AM64	FPC8	Para 6.37 (page 114)	All development schemes with a residential component <u>Housing schemes will be assessed using the expected to demonstrate how they have been designed to meet Building for Life 12 methodology standards (or equivalent, as identified by the Council, should these be superseded within the strategy period). The Council will expect proposals to achieve as a minimum, a 'good' standard as defined by BfL or an equivalent future standard.</u>
AM65	SPC166	Para 6.42 (page 116)	National policies in PPS5 the NPPF <u>the NPPF</u> complemented by Core Strategy Policy CP6 together with more detailed saved policies in the Local Plan will provide the context for considering development proposals.
AM66	SPC170	Para 6.55 (page 118)	Green Infrastructure (GI) is a 'network of multi-functional green space, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable <u>is capable of delivering a wide range of environmental and quality of life benefits for local communities'</u> (PPS12 <u>NPPF</u>). The wider benefits of GI for B&NES will be set out in the Council's Green

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			Infrastructure Strategy (see below).
AM67	FPC12	Para 6.67 (page 121)	Historically Bath & North East Somerset has never made any significant contribution to regional aggregates supply and because of the scale and nature of the mineral operations in the District and the geology of the area it is considered that this situation will continue. Bristol is also in no position to make a contribution to regional aggregates supply, other than the provision of wharf facilities. However North Somerset and South Gloucestershire have extensive permitted reserves of aggregates and have historically always met the sub regional apportionment for the West of England. The approach to this is set out in Policy 26 of the Joint Replacement Structure Plan. <u>This approach is consistent with national planning policy advice for minerals.</u>
AM68	FPC13	Para 6.68 (page 121)	The emerging West of England Joint Waste Core Strategy (JWCS) seeks to encourage the prudent use of resources with specific reference to minerals and includes policy guidance on the recycling, storage and transfer of construction, demolition and excavation waste at mineral sites.
-	-	Para 6.70 (page 121)	The JWCS Development Plan Document (<u>March 2011</u>) will set <u>sets</u> out the planning strategy for the provision of waste management infrastructure within the West of England. The Strategy is being prepared by the four West of England unitary authorities of B&NES, Bristol, North Somerset and South Gloucestershire Councils.
AM69	SPC175 (RC48)	Para 6.69 footnote (page 121)	'A guide to minerals safeguarding in England', BGS (2007) <u>'BGS/Coal Authority Guide to Minerals Safeguarding in England 2011'</u>
AM70	FPC16	Policy CP8a Delivery (page 121)	Delivery: Delivery will be through the Development Management process. Minerals Safeguarding Areas will be identified in the Placemaking Plan <u>a separate Development Plan Document</u> where and other current designations and allocations will be reviewed to ensure adequate resources are safeguarded.
AM71	SPC176	Para 6.71 (page 121)	The JWCS applies to all waste, with the exception of radioactive waste, which is dealt with at a national level and sets out the authorities' aspirations for all levels of waste management until 2026 <u>2029</u> : prevention; recycling; recovery; and disposal. When adopted, the JWCS policies will supersede the Local Plan waste policies. Details can be found at www.westofengland.org/waste/planning
AM72	SPC181	Para 6.78 (page 122)	To understand the capacity of private development to deliver affordable housing the council has commissioned a viability study. The B&NES Viability Study (Three Dragons, July 2010) and the B&NES Viability Update (Dec 2012) <u>have</u> has taken account of market prospects and a range of cost implications including other Section 106 obligations in order to create a baseline level of affordable housing that will be viable in the majority of schemes without recourse for public subsidy.

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MM124	SPC189	Policy CP9 Delivery (page 123)	<p>Affordable housing will be delivered in accordance with the Council's Housing Strategy or equivalent.</p> <p>The quantity, tenure balance and type/size mix of the affordable housing will be agreed with the Council's Affordable Housing Development <u>Enabling</u> Team, or equivalent, through the development management process. Applicants are recommended to hold early conversations with Affordable Housing Development <u>Enabling</u> Team in order to agree the affordable housing provision and in particular the likely availability of public subsidy.</p> <p>In exceptional circumstances.....</p>
AM73	SPC192 (FPC18)	Para 6.81 (page 124)	<p>Gypsies, Travellers & Travelling Showpeople</p> <p>Local Development Frameworks <u>Plans</u> must consider the accommodation needs of Gypsies, Travellers and Travelling Showpeople. There is currently a national and local shortage of authorised sites for these communities. Taking steps to address this will help to improve access to services for Gypsies, Travellers and Travelling Showpeople (including health care, schools and shops) and also help to reduce conflicts that can arise from the setting up of unauthorised camps.</p>
AM74	SPC193 (FPC19)	Para 6.81a (page 124)	<p>Gypsies, Travellers and Travelling Showpeople are not one single group and their differing cultural needs relating to residential homes <u>the provision of permanent pitches</u> and stopping places must be considered. There are currently no permanent authorised Gypsy and Traveller sites within the District.</p>
AM75	SPC199	Para 6.87 (page 126)	<p><i>Amend first sentence of para 6.87 as follows:</i></p> <p>By 2026 <u>2029</u>, the District will have a more environmentally sustainable economy with increased local employment, less overall commuting, a reduction in the contribution made by commerce and industry to the carbon footprint of the area, and a strong low carbon business sector.</p>
MM132	SPC200	Delivery (page 126)	<p>Sites will be identified and allocated in the Placemaking Plan to meet the identified employment space requirements. Delivery of economic development will also be facilitated by the B&NES Economic Strategy, the Regeneration Delivery Plans and the Development Management process. Working alongside local communities and partners will be essential to deliver the ambitions of the Economic Strategy <u>and developers may be asked to support the objectives of the Strategy through a Targeted Recruitment, Training and Supply-chain Protocol.</u></p>
AM76	SPC201	CP12 Delivery section	<p>The place-based sections for Bath, Keynsham, Midsomer Norton and Radstock will set out more detail on the approach to the centres contained in those settlements.</p>

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	(NPPF4)	(page 128)	<p>The boundaries for all of the centres listed within the hierarchy are defined on the Proposals Map. Other than the Bath city centre boundary these boundaries reflect those established in the Bath & North East Somerset Local Plan. The Placemaking Plan will review these boundaries and identify sites for development. It will also review and define, where appropriate, the primary shopping areas and retail frontages in the larger centres. These designations will be supported by development management policies in the Placemaking Plan to guide decisions on individual planning applications.</p> <p>An updated retail study will be undertaken during 2010/11 to support future planning decisions and guide the Placemaking Plan.</p> <p>PPS4 'Planning for Sustainable Economic Development' contains national planning policies towards development in town centres and for economic development in general which are a material consideration and will inform decisions on specific proposals. Main town centre uses will be subject to the sequential and impact tests set out in the NPPF.</p>						
AM77	SPC202	Para 6.101 (page 129)	The reduction of the adverse effects of transport on climate change and air quality, particularly in Air Quality Management Areas (AQMA) in Bath and Keynsham and in future AQMAs, will be managed in accordance with PPS1 and PPS23 <u>the NPPF</u> .						
AM78	FPC23	Para 7.04 (page 134)	<u>Progress against many objectives/policies can be measured quantitatively and this is reflected in the targets set out in the framework below. Where appropriate the target is set out in a way that will help to inform review of the Core Strategy in accordance with the programme set out in Para 7.05 below. However, others objectives/policies do not lend themselves to this quantification and where appropriate a qualitative target is included in order to enable performance is to be measured in a different way.</u> Monitoring performance against the indicators set out is principally undertaken through the Annual Monitoring Report (AMR). The AMR is published in December each year and in addition to setting out monitoring information includes analysis of whether and how the policies are being delivered. In so doing it will inform the process of Core Strategy policy review and provides evidence to inform formulation of policies in other Local Development Documents.						
AM79	SPC212	Appendix 1 (page 139)	<p>Amend Appendix 1 (Replaced Local Plan policies) by adding policy HG.1 as follows:</p> <table><tr><th>B&NES Local Plan Policy</th><th>Topic</th><th>Replaced by Core Strategy Policy</th></tr><tr><td><u>ET.1</u></td><td><u>Employment Plan Overview</u></td><td><u>DW1 District Wide Spatial Strategy</u> <u>B1 Bath Spatial Strategy</u> <u>KE1 Keynsham Spatial Strategy</u> <u>SV1 Somer Valley Spatial Strategy</u></td></tr></table>	B&NES Local Plan Policy	Topic	Replaced by Core Strategy Policy	<u>ET.1</u>	<u>Employment Plan Overview</u>	<u>DW1 District Wide Spatial Strategy</u> <u>B1 Bath Spatial Strategy</u> <u>KE1 Keynsham Spatial Strategy</u> <u>SV1 Somer Valley Spatial Strategy</u>
B&NES Local Plan Policy	Topic	Replaced by Core Strategy Policy							
<u>ET.1</u>	<u>Employment Plan Overview</u>	<u>DW1 District Wide Spatial Strategy</u> <u>B1 Bath Spatial Strategy</u> <u>KE1 Keynsham Spatial Strategy</u> <u>SV1 Somer Valley Spatial Strategy</u>							

Add Mod	Origin of the change	Plan Ref/ Page in Draft Core Strategy	Proposed Change						
AM80	SPC213 (FM11)	Appendix 1 & 2 (pages 139/140)	<div>Amend Appendix 1 (Replaced Local Plan policies) by adding policy HG.1 as follows:</div> <table><tr><td>B&NES Local Plan Policy</td><td></td><td>Replaced by Core Strategy Policy</td></tr><tr><td><u>ES.1</u></td><td><u>Renewable energy proposals</u></td><td><u>CP3 Renewable Energy</u></td></tr></table> <div>Delete policy ES.1 from Appendix 2 (Saved Local Plan Policies): ES.1 Renewable energy proposals</div>	B&NES Local Plan Policy		Replaced by Core Strategy Policy	<u>ES.1</u>	<u>Renewable energy proposals</u>	<u>CP3 Renewable Energy</u>
B&NES Local Plan Policy		Replaced by Core Strategy Policy							
<u>ES.1</u>	<u>Renewable energy proposals</u>	<u>CP3 Renewable Energy</u>							
AM81	SPC214 (FM12)	Appendix 1 & 2 (pages 139/140)	<div>Amend Appendix 1 (Replaced Local Plan policies) by adding policy HG.1 as follows:</div> <table><tr><td>B&NES Local Plan Policy</td><td>Topic</td><td>Replaced by Core Strategy Policy</td></tr><tr><td><u>HG.1</u></td><td><u>Overall housing requirement and mix</u></td><td><u>DW1 District Wide Spatial Strategy</u> <u>CP10 Housing Mix</u></td></tr></table> <div>Delete policy HG.1 from Appendix 2 (Saved Local Plan Policies): HG.1 Meeting the District housing requirement</div>	B&NES Local Plan Policy	Topic	Replaced by Core Strategy Policy	<u>HG.1</u>	<u>Overall housing requirement and mix</u>	<u>DW1 District Wide Spatial Strategy</u> <u>CP10 Housing Mix</u>
B&NES Local Plan Policy	Topic	Replaced by Core Strategy Policy							
<u>HG.1</u>	<u>Overall housing requirement and mix</u>	<u>DW1 District Wide Spatial Strategy</u> <u>CP10 Housing Mix</u>							
AM82	SPC215	Appendix 2 (page 140)	<div>Delete policy ET.1 from Appendix 2 (Saved Local Plan Policies): ET.1 Employment Land Overview</div>						
-	-	Appendix 1 & 2 (pages 139/140)	<div>Amend entry for Policy H.4 in Appendix 1 (Replaced Local Plan policies) as follows for the purposes of clarity:</div> <table><tr><td>B&NES Local Plan Policy</td><td>Topic</td><td>Replaced by Core Strategy Policy</td></tr><tr><td>HG.4*</td><td>Residential development in Bath, Keynsham, Norton Radstock and R.1 and R.2 settlements</td><td>B1 Bath Spatial Strategy KE1 Keynsham Spatial Strategy SV1 Somer Valley Spatial Strategy *excluding Midsomer Norton, Radstock, Westfield, Peasedown St. John and Paulton for which Policy HG.4 still applies RA1 Development in the Villages Meeting the Listed Criteria RA2 Development in Villages Outside the Green Belt not Meeting Policy RA1 Criteria</td></tr></table> <div>Reintroduce HG.4 as follows: HG.4 Residential Development in the urban areas - this applies to Midsomer Norton, Radstock, Westfield,</div>	B&NES Local Plan Policy	Topic	Replaced by Core Strategy Policy	HG.4*	Residential development in Bath, Keynsham, Norton Radstock and R.1 and R.2 settlements	B1 Bath Spatial Strategy KE1 Keynsham Spatial Strategy SV1 Somer Valley Spatial Strategy *excluding Midsomer Norton, Radstock, Westfield, Peasedown St. John and Paulton for which Policy HG.4 still applies RA1 Development in the Villages Meeting the Listed Criteria RA2 Development in Villages Outside the Green Belt not Meeting Policy RA1 Criteria
B&NES Local Plan Policy	Topic	Replaced by Core Strategy Policy							
HG.4*	Residential development in Bath, Keynsham, Norton Radstock and R.1 and R.2 settlements	B1 Bath Spatial Strategy KE1 Keynsham Spatial Strategy SV1 Somer Valley Spatial Strategy *excluding Midsomer Norton, Radstock, Westfield, Peasedown St. John and Paulton for which Policy HG.4 still applies RA1 Development in the Villages Meeting the Listed Criteria RA2 Development in Villages Outside the Green Belt not Meeting Policy RA1 Criteria							

Add Mod	Origin of the change	Plan Ref/ Page in Draft Core Strategy	Proposed Change
			<u>Peasedown St. John and Paulton only (see Appendix 1)</u>
AM83	-	Appendix 2 (page 141)	Re-introduce the following saved policy to Appendix 2 (Saved Local Plan Policies) which was omitted in error: <u>Site B12 Lower Bristol Road</u>
AM84	SPC216 (FM13)	Appendix 2 (pages 140-142)	Delete following policies from Appendix 2 (Saved Local Plan Policies) and list as superseded by the adopted Joint Waste Core Strategy in March 2011 at the end of Appendix 2: <u>WM.1 (Development of waste management facilities)</u> <u>WM.3 (Waste reduction and the reuse in development proposals)</u> <u>WM.5 (Waste transfer stations and material recovery facilities)</u> <u>WM.6 (Recovery of materials from waste brought to landfill)</u> <u>WM.7 (Household waste recycling centres)</u> <u>WM.8 (Composting facilities)</u> <u>WM.10 (Thermal treatment with energy recovery)</u> <u>WM.12 (Landfill)</u> <u>WM.13 (Landraising)</u> <u>WM.14 (Agricultural land improvement schemes)</u> <u>WM.15 (Time extensions for landfill, landscaping or agricultural land improvement schemes)</u>
AM85	SPC217 SPC218	Glossary (pages 143-146)	<u>Allowable Solutions</u> <u>To comply with the 2016 Building Regulations new zero carbon homes will need to account for the carbon emissions that are not expected to be achieved on site. This can be achieved through 'Allowable Solutions' where the developer will make a payment to an Allowable Solutions provider, who will take the responsibility and liability for ensuring that Allowable Solutions, which may be small, medium or large scale carbon-saving projects, deliver the required emissions reductions. Some local authority areas have Allowable Solutions policies attached to local energy requirements, which is an approach being considered by Bath and North East Somerset Council.</u> <u>National Planning Policy Framework (NPPF)</u> <u>Document which set out the government's planning policies for England and how they are expected to be applied</u> <u>Planning Policy Guidance (PPG)</u>

Add Mod	Origin of the change	Plan Ref/ Page in Draft Core Strategy	Proposed Change
	SPC219		<p>Guidance documents which set out national planning policy. These are gradually being replaced by Planning Policy Statements.</p> <p>Planning Policy Statements (PPS)</p> <p>Documents which set out national planning policy. These are gradually replacing Planning Policy Guidance.</p> <p>Priority Species</p> <p><u>Priority species are those which are rare, threatened or declining in distribution and/or number.</u></p> <p>Proposals Policies Map</p> <p>Proposals <u>The Policies Map (formerly the Proposals Map) illustrates.....</u></p> <p>Regional Spatial Strategy (RSS)</p> <p>Sets out the region's policies in relation to the development and use of land and forms part of the development plan for local planning authorities. The government has announced its intention to abolish RSS through the Localism Bill.</p> <p>Safeguarded Land</p> <p><u>A greenfield site not allocated for development but excluded from the Green Belt to provide for development needs beyond the Plan period.</u></p>
	SPC220		<p>Sequential Test (PPS25 'Development and Flood Risk')</p> <p>PPS25 'Development and Flood Risk' <u>The NPPF advocates that planners use a sequential test when considering land allocations for development to avoid flood risk where possible. The risk of flooding to the site should be assessed and the land should be classified into the appropriate flood zone (Table D.1 of PPS25-1 Flood zones and 2 Flood Risk Vulnerability Classification of the Technical Guidance to the NPPF).</u></p> <p>Strategic Flood Risk Assessment (SFRA)</p> <p>The SFRA is a high-level assessment of the flood risk and provides essential information for the allocation of land for development and the control of development in order to limit flood risk to people and property where possible and manage it elsewhere. It provides the information needed to apply the sequential risk-based approach required in Planning Policy Statement 25 'Development and Flood Risk' the NPPF.</p>