

Democratic Services

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Date: 22 February 2013

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To: All Members of the Council

Chief Executive and other appropriate officers
Press and Public

Dear Member

Council: Monday, 4th March, 2013

You are invited to attend a meeting of the **Council** to be held on **Monday, 4th March, 2013** at **6.30 pm** in the **Ball Room - Assembly Rooms**.

PLEASE NOTE THE VENUE!

The agenda is set out overleaf.

Tea and coffee will be available for Councillors before the meeting.

Yours sincerely



Jo Morrison
Democratic Services Manager
for Chief Executive

We will contact you in due course regarding arrangements for pre-meetings at the Assembly rooms.

If you need to access this agenda or any of the supporting reports in an alternative accessible format please contact Democratic Services or the relevant report author whose details are listed at the end of each report.

This Agenda and all accompanying reports are printed on recycled paper

NOTES:

1. **Inspection of Papers:** Any person wishing to inspect minutes, reports, or a list of the background papers relating to any item on this Agenda should contact Jo Morrison who is available by telephoning Bath 01225 394358.
2. **Details of decisions taken at this meeting** can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above. Papers are available for inspection as follows:

Public Access points – Guildhall – Bath, Riverside – Keynsham, Hollies – Midsomer Norton, and Bath Central, Keynsham and Midsomer Norton Public Libraries.

For Councillors and officers, papers may be inspected via Political Group Research Assistants and Group Rooms/Members' Libraries.
3. **Spokespersons:** The Political Group Spokespersons for the Council are the Group Leaders, who are Councillors Paul Crossley (Liberal Democrat Group), Francine Haerberling (Conservative Group), John Bull (Labour Group) and Doug Deacon (Independent Group).
4. **Attendance Register:** Members should sign the Register, which will be circulated at the meeting.
5. **Public Speaking at Meetings:** The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition or a deputation on behalf of a group. They may also ask a question to which a written answer will be given. **Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Thursdays notice must be received in Democratic Services by 5.00pm the previous Monday.** Further details of the scheme can be obtained by contacting Jo Morrison as above.
6. THE APPENDED SUPPORTING DOCUMENTS ARE IDENTIFIED BY AGENDA ITEM NUMBER.
7. **Emergency Evacuation Procedure**

When the continuous alarm sounds, you must evacuate the building by one of the designated exits and proceed to the named assembly point. The designated exits are sign-posted.

Arrangements are in place for the safe evacuation of disabled people.
8. **Presentation of reports:** Officers of the Council will not normally introduce their reports unless requested by the meeting to do so. Officers may need to advise the meeting of new information arising since the agenda was sent out.

A G E N D A

1. EMERGENCY EVACUATION PROCEDURE

The Chairman will draw attention to the emergency evacuation procedure as set out under Note 7.

2. APOLOGIES FOR ABSENCE

3. DECLARATIONS OF INTEREST

At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to complete the green interest forms circulated to groups in their pre-meetings (which will be announced at the Council Meeting) to indicate:

(a) The agenda item number in which they have an interest to declare.

(b) The nature of their interest.

(c) Whether their interest is **a disclosable pecuniary interest** *or* an **other interest**, (as defined in Part 2, A and B of the Code of Conduct and Rules for Registration of Interests)

Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer before the meeting to expedite dealing with the item during the meeting.

4. MINUTES - 19TH NOVEMBER 2013 (Pages 5 - 14)

To be confirmed as a correct record and signed by the Chair(man)

5. ANNOUNCEMENTS FROM THE CHAIRMAN OF THE COUNCIL OR FROM THE CHIEF EXECUTIVE

These are matters of information for Members of the Council. No decisions will be required arising from the announcements.

6. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIRMAN

If there is any urgent business arising since the formal agenda was published, the Chairman will announce this and give reasons why he has agreed to consider it at this meeting. In making his decision, the Chairman will, where practicable, have consulted with the Leaders of the Political Groups. Any documentation on urgent business will be circulated at the meeting, if not made available previously.

7. QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM THE PUBLIC

The Democratic Services Manager will announce any submissions received under the arrangements set out in note 5 above. The Council will be invited to decide what action it wishes to take, if any, on the matters raised in these submissions. As the questions

received and the answers given will be circulated in written form there is no requirement for them to be read out at the meeting. The questions and answers will be published with the draft minutes.

8. REFERRAL FROM STANDARDS COMMITTEE

At a hearing on 17th January 2013, the Standards Committee considered a complaint concerning Councillor X. The Committee resolved;

With regard to the issue of the house which is owned by a relative of Councillor X, the Committee found that Councillor X had failed to comply with the Code of Conduct. At the Development Control Committee on 26th September 2012, at which a planning application for development on land adjacent to the house was considered, Councillor X should have declared a non-disclosable pecuniary or other interest in the light of his family connection and should not have spoken or voted on the application.

The Committee therefore recommends to Council that Councillor X be censured.

Council is asked to CONSIDER the Committee's recommendation.

[Councillor X will be identified at the meeting].

9. CHANGES TO THE B&NES CORE STRATEGY (Pages 15 - 206)

This report sets out the changes to the Bath & North East Somerset Core Strategy needed to address the examination Inspector's concerns raised following the hearings which were held in January 2012.

10. QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM COUNCILLORS

The Democratic Services Manager will announce any submissions received. The Council will be invited to decide what action it wishes to take, if any, on the matters raised in these submissions. As the questions received and the answers given will be circulated in written form there is no requirement for them to be read out at the meeting. The questions and answers will be published with the draft minutes.

The Committee Administrator for this meeting is Jo Morrison who can be contacted on 01225 394358.

BATH AND NORTH EAST SOMERSET COUNCIL

MINUTES OF COUNCIL MEETING

Tuesday, 19th February, 2013

Present:- **Councillors** Simon Allen, Patrick Anketell-Jones, Rob Appleyard, Sharon Ball, Tim Ball, Colin Barrett, Gabriel Batt, Cherry Beath, David Bellotti, Sarah Bevan, Mathew Blankley, Lisa Brett, John Bull, Neil Butters, Bryan Chalker, Anthony Clarke, Nicholas Coombes, Paul Crossley, Gerry Curran, Sally Davis, Douglas Deacon, David Dixon, Peter Edwards, Michael Evans, Paul Fox, Andrew Furse, Charles Gerrish, Ian Gilchrist, Francine Haerberling, Alan Hale, Katie Hall, Liz Hardman, Nathan Hartley, Steve Hedges, Eleanor Jackson, Dave Laming, Malcolm Lees, Marie Longstaff, Barry Macrae, David Martin, Loraine Morgan-Brinkhurst MBE, Robin Moss, Paul Myers, Bryan Organ, June Player, Vic Pritchard, Liz Richardson, Manda Rigby, Caroline Roberts, Nigel Roberts, Dine Romero, Will Sandry, Brian Simmons, Kate Simmons, Jeremy Sparks, Ben Stevens, Roger Symonds, David Veale, Martin Veal, Geoff Ward, Tim Warren, Chris Watt and Brian Webber

Apologies for absence: **Councillors** Les Kew and Douglas Nicol

71 EMERGENCY EVACUATION PROCEDURE

The Chairman drew attention to the emergency evacuation procedure, as set out on the agenda.

72 APOLOGIES FOR ABSENCE

Apologies were received from Councillors Lew Kew and Doug Nicol

73 DECLARATIONS OF INTEREST

The Council's Monitoring Officer gave specific advice regarding declarations of interest in relation to the budget report.

Councillor Lorraine Morgan-Brinkhurst MBE declared an 'other' interest in agenda item 8 as the Council's representative on Bath Tourism Plus, as non-executive Director on Sirona Care and Health and as a member of the Bath in Bloom Committee.

Councillor Geoff Ward declared an 'other' interest in agenda item 8 as an Environmental Health practice professional.

Councillor Eleanor Jackson declared an 'other' interest in agenda item 8 as a Friend of Victoria Hall.

74 MINUTES - 8TH NOVEMBER 2012

On a motion from Councillor Paul Crossley, seconded by Councillor Eleanor Jackson, it was

RESOLVED that the minutes of 8th November 2012 be approved as a correct record and signed by the Chairman.

75 ANNOUNCEMENTS FROM THE CHAIRMAN OF THE COUNCIL OR FROM THE CHIEF EXECUTIVE

The Chairman made the following announcements;

1. He passed sympathies to those Members who had recently lost family members, mentioned the recent death of former mayor of Bath Ray Roseworn and asked the Council to stand in silence as a mark of respect following the recent death of former Councillor and Honorary Alderman Gordon Wood.
2. He checked that everyone had received copies of the supplementary information that had been circulated following the despatch of the agenda.
3. He asked everyone to turn their phones to off/silent and reminded members of the public that some Councillors were accessing their meeting papers on their iPads.
4. He referred to the agenda timings and asked everyone to keep contributions relevant and not to repeat comments already made.
5. He stated that he would announce a comfort break between 8pm and 9pm if the meeting did not appear to be near its conclusion by then.

76 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIRMAN

There were no items of urgent business.

77 QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM THE PUBLIC

Statements to the meeting were made by the following people;

- Joanna and Beinn Wright and Mani Campion-Dye made statements in support of a skate park on the east side of Bath and presented a petition of 572 signatures. In response to a question from Paul Crossley as to whether the community would work with the Council to help raise funds, Joanna Wright responded that her husband was an ex-skater and would be happy to do so, as would many others in the community. Councillor John Bull referred to the site next to Lambridge training ground which Joanna Wright had mentioned as a possible site for a skatepark and asked whether they had approached Bath Rugby about it. Joanna Wright responded that it would be an ideal site on the right side of the road but they hadn't approached anyone about it yet. Councillor Bryan Chalker asked who had signed the petition and what kind of responses they had received from people. Joanna Wright responded that there were only 2 people had refused to sign due to concerns about noise. Generally people were positive – the key issue was about siting it in the right place. The statements are available online and copies have been placed on

the Minute book. The petition was referred to the Cabinet Member for Neighbourhoods.

- David Redgewell from the South West Transport Network made a statement calling for the Council to work with the new Police Commissioner regarding the night bus network. He called for a co-ordinated approach with Bristol regarding night services in the south east Bristol area, eg; Brislington for which B&NES was the contract holder, and wanted consideration of buses until 3am. He also asked for a joined up approach for areas such as Whitchurch which is served by both Bristol and B&NES. The statement was referred to the Cabinet Member for Transport.

78 MEDIUM TERM SERVICE & RESOURCE PLANNING 2013/14 - 2015/16 & BUDGET & COUNCIL TAX 2013/14

The Council considered a report setting out the Cabinet's draft medium term financial plan, and revenue and capital budgets for the 2013/14 financial year together with a proposal for a Council tax level for 2013/14.

In addition to the reports circulated with the agenda, all Councillors received a copy of the draft minute of the Resources Policy Development and Scrutiny (PDS) Panel meeting held on 11th February with the Panel's comments on the budget proposals. Councillors also received Appendix 6 – Formal Council Tax Setting resolutions (incorporating precepts from Parishes, Fire and Police), Cabinet's amendments from the 13th February Cabinet meeting and an Equalities update from the Monitoring Officer.

On a motion from Councillor Paul Crossley, seconded by Councillor Francine Haeberling, it was **RESOLVED** that the Council suspends Council rule 42, Content and Length of Speeches, for the duration of this debate so as to enable variations to be permitted to the length of speeches by the Cabinet Member for Community Resources, the Conservative, Labour and Independent Groups and the Chair of the Resources Policy Development & Scrutiny Panel. During the debate, a motion was received from Councillor Paul Crossley that the meeting continue until 10.20pm in accordance with Council rule 48. This was accepted by the meeting.

On a motion from Councillor David Bellotti, seconded by Councillor Paul Crossley, it was

RESOLVED

1. To approve:
 - a. The General Fund net revenue budget for 2013/14 of £123.632m with no increase in Council Tax, and the savings proposals in Annex 2, Appendix 5, **with the exception of the proposed savings in Early Years and Children's centres of £273k and the substitution to balance the budget of funds received in the final settlement as a result of the redistribution of unallocated funding from the New**

Homes Bonus (£174k) and by drawing an additional £99k from the Council's Financial Planning Reserve and with the additional sum of £25,000 to establish a hardship fund for residents of Bath & North East Somerset Council to meet their Council tax costs on their main residence in the Council area for up to 6 months in the event that it becomes uninhabitable as a result of flood or fire. Funding of £25k to be made available for this purpose for 2013/14 with this amount being drawn from the Council's Financial Planning Reserve.

- b. That no Special Expenses be charged other than Town and Parish Council precepts for 2013/14.
 - c. The adequacy of reserves at Appendix 2 Table 9 with a risk-assessed level of £10.5m.
 - d. The individual service cash limits for 2013/14 summarised at Appendix 2 Table 5 and detailed in Annex 1.
 - e. That the specific arrangements for the governance and release of reserves, including invest to save proposals, be delegated to the Council's Section 151 Officer in consultation with the Cabinet Member for Community Resources and the Chief Executive.
2. To include in its Council Tax setting, the precepts set and approved by other bodies including the local precepts of Town Councils, Parish Councils and the Charter Trustees of the City of Bath, and those of the Fire and Police Authorities.
 3. To note the Section 151 officer's report on the robustness of the proposed budget and the adequacy of the Council's reserves (Appendix 2, Annex 2) and approves the conditions upon which the recommendations are made as set out throughout Appendix 2.
 4. That in relation to the capital budget the Council:
 - a. approves a capital programme of £59.036m for 2013/14 and notes items for provisional approval in 2013/14 and the programme for 2014/15 to 2017/18 as shown at Appendix 2, Annex 3 including the planned sources of funding .
 - b. approves the Minimum Revenue Provision Policy as shown at Appendix 2, Annex 4
 - c. approves the Capital Prudential Indicators as set out in Appendix 2 Table 7.
 5. To note the approach to Community Assets as set out in Appendix 2, Annex 6 and supports the progression of the Quick Wins identified in this Annex.
 6. To note the Policy Development & Scrutiny review of Medium Term Service and Resource Plans and instructs the relevant officers to finalise these in

consultation with the relevant Cabinet Member and in light of feedback from the PD&S reviews, and in line with the approved cash limits.

7. To agree the Council's proposed pay policy statement as set out at Appendix 5.
8. To approve the technical resolutions that are derived from the budget report, and all figures in that report, including the precepts for towns, parishes and other precepting bodies as set out in Appendix 6.
9. **To request that Cabinet, in order to retain the vital facility of public toilets in Weston, explores all alternative opportunities, including the new Tesco development, other community and commercial buildings and secures alternative facilities prior to the closing of the existing public toilets; and further that the heritage of the Larkhall Square toilets, dating back to 1907, and their strong links to Bath's World Heritage status should be recognised.**
10. To request that Cabinet review the arrangements for providing discretionary Council tax discounts in the above cases as part of the 2014/15 Council Tax Base setting process.
11. **To request that Cabinet implement additional free short-stay parking in Ashton Way car park or the Labbott car park for the duration of the period whilst the town hall car park is closed due to the town centre redevelopment and to allocate up to £100,000 from the Financial Planning Reserve to implement this.**

THE COUNCIL APPROVES THE BUDGET AND COUNCIL TAX FOR 2013/14 AS INDICATED ABOVE AND ACCORDINGLY RESOLVES:

12. That the 2013/14 expenditure is funded as follows;

| | Total £ |
|--|--------------------|
| 2013/14 Gross Expenditure | 303,498,010 |
| 2013/14 Income (service income and specific grants) | 180,605,987 |
| Core Funding: | |
| Revenue Support Grant | 31,106,126 |
| Retained Business Rates | 20,261,686 |
| Use of Reserves | 14,191 |
| Collection Fund Surplus | 168,000 |
| 2013/14 Gross Income | 232,155,990 |
| Council Tax Requirement (excluding Parish Precepts) | 71,342,020 |

13. That it be noted that
 - a. on the 2nd January 2013 the Divisional Director of Finance (as authorised section 151 officer) agreed 59,360.17 Band D property equivalent as the Council Tax Base for the year 2013/14 in accordance with regulation 3 of the Local Authorities (Calculation of Council Tax

Base) Regulations 1992 made under Section 35(5) of the Local Government Finance Act 1992.

- b. The amounts calculated by the Council, in accordance with Regulation 6 of the Regulations, as the amount of its Council Tax Base for the year for dwellings in those parts of its area to which one or more special items relate is given as Annex 1 (1). *[Annex 1 (1) gives Band D Tax base by parish]*

14. That the following amounts be now calculated by the Council for the 2013/14 financial year in accordance with Sections 31 to 36 of the Local Government and Finance Act 1992, as amended:

- a. **£305,542,728** (=£303,498,010 (gross expenditure) +£2,044,718 (Parish precepts)) being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(2) of the 1992 Act. *[This is the gross expenditure incurred in performing functions and charged to the revenue account, contingencies for revenue, any financial reserves to be raised, financial reserves to meet prior year deficit not yet provided for, any amounts transferred from its general fund to its collection fund in accordance with section 97(4) of the Local Government Finance 1988 Act, and any amounts transferred from general fund to collection fund under section 98(5) of 1988 Act.]*
- b. **£232,155,990** (gross income) being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3) of the 1992 Act. *[This is the income estimated to accrue which will be credited into the revenue account for the year in accordance with proper practices, any amounts transferred in the year from the collection fund to the general fund in accordance with section 97(3) of the 1988 Act, any amounts which will be transferred from the collection fund to the general fund pursuant to a direction under section 98(4) of the 1988 Act and will be credited to the revenue account for the year, and financial reserves used to provide for items in Section 31A(2)]*
- c. **£73,386,738** being the amount by which the aggregate at 11(a) above exceeds the aggregate at 11(b) above calculated by the Council in accordance with Section 31A(4) of the 1992 Act as its **Council Tax requirement** for the year;
- d. **£ 1,236.30** being the amount at 11(c) above divided by the amount at 10(a) above, calculated in accordance with Section 31B of the 1992 Act, as the basic amount of Council Tax for the year. *[This is the average Council tax including B&NES and parish precepts]*
- e. **£ 2,044,718** being the aggregate amount of all special items (Parish precepts) referred to in Section 34(1) of the 1992 Act. *[This is the total of parish precepts]*
- f. **£1,201.85** being the amount at 11(d) above less the result given by dividing the amount at 11(e) above by the amount at 10(a) above,

calculated by the Council, in accordance with Section 34(2) of the 1992 Act, as the basic amount of its council tax for the year for dwellings in those parts of its area to which no special item relates. *[This is the B&NES Council tax only excluding parish precepts]*

- g. The amounts given by adding to the amount at 11(f) above the amounts of special items or items relating to dwellings in those parts of the Council's area mentioned above divided in each case by the amount at 10(b) above, calculated by the Council, in accordance with section 34(3) of the 1992 Act, as the basic amount of its Council Tax for the year for dwellings in those parts of its area to which one or more special items relate are given at Annex 1 (3). *[Annex 1 (3) gives the Band D Council tax for each area **including** the parish precepts]*
- h. The amounts given by multiplying the amounts at 11(g) above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation band D, calculated by the Council, in accordance with Section 36(1) of the 1992 Act, as the amounts to be taken into account for the year in respect of categories of dwellings listed in different valuation bands are given in Annex 1 (4). *[Annex 1 (4) shows the B&NES and parish Council Tax for all bands.]*

Precepting Authorities

15. That it be noted that for the year 2013/14 the Police & Crime Commissioner for Avon and Somerset has determined the amount in precepts issued to the Council in accordance with Section 40 of the Local Government Finance Act 1992, for each of the categories of the dwellings shown below:-

16. Avon and Somerset Police Valuation Bands

| A | B | C | D | E | F | G | H |
|---------|---------|---------|---------|---------|---------|---------|---------|
| £112.02 | £130.69 | £149.36 | £168.03 | £205.37 | £242.71 | £280.05 | £336.06 |

17. Avon Fire Authority Valuation Bands

| A | B | C | D | E | F | G | H |
|---------------|---------------|---------------|---------------|---------------|---------------|----------------|----------------|
| £42.68 | £49.79 | £56.91 | £64.02 | £78.25 | £92.47 | £106.70 | £128.04 |

18. That, having calculated the aggregate in each case of the amounts 13, 14 and 11(h) above, the Council, in accordance with Sections 30 and 36 of the Local Government Finance Act 1992 hereby sets the following amounts as the amounts of Council Tax for the 2013/14 financial year for each of the categories of dwellings shown, as listed in Annex 1 (5).

19. On average (for a Band D, 2 adult household) the Council Tax for 2013/14 will be as follows:

| <i>Reference Band D 2012/13 £</i> | | £ Band D 2013/14 | % Increase on 2012/13 |
|-----------------------------------|--------------------------------------|-------------------------|------------------------------|
| 1,201.85 | Bath and North East Somerset Council | 1,201.85 | 0.00 |
| 33.62 | Average Parish Precept | 34.45 | 2.47 |
| 62.77 | Avon Fire Authority | 64.02 | 1.99 |
| 168.03 | Avon and Somerset Police Authority | 168.03 | 0.00 |
| 1,466.27 | Total Tax charged | 1,468.35 | 0.14 |

[Overall annual increase in average Band D Council Tax is £2.08]

20. The Council's basic amount of Council Tax for 2013/14 is not determined to be excessive in accordance with principles approved under section 52ZB Local Government Finance Act 1992.

(Notes:

1. *The above motion was carried with 38 Councillors voting in favour, 24 Councillors voting against and 1 Councillor abstaining from voting.*
 - a. *An amendment to wording was suggested on behalf of the Labour group by Councillor Liz Hardman, seconded by Councillor John Bull, which was accepted by the mover and seconder of the motion. This wording is incorporated in bold in paragraph 1a. of the resolution above.*
 - b. *A further amendment to wording was suggested by Councillor Bryan Chalker on behalf of the Independent group, which was accepted by the mover and seconder of the motion. This wording is incorporated in bold in paragraph 9 of the resolution above.*
 - c. *A further amendment to wording was suggested by Councillor Liz Richardson on behalf of the Conservative group, which was accepted by the mover and seconder of the motion. This wording is incorporated and underlined in paragraph 1a and paragraph 10 of the resolution above.*
2. *An amendment was moved on behalf of the Conservative group by Councillor Marie Longstaff, seconded by Councillor Tim Warren. This wording is incorporated in bold in paragraph 11. The amendment was carried with 31 Councillors voting in favour, 30 Councillors voting against and 2 abstentions.*
3. *An amendment was moved on behalf of the Conservative group by Councillor Tim Warren, seconded by Councillor Alan Hale, to move the recommendations as printed with an amendment to paragraph 2.4 (a) to add the words "subject to the reduction of the provisionally approved proposal concerning gypsy and traveller sites by £1m and an allocation of an additional £1 million for full approval to the Highways Structural Maintenance programme. The amendment was not carried with 25 Councillors voting in favour and 38 voting against and no abstentions.*

4. *An amendment was moved by Councillor Patrick Anketell-Jones, seconded by Councillor Martin Veal, on behalf of the Conservative group to request Cabinet to give serious consideration to various measures regarding access to the Victoria Art Gallery and whether Discovery card holders could continue to get free access with an increased fee for the Discovery card and proposals to include admission to the combined Roman Bath and Fashion Museum entry ticket. The amendment was not carried with 25 Councillors voting in favour and 38 voting against and no abstentions.*
5. *An amendment was moved by Councillor Martin Veal, seconded by Councillor David Veale, on behalf of the Conservative group to request Cabinet to use funds from the Financial Planning Reserve to enable the mobile library service to continue on the existing timetable until a full public consultation took place on this and proposals to close public toilets. The amendment was not carried with 25 Councillors voting in favour and 35 voting against and 3 abstentions.*
6. *During the debate, a short comfort break was taken.*

Supplement - Budget Changes following Cabinet & Equalities advice

79 TRANSPORT IMPROVEMENT CAPITAL PROGRAMME 2013/14

The Council considered a report setting out the draft Integrated Transport Improvement Capital programme for consultation. The programme of expenditure aims to develop the policies of the Joint Local Transport Plan in accordance with Government guidelines.

On a motion from Councillor Roger Symonds, seconded by Councillor Paul Crossley, it was **RESOLVED** (unan)

1. That the draft Transport Improvement Capital programme for 2013/14 as set out in Appendix 1 to the report is approved for consultation; and
2. To delegate to the Group Manager, Transport and Planning Policy, authority to alter the programme, in consultation with the Cabinet Member for Transport, as may prove necessary within the overall budget allocation.

80 TREASURY MANAGEMENT STRATEGY STATEMENT & ANNUAL INVESTMENT STRATEGY 2013/14

The Council considered a report which fulfils the Council's legal obligation under the Local Government Act 2003 to have regard to both the CIPFA Code and the CLG Guidance in approving the Treasury Management Strategy statement and the Investment Strategy.

The report had also been scrutinised by the Corporate Audit Committee (5th February 2013) and the Cabinet (13th February 2013).

On a motion from Councillor David Bellotti, seconded by Councillor Will Sandry, it was

RESOLVED (unan)

1. That the actions proposed within the Treasury Management Strategy Statement (Appendix 1) are approved;
2. That the Investment Strategy as detailed in Appendix 2 of the report be approved; and
3. That the changes to the authorised lending lists detailed in Appendix 2 to the report and highlighted in Appendix 3 are approved.

81 NOMINATION OF COUNCIL CHAIR(MAN) DESIGNATE 2013/14

This report allows Council to indicate which Councillor is likely to take over as Chair(man) from the Annual General meeting in May. This allows advance planning of the Chair(man)'s diary but will still require a formal election to take place at the May meeting.

On a motion from Councillor Paul Crossley, seconded by Councillor Francine Haeberling and with an indication of support from Councillors John Bull and Doug Deacon, it was

RESOLVED (unan) that Councillor Neil Butters be named as Chair(man) Designate for the 2013/14 Council year.

82 QUESTIONS, STATEMENTS, PETITIONS AND DEPUTATIONS FROM COUNCILLORS

There were none.

The meeting ended at 10.10 pm

Chair(person)

Date Confirmed and Signed

Prepared by Democratic Services

| Bath & North East Somerset Council | |
|---|--|
| MEETING: | Council |
| MEETING DATE: | 4 th March 2013 |
| TITLE: | Changes to the B&NES Core Strategy |
| WARD: | ALL |
| AN OPEN PUBLIC ITEM | |
| List of attachments to this report: | |
| Annex 1: | Changes to the Core Strategy policies on Housing Requirement and Housing Land Supply. |
| Annex 2: | Changes to polices on Affordable Housing, District heating, Gypsies, Travellers and Travelling Showpeople and the Bath Recreation Ground |
| Annex 3: | Schedule of Proposed Changes to the Submitted Core Strategy |
| Annex 4: | Consultation strategy |

1 THE ISSUE

- 1.1 This report sets out the changes to the Bath & North East Somerset Core Strategy needed to address the examination Inspector's concerns raised following the hearings which were held in January 2012.

2 RECOMMENDATION

- 2.1 That the Council agrees;

- (1) that the Core Strategy should be amended to enable an increase of around 10,200 jobs and 12,700 homes, including around 3,100 affordable homes, in B&NES between 2011 and 2029 as set out in **Annex 1**,
- (2) that each of the locations listed in **Table 8 of Annex 1** are considered for identification for development in the Plan period, with the necessary planning requirements in **Table 10**,
- (3) the proposed changes to the following Core Strategy Policies as set out in **Annex 2**;

- a) B1(8): The Recreation Ground, Bath
- b) CP.4: District Heating

- c) CP.9: Affordable Housing,
 - d) CP.11: Accommodation needs of Gypsies, Travellers and Travelling showpeople
- (4) the Schedule of Proposed Changes to the Submitted Core Strategy in **Annex 3**, subject to any amendments arising from (1), (2), and (3) above,
 - (5) that the Schedule of Proposed Changes in (4) above is published for consultation in accordance with the consultation strategy in **Annex 5**, along with the other locational options considered in Annex 1 but rejected,
 - (6) that the Schedule of Proposed Changes in (4) above is forwarded to the Inspector for his consideration along with a schedule of all the comments received,
 - (7) that the amended Core Strategy is approved for Development Management purposes, and
 - (8) that delegated authority is granted to the Divisional Director for Planning and Transport Development to make minor changes to the Core Strategy in consultation with Cabinet Member for Planning and Homes to ensure clarity, consistency and accuracy across the Plan.

3.0 FINANCIAL IMPLICATIONS

- 3.1 The Core Strategy has been prepared using the Local Development Framework budget and has been the primary focus of work for the Planning Policy Team. However, significant input has also been required from other parts of the Planning Service as well as services within the Council.
- 3.2 The additional work required to respond to the issues raised by the Inspector has necessitated the drawdown of £130,000 reserve funds. This has been needed to expedite the work and provide specialist expertise.
- 3.3 The Core Strategy has significant financial implications for the Council. Its preparation enables progress to be made agreeing a Community Infrastructure Levy for the District. It establishes the level of transport and social infrastructure required to support new development and how this will be funded. It plays a key role in helping to deliver the Council's economic growth aspirations by ensuring sufficient land is available. It also determines the level of New Homes Bonus awarded to the Council and helps to meet aspirations for growth in local business rates.

4. CORPORATE OBJECTIVES

- *Promoting independence and positive lives for everyone*
- *Creating neighbourhoods where people are proud to live*
- *Building a stronger economy very*

5. THE REPORT

Background

5.1 National Planning Policy Framework (NPPF) para 153 requires that all Local Authorities have an up-to-date, adopted Core Strategy (or Local Plan). The Localism Act 2012 replaces 'Core Strategies with' 'Local Plans'. The benefits of having an up-to-date, adopted Core Strategy are;

- the delivery of corporate objectives such as economic growth, provision of affordable housing and, responding to climate change,
- the Council can introduce the Community Infrastructure Levy (CIL) which will entail a revenue of around £2 m per annum,
- to ensure development takes place in a planned and co-ordinated way, is properly aligned with infrastructure and is in the most sustainable locations,
- the ability to refuse development proposals which are contrary to its objectives

5.2 All Core Strategies must be subject to scrutiny through examination by an independent Inspector to assess whether the plan has been prepared in accordance with legal and procedural requirements, and whether it is 'sound'. The four tests of soundness are that the Plan should be (NPPF para 182);

- **Positively prepared** – seek to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – enable the delivery of sustainable development in accordance with the NPPF.

5.3 The Core Strategy examination hearings were held in January and March 2012. In June 2012 the Inspector issued his preliminary conclusions ([ID/28](#) and [ID/30](#)). His concerns primarily related to the housing element of the strategy and his main conclusions were:

- the lack of a NPPF compliant assessment of the District housing requirement;
- the need to make up the housing delivery shortfall from the Local Plan;
- the need for a 20% buffer to the 5 year housing land supply;
- a lack of flexibility in housing supply to accommodate any delay in bringing forward the complex, brownfield, mixed use proposals, particularly in Bath and Keynsham;
- a lack of flexibility to properly apply the sequential and exception flood risk tests on the brownfield, mixed use sites in Bath and Keynsham;

- a lack of flexibility to adapt to rapid change, including (other than in the Somer Valley) being able to accommodate more business growth, if opportunities arise.
- Lack of justification for the policy approach for the Somer Valley.
- The need to explain in the Sustainability Appraisal Report the reasons for the choice made in relation to not fully meeting assessed needs (if that continues to be the Council's strategy).
- the scale of affordable housing need does not appear to have influenced the overall scale of the housing requirement.

5.4 He advised that the further work needed to rectify these issues included;

- the identification of the housing requirement in a manner consistent with the NPPF;
- changes to the plan to fully accommodate the assessed needs and demands or evidence to demonstrate that doing so would result in adverse impacts which would significantly and demonstrably outweigh the benefits (NPPF, 14);
- subject to the outcome of the above, a possible review of the Green Belt's capacity to accommodate further development in a sustainable manner.
- the publication of all proposed changes which have not previously been the subject of consultation, including those changes discussed at the hearings, or suggested by the Council subsequently, and which remain relevant in the light of the updated evidence.
- Updating of other evidence.

5.5 There are also a limited number of other policies on which the Inspector expressed concerns. These include ;

- the blanket requirement for all housing sites to be 35% affordable doesn't reflect the evidence of variations in viability across the district,
- the requirements of the District Heating policy are too onerous,
- the accommodation needs assessment for the Travelling Community should be updated
- the need to ensure sufficient flexibility is available in Bath & Keynsham to facilitate economic growth
- Clarification on the Council's policy on the future of the Recreation Ground in Bath

Council's action in response to inspector's concerns

5.6 The Inspector suggested that the Council could either; withdraw the Core Strategy and address the above issues and start the plan preparation process again from the beginning by preparing a new style Local Plan; or the examination could be suspended to enable the Council to address the Inspector's concerns. The Council preferred the suspension route because this would entail less of a delay than a complete withdrawal (BNES/39).

5.7 Furthermore, withdrawal would have entailed the removal of the entire emerging policy framework in the Core Strategy requiring the Council to fall back on Local Plan policies and the NPPF. Even those emerging policies which are sound (with amendments) would be lost. Added to which the Government requires local

authorities to ensure that an up-to-date Local Plan is in place as quickly as possible (NPPF para 184). Therefore the Core Strategy is still at the examination stage. In order to address the Inspector’s concerns, the Council has undertaken the following actions.

Housing requirement and housing land supply

5.8 The Council has reviewed its housing requirement and housing land supply through two studies, and as a result of this work a number of changes are proposed to the Plan:

- The **Strategic Housing Market Assessment (SHMA)** has been updated. This study was undertaken in accordance with national guidance and the latest best practice. Its objective is to assess demographics, market trends and other statistics, and to identify the housing requirement in a given area. This updates the 2010 SHMA for the B&NES.
- An assessment of the District’s potential housing land supply is assessed through the **Strategic Housing Land Availability Study (SHLAA)**. This assesses the potential of sites to be suitable, deliverable and developable during the plan period. It is part of the evidence base and sites in SHLAA still need either to be allocated in the Placemaking Plan or planning permission before development can proceed.

5.9 **Annex 1** to this report sets out the process for reviewing the Core Strategy, the conclusions reached and the reasoning behind any changes to the spatial strategy. The Sustainability Appraisal process has been the key mechanism for assessing options and informing recommendations.

5.10 Table A below summarises the existing housing land supply as identified in SHLAA. It illustrates that the majority of existing housing supply is focussed in Bath.

Table A: Existing housing supply

| Location | Total | %* |
|-----------------|---------------|-------------|
| Bath | 6,285 | 58% |
| Keynsham | 1,641 | 15% |
| Somer Valley | 2,095 | 19% |
| Rural Areas | 831 | 8% |
| Total | 10,852 | 100% |

**NB totals rounded*

5.11 Table B below illustrates that the District’s housing land supply needs to be boosted by around 1,870 to dwellings to around 12,700 dwellings to meet the requirements of the NPPF and to ensure that the Core Strategy is sound. This includes ensuring a sufficient housing supply to;

- Provide for population/demographic projections,
- Facilitate economic growth

- Provide for affordable housing needs
- Ensure flexibility to respond to change and unforeseen circumstances
- Ensure a five year land supply (plus 20%)

Table B: Summary of the assessment of the housing requirement for B&NES

| | Plan Period (18 yrs) | plus backlog | SHLAA Supply | Additional for Affordable Housing | Total |
|--------------|-----------------------------|---------------------|---------------------|--|---------------|
| Homes | 7,470 | 8,637 | 10,852 | 1,870 | 12,722 |

- 5.12 Having already maximised opportunities on brownfield sites and in order to meet the housing need in the most sustainable way, the additional housing requires the identification of greenfield locations, including the release of land from the Green Belt.

Other policies

- 5.13 The Council has also reviewed the other policies with which the Inspector had concerns and the results of this work are set out in **Annex 2**.

Schedule of Changes

- 5.14 **Annex 3** sets out a composite schedule of proposed changes to the Core Strategy. In addition to the changes being proposed in Annexes 1 and 2, the schedule includes a number of informal changes arising during the hearings in 2012. For completeness, the schedule also includes the changes agreed by the Council to the submitted plan in September 2011.

Evidence

- 5.15 In ID/28 para 8, the inspector referred to the potential complexity arising from the suspension due to the layers of further evidence and changes to the Plan. Supporting evidence, not previously questioned, can become outdated. Therefore, in order to assist all parties, the Council has compiled an up-to-date list of the evidence underpinning the Core Strategy. This is set out in the **list of background papers** to this report.

Conclusions

- 5.16 Changes are proposed to the Core Strategy to ensure it provides an up-to-date, sound and effective basis to deliver the Council's objectives for its communities.

Next steps

- 5.17 The work on the Core Strategy has been made in accordance with the Local Development Scheme as amended in September 2012. The next steps on the Core Strategy as follows;

- March 2013 – Council agrees changes to the Core Strategy
- Mid-March to early May 2013 – 6 weeks public consultation
- May 2010 – Council collates comments on changes and forwards them to the Inspector

- June – preparation for resumption of examination
- July – Hearings resume
- August onwards – Inspector’s report received, Council to consider Inspector’s recommendations and adoption of the Core Strategy

Relationship with other Plans

- 5.18 The Core Strategy has been prepared in accordance with the Local Development Scheme a revised in September 2012. The Core Strategy sets the context for both the Council’s Placemaking Plan and any Neighbourhood Plans. The Placemaking Plan will set out the specific planning requirements for key development sites and updates the planning policies used in the determination of planning applications and its preparation is key to the delivery of the Core Strategy. The Core Strategy also provides the context to the preparation of the Gypsies, Travellers and Travelling Showpeople Plan.

6.0 RISK MANAGEMENT

- 6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

7. EQUALITIES

- 7.1 An Equality Impact Assessment (EqIA) has been completed. It concludes that there are benefits across all equalities groups of responding to local housing needs and making additional land for required housing development. In relation to the other policy amendments there is not seen to be a significant impact on the policy direction, and there are no further discernable impact on equalities groups.
- 7.2 In terms of adverse impacts, the need to ensure that equalities groups can access the consultation in terms of accessibility of information, venues and how to respond (given the formal requirements of a Planning Examination) were noted as a potential adverse impact. However, these impacts are planned to be mitigated via the Consultation Strategy (Annex 4) and extra support that is offered by the Council to engage the public in understanding the changes and how to respond.
- 7.3 In addition, the engagement strategy for the Placemaking Plan will allow equalities groups to get involved in the detailed site requirements and subsequent planning process for the development locations at the next stage.

8. CONSULTATION

- 8.1 *Ward Councillor; Cabinet Member; Parish Council; Town Council; Policy Development and Scrutiny Panel; Other B&NES Services; Local Residents; Community Interest Groups; Stakeholders/Partners; Other Public Sector Bodies; Charter Trustees of Bath; Section 151 Finance Officer; Chief Executive; Monitoring Officer*
- 8.2 Preparation of the Core Strategy has so far has involved significant community involvement and has entailed both broad engagement on the consideration of

options as well as more formal consultations. This is required in order to meet both regulatory requirements as well as the Council's Neighbourhood Planning Protocol.

8.3 The changes proposed in this report will be subject to public consultation, proposed to be held from March 2013 to May 2013. Anyone who objects to the Council's changes has the right to appear at the hearings. The proposed consultation strategy is set out in **Annex 4**.

8.4 An issue of debate at the January 2012 hearings was whether the Duty to Co-operate introduced by Section 110 of the Localism Act applies to the B&NES Core Strategy in light of the fact that the Plan was prepared and submitted prior to the legislation coming into force. The Council maintains its existing legal position that the Duty to Co-operate does not apply but nevertheless, it has undertaken the work since the suspension of the Examination as if it did. This also reflects the requirement in the NPPF Para 179 that Local Planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated.

9.0 ISSUES TO CONSIDER IN REACHING THE DECISION

9.1 *Social Inclusion; Customer Focus; Sustainability; Human Resources; Property; Young People; Human Rights; Corporate; Health & Safety; Impact on Staff; Other Legal Considerations*

10. ADVICE SOUGHT

10.1 The Council's Monitoring Officer (Divisional Director – Legal and Democratic Services) and Section 151 Officer (Divisional Director - Finance) have had the opportunity to input to this report and have cleared it for publication.

10.2 The issues as to whether the Duty to Cooperate applies to this Plan was a point of debate at the hearings and the Council is still of the view that it does not apply. Nevertheless, these amendments to the Core Strategy have been prepared as if the duty did apply.

| | |
|--------------------------|--|
| Contact person | <i>David Trigwell, Divisional Director for Planning & Transport Development, tel : 01225 394125</i> |
| Background papers | <p>Draft Core Strategy 2011</p> <p>National Planning Policy Framework 2013</p> <p>Inspector's Preliminary Conclusions ID28, ID29 & ID30</p> <p>B&NES Local Plan 2007</p> <p>Green Belt Review (Arup, 2013)</p> <p>Updated B&NES Strategic Housing Land Availability Assessment [SHLAA] (2013)</p> <p>Updated Strategic Housing Market Assessment [SHMA] (2013)</p> |

| | |
|--|--|
| | <p>Updated Affordable Housing Viability Study (2013)</p> <p>Updated Infrastructure Delivery Plan [IDP] (2013)</p> <p>Economic Growth Report (2013)</p> <p>Flooding sequential & exceptions test update (2013)</p> <p>Transport Evaluation Report (2013)</p> <p>Joint Local Transport Plan 3</p> <p>Updated Gypsy and Traveller Accommodation Assessment [GTAA] (2013)</p> <p>Draft World Heritage Setting SPD (2013)</p> <p>MOD Concept Statements (2012)</p> <p>Bat Walkover Survey - Weston slopes/Sulis Manor (Bat Pro, 2013)</p> <p>Sustainability Appraisal of the Proposed Changes to the Submitted Core Strategy (2013)</p> <p>Sustainability Appraisal of Alternatives (2013)</p> <p>Habitats Regulations Assessment of the Proposed Changes to the Submitted Core Strategy (2013)</p> |
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ANNEX 1: CHANGES TO POLICIES ON HOUSING REQUIREMENT AND HOUSING LAND SUPPLY

1.0 THE INSPECTOR'S CONCERNS

1.1 This annex sets out the Council's response to the concerns raised by the Inspector's concerns regarding the approach to growth and housing in the Core Strategy. The key areas of work are outlined below. This has to be undertaken in a way which is compliant with the National Planning Policy Framework (NPPF)

1.2 Regarding the **housing land requirement** to;

- review the Strategic Housing Market Assessment (SHMA);
- consider the shortfall of delivery of dwellings from the existing Local Plan
- ensure a 5 year housing land supply with a 20% buffer;
- consider whether the scale of affordable housing need should influence the overall scale of the housing requirement
- ensure the plan period runs for at least 15 years post adoption

1.3 Regarding the **housing land supply**, the work required is to;

- ensure the plan fully accommodates the assessed needs and demands (unless evidence demonstrates that doing so would result in adverse impacts which would significantly and demonstrably outweigh the benefits - NPPF para 14);
- If changes are required to the plan to meet the housing requirement, undertake a review of the Green Belt to accommodate further development in a sustainable manner.
- ensure the Plan has flexibility to accommodate a delay in bringing forward the complex, brownfield, mixed use proposals, especially in Bath and Keynsham
- review the sequential and exception flood risk tests in relation to the brownfield, mixed use sites in Bath and Keynsham;
- ensure that the policy approach for the Somer Valley is justified.
- explain in the Sustainability Appraisal Report the reasons for the choice made

2.0 HOUSING LAND SUPPLY

NPPF requirements

2.1 The NPPF *para 14* requires that;

- "Local planning authorities should positively seek opportunities to meet the development needs of their area" and that
- "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.....";

2.2 Para 47 requires that local authorities should boost **significantly the supply of housing** and meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

2.3 To this end, Para 159 requires that Local Authorities prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The SHLAA should identify;

- a supply of **deliverable** sites sufficient to provide five years worth of housing (*NPPF para 47 defines deliverable as: available now, a suitable location for development now, a realistic prospect that housing will be delivered within five years and the site is viable*)
- **developable** sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

REVIEW OF THE SHLAA

2.4 The SHLAA has been reviewed and updated in response to the Inspector’s concerns expressed in ID/28 par 2.1 and the Government’s practice guide (currently under review). The SHLAA records not only the houses built in the plan period and those with planning permission, but also makes an objective assessment of development opportunities and capacity of sites in order to inform the strategy. To assist in updating the SHLAA, the Council undertook a new call for sites exercise. The up-to-date SHLAA is a background document to this report and is summarised in Table 1 below.

Small Windfall sites

2.5 NPPF 3 para 48 permits an allowance to be made for small windfalls sites under certain circumstances. The B&NES windfall allowance is described in SHLAA..

Table 1: SHLAA update

| Location | Total | % <i>(rounded)</i> |
|---------------------|---------------|-----------------------|
| Bath | 6,285 | 58% |
| Keynsham | 1,584 | 15% |
| Somer Valley | 2,095 | 20% |
| Rural Areas | 859 | 8% |
| Total | 10,852 | 100% |

2.6 Whilst CLG has confirmed that **student cluster flats** can be counted in the housing land supply, existing and proposed student accommodation have not been included in the supply because the SHMAA has excluded these from the housing requirement.

2.7 The potential supply from bringing **empty properties** back into use as well as scope to increase residential accommodation in under-used space above shops (NPPF para 51) has been taken into account and forms part of the windfall allowance.

2.8 The potential contribution to housing land supply from **boat dwellers** has been considered, and whilst the Council has initiated a strategy, the current information is insufficient to make a robust assessment.

Other commitments

- 2.9 The SHLAA also records those sites which are 'existing commitments' such as Local Plan allocations and sites on where the evidence indicates that the Council can have confidence that they can come forward in the Plan period. The review of SHLAA has entailed re-assessing the 'other commitments' category in light of NPPF para 47. The Inspector expressed concern about the reliance on sites such as **Bath Western Riverside (BWR)**. Since the hearings in 2012, a scheme to decommission the Gas Station has been agreed between Crest Nicholson, the developers of Bath Riverside, and Wales and West Utilities. The LEP infrastructure funding will be used to finance the works through the Corporate Agreement between the Council and Crest. The decommissioning of the Gas Station will allow the development of BWR to be completed and release adjoining sites on the Lower Bristol Road and Windsor Bridge. The works are scheduled to commence this Summer and be completed in 2014/15.
- 2.10 Regarding the three former **MoD sites** in Bath, since the hearings, the Council has prepared and agreed Concept Statements for each site to facilitate their delivery. All three sites are in the process of being disposed of to developers, with completions due to take place by the end of March 2013. It is anticipated that planning applications for their redevelopment will be forthcoming during the 2013/14 Financial Year.
- 2.11 New sites have only been relied on for delivery during the Plan period where there is evidence is robust evidence that they are available and deliverable. Since the hearings in 2012, Bath City Football Club, who owns **Twerton Park** (The football stadium) has advised the Council that the 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. The Council is endeavouring to assist the Football Club to identify a suitable alternative location and this can be progressed in the Placemaking Plan.

Flood Risk and mitigation

- 2.12 The Inspector expressed reservations about the Core Strategy's approach to dealing with flood risk (ID28 para 3.10 to 3.14). He was not convinced that the sequential test for the proposed scale of development has been properly applied taking into account the flooding implications of climate change; whether the exception test will be able to be met in the future and the likelihood of delivering the upstream flood compensation scheme.
- 2.13 National Planning Policy Framework and Technical Guidance to the NPPF provide the national planning policy for consideration of flood risk. It states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The overall aim should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, sites in Flood Zone 2 can be considered. Only where there are no reasonably available sites in Flood Zone 1 and 2 should the suitability of sites in Flood Zone 3 be considered.

- 2.14 In response, SHLAA housing sites were reassessed in accordance with the NPPF, taking into account climate change. There are a number of new development sites with about 600 homes proposed in the Bath city centre which are in or partly within Flood Zones 2 and 3.
- 2.15 The SHLAA shows that there are available greenfield sites available in flood zone 1 for residential development. The fact that the greenfield land housing sites in flood zone 1 would be sequentially preferable in terms of flood risk needs to be weighed in balance with wider sustainability objectives. The SA provides essential information to balance these objectives. In summary, development of sites in the river corridor is essential to the Council's economic strategy and the growth aspirations of the LEP Enterprise Area. Residential development is integral to mixed use regeneration of priority sites in Bath and is essential to make development viable in some sites. Development in the city centre presents opportunities for walking, cycling and public transport to access existing facilities services and jobs. The SA show that the residential capacity of greenfield sites in Flood Zone 1 on the edge of Bath are significantly constrained by a highly sensitive environment such as the World Heritage Site and its setting, the AONB and Conservation Areas. Therefore there are robust reasons for accommodate the level of housing proposed in the city centre (about 600 homes).
- 2.16 Since the Inspector produced ID/28, further detailed work has been undertaken to develop a flood risk management scheme. A hydrological study has now been completed and confirms that the impact of raising the development sites is a loss of conveyance, rather than a loss of flood storage. Based on the findings of this study, a compensatory flow conveyance scheme has been developed and agreed in principle with the Environment Agency. The scheme can be delivered in a number of phases as development sites come forward. It is proposed to submit a planning application for the first phase scheme in the current year with a view to completing the works in 2014/15. This work, which will enable the key employment sites in the EA to come forward, will be funded by part of the £13m infrastructure funding awarded to B&NES by the LEP. Onsite defences combined with the conveyance mitigation scheme ensures that new development will be safe without increasing risk elsewhere, passing the Exception Test.

Flexibility

- 2.17 Nevertheless, in light of the Inspector's concerns that that sites such as BWR or those in flood risk areas might not come forward for development as anticipated, revisions are required to the spatial strategy to ensure robust flexibility exists.

5 yr land supply

- 2.18 The inspector is of the view in ID/28 para 2.19 that "there is convincing evidence that the Council has a record of persistent under delivery in housing. A 20% buffer is therefore required" This view has been corroborated at recent appeals. The 20% is not meant to entail increase in overall requirement but should be moved forward from later in the Plan.

Affordable housing

- 2.19 The analysis of all the sites in SHLAA indicates that the supply of affordable housing is around 2,700 dwellings. This includes application of the amended Policy CP9 (affordable housing) as set out in Annex 2.

3.0 THE HOUSING REQUIREMENT

NPPF requirements

- 3.1 One of the inspector's primary concerns with the draft Core Strategy related to the need for the District housing requirement to be assessed in a way consistent with national Policy. The NPPF requires that Local Authorities;

Para 50: must plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand;

Para 159: should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross boundaries. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community
- caters for housing demand and the scale of housing supply necessary to meet this demand

Review of SHMA

- 3.2 The West of England SHMA (2010) focused mainly on matters of affordable housing need and took its cue in relation to overall housing numbers from the Draft SW RSS. In order to address the inspectors concerns and the NPPF it has been necessary to review the SHMA. The Council has appointed Opinion Research Services (ORS) to assist with the review of a SHMA that sets out the long term housing requirement to be met within B&NES. ORS have developed a housing mix model which aligns with what the NPPF requires and has a proven track record at Local Plan examinations. The Draft SHMA is listed as a background document to this report.

Housing Market Area

- 3.3 The 2010 SHMA was undertaken for a very large geography, encompassing the West of England authorities, Mendip DC and the former area of West Wiltshire DC. The Council asked ORS to examine whether this was indeed a single functional HMA. The driver for this reappraisal was a study undertaken on behalf of CLG, by CURDS (Centre of Urban and Regional Development Studies, University of Newcastle) to define a consistent set of housing market areas across England. This study found that the former West of England HMA was actually comprised of two distinct housing market areas, with a boundary running north-south through the centre of B&NES. Figure 1 shows the east of B&NES forms part of a B&NES/West Wiltshire, North Mendip HMA. The west of B&NES belongs more to a Bristol centred West of England HMA.

Figure 1: CURDS Strategic Housing Market Area

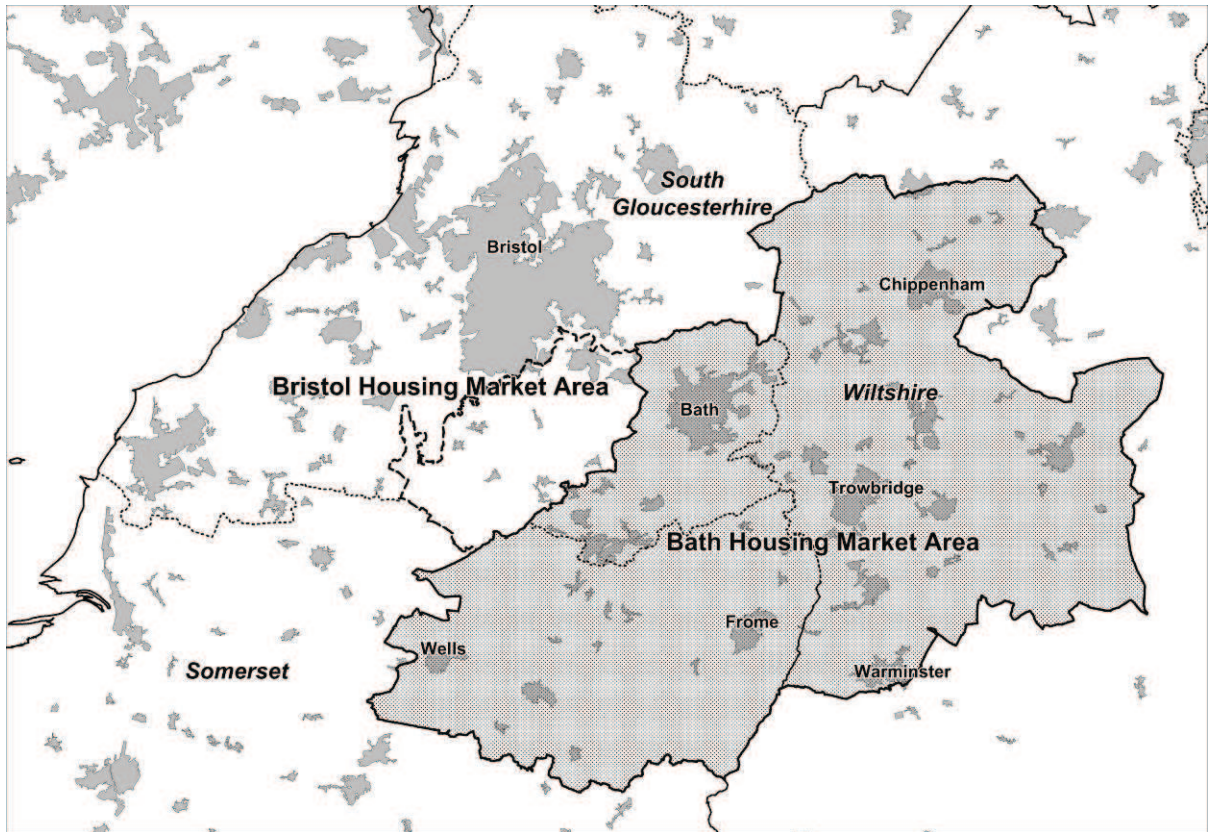
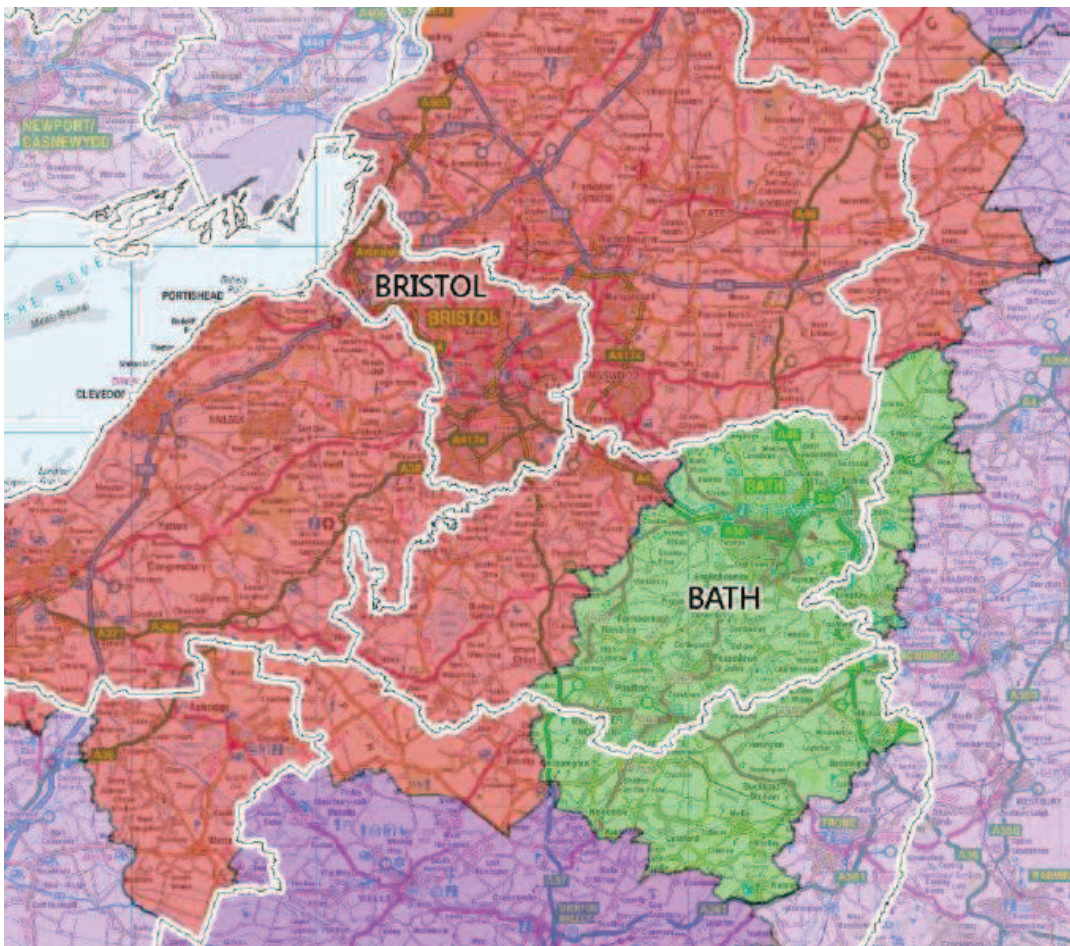


Figure 2: ORS SHMA Housing Market Areas



- 3.4 ORS has confirmed this boundary and have identified two distinct HMAs operating within the district, one focused centred on Bath and drawing in the Somer Valley and the fringes of Wiltshire and Mendip, and another related to the periphery of a Bristol HMA. Despite this distinction, the ORS review provides housing requirement scenarios for the whole district.
- 3.5 At the examination hearings in January 2012, a number of objectors stated that the B&NES Core Strategy should accommodate unmet housing needs generated from within Bristol. However, Bristol has confirmed that its adopted Core Strategy does not identify any unmet need to be met outside its boundaries. In the event that there are housing delivery issues, Bristol has identified a contingency site at Hicks Gate. Therefore there is currently no identified unmet need from Bristol to be accommodated in B&NES. Bristol is scheduled to review its Core Strategy in 2016 based on an updated SHMA evidence. It is therefore inappropriate for B&NES to seek to undertake a SHMA for the separate Bristol HMA and pre-empt a policy response to it. That being, said B&NES will need to engage with that SHMA and the policy response at the appropriate time.

The Plan Period

- 3.6 The Inspector notes (ID/28, para 2.20) the requirement in NPPF para 157 to plan for the longer term, preferably have a 15-year time horizon, particularly if there needs to be any review of the Green Belt. The current plan period for the draft Core Strategy is 2006 to 2026 which entails only a 12 year plan period from adoption in 2014.
- 3.7 The Local Plan period expired in April 2011 which provides a new start date for the Core Strategy. The Core Strategy is likely to be adopted by April 2014 from whence 15 yrs is April 2029. It is therefore recommended that the Plan period run until 2029. This would make the total Plan period 18 years.

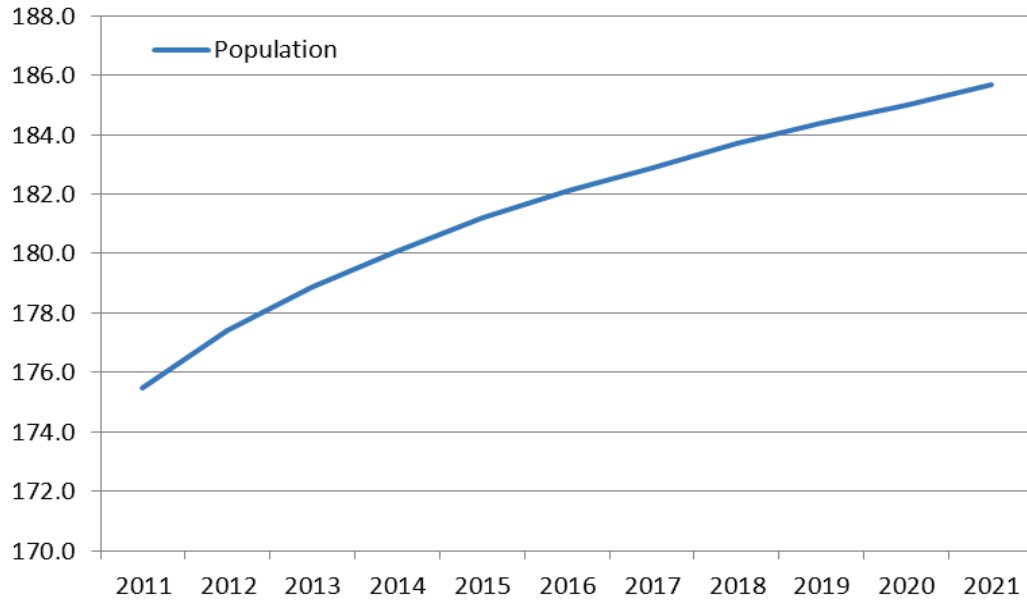
Developing Housing Growth Scenarios

- 3.8 The SHMA review assesses the likely household and housing implications of the post ONS population projections (extrapolated to 2031). It cross checks a number of potential outputs with the labour market and housing requirements of the implications of the WoE LEPs economic growth aspirations.

Population and Household Projections

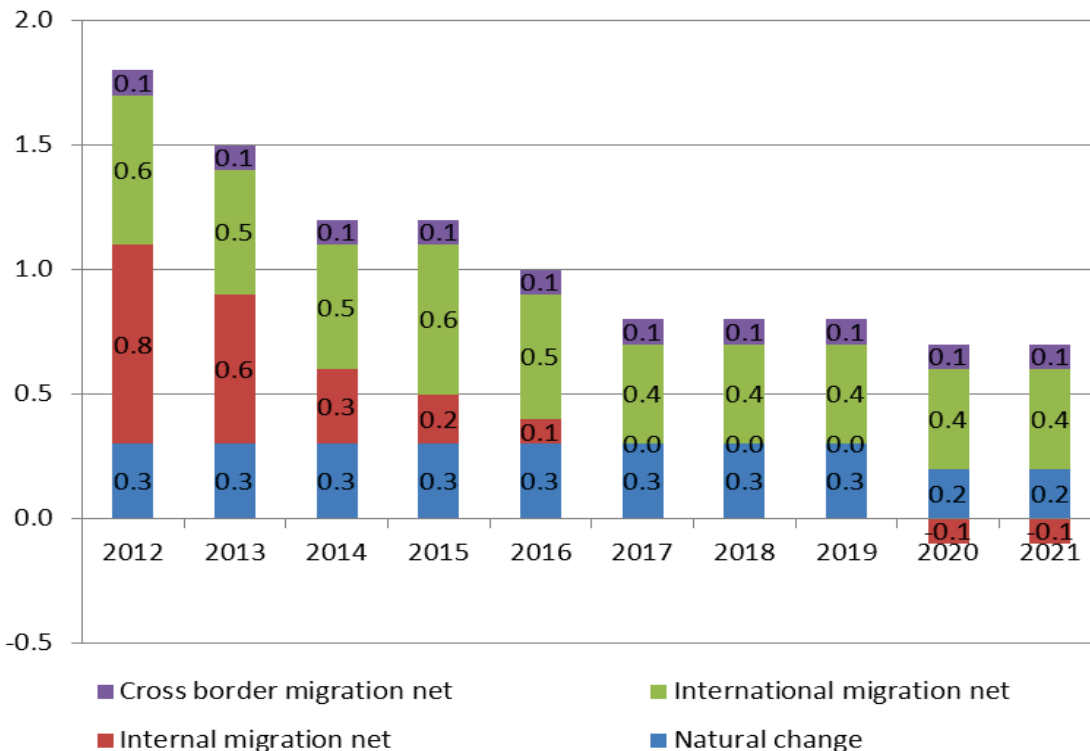
- 3.9 The only official population and household projections that run to 2029 are those that were published before the 2011 census was undertaken. These include 2008 based population and household projections and 2010 based population projections. The results of the census cast doubt on these projections and the accuracy of the intercensal mid-year population estimates upon which they are based. The mid-year population estimates overestimated the changes that were taking place each year and in particular over estimated net migration.
- 3.10 Helpfully, in September 2012 the ONS published a post census population projection but this only runs until 2021. CLG have yet to convert this into a household projection but this is expected to be published before the reopening of the hearings in July and will need to be taken into account. The SHMA aims to predict what the CLG household projection might be great weight should be placed on the post census population projections as these currently represent the most up-to-date estimates of change.

Figure 3: ONS Post Census Population Projection 2011-2021



3.11 For B&NES, ONS estimate that the population will increase by 10,300 between 2011 and 2021 (compared with 7,000 during the previous decade). For the SHMA, ORS have converted this estimate to 2031 based upon the net migration and natural change patterns observable within the ONS projection. A simple doubling of the ten year projection results in 20 year population projection of 20,600 but this is considered too simple an approach given a population growth trajectory that slows significantly between 2011 -21 This is illustrated below.

Figure 4: ONS Post Census Population Projection 2011-2021, yearly components of change



- 3.12 Net migration, particularly net internal migration is the least stable component of the projections. Broadly speaking, ORS postulate a number of scenarios for a 20 year period (2011-2031) based on whether population change reflect the high levels of 2012-13, a mid-level of 2014-16 or plateaus at a lower level of 2014-21. An even low trend (2028-21) is evident but has been discounted from further analysis. The moderate migration scenario reflects the average of 8 of the 10 years between 2011 and 2021 and is therefore consider be a robust reflection of projected growth.
- 3.13 The next stage has been to convert each of these future estimates of population change (and the age structure that is expected) into an associated household / dwellings projection. To do this ORS have taken household headship rates from the 2011 census (this is the probability of a male or female or a specific age being the head of household) and applied them to the projected population structure in 2031.
- 3.14 A crucial technique in this process has been to remove the **student population** from the calculations so that the households generated reflect the additional non-student households/ that are likely to be generated. This is important given the disproportionate number of 18-23 year olds in the Bath population structure. It is unlikely that CLG will undertake this 'correction' when it prepares its official household projections. Students will simply be regarded as young adults forming households. The Core Strategy aims to accommodate the growth of students in dedicated on-campus or off campus accommodation. Therefore the dwellings figures in Tables 2a and 2b do not contain a student component
- 3.15 Finally, the ORS Housing Mix Model considers the existing mix of tenures within the District and how this needs to change in response to each household projection so that a suitable mix of tenures to be available at the end of the plan period.
- 3.16 SHMA projections over 20 and 18 years are presented in Tables 2a and 2b. These show the total housing requirement and that which needs to be affordable housing.

Table 2a: ORS population led projections (20 years)

| | Low | Mid | High |
|-----------------------------|--------------|---------------|---------------|
| Natural Change | 4,400 | 5,500 | 7,600 |
| Net Migration | 12,100 | 16,680 | 25,300 |
| Population Change | 16,600 | 22,200 | 32,800 |
| Additional Dwellings | 8,300 | 10,640 | 15,310 |
| Of which Social/Aff Rent | 3,000 | 3,300 | 4,100 |

Table 2b: ORS population led projections (18 years)

| | Low | Mid | High |
|--------------------------|-------|-------|--------|
| Additional Dwellings | 7,515 | 9,575 | 13,780 |
| Of Which Social/Aff Rent | 2,700 | 2,970 | 3,690 |

Employment-led housing requirement

3.17 For, the **jobs growth scenarios**, ORS tested two economic and employment growth scenarios. These have been based on the forecasts used by the West of England LEP (Oxford Economics 2010 – 2030) to underpin its aspirations for 95,000 more jobs between 2010 and 2030. The first scenario sees B&NES taking a 12% of West of England jobs growth as per the assumptions from Oxford Economics, and the second sees B&NES take its current 15% share of employment. For both scenarios a reduction of 2,800 is made to reflect the fact that the Oxford Economics projections are not sensitive enough to reflect the loss of MoD jobs in Bath. This adjustment was given support by the inspector in his preliminary conclusions. This overall approach produces a need to provide about 9,000 - 11,300 new jobs in B&NES to 2011-2031 which converts to 8,100-10,170 jobs to 2029. The preferred approach is to maintain market share i.e. pursue a spatial development strategy that aligns with the labour market implications of 10,170 jobs (595 pa) for 2011-29. This compares to a rate of 435 pa in the submission Core Strategy for the period 2006-2026.

Table 3: Employment led projections (20 & 18 years)

| | | | |
|----------|-----------|-------|--------|
| 20 years | Jobs | 9,000 | 11,300 |
| | Dwellings | 6,400 | 8,300 |
| 18 years | Jobs | 8,100 | 10,170 |
| | Dwellings | 5,760 | 7,470 |

3.18 The SHMA sets out the housing supply implications of these employment change scenarios are set out in Table 3. In calculating these requirements account has been taken of the net effect of the increase in the school leaving age from 16-18 and of the equalisation and subsequent joint increases in the state retirement age. These changes will alter the way that people behave in the labour market. In aggregate these changes, once applied to the projected age/gender structure of the population, will boost overall participation rates. This put downwards pressure on the number of new homes required from labour supply perspective. Assumptions on behavioural change are background data to the SHMA.

3.19 Though not of direct relevance to the overall housing requirement the Councils expectations in respect of where the 10,170 jobs might arise up to 2029 are set out below:

- 7,000 at Bath - maintaining its role as the pre-eminent employment location through policy interventions focussed around the Bath City Riverside EA

- 1,600 jobs at Keynsham and 9,00 jobs in the Somer Valley - continuing to attract employment growth to the markets towns as a result of interventions to support regeneration and preserve employment in Manufacturing and Transport and communications
- 700 jobs in the rural areas - avoiding a substantial dispersal of jobs growth in an unsustainable way

Bringing the Approaches together

- 3.20 The ORS household projections effectively provide the Council with five options for determining its overall housing requirement. Three are population/household projection based (Table 2a) and 2 are employment-led (Table 3).
- 3.21 The ORS low population/household trend reflects the period 2013-21 of the ONS population projection. As is observed from Fig 1 and Fig 2, this is the most logical trend to use to extend the projection to 2029. There is nothing to indicate that growth post 2021 will rebound to the levels projected for 2012-13 or 2014-16. Further the period 2013-21 is by no means the lowest trend that could have been applied. These are evident in the period 2017-21.
- 3.22 Of note is the similarity between the low trend housing requirement and the LEP aligned housing requirement i.e. building 8,300 houses over 20 years or 7,470 over 18 years will cater for the latent demand for housing whilst providing the conditions for the labour supply to rise. Crucially there is a need for 2,700 social rented/affordable rented homes (over 18 years) within this total.
- 3.23 This is not the end of the narrative in respect of setting the housing requirement. There are two key issues that remain;
- (1) the backlog of housing during the previous Local Plan period, and
 - (2) the mismatch between the level of affordable housing that can be generated from current commitments or developable brownfield supply and what is required in the SHMA.

Setting the Core Strategy Housing Requirement

Local Plan Shortfall & Affordable Housing

- 3.24 The issue of previous under delivery was of concern to the Inspector who considers that the Local Plan backlog should be added to the housing requirement (ID/28 para 1.39). At the end of the Local Plan period in April 2011, this shortfall was 1,167 dwellings. The housing market in B&NES has in part responded to an under supply of new build properties with the growth of shared housing for non-students. People have still been able to access housing but not all of this has resulted in suitable accommodation and the affordable component of the shortfall was not provided. It is also important that an historic backlog be corrected relatively quickly rather than being dealt with over the 18 year plan period. It is therefore proposed that this should be dealt with during the first five years of the plan period.

3.25 Had Council achieved 35% affordable housing on the 1,170 undelivered homes it would have yielded a market / affordable split of 410 / 760.

3.26 It is recommended that these backlog totals be added to the SHMA requirement in paragraph 3.17. The result in the revised requirement set out in the column titled SHMA plus backlog in Table 4. The shaded area of Table 4 is relevant in respect of paras 3.27-3.29 that follow.

Table 4: B&NES Housing Requirement based on ORS moderate growth scenario

| | SHMA (20 yrs) | Plan Period (18 yrs) | Local Plan Backlog | SHMA plus backlog | SHLAA Supply | Difference | Add for Affordable Housing @40-30%* | Total* |
|--------------|---------------------|----------------------------|--------------------------|-------------------------|-----------------|------------|--|----------------------------|
| Total | 8,300 | 7,470 | 1,167 | 8,637 | 10,852 | +2,215 | 1422- 1,897* | 12,274- 12,749* |
| Market | 5,300 | 4,770 | 757 | 5,527 | 8,311 | +2,784 | 853-1,328* | 9,164- 9,549* |
| Affordable | 3,000 | 2,700 | 410 | 3,110 | 2,541 | -569 | 569 | 3,110 |

**NB: the precise level of additional market housing required will vary in relation to the extent of development identified in 30% locations and 40% locations.*

3.27 When the SHLAA is compared to the 'SHMA plus backlog' requirement it can be seen that, whilst the housing supply is greater than the requirement, there is a deficit in respect of affordable housing. The good supply of market housing generates a significant buffer to compensate for non-delivery risks on some of the more complex sites and would enable enough market housing to come forward to actually meet the high trend population scenario over 20 years.

3.28 However, in respect of affordable housing the SHLAA indicates a supply of around only 2,500 affordable units. This is a shortfall of 590 dwellings against the evidenced need of around 3,110 social rented/affordable rented units. NPPF requires that all housing requirements are met. It is therefore necessary to boost the overall supply of housing by around 1,422-1,897 dwellings to facilitate delivery of the additional 569 affordable houses. Further, this boost creates even more flexibility in respect of market supply.

3.29 The overall level of housing required to meet the affordable housing requirement is therefore about 12,300-12,800. An oversupply of market housing of around of 3,600-4,000 dwellings will be provided.

3.30 This housing requirement has been assessed in a way which is consistent with NPPF 159, and includes the Local Plan shortfall. The supply side enables considerable flexibility and will entail an annual delivery of rate of over 700 homes per annum. Both the requirement and the supply side represent a significant boost to the existing District supply of 76,000 homes.

3.31 In respect of the housing target for plan period and against which the five year land supply position should be calculated the figure of 8,637 homes (480 per annum) reflects the total amount of housing that needs to be delivered. In order to address the Local Plan shortfall

of 1,167 within the first 5 years the annual requirement is 648 for this period and 415 thereafter.

- 3.32 Against a target of 8,300 dwellings (frontload to enable the Local Plan backlog to be delivered within the first five years of the plan period) the updated SHLAA demonstrates that there is a five year supply of suitable and deliverable sites, plus a 20% buffer. The buffer is a requirement of the NPPF where there has been a record of persistent under delivery. There is no 20% buffer in respect of social rented /affordable rented housing rolling requirement.

Flexibility of employment land provision

- 3.32 The Inspector indicated that the Core Strategy should provide flexibility to accommodate higher levels of economic growth, should circumstances in the future be more favourable. He was particularly concerned about limited flexibility in Bath and Keynsham.
- 3.33 Further analysis of the new employment projections and associated employment space requirements, using the latest employment density figures published by the HCA, shows that in Bath and Keynsham there is the capacity, on key development sites, to deliver 145% of the required office space, providing headroom to accommodate choice and flexibility in line with the approach taken in the Business Growth & Employment Land Study.
- 3.34 However a similar analysis in relation to industrial employment shows that there is a need to identify additional floorspace to meet expansion needs at Keynsham and make good the forecast loss of industrial space in Bath. It is therefore proposed to provide for an extension to the Ashmead Industrial Estate in Keynsham to both address the shortfall and provide for flexibility and choice.

Provision for students

- 3.35 Growth in student numbers at bath University is not expected to be a significant as it was in the last decade. Bath Spa University is also planning for consolidation rather than expansion. Significant provision has already been made at Bath University through the removal of land from the Green Belt in the Local Plan for both student accommodation and academic needs.

4.0 LOCALATIONAL OPTIONS TO BOOST HOUSING LAND SUPPLY

Context

- 4.1 The need to boost existing housing land supply by around 1,870 dwellings requires the identification of new housing/development locations. This will need to be done in the context of the NPPF presumption in favour of sustainable development. In selecting housing development options, the Council needs to balance the economic, social and environmental dimensions (NPPF para 8). A Sustainability Appraisal is integral to identifying development options (NPPF para 165). It will also need to take account of the tests of soundness in NPPF para 182. NPPF The vision and aspirations of local communities will also need to be taken into account (NPPF para 151).

Process for identifying options

- 4.2 Opportunities have been maximised to boost supply from existing sources of supply such as brownfield sites, windfall sites, re-use of empty properties, the identification of new locations is required. The Council will need to consider reasonable alternatives (NPPF 182). The Council has followed a three stage process and the relevant evidence base listed in the covering report.

- Stage 1: District-wide locational sequence
- Stage 2: Identification of suitable locations
- Stage 3: Detailed site assessments

Stage 1: District-wide locational sequence

- 4.3 The Sustainability Appraisal (SA) assesses the different parts of the district and sets out a broad locational sequential preference across the district judged against existing Core Strategy and Sustainability Appraisal objectives. These objectives have been updated against NPPF (see SA paper 1 and schedule of changes in Annex 3). The conclusions of this assessment are that Bath is the most sustainable location in seeking to identify new development locations, followed by Keynsham. The Somer Valley, the rural areas, locations on the edge of Bristol and a new settlement are relatively less sustainable.

Stage 2: Identification of suitable locations

- 4.4 Having established the district-wide sequential preference, Stage 2 of the SA process sought to identify the most suitable locations in these places. The SA explains how these locations have been identified and key points are summarised below.

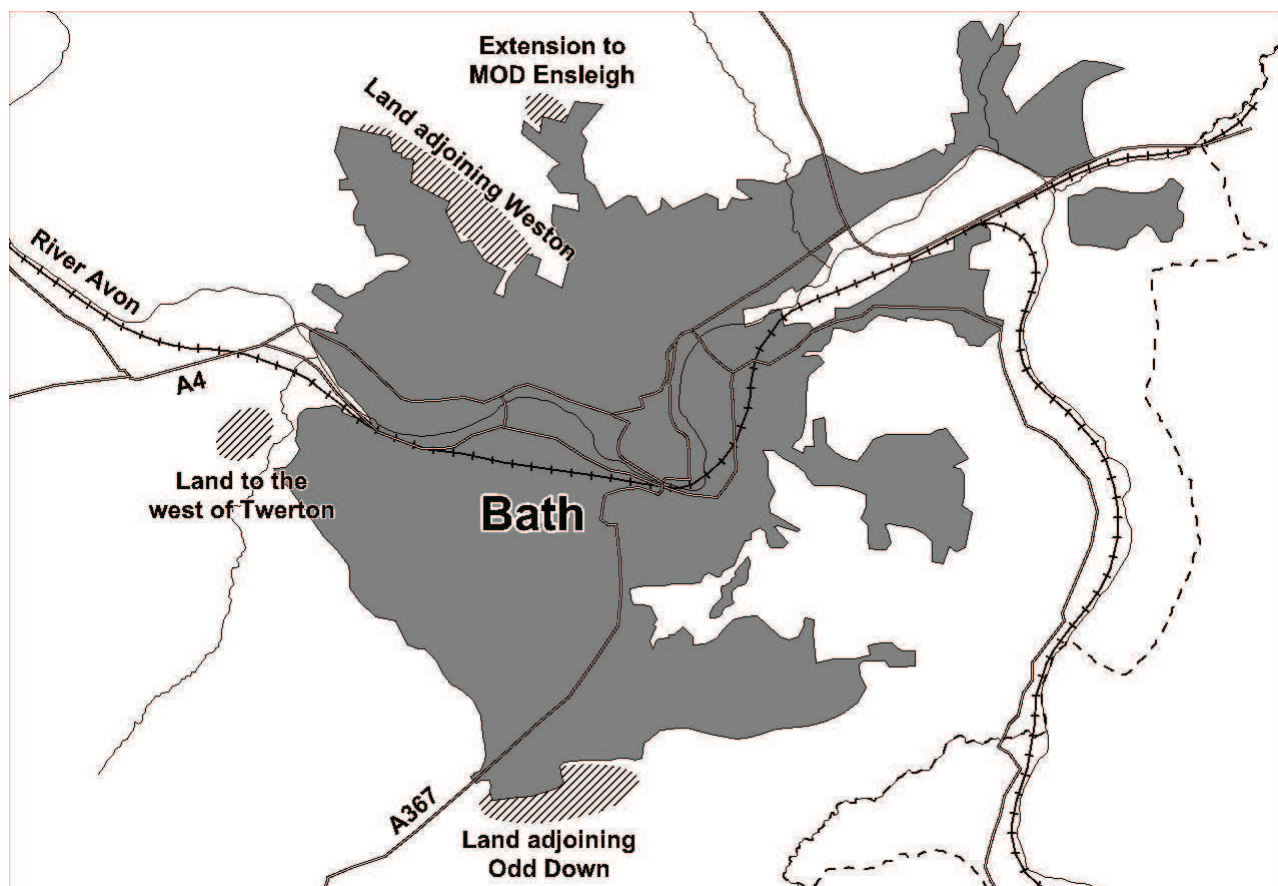
Bath

- 4.5 As explained in the SA Stage 1, Bath is the most sustainable location in district. It is the district's primary economic driver, primary generator of jobs and is the focus for new development in the Core Strategy (para 1.27). It is a key centre within West of England and integral to the LEP economic growth strategy with the identification of an Enterprise Area. The current supply of around 52,000 jobs in the city is expected to grow by 7,700 jobs by 2029. The city already is a significant importer of labour with around a net 12,000 workers in-commuting every day to work. The city has an excellent range of facilities and infrastructure and it is relatively sustainable in terms of internal travel patterns. The Council is also making significant infrastructure investments in the city. The affordable housing need is also greatest in this part of the district. The existing strategy therefore

seeks to focus new development in Bath and SHLAA identifies an existing supply of around 6,285 dwellings in the city during the plan period. There are therefore sound reasons for Bath to continue to be the focus for new development.

- 4.6 Notwithstanding the advantages, the substantial environmental assets of Bath also need to be taken into account in identifying new sites. These are recorded in the SA report. Noteworthy are the inscription of the whole City along with its setting as a World Heritage Site, the inclusion of land to the north, east and south of Bath within the Cotswolds Area of Outstanding Natural Beauty (AONB), the Special Area for Conservation (SAC) protecting bats of European importance, the extensive Conservation Area and other nationally important heritage assets such as the Wansdyke. NPPF para 152 requires that significant adverse impacts on important environmental assets should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 4.7 Furthermore, Bath is entirely surrounded by the Bristol-Bath Green Belt and NPPF para 83 states that Green Belt boundaries should only be altered in exceptional circumstances. NPPF para 84 requires that any review of Green Belt boundaries should take account of the need to promote sustainable patterns of development. It is considered that the scale of the need for housing and the overwhelming benefits of Bath as the most sustainable location for new development amount to the he exceptional circumstances need to release land from the Green Belt. However this can only be done if safeguards are put in place to minimise and mitigate harm.
- 4.8 NPPF para 115 states that AONBs have the highest status of protection in relation to landscape and scenic beauty. NPPF para 116 advises that major development in AONBs should only be allowed in exceptional circumstances. These include public interest, the need for the development, whether there are any alternatives and the harm caused with scope for mitigation. It is considered that the scale of the need for housing, the overwhelming benefits of locating this at Bath, the lack of equivalent sustainable locations and the scope to minimise harm justify locating development in the AONB in certain locations, under specified circumstances and only with necessary safeguards .
- 4.9 In order to secure the safeguards referred to above, locations would only be identified in the Core Strategy for development with clear development requirements to minimise and mitigate harm, achieve a high standard of development, create positive environments and minimise the impact on neighbouring residents (see Table 10 below).
- 4.10 The opportunities on the edge of the city as identified in the SA stage 2 analysis to increase housing supply are;
- An extension to MoD Ensleigh
 - land west of Twerton
 - Land adjoining Weston
 - Land at Odd Down

Map 1: Opportunities to boost housing land supply at Bath



4.11 The SHLAA also shows that there may be some smaller sites in the Green Belt on the edge of the urban area of Bath but these are not of strategic significance and would not make a strategic contribution to housing land supply. The opportunity exists in the PlaceMaking Plan to consider these sites as part of a minor review of the inner Green Belt boundary in the context of the NPPF requirements.

Keynsham

4.12 Whilst Keynsham is not in the Bath Housing Market Area, the relative sustainability of its location is described in the SA. The Core Strategy recognises that the town occupies a strategically important location between Bristol and Bath. SHLAA identifies that the town has currently has a supply of over 1,600 additional dwellings. The existing Core Strategy seeks to ensure that new housing is balanced with the generation of new jobs and that the town should evolve as a significant business location.

4.13 Notwithstanding its location on a good public transport route, the town is not without local transport difficulties, particularly the existing levels of congestion on the A4 and in the town centre. This has implications for all large potential development locations at the town.

4.14 The environmental constraints are not in the same order as those affecting Bath but the town is tightly bound by the Green Belt and any new large development locations will need to be released from the Green Belt. It is considered that the scale of the need for housing and the relative sustainability of Keynsham's location amount to the exceptional reasons

for changing the Green Belt boundary. As with Bath, this would only be on the basis that the necessary planning safeguards are identified.

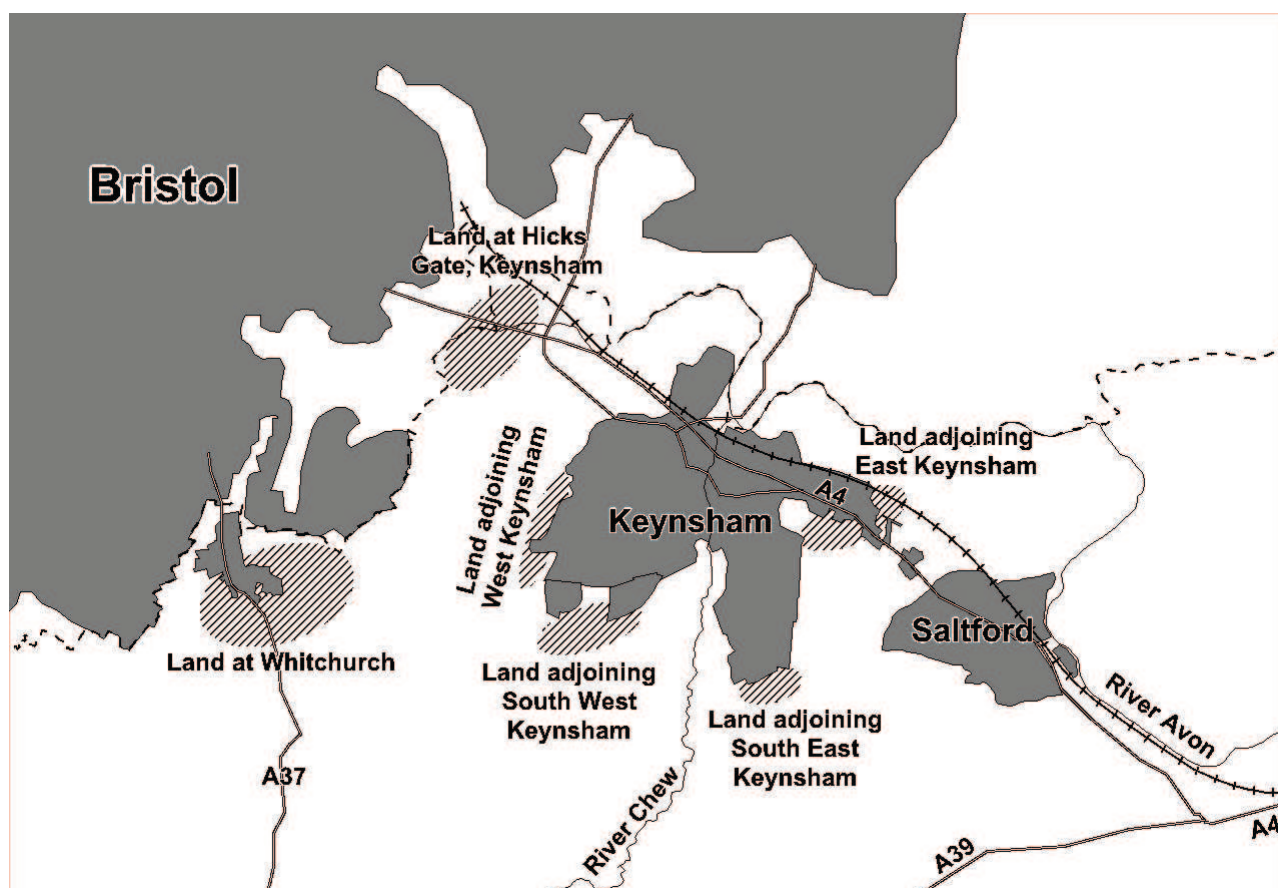
4.15 There options at Keynsham identified in the SA stage 2 analysis are;

- Land west of Keynsham
- Land south of K2
- Land at Uplands
- Land east of Keynsham

4.16 Development options to Saltford were considered in the SA analysis but are not considered deliverable in the Plan period.

4.17 As with Bath the SHLAA also shows that there may be some smaller sites in the Green Belt on the edge of Keynsham but these are not of strategic significance and would not make a strategic contribution to housing land supply. The opportunity exists in the Placemaking Plan to consider these sites in the context of the NPPF requirements.

Map 2: Locational options to boost housing land supply at Keynsham/Edge of Bristol



Remainder of the District

4.18 Two thirds of the remainder of the District falls within the Green Belt leaving around a third of the District lying south of the Green Belt. This latter area includes the Somer Valley settlements along with a limited number of other villages and hamlets lying in open countryside.

4.19 The north western part of the District lies in the Green Belt and borders onto Bristol which, due its size, exerts an influence over the district. The western part of B&NES falls within the Bristol Housing Market Area.

Somer Valley

4.20 In relation to the Somer valley, the submitted Core Strategy seeks to boost jobs and promotes regeneration in response to the existing significant and growing imbalance between jobs and homes. The employment base has been diminishing over recent years whilst incremental housing growth has continued. Currently over 50 % of workers leave the area to find work elsewhere. There is limited potential to substantially rectify transport inadequacies and the area has not proved to be an attractive location for new businesses. NPPF para 37 requires that Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

4.21 There are already existing commitments of around 2,000 dwellings in these towns and the likelihood of generating only an extra 1,000 jobs by 2029. Even this position will exacerbate the existing high level of out-commuting. The submitted Core Strategy does not therefore seek major expansion of the Somer Valley towns. Instead it focuses on regeneration involving re-use of brownfield sites and investment in the town centres. It seeks restraint over additional housing growth so as not to prejudice this objective and seeks to secure economic benefit from any necessary greenfield development.

4.22 It is considered that this broad strategy is still justified because the issues highlighted above have not changed. However, because of need to boost housing land supply, it is accepted that some additional housing is necessary to meet needs and to ensure flexibility in housing supply. This will require greenfield sites because the brownfield opportunities are already accounted for. Various deliverable mostly small/moderate sized sites have been suggested through SHLAA.

Rural Areas

4.23 In rural areas, the SHLAA identifies that the existing supply of housing is around 850 dwellings. Around two thirds of the District falls within the Green Belt and the Cotswolds and Mendips AONBs cover much of the eastern and western parts of the district respectively. Within the Green Belt, the capacity for additional housing development is governed by NPPF para 89 which limits new development such as to limited infilling or limited affordable housing. SHLAA makes limited windfall provision for housing coming forward under this policy.

4.24 Six settlements are Green Belt insets and these are tightly bound by their inner Green Belt boundaries with limited capacity to accommodate additional housing growth other than what could come forward under Policy RA.1. Any additional housing in the Green Belt adjoining these settlements would need to be justified by exceptional circumstances warranting a change to the Green Belt inset boundaries. It is not considered that this is currently the case.

4.25 Beyond the Green Belt, Policy RA1 in the existing Core Strategy promotes new housing at more sustainable villages (i.e. those with facilities and good public transport links). There are four villages outside the Green Belt which meet RA1 requirements and could accommodate additional development over plan period. The draft Core Strategy currently

expects them to accommodate an additional housing capacity of about 30 dwellings each in addition to the existing supply already identified at these villages in the SHLAA. There are options to increase this but not to point which is unsustainable or becomes as strategy of dispersal of development in an unsustainable way. NPPF para 54 advises that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect *local* needs.

4.26 It is also not unreasonable for the 8 smaller villages which met requirements of Policy RA2 to grow sustainably during plan period. In addition to of the expected small site windfall growth all could be expected to review their HDBs over plan period to identify a small amount of new housing, around 15 dwellings each, through the Placemaking Plan or Neighbourhood Planning. The Council has begun working with local communities on the Placemaking Plan to facilitate this process.

Edge of Bristol/Keynsham area

4.27 Whilst new development on land adjoining Bristol would enable residents will have good access to local facilities and services, this area is poorly located for Bath and is not within the Bath HMA. It is likely that people living here would in practice be seeking to work in Bristol. Bristol’s adopted Bristol Core Strategy does not identify a housing shortfall for Bristol and it does not need housing outside its boundaries to meet needs of Bristol. Furthermore Bristol is concerned about loss of Green Belt land on the edge of the City and the impact on regeneration of south Bristol.

4.28 However, if the need for housing need warrants releasing land from Green Belt and if the exceptional circumstances can be demonstrated, then the SA highlights two opportunities;

- Land at Hicks Gate, Keynsham
- Land at Whitchurch

4.29 In conclusion, the identified opportunities to boost housing land supply are summarised in Table 5 below and illustrated in maps 1 and 2. The suitability of these locations and their capacity is assessed in stage 3.

Table 5: Locational options with potential to boost housing land supply

| Ref | Location |
|-----|---|
| | Bath |
| 1 | Land adjoining Odd Down |
| 2 | Land adjoining Weston |
| 3 | Extension to MoD Ensleigh |
| 4 | Land to the west of Twerton |
| | Keynsham |
| 5 | Land adjoining east Keynsham |
| 6 | Land adjoining south west Keynsham (south of Local Plan K2) |
| 7 | Land adjoining west Keynsham |
| 8 | Land at Uplands, south east Keynsham |
| | Somer Valley |
| - | Various moderately sized site options (see SHLAA) |

| | |
|-----|------------------------------|
| | Rural Areas |
| - | Various Options (see SHLAA) |
| | Edge of Bristol |
| 9 | Land at Whitchurch |
| 10. | Land at Hicks Gate, Keynsham |

Stage 3: Assessment of the Locational options

4.30 In order to identify the most suitable locations to boost housing land supply, Stage 3 of the SA has undertaken an assessment of the options listed in Table 5. The results are summarised in Table 6 below. This has drawn heavily on the SHLAA. The following evidence/studies are of particular note in these assessments.

Green Belt review

4.31 In para 7 of ID/28, the Inspector advises that if it is apparent that additional housing land is needed, the Council should undertake review of the Green Belt to assess capacity to accommodate further development in a sustainable manner. The results of this review are a background paper to this report

Infrastructure

4.32 The Infrastructure Delivery Plan (IDP) underpinning the Core Strategy has been updated to ensure new development is aligned with the necessary supporting infrastructure and that development on the locations is deliverable and there are no infrastructural obstacles. In particular, the Council has undertaken high level transport assessments of these locations

Site assessment work

4.33 Various development options have been undertaken to assist in assessing the site options and to inform capacity. This has taken into account the environmental sensitivities which are particular significant in some locations.

Table 6: Summary of Locational Assessments: Options for increasing the housing land supply in Bath & North East Somerset

| Location | Summary of key issues (see evidence base including SA/SHLAA for more detailed ¹ assessments) |
|-------------------------|---|
| Bath | |
| Land adjoining Odd Down | <p>Social/Economic</p> <ul style="list-style-type: none"> Well related to Bath and Odd Down local centre and other facilities and services, with good potential for walking and cycling to local facilities Well located for public transport accessibility Meets the 3rd Joint Local Transport Plan aims of reducing carbon emissions, improving accessibility, improving safety and improving quality of life, enables people to live closer to where they work, well located to address in-commuting |

- Development at this scale would support the provision of a new primary school on site or could facilitate the potential expansion of existing schools.
- Opportunity to integrate well into the City and recreational opportunities in the adjoining countryside

Environmental

- Reduced capacity option allows for many environmental impacts to be mitigated
- Smaller scale of development can maintain separation between Bath and the village of South Stoke Conservation Area.
- This is a green belt location of high importance for preventing the sprawl of Bath into open countryside and preventing coalescence with South Stoke village and preserving the special character of the World Heritage site (particularly in the western part of the area)
- Smaller scale of development can avoid encroachment onto the edge of the scarp and visibility in long views
- Eastern part of location has a moderate impact on the World Heritage site and its setting rising to high impact in the Western part
- The Wansdyke (Scheduled Ancient Monument) Post-Roman linear earthwork lies immediately the north of the appraisal area, with the area forming part of the monument's setting. Development would be likely to have an adverse impact on this heritage asset. This impact will need to be moderated and appropriate management arrangements put in place in relation to the Wansdyke.
- Likely to have an adverse impact South Stoke Conservation Area and its setting, which would need to be mitigated by reducing the scale of the development
- Development is within the Cotswold AONB
- Affects views from Public Rights of Way
- Within the appraisal area there is evidence of Prehistoric activity in the form of flint scatters, along with Bronze Age and Roman occupation south-west of Sulis Manor.
- Potential for significant effects on ecology and the integrity of Bradford-upon-Avon SAC unless adequate mitigation secured.
- Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues.
- Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. However, there is existing surface water flood issues in Weston and a mitigation scheme is currently being developed in partnership with the EA. Potential to upgrade the scheme to ensure new development is safe without increasing the risk to elsewhere in Weston.

Delivery

- Land is available for development and is being actively promoted by a single landowner
- A smaller scale of development proposed would only generate limited infrastructure.

| | |
|------------------------------|---|
| <p>Land adjoining Weston</p> | <p>Social/Economic</p> <ul style="list-style-type: none"> ● Well related to Bath City Centre and local facilities and services in Weston ● Well located for public transport accessibility and good potential for walking and cycling to local facilities ● Is in line with the 3rd Joint Local Transport Plan aims of reducing carbon emissions, improving accessibility, improving safety and improving quality of life, ● Allows people to live closer to where they work, well located to address in-commenting ● On its own development on this scale does not generate sufficient housing to support a new primary school on site. However, the need for primary school places arising from this development combined with the residential development of other sites in the Weston area identified in SHLAA would need to be met through provision of a new primary school. ● Opportunity to integrate well into the City and recreational opportunities in the adjoining countryside <p>Environmental</p> <ul style="list-style-type: none"> ● Small scale of development allows for environmental and heritage impacts to be mitigated and areas of greatest sensitivity to be avoided ● This is a green belt location of high importance particularly in terms of preventing sprawl into the open countryside. ● Site lies within the World Heritage Site but, development at this location would only have a moderate impact on the World Heritage Site and its setting, as long as development is contained within the lower slopes ● Development is within the Cotswold AONB ● Development here would need to address the hydrological and surface water flooding issues (springs/slope run-off) which will constrain capacity ● Located largely within the Bath Conservation Area and development could impact on the Conservation Area and open fields to the north of Primrose Hill and setting of listed buildings locally. ● Development would impact on rural character of landscape, although green hillsides and upper slopes would be protected and retained ● Impacts of views from Public Rights of Way (including the Cotswold Way) ● Includes a Strategic Nature Area, Sites of Nature Conservation interest and ancient woodland which could be harmed by habitat fragmentation and impacts of urbanisation. Development of these areas could be avoided ● Potential for significant effects on ecology and the integrity of Bradford-upon-Avon SAC unless adequate mitigation secured, including avoidance of key foraging areas and flight-lines, and other protected habitats, Delivery ● Land is available for development to meet this level of development capacity ● Low development capacity means there are limited infrastructure requirements ● Well located for public transport accessibility and is supported on transport grounds ● Within Flood Zone 1 and passes the sequential test. It also provides |
|------------------------------|---|

| | |
|----------------------------------|--|
| | <p>flexibility to respond potential brownfield delivery issues. However, there are existing surface water flood issues in Weston. New development should be safe without increasing the risk to elsewhere.</p> <ul style="list-style-type: none"> • |
| <p>Extension to MOD Ensleigh</p> | <p>Extension of an option previously consulted on as part of the MOD Concept Statement</p> <p>Social/Economic</p> <ul style="list-style-type: none"> • Relates well to the MOD Ensleigh site • There are benefits of extending this MOD development site in terms of the ability of new development to generate to support the provision of facilities and services (e.g. a new primary school) • Comprehensive development of the MOD site and the land adjoining provides the opportunity to provide some new employment space • Well related to access Bath and its facilities and services • Well located for public transport accessibility and is supported on transport grounds • Is in line with the 3rd Joint Local Transport Plan aims of reducing carbon emissions, improving accessibility, improving safety and improving quality of life, • Opportunity to integrate well into the City and recreational opportunities in the adjoining countryside • enables people to live closer to where they work, well located to address in-commuting <p>Environmental</p> <ul style="list-style-type: none"> • Development extending beyond this area to the north and west would have greater landscape harm and has therefore been avoided • This site is not within the AONB, impacts of development on the AONB can be limited. • This site is not within the Green Belt • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. • Part of the site is designated as a Site of Nature Conservation Importance, and is notable for the presence of Green Winged Orchids. Valued features would need to protected and sustained. <p>Delivery</p> <ul style="list-style-type: none"> • The land is available for development. • As the site is currently used as the Royal High School playing fields, suitable replacement playing fields are required. • Kingswood Playing Fields are not currently available for development during the plan period • Capacity to extend development beyond this in future is limited due to existing sports uses that would need to be relocated and the high environmental sensitivity of the area. This will be assessed in more detail as part of the Placemaking Plan. |

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| <p>Land to west of Twerton</p> | <p>A larger site was considered during plan preparation stage fronting the A4 concluded that this was a good location for and cycling access and enabled employment development. However the SA and subsequent confirmation by English Heritage of the significance impact that development of this scale and this location would have on World Heritage site and its setting has led to this full site no longer being considered as a reasonable option.</p> <p>A smaller site area of approx. 300 dwellings has been considered adjoining Pennyquick for the purpose of this assessment. However, the high impact on the World Heritage site remains and it does not offer many of the advantages of the larger site.</p> <p>This site is therefore not recommended as an option for inclusion in the Core Strategy changes.</p> <p>Social/Economic</p> <ul style="list-style-type: none"> • A smaller development area is physically detached from the urban edge and key transport corridors • Limited development along Pennyquick is not on a public transport route and therefore, development would be car dominated and isolated • Performs poorly in meeting the 3rd Joint Local Transport Plan aims of reducing carbon emissions, improving accessibility, improving safety and improving quality of life, • A smaller development area would not be attractive for local employment and would not support local facilities on site, this site is isolated and does not relate well to the existing urban area. • enables people to live closer to where they work, but not well located to address in-commuting as this would be predominantly by car <p>Environmental</p> <ul style="list-style-type: none"> • This is a Green Belt location, of particularly high importance in terms of impact on Green Belt purposes as it lies within the corridor between Bath and Bristol and it– prevents the unrestricted sprawl of Bath, and plays a key role in protecting the setting and special character of the World Heritage site • Smaller level of development still has a high adverse impact on the World Heritage Site and its setting. This would conflict with national policy and would be of significant concern to English Heritage. • Smaller level of development would still have a potentially detrimental impact on the Newton St Loe Conservation Area • Development impacts on the Cotswold AONB and is visually prominent from it • The smaller scale of development proposed would only generate limited infrastructure, this area does not link well to existing services and facilities • Development would impact on rural character of landscape • Impacts of views from Public Rights of Way • Possible ecology effects are noted on the Bradford-upon-Avon SAC and in particular foraging areas although these impacts are considered to be quite |
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| | <p>limited, with mitigation possible</p> <ul style="list-style-type: none"> • Within the appraisal area there is evidence of Iron Age field systems, Roman villa cemetery, and the site of Newton Mill. More recent archaeological field evaluation has revealed the existence of a late Bronze Age to Romano-British settlement within the current study area • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. <p>Delivery</p> <ul style="list-style-type: none"> • Although a single landowner is promoting the wider site, indications are that a reduced capacity option is unlikely to be taken forward by the landowner who is seeking a mixed use development with excellent public transport accessibility |
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Keynsham

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| <p>Land adjoining East Keynsham</p> | <p>Social/Economic</p> <ul style="list-style-type: none"> • Reasonably well located for proximity to town centre and other services. • Better located than other sites within town for access to A4 public transport corridor with existing excellent bus services to Bath, Keynsham and Bristol • Good access to employment opportunities and scope to extends existing industrial estate to provide enhanced employment opportunities in an area of demand. • Has greatest scope to align with the Strategy for Keynsham of balancing new homes with additional jobs. • Extensive community forest planting could provide a good setting for new development. • Transport advice is that only limited development should be brought forward in this location due to existing congestion on the A4. • Development of this scale may not support a primary school on site. There may be potential to meet primary education requirements by expanding existing schools in Keynsham and Saltford . • Location lies close to Wellsway Secondary School – children inform this new development would displace students currently resident Broadlands School catchment area, thereby increasing student numbers at Broadlands • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. <p>Environmental</p> <ul style="list-style-type: none"> • Impact of development on the landscape low to moderate • Green Belt in this location is of high importance on the basis that it prevents the merger of Bath and Keynsham, protects the countryside from encroachment and protects the separate identities of Keynsham and Saltford. • The location is adjacent to Manor Road Community Woodland LNR which would warrant protection |
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| | <p>Delivery</p> <ul style="list-style-type: none"> • Land available for development and being actively promoted • More significant development at this location would require major transport infrastructure and cannot currently be demonstrated to be deliverable • Development at this location could increase congestion through Saltford • Relocation of propose site for Saltford Station to East Keynsham may assist with transport issues but again, we are unlikely to be able to demonstrate deliverability at the current time. • The eastern part of the site contains the national high pressure gas main which significantly reduces the capacity for any significant development here. |
| <p>Land at South West Keynsham (Local Plan allocation K2)</p> | <p>Social/Economic</p> <ul style="list-style-type: none"> • Avon Cycle Way provides a link to Saltford/Compton Dando to the south west of the site accessed via Redlynch Lane. Existing footpaths to the east of the site along the River Chew connect to Keynsham Health centre and on to the Town Centre • Site could incorporate an extension to the Community Woodland • Has detractions on transport grounds because would bring traffic into already congested town centre, particularly travelling to Bath and north fringe of Bristol, with limited scope for mitigation. • Will lead to use of unsuitable minor roads to access Bristol by car, specific localised improvements may be necessary. • Bristol bound traffic may also use the already congested A37 route. • Poorly located for travel to Bath. • Potential accessibility by public transport from the location is poor • Not well linked to Keynsham station • Over 500m from the nearest local centre, 2km from the town centre and 3km from the railway station (all distances further than the recommended reasonable walking distance in the developers transport assessment) • This poses issues regarding the social and environmental sustainability of development of this site and could lead to the creation of an isolated and car-dominated environment. • Additional development of this scale may not be sufficient to support a new primary school, Castle Primary School is already being extended to its full capacity address additional demand from K2. It may be possible to expand existing primary school facilities. <p>Environmental</p> <ul style="list-style-type: none"> • The Green Belt in this location has an important role in protecting the countryside from encroachment, although not of great importance in preventing the merger of Bristol and Keynsham. • Records suggest the site supports limited features of ecological importance, with the exception the presence of Great Crested newts, and Brown Hare, both are UK Priority Species. If confirmed through detailed surveys, measure to protect and sustain these species would be required. |

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| | <ul style="list-style-type: none"> • There is a degree of topographic continuity between the existing urban edge of Keynsham, the future K2 development sites and the northern part of this site. • Good scope for structure planting to be moderately to highly effective in softening the impact on landscape and views north of Parkhouse Lane • Development of this site would not extend the southern limits of Keynsham any further south than that which already exists on the east side of Keynsham, or any further westwards than that which already exists. • Physical separation would remain between Keynsham, Queen Charlton and Chewton Keynsham, although distances between them would inevitably be narrowed. • Possible impact on Queen Charlton Conservation Area and Parkhouse Farm (Grade II listed) • Prehistoric and medieval finds have been recovered from the central part of the area and could suggest early settlement and/or occupation • Overall capacity of the landscape to absorb development is low – area is deemed to be of high importance in landscape terms and development would have a high impact. Structure planting to the south of Parkhouse Lane would have some effect locally but largely ineffective from wider views. • Inspector of 1992 Keynsham and Chew Valley Local Plan recommended that the character and charm of the views from the Wellsway should be safeguarded carefully and that development on the west side of the Wellsway (i.e. including this site) would erode that character. • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. <p>Delivery</p> <ul style="list-style-type: none"> • Landowners promoting land in this area for development at higher capacity than proposed • Could help to improve access difficulties with existing K2B allocation. However, there is no provision in the planning permission for K2B to allow for a vehicle connection to this site • Capacity depends on how far south the site extends. • Would require fairly significant sewerage infrastructure |
| Land adjoining West Keynsham | <p>Social/Economic</p> <ul style="list-style-type: none"> • Close to Queens Road Local Centre and the Town Centre • Potentially good pedestrian and cycle links to Keynsham town centre. A public right of way runs east/east through the northern site • Has detractors on transport grounds because would bring traffic into already congested town centre particularly travelling towards Bath and the north fringe of Bristol, with limited scope for mitigation • Bristol bound traffic may travel via the already congested A37 route <p>Environmental</p> <ul style="list-style-type: none"> • Moderate capacity to accommodate development in landscape terms - |

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| | <p>planting and open space would soften the impact of development from across valley views and could be very successful in the medium to long term.</p> <ul style="list-style-type: none"> • Site lies in the sensitive part of the Green Belt in a narrow gap considered to be of high importance • High impact on open character of the area and high impact from views from the public right of way and from across the valley at Stockwood, • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. • The site is adjacent to a grassland and wetland SNCI. Measures to protect and sustain these sites would be required. <p>Delivery</p> <ul style="list-style-type: none"> • Transport issues could be partly overcome by a new road link to the A4175 which would also increase capacity but it is premature to demonstrate deliverability at this stage. • A gas pipeline runs through the central/southern part of the site • Landowners promoting land at this location for development |
| <p>Land at Uplands, South East Keynsham Uplands</p> | <p>Social/Economic</p> <ul style="list-style-type: none"> • Close to existing bus route linking to the town centre and directly to Bristol. • Development here could access Bristol and north fringe of Bristol via Keynsham by-pass and Bath via the A4 although some traffic to Bath may use inappropriate country lanes. • This site is peripheral with limited access to local facilities and services and is beyond a reasonable walking distance to the town centre • Good potential for cycle links. • Not well linked to Keynsham station • Scale of development may be large enough to support a new primary school <p>Environmental</p> <ul style="list-style-type: none"> • The Green Belt safeguards the countryside from encroachment in this location and to the east prevents Keynsham and Saltford merging . • Overall impact on visual effects is high. The impact of development on the landscape character would be high, markedly changing the open, exposed character. The scope for mitigation is gets increasingly lower the further west you go towards the Chew Valley. • B&NES Local Plan Inspectors Report assessed this site and concluded that it was a peripheral location and that development here would intrude into the Chew Valley, an important green corridor which runs into and through the town; as a result, the development of sites likely to affect the Chew Valley would harm the existing character of the town, and the Inspector recommended against the further consideration of these sites in view of this harm. • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. |

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| | <p>Delivery</p> <ul style="list-style-type: none"> • The eastern part of the site contains the national high pressure gas main which significantly reduces the capacity for any development here. • Land is potentially available for development and in single land ownership |
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EDGE OF BRISTOL

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| <p>Land at Hicks Gate, Keynsham</p> | <p>Social/Economic</p> <ul style="list-style-type: none"> • Well located for public transport route on A4 which is well served by existing bus services to Bath and Bristol • Difficult to establish safe walking and cycling links to Keynsham • Not well linked to Keynsham Rail Station • Not within Bath Strategic Housing Market Area and unlikely to contribute the needs for B&NES. It is likely that new residents would be seeking to work in Bristol. • <p>Environmental</p> <ul style="list-style-type: none"> • Located in an area of high importance as part of the Bristol-Bath Green Belt in preventing the merger of Bristol and Bath along the A4 corridor and protecting the countryside from encroachment. • Development would have a low to moderate landscape impact. The most sensitive part is towards the skyline by Stockwood Lane where development could intrude into the hilltop and skyline views. • Listed buildings (St Keyna and Stockwood Farm), and Foxes Wood (Historic Park & Garden) lie within the development area and could be adversely affected by development. • Within the appraisal area there is evidence of a possible Neolithic henge at Durley Hill, as well as numerous Prehistoric, Roman and medieval findspots and post-medieval boundary markers. • Majority of the area is within flood zone 1. The higher risk area should be avoided. It provides flexibility to respond potential brownfield delivery issues. • The location is adjacent to a BCC local wildlife network designation and Wildlife Trust reserve. Measures to retain and enhance th a wildlife network function across the site would be required. <p>Delivery</p> <ul style="list-style-type: none"> • Significant developer interest and land being actively promoted across the B&NES and Bristol City Council boundary • Adjoins Bristol City Council’s contingency site, and unless their site comes forward, development here would be feasible as it would be isolated from existing facilities and poorly integrated into the existing urban area. • At most development at this location could be a contingency to be reviewed as part of any subsequent of Core Strategies the West of England. • Bristol City Council would object to its release at this stage. |
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| <p>Land at Whitchurch</p> | <p>Social/Economic</p> <ul style="list-style-type: none"> • Development likely to relate better to Bristol rather than Bath for the jobs market and local facilities therefore not well located to address the needs of B&NES. • Will lead to potentially unacceptable use of unsuitable minor roads to access Bristol by car • Limited local facilities at Whitchurch village and in adjoining urban edge of Bristol within walking or cycling distance • Access to Bristol and north fringe of Bristol would be via the already significantly congested A37. • The site is remote from Bath and any trips to Bath which would encourage travel primarily by car along either already congested (e.g. through Keynsham town centre) routes and/or country routes not designed as high capacity links. • Bristol City Council would object to its release due to impact on their regeneration proposals for south Bristol, loss of Green Belt and transport impacts on neighbouring parts of Bristol. • Primary education requirements arising from development would need to be met on-site and secondary education needs would be served by Broadlands in Keynsham, increasing pupil numbers at the school but resulting in increased travel from Whitchurch area to Keynsham <p>Environmental</p> <ul style="list-style-type: none"> • Development at a significantly lower level than previously proposed via the RSS would enable environmental impacts to be minimised and avoided (e.g. impact of development on the Maes Knoll Scheduled Ancient monument and its setting). The most sensitive parts include the setting of Maes Knoll and the Wansdyke Scheduled Ancient Monuments and the historic landscape around Whitchurch which includes listed buildings and their setting. Development affecting these could have a high negative impact. • Transport advice is that no significant development is acceptable unless major infrastructure provided, primarily to of extension of the Avon Ring Road from A4 to A37 the delivery of which cannot be demonstrated. Investigations continue into for how much limited development could be accepted before major transport infrastructure need triggered. • Green Belt in this location is of high importance preventing the merger of Bristol and Keynsham and in relation to preventing sprawl of Bristol into open countryside and assisting in the regeneration of South Bristol. • Within Flood Zone 1 and passes the sequential test. It also provides flexibility to respond potential brownfield delivery issues. • Records indicate the presence of priority species (brown hare, skylark) on site. If confirmed through detailed surveys, measure to protect and sustain these species would be required. <p>Delivery</p> <ul style="list-style-type: none"> • Significant developer interest potentially demonstrating deliverability despite transport constraints (currently live planning applications in the |
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| | <p>area amounting to a significant level of residential development). One appeal has recently been lost for 47 dwellings.</p> <ul style="list-style-type: none"> • There are a number of heritage assets including Scheduled Ancient Monuments (Maes Knoll Iron Aged Hillfort and the Wansdyke), listed buildings and medieval field patterns that could be adversely affected |
| Somer Valley | |
| | <p>SHLAA identifies that in addition to the existing commitments, there is a range of potential sites that could come forward during the Plan period in the Somer Valley. However, the relative unsustainability of this location militates against a substantial residential expansion in this area. Provision for around 300 additional dwellings to existing commitments is a 15% increase in the existing supply and will enable around 2 or 3 additional sites to come forward to make a modest contribution to the need to boost housing land supply and provide some local flexibility. All new sites are highly likely to be greenfield. The identification of the most suitable sites should be left to the Placemaking Plan in conjunction with local communities guided by the generic policies of the Core Strategy and the NPPF. Dependent on the location of the new sites it is likely that the primary education requirements arising from development of this scale could be met via the expansion of existing schools.</p> |
| Rural Areas | |
| | <p>The SHLAA currently identifies around a supply of around 860 dwellings in the rural areas comprising existing commitments and windfall sites. SHLAA also identifies that there are a number of opportunities to increase the housing land supply if required.</p> <p>All 'less sustainable' villages meeting the requirements of Policy RA2 could be expected to make provision of around 15 dwellings during the Plan period which would yield about 120 dgs in total.</p> <p>The Core Strategy already plans for the Policy Ra1 villages to grow by around 30 dwellings each in the Pan period. Options to increase this are set below showing the overall increase for the rural areas, including the figure for the RA2 villages;</p> <ul style="list-style-type: none"> • 50 which would yield around an extra 200 dgs • 70 which would yield around an extra 300 dgs • 100 which would yield around an extra 400 dgs <p>However there are currently only 4 settlements beyond the Green Belt which meet the requirements of Policy RA1 and it is considered that more than 50 dgs begins to entail an unsustainable degree of dispersal of development. However 50 dwellings at each RA1 settlement over 5 years helps to boost the housing land supply and provides some flexibility without encouraging unsustainable, patterns of development</p> |

4.34 As a result of the above analysis, the locations which have some capacity to contribute to housing land supply are set out in Table 7 below.

Table 7: The Locations with capacity to contribute to housing land supply

| Ref | Location | Capacity |
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| | Bath | |
| 1 | Land adjoining Odd Down | 300 |
| 2 | Land adjoining Weston | 300 |
| 3 | Extension to MoD Ensleigh | 120 |
| 4 | West of Twerton | 0 |
| | Keynsham | |
| 5 | Land adjoining east Keynsham | 250 + employment |
| 6 | Land at south west Keynsham (south of Local Plan K2) | 200 |
| 7 | Land adjoining west Keynsham | 200 |
| 8 | Land at Uplands, south east Keynsham | 300 |
| | Somer Valley | |
| - | Various moderately sized site options (see SHLAA) | 300 |
| | Rural Areas | |
| - | Various Options (see SHLAA) | 250 |
| | Edge of Bristol | |
| 9 | Land at Whitchurch | 500 |
| 10. | Land at Hicks Gate, Keynsham | 800 |

5.0 RECOMMENDED CHANGES TO THE CORE STRATEGY HOUSING LAND SUPPLY

- 5.1 Based on the SA and SHLAA assessments, as summarised in Tables 6 & 7 above, the conclusions on the most appropriate locations to boost housing land supply are set out below.

Bath

Extension to MoD, Ensligh

- 5.2 The playing fields North West of the MoD site are neither in the Green Belt nor the AONB. There are also sustainability benefits in increasing the development capacity of the existing proposals on the MoD site. However, the impact of development on the landscape is greater on the playing fields further to the north and west of the MoD site. Therefore it is recommended that the land immediately adjoining the MoD site, the Royal High School playing field, is identified for development. This provides an additional capacity of around 120 dwellings and requires the relocation of the school playing fields as needed.

Land to the west of Twerton

- 5.3 In light of the assessment in Table 6, it is considered that the severity of harm caused by development in this location would significantly outweigh the benefits. Whilst, this site is one of the sites on the edge of Bath that is not in the AONB it would still cause harm to the AONB, as well as significant harm to the setting of the WHS. As such English Heritage confirms that development would contradict national policy. Therefore it is recommended that the location is not identified for development in the plan period.

Land adjoining Weston

- 5.4 Whilst there are significant advantages of development in this location, the environmental sensitivities of development here are recognised in the assessments in Table 6. In particular the impact on the WHS setting, its location in the AONB and the existing hydrological issues in the area and those relating to development. However, the Council has recently been awarded a substantial grant to address the existing flooding issues in this area, and the impact on the WHS and the AONB can be minimised if development is restrained in scale and restricted to the lower slopes.

- 5.5 It is therefore recommended that this site be identified in the Core Strategy to deliver around 300 dwellings in the plan period. Whilst the evidence suggested that the overall scale of development might be greater, this reduced capacity recognizes the location's environmental sensitivities and deliverability of development. The proposed conditions of development are set out in Table 10 and the nature of development will need to be carefully determined through working with local communities in the Placemaking Plan.

- 5.6 The need to mitigate harm to the World Heritage Site and its setting and to the AONB mean that there is no scope for longer term development further up the slopes and beyond what is currently being proposed. Therefore, no safeguarded land is identified in this location and the detailed inner Green Belt detailed boundary will be determined through the Placemaking Plan.

Land adjoining Odd Down

- 5.7 Table 6 outlines both the benefits of this location in fulfilling the objectives of the Core Strategy as well as the significant environmental sensitivities in this area. Of particular note

are its location within the AONB, its proximity to the WHS, the Wansdyke scheduled Ancient Monument, the proximity of South Stoke Conservation area and the sensitivity of the land scape setting to the south. Nevertheless it is considered that with a carefully designed development and with the necessary safeguards, there is scope to release land from the Green Belt to contribute to meeting the District's development needs during the Plan period.

- 5.8 It is therefore recommended that this site be identified in the Core Strategy to deliver around 300 dwellings in the plan period. The proposed conditions of development are set out in Table 10 and the nature of development will need to be carefully determined through working with local communities in the Placemaking Plan.
- 5.9 NPPF para 85 requires that when reviewing Green Belt Boundaries Local Authorities should consider whether land needs to be safeguarded for the longer term for development. The need to minimise and mitigate harm to the World Heritage Site and its setting, the AONB and South Stoke Conservation Area limit the scope for longer term development. Therefore no safeguarded land is identified and the detailed inner Green Belt detailed boundary will be determined through the Placemaking Plan.

Conclusion on Bath

- 5.10 The above recommendations would boost the Bath's housing land supply by around 720 dwellings in the Plan period accordance with the spatial strategy of seeking to focus new development at Bath as far as possible. The total allocation in the Core Strategy for Bath is would therefore rise to around 7,000 dwellings. However to meet the identified housing requirement, land for a further 1,170 dwellings is still required.

Keynsham

- 5.11 As described in the SA, Keynsham is the next most sustainable location for boosting housing land supply. Four locations at Keynsham were assessed and the conclusions are set out below.

Land adjoining East Keynsham

- 5.12 Table 6 highlights the significant planning benefits of the location at East Keynsham. However, the location lies within a highly sensitive part of the Green Belt and the deliverability of development is constrained by transport concerns. Despite these it is still considered that there is scope for a moderate level of development before substantial infrastructure requirements are triggered or substantial harm is caused to the Green Belt.
- 5.13 In ID/28, the Inspector recognised that the increased self-containment of Keynsham, as measured by the proportion of local people working locally, was a desirable objective. Keynsham being on the A4 corridor is a good business location and there are limited opportunities for creating new business at Bath. Therefore it is recommended that land is released from the Green Belt to provide for a mixed use development comprising both homes and jobs entailing around 250 dwellings as well 25-30,000 m² of employment floorspace. The revisions to the Core Strategy are consistent with the existing objective for the town of encouraging self-containment, by allowing an increase in both dwellings and employment floorspace at Keynsham.

5.14 As with other sites the key parameters for the development of this land are set out in Table 10 and the details on the nature of the scheme can be worked up with local community in the Placemaking Plan. In light of the sensitivity of the Green Belt between Bristol and Bath, it is considered that that there is no scope to identify safeguarded land for the longer term.

Land adjoining South West Keynsham (south of Local Plan allocation K2)

5.15 Whilst its transport detractions are recognized and development here could potentially affect the village of Queen Charlton, this location does have advantages. Land south of K2 has less impact on the purposes of the Green Belt than the other locations, this is already an area of change in the town and there is scope for development here to be co-ordinated with the existing development sites at K2. It is therefore recommended that land is released from the Green Belt to accommodate around 200 additional homes in the Plan period. Charlton Road and Parkhouse Lane provide new, readily recognisable Green Belt boundaries that are defensible. There may be scope for additional development in this location and the Placemaking Plan provides the opportunity to work with the local community establish the parameters and nature of development as well as identify if there is any scope for safeguarded land for the longer term.

5.16 The need for housing and the advantages of Keynsham's location provide the exceptional circumstances justifying the release of land in this location

Land adjoining west Keynsham

5.17 The transportation drawbacks, the particularly high impact on a very sensitive part of the Bristol / Bath Green Belt, along with the limited opportunities to mitigate the harm all militate against the identification of this location for development in the Plan period. This location is therefore not recommended for identification for development in the Core Strategy.

Land at Uplands, South East Keynsham

5.18 The advantages and disadvantages of this location are described in Table 6. The peripheral nature of this location, its distance from facilities make this site unsuitable for development at this stage. It is therefore not recommended for development.

5.19 Issues relating to Hicks Gate are set out below

Remainder of the District

5.20 Having identified locations to accommodate around two thirds (1,270 dwellings) of the additional housing land required in the more sustainable parts of the District, there is still the need to identify capacity for an additional 700 dwellings. As set out in the SA there are opportunities in the Somer Valley, the edge of Bristol and the rural areas.

Somer Valley

5.21 As described in the SA, the relative unsustainability of this area location makes it inappropriate for a significant boost in housing land supply to meet strategic needs. New housing will inevitably exacerbate out-commuting. The relationship of existing commitments of housing to jobs is already unsustainable There is a case to argue that housing should not be increased above existing commitments. However in light of the need for housing, the opportunities in SHLAA and the need for flexibility in provision, 2 or 3

sites could come forward in the plan period. This would contribute an additional 300 to the district's housing land supply. These would all be greenfield sites because brownfield opportunities have already been included in the SHLAA.

- 5.22 Sites will be determined by working with local communities through the Placemaking Plan or Neighbourhood Planning (however it is recognised that there is a risk that this process may be overtaken by the Development Management process).

Rural Areas

- 5.23 The options for village expansion are set out in Table 6 above. It is reasonable for those villages that meet the requirements of Policy RA1 to review their HDBs over the plan period to allocate a site of around 50 dwellings each through Placemaking Plan or Neighbourhood Planning. This yields about 80 extra dwellings. Those villages that meet the requirements of Policy RA2 can accommodate around 15 extra in plan period and this yields around 120 additional dwellings over the plan period. Not only does this make a contribution to housing land supply, it has benefits of bolstering local services but not to a point where development is dispersed in a way which encourages unsustainable patterns of development. This yields around 200 extra dwellings.

Edge of Bristol

Land at Hicks Gate, Keynsham

- 5.24 The Hicks Gate location has some significant disadvantages in that the site lies astride the B&NES/Bristol district boundary and therefore its proper implementation is largely dependent on a comprehensive scheme coming forward. The area plays an important Green Belt function. Bristol has no plans for development to come forward on its side of the boundary unless demonstrated to be required at a review of the Bristol Core Strategy in 2016. Seeking to pursue only on the B&NES part of Hicks Gate is likely to result in a poorly designed and isolated scheme which is not integrated. The future of this site is therefore dependent on a wider review of the West of England Core Strategies, particularly that of Bristol. It is therefore not appropriate to identify this location for development in the current circumstances.
- 5.25 In the event that Bristol concludes in the planned review of their Core Strategy that their contingency at Hicks Gate is required to meet housing needs, then reconsideration of the land on the B&NES side of the boundary will need to be addressed in conjunction with Bristol.

Land at Whitchurch

- 5.26 There is scope for some development in this location but it is not well placed to meet the needs of Bath. The Bristol Core Strategy does not envisage housing coming forward in this location and Bristol is concerned about the impact that any development would have on their regeneration aspirations for south Bristol and loss of Green Belt land. Capacity in this location is constrained by environmental assets such as Maes Knoll as well as the need for substantial transport infrastructure. The land in this area plays an important Green Belt function and development can only be justified if the need for development could not be met in relatively more sustainable locations.

5.27 In light of the fact there is an outstanding need to identify a further 200 houses to meet the District’s housing land requirement, it is recommended that land from the Green Belt is released to enable the delivery of 200 homes. The issue of safeguarded land will need to be addressed in the Placemaking Plan alongside more detailed work on the overall site capacity.

Conclusion

5.28 The locations recommended for identification in the Core Strategy are identified in Table 8 below.

Table 8: Locations recommended for identification in the Core Strategy

| Site ref | Location | Recommended increase 2011-2029 |
|----------|---|--------------------------------|
| | Bath | |
| 1 | Land adjoining Odd Down | 300 |
| 2 | Land adjoining Weston | 300 |
| 3 | Extension to MoD Ensleigh | 120 |
| | Keynsham | |
| 5 | Land adjoining East Keynsham | 250 + employment |
| 6 | Land adjoining South West Keynsham (Local Plan allocation K2) | 200 |
| | Edge of Bristol | |
| 7 | Land at Whitchurch | 200 |
| | Somer Valley | |
| | Sites to be determined through Placemaking Plan | 300 |
| | Rural Areas | |
| | Sites to be determined through Placemaking Plan | 200 |
| | TOTAL | 1,870 |

The strategy and prospects for delivery in the Spatial Areas

5.29 It is therefore recommended that the Core Strategy is amended to address the issues of soundness raised by the inspector. In summary the Core strategy;

Has been positively prepared;

- The objectively assessed housing requirement is accommodated by boosting the District housing supply to 12,700 dwellings to meet market and affordable housing needs;
- A five year land supply with a 20% buffer can be demonstrated;
- The Core Strategy responds to the national objective of economic growth through provision of the capacity to deliver 10,170 jobs;

Is justified;

- Having assessed the alternatives through the SA process and based on the up-to-date evidence, the Core Strategy focuses home and jobs in most sustainable and deliverable locations in a way which limits harm to the environment;

Is effective;

- The SHLAA provides evidence that the strategy is deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- the measures required to bring forward key infrastructure requirements are identified
- The Plan provides of robust flexibility of market housing

Is consistent with national policy;

- The changes to the Core Strategy are consistent with the requirements of the NPPF and other national policies

5.30 The Inspector's concerns regarding the prospects for delivery in the spatial areas have also been addressed as summarised below. Table 9 sets out the implications for the overall spatial strategy

Table 9: Overall recommendations on housing and employment increase 2011-2029

| Area | Target jobs increase (Based on LEP) | Existing housing land supply | Proposed dwelling increase | TOTAL dwellings |
|-----------------|--|------------------------------|----------------------------|----------------------|
| Bath | 6,750 | 6,285 (58%) | 720 (38%) | 7,005 (55%) |
| Keynsham | 1,800 | 1,641 (15%) | 450 (24%) | 2,091 (16%) |
| Somer Valley | 900 | 2,095 (19%) | 300 (16%) | 2,395 (19%) |
| Rural Areas | 720 | 784 (7%) | 200 (11%) | 984 (8%) |
| Edge of Bristol | See rural areas | 47 (0.5%) | 200 (11%) | 247 (2%) |
| TOTAL | 10,170 | 10,852 (100%) | 1,870 (100%) | 12,722 (100%) |

Bath

5.31 Bath continues to play the role in the strategy being the focus of new homes and jobs. Over the plan period, the existing supply of around 35,400 homes will be boosted by 7,005 new homes which is an increase of around 20% and increase in existing jobs of 52,000 jobs by 7,700.

5.32 The Inspector identified that main challenges to the soundness of the scale of change proposed within Bath are whether the sequential flood risk test for proposed scale of development had been properly applied; whether the exception test will be able to be met in the future, and in particular the likelihood of delivering the planned upstream flood compensation scheme; and other delivery issues, particularly at BWR.

- 5.33 In response, the flood mitigation strategy has been revised in response to the hydrological modelling and progress has been made in addressing the potential obstacles to bringing forward the large development sites. Sustainability priorities still warrant bringing forward redevelopment of disused and under-used sites in the river corridor but now the revised strategy provides substantial flexibility in housing provision, especially at Bath in the event that there is delay in bringing forward sites such as BWR or the implementation of the flood mitigation strategy. There is also sufficient flexibility in office space supply in Bath.
- 5.34 In seeking to boost housing land supply, the Council has demonstrated the need to treat carefully the unusually sensitive environment of the City of Bath.
- 5.35 The Inspector was also concerned that Policy B3 applying to Twerton and Newbridge Riverside was policy unsound because it does not clearly express the Council's intention. In response, this is proposed to be changed as is set out in Annex 3.

Keynsham

- 5.36 To make Policy KE2 regarding Somerdale sound, the Inspector considered that the flood risk constraint on accommodating homes should be acknowledged. The sequential and exception tests would have to be met to justify any dwellings in higher risk parts of the site. Some flexibility/contingency is also required in order to accommodate the required level of housing.
- 5.37 The revised strategy takes advantage of the relative sustainability of location of Keynsham. Both housing and employment opportunities are increased but in a way which maintains the objective of increasing self containment as far as possible. The housing land supply is increased to 2,090 dwellings and the opportunity for employment generation to 1,800. Jobs during the Plan period by releasing land from the Green Belt in two locations. The new housing at Keynsham contributes to the need for flexibility in housing delivery.
- 5.38 The Core strategy identified additional floorspace to meet expansion needs at Keynsham and make good the forecast loss of industrial space in Bath. An extension to the Ashmead Industrial Estate addresses both the shortfall and provide for flexibility and choice.
- 5.39 The developer is in the final stages of preparing their plans for submitting a planning application for the Somerdale site which is expected in Spring 2013. Policy KE2 has been amended as per the Inspectors recommendation to state that the sequential and exceptions tests for flood risk need to be met to justify any dwellings in higher risk parts of the site. There is flexibility in the housing land supply to accommodate this requirement.

Somer Valley

- 5.40 Regarding the Somer Valley, the Inspector was concerned that;
- the approach to the protection of approach to employment sites was unclear,
 - the suitability and deliverability of some of the SHLAA sites, especially in the town centres
 - The constraint imposed in SV1 4b of requiring any additional housing to be within existing HDB is not justified
- 5.41 The SHLAA has been reviewed and sites where the evidence is not sufficiently robust to demonstrate deliverability with confidence are no longer relied to deliver housing in the

Plan period. Furthermore, the strategy now makes provision for deliverable greenfield sites to come forward to improve supply and provide flexibility.

- 5.42 However this revised strategy still seeks to limit exacerbating the unsustainable out-commuting by not seeking requiring this part of the District to make a significant contribution to meeting strategic development needs. The area will be expected to accommodate nearly 2,400 homes and could generate around 1,000 jobs. The housing supply is less than the draft Core Strategy because a substantial number of houses (around 600 dwellings) built in the former plan period from 2006 to 2011 are no longer included and a number of brownfield sites are no longer included in SHLAA as part of the housing land supply
- 5.43 The requirement for housing to that to produces an economic benefit is difficult to sustain although this could be pursued through the Development Management process where it was justified by the evidence and the circumstances in light of the existing homes vs jobs imbalance and the limited opportunity to rectify this issue. The allocation of new housing sites and the re-use of redundant or unsuitable employment sites will be undertaken through the Placemaking Plan Sites. It is still considered that the modern, functional employment sites should continue to be protected in light of the need to maintain and improve the towns' employment base as far as possible and these sites will identified in the Placemaking Plan.

Rural Areas

- 5.44 The Inspector was of the view that the Core Strategy's overall approach to the rural areas was generally sound subject to a few relatively minor changes. These are formalised in Annex 3. Provision is made within the Plan period for the rural areas to deliver altogether around additional 1,000 homes and about 800 jobs.

Edge of Bristol

- 5.45 Land is proposed to be released from the Green Belt at Whitchurch in order to meet housing needs. The extent of development is moderated release in light of the transport infrastructure constraints, the environmental constraints, and the need to minimise the impact on the regeneration of south Bristol and the poor location to serve Bath. The exact location and extent should be determined through the Placemaking Plan when the issue of safeguarded land can also be addressed.

Alternate growth options

- 5.46 The SA makes a comparison of the alternate growth options. It assesses the impact of;
- a. a strategy based only on the existing housing land supply of around 10,800 dwellings (this would deliver the Oxford Central based jobs growth);
 - b. The recommended strategy of increasing housing land supply to 12,700 dwellings based on the moderate trend scenario
 - c. A higher growth Strategy reflecting the high and very high ORS demographic projections.
- 5.47 The reasons for favouring the ORS moderate trend scenario are set out in section 3. Key points to note from the SA are that the existing housing land supply option (a) above does not perform very well in relation to the national growth agenda and the high growth options (c) require a level of housing which causes an unacceptable degree of

environmental harm, the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of such high growth (NPPF para 14).

Table 10: Development Requirements of Identified Development Locations

Extension to MOD, Ensleigh

Overview

The extension to the Ensleigh MoD site, whilst in a visually sensitive location, provides a significant opportunity to improve the level of self-containment when the MoD site is redeveloped. Additional housing at this location will help to sustain local facilities, services and public transport.

Strategic location requirements

1. Development 120 dwellings in the plan period, including 40% affordable housing
2. Developed to a comprehensive Masterplan for Ensleigh MOD, development phasing should start with the current MOD Ensleigh site
3. Appropriate site assessment and ecological surveys to be undertaken to inform site master planning with particular attention to the SNCI, and potential impacts to Bradford-upon-Avon bats SAC, (this to include planning for public open space and recreation facilities to minimise adverse recreational pressures). Ecological mitigation to be in place ahead of development.
4. Comply with the Green Infrastructure Strategy.
5. Incorporate Sustainable Urban Drainage Systems
6. Be designed to enhance the potential of the whole Ensleigh site to be more self-contained with local facilities, including an on-site primary school
7. Ensure good public transport provision
8. Ensure good pedestrian and cycle access particularly towards Bath city centre, as well as to Weston and Larkhall Local Centres
9. Ensure that displaced playing pitches are re-provided at an appropriate and suitable location (as required)
10. Respond to the setting of Beckford's Tower and undertake detailed work in terms of mitigating impacts and enhancing heritage assets at this locality
11. Provide improved habitat connectivity, through the retention and enhancement of the existing high valued habitat, and well-integrated provision of green space (informal, formal and natural) .
12. Minimise AONB landscape impact by avoid developing visually sensitive areas
13. Appropriate ecological survey work should be undertaken, with particular attention to the Bradford-upon-Avon bats SAC
14. Provide an integrated waste management infrastructure.

LOCATION REF: Land adjoining Odd Down, Bath;

Planning requirements

1. Residential led development providing 300 dwellings in the plan period, including 40% affordable housing as well as small scale local employment opportunities
2. Be developed to a comprehensive Masterplan, ensuring that it is well integrated with neighbouring areas, with excellent pedestrian and cycling access, connectivity to local centres, other facilities and services, and to green infrastructure.
3. Appropriate site assessment and ecological surveys to be undertaken to inform site master planning with particular attention to potential impacts to Bradford-upon-Avon bats and Mells SACs, (this to include planning for public open space and recreation facilities to minimise adverse recreational pressures)). Consideration should be given to any ecological mitigation that needs to be in place ahead of development.
1. An Ecological Mitigation Strategy and Management scheme to ensure satisfactory compensation, mitigation and protection of European protected bat species and their habitats (to include protection of dark skies to the south of the location, retention and cultivation of linear planting features and off-site habitat protection and compensation on land south of this location) , and protection of Priority species.
2. Comply with the Green Infrastructure Strategy.
3. Development should scope potential for and incorporate renewable energy, including investigation of District Heating opportunities (linking to the Odd Down District Heating Opportunity Area)
4. Sustainable Urban Drainage Systems should be incorporated
5. Educational needs generated by the development must be met, a primary school to be provided on site, unless an alternative solution can be found
6. Provide improved habitat connectivity, through the retention and enhancement of the existing high valued habitat, and well integrated provision of green space (informal, formal and natural green space
7. Provision for public rights of way
8. Minimise the visual/landscape impact on the surrounding countryside to the south and minimise the impact on the AONB
9. Minimise visual/setting impact on South Stoke Conservation area and retain the physical separation of South Stoke village
10. Junction improvement at the B3110 Midford Rd/Southstoke Rd (Cross Keys) and A367 junctions to provide the principle vehicular accesses to the location
11. Ensure good public transport provision at the location
12. Ensure good pedestrian and cycle access particularly towards Bath city centre, as well as to Odd Down and Combe Down local centres.
13. Ensure any areas of land instability are either avoided or addressed
14. Implement a Management scheme to ensure the enhancement and long-term protection of the Wansdyke Scheduled Ancient Monument and its setting
15. Provide an integrated waste management infrastructure.
16. Light pollution onto dark landscapes to the south should be minimised

Land adjoining Weston, Bath;

Planning requirements

1. Mixed use development to provide around 300 dwellings in the plan period, including 40% affordable housing and local employment opportunities
2. Be developed to a comprehensive Masterplan, ensuring that it is well integrated with neighbouring areas, with good pedestrian and cycling access and connectivity to local centres, other facilities and services, and to green infrastructure.
3. Appropriate site assessment and ecological surveys should be undertaken to inform site master planning with particular attention to potential impacts to protected sites, priority species, and Bradford-upon-Avon SAC, (this to include planning for public open space and recreation facilities to minimise adverse recreational pressures). Consideration should be given to any ecological mitigation that needs to be in place ahead of development.
4. An ecological mitigation and management plan to retain, protect and enhance protected ecological habitats and species, and to safeguard and enhance key SAC bat foraging areas and flight lines.
5. Provide improved habitat connectivity, through the retention and enhancement of existing high valued habitat, and well integrated provision of green space (informal, formal and natural)
6. Comply with the Green Infrastructure Strategy by ensuring that the principles of GI and related benefits are embedded in the development process at an early stage.
7. Educational needs generated by the development must be met by a provision of a primary school on site unless an alternative solution can be found and agreed with the Education Authority
8. Development should scope potential for and incorporate renewable energy, including investigation of District Heating opportunities (linking to the RUH District Heating Opportunity Area)
9. Sustainable Urban Drainage Systems should be incorporated.
10. Provision for public rights of way on site including the Cotswolds Long Distance Footpath
11. Minimise the visual/landscape impact on the surrounding countryside and rural character
12. Ensure good public transport accessibility at the location and links to the Weston local centres and other facilities and services
13. Cycle link should be provided to connect to Weston local centre and the City Centre
14. Educational needs generated by the development must be met
15. Minimise the effect on listed buildings, the Bath Conservation Area and the World Heritage site and its setting
16. Protect the hillsides of the upper slopes of Weston, the ancient woodlands and provide for green space (informal, formal and allotments) and opportunities for local food production
17. Vehicular access to the east, west and south of the location should be provided
18. Ensure excellent pedestrian and cycle access particularly towards Bath city centre, as well as to Weston local centres
19. Appropriate ecological survey work should be undertaken, with particular attention to the Bradford-upon-Avon bats SAC
20. Provide an integrated waste management infrastructure.

Extension to South West Keynsham (South of Local Plan K2);

Planning requirements

1. Around 200 dwellings, including 30% affordable housing
2. Be developed comprehensively as part of a Masterplan, reflecting best practice as embodied in 'By Design' (or successor guidance) ensuring that it is well integrated with the neighbouring development locations, with good pedestrian and cycling access and connectivity to local centres, other facilities and services, and to green infrastructure. Pedestrian, cycling and vehicular links should be made with both K2 sites to the north.
3. Development should front onto Charlton Road and Parkhouse Lane as well as any significant access roads, face outwards towards the open countryside.
4. Educational needs generated by the development must be met by provision of a primary school on-site, unless an alternative solution can be found and agreed with the Education Authority
5. Comply with the Green Infrastructure Strategy by ensuring that the principles of GI and related benefits are embedded in the development process at an early stage.
6. Provide for green space (informal, formal and allotments) and include an extension to the community woodland which is located immediately to the north.
7. Minimise the visual/landscape impact on the surrounding countryside and rural character.
8. Ensure public transport accessibility to Bristol, Bath, Keynsham Town centre and railway station and other local facilities and services,
9. Minimise visual/setting impact on the Queen Charlton Conservation area and the setting of the Grade II Listed Parkhouse Farm
10. Charlton Road to provide the principle vehicular access to the location (the widening of Parkhouse Lane will be sought)
11. Ensure good pedestrian and cycle access particularly towards Keynsham town centre
12. Provision for public rights of way in the location
13. Protection and enhancement of hedgerows throughout the site, especially the hedgerow along Parkhouse Lane which is of ecological importance. Maintain and enhance the hedgerows on the perimeter of the site to frame residential development. The inner hedgerows should be maintained and enhanced to provide an opportunity to subdivide the sites into development parcels and create green infrastructure corridors.
14. provide improved habitat connectivity, through the retention and enhancement of existing high valued habitat, and well integrated provision of green space (informal, formal and natural)
15. Mitigation of any impact on bat foraging habitat and commuting routes
16. Possible early settlement/occupation as implied by the prehistoric and medieval finds requires further investigation and appropriate mitigation if required.
17. Pluvial flood risk to be mitigated through layout design and implementation of SUDS
18. New water mains and sewer connections required, including downstream upsizing works and pumping station upgrade.

Residential & employment extension to East Keynsham;

Strategic location requirements

1. Mixed use development to include 25,000-30,000 m² of employment land in an expansion to Keynsham Industrial Estate and 250 dwellings (including 30% affordable housing)
2. Be developed comprehensively part of a Masterplan, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with Keynsham, with excellent pedestrian and cycling access and connectivity to local centres, other facilities and services, and to green infrastructure.
3. Dwellings should face onto the open countryside and create an attractive boundary treatment.
4. Maintain a landscape buffer between Keynsham and Saltford
5. Provide for green space (informal, formal and allotments) as part of a comprehensive Green Infrastructure Strategy for the location.
6. Mitigation of landscape impact by extending the community woodland and providing additional structure planting and improving hedgerows. Species rich hedgerows, ponds, ditches and trees should be retained and enhanced, and habitat suitable for the population of skylarks provided.
7. Enhancement of current and provision of new pedestrian and cyclist routes, including routes across the A4. Links should also be made to the public right of way network at Clay Lane Bridge to form a link from the area north to the Bristol-Bath cycle path.
8. Educational needs generated by the development must be met by the provision of a primary school on site, unless an alternative solution can be found and agreed with the Education Authority
9. Ensure public transport accessibility at the location and links to the Keynsham Town centre other local facilities and services
10. Ensure good pedestrian and cycle access particularly towards Keynsham town centre and to NCN4.
11. All watercourses running through the area should remain open and will need to be incorporated into development proposals. Mitigation of poor drainage south of World's End Lane is required. A substantial watercourse corridor is required surrounding Broadmead Brook and subsidiary ditches and requires significant attenuation to provide for surface water run-off to restrict flows before discharge.
12. New water mains and sewer site connections required, including separate systems of drainage and downstream sewer improvements to critical sewers.

Land at Whitchurch;

Strategic location requirements

1. Mixed use development to include 200 dwellings
2. Be developed comprehensively part of a Masterplan, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with Keynsham,

with excellent pedestrian and cycling access and connectivity to local centres, other facilities and services, and to green infrastructure.

3. Provide for green space (informal, formal and allotments) as part of a comprehensive Green Infrastructure Strategy for the location.
 4. Mitigation of landscape impact by extending the community woodland and providing additional structure planting and improving hedgerows.
 5. Educational needs generated by the development must be met by the provision of a primary school on site, unless an alternative solution can be found and agreed with the Education Authority
 6. Ensure public transport accessibility
 7. Ensure good pedestrian and cycle access
 8. Take account of the impact on Maes Knoll SAM and its setting
-

ANNEX 2: CHANGES TO POLICIES B1(8), CP.4, CP.9, CP.11 (REF ID/29)

- 1.0 The schedule in Annex 3 sets out all the changes proposed to the Core Strategy. IN ID/29 the Inspector highlights the need to review a number of other policies in the Core Strategy and these are addressed below.
- 2.0 POLICY B1(8): RECREATION GROUND IN BATH**
- 2.1 The Inspector requested that the Council provide clarity on the policy approach towards the Rec
- 2.2 In June 2011, the Trust consulted on a proposal which allowed the Rugby Club to remain at the Recreation Ground. It would be granted a new lease that would enable it to redevelop its stadium. This would include a temporary east stand and the rugby pitch would be available to the Trust during the summer months. The Club would pass its Lambridge training ground to the Trust as replacement land for the area that it occupied at the Recreation Ground. The consultation exercise showed there was strong support for this proposal.
- 2.3 The Charity Commission has now published a draft Scheme which confers certain powers on the Trust. The Scheme permits the Trust to grant a new lease to the Rugby Club and receive the Lambridge site as replacement land. It also brings indoor recreation on the Leisure Centre land within the objects of the trust.
- 2.4 It will be for a new trustee body to take the decisions involved in implementing the proposal. These will include determining the terms of the property transactions with the Rugby Club and agreeing to the details of any new stadium. Any new development will be subject to the planning process, entirely separately from the Trust.
- 2.5 The Council can give in-principal planning policy support to the improvement and expansion of the existing stadium, in manner that reflects the draft Scheme. The situation of a sporting arena close to a city centre and in good reach of public transport facilities accords with the NPPF. In the Bath situation – there are other issues in respect of companion land uses and unique design challenges to be addressed.

RECOMMENDED CHANGE TO POLICY B1(8): RECREATION GROUND IN BATH

Adjoining the Central Area, at the Recreation Ground, and subject to the resolution of any unique legal issues and constraints, enable the development of a sporting, cultural and leisure arena. Associated uses may be acceptable but will be considered on their merits.

3.0 POLICY CP4: DISTRICT HEATING

- 1.1 Policy CP4 is part of the Council's policy response to climate change. The policy as currently drafted states that within 15 identified areas development will be expected to incorporate infrastructure for district heating. However, the Inspector states that this wording is only appropriate for the 3 most promising locations identified in the Council's study – Bath Central, Bath Riverside (District Heating is already in place at Bath Western Riverside with potential for extension) and Keynsham High Street (the re-developed Keynsham Town centre scheme already incorporates potential connection to a future District Heating system).
- 1.2 In the other 12 smaller areas (Radstock, Midsomer Norton, Paulton, Bath Spa University, Twerton, Kingsway, Bathwick, Moorfields, Odd Down, Lansdown, RUH & Keynsham Somerdale) the Inspector states that the policy should be encouraging unless there is a system to connect to (or will be a system to connect to at the time of development). District Heating is already in the process of being delivered in some of the smaller areas e.g. Bath Spa University (as part of their Masterplan proposals) and RUH (as part of their energy strategy) and considered in others (e.g. Keynsham Somerdale). Therefore this policy does seem sufficiently enabling even as re-drafted.
- 1.3 It is accepted that Policy CP4 should be amended to reflect the Inspector's concerns. The policy still remains robust, and is unchanged for the 3 most promising locations. For the smaller clusters the policy change will not fundamentally effect delivery as shown by the existing clusters already being taken forward at Bath Spa University and the RUH, and further enabling work can support additional clusters being delivered.
- 1.4 An additional minor amendment to the hierarchy wording has been included to reflect the latest precedent. The amended wording is included below in bold (amendments to composite January 2012 version):

RECOMMENDED CHANGE TO POLICY CP.4 (DISTRICT HEATING)

POLICY CP4 District Heating

The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the **three** identified "district heating priority areas", shown on diagram 19 (**Bath Central, Bath Riverside and Keynsham High Street**), development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable.

Within the remaining 12 "district heating opportunity areas" shown on diagram 19, (Radstock, Midsomer Norton, Paulton, Bath Spa University, Twerton, Kingsway,

Bathwick, Moorfields, Odd Down, Lansdown, RUH & Keynsham Somerdale), development will be encouraged to incorporate infrastructure for district heating, and will be expected to connect to any existing suitable systems (including systems that will be in place at the time of construction), unless it is demonstrated that this would render development unviable.

Masterplanning and major development in the district should demonstrate a thermal masterplanning approach considering efficiency/opportunity issues such as mix of uses, anchor loads, density and heat load profiles to maximise opportunities for the use of district heating.

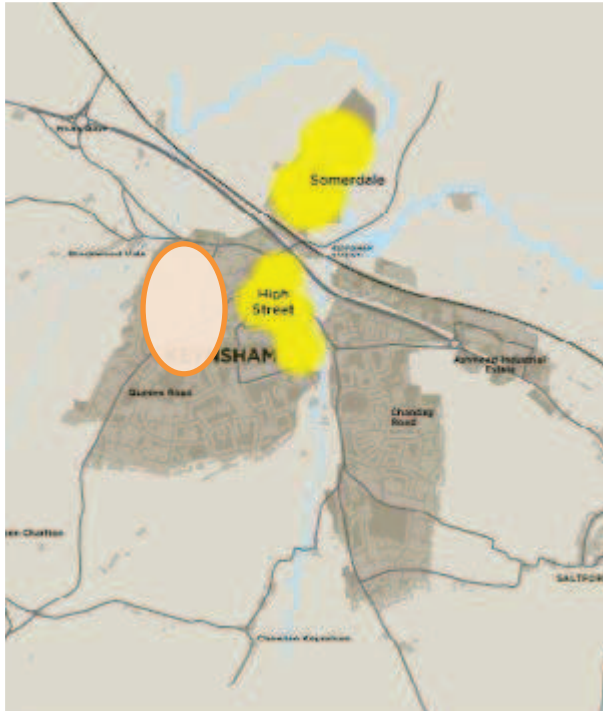
Where a district heating scheme is proposed as part of a major development the Council will expect the scheme all major developments to demonstrate that the proposed heating and cooling systems (CHP/CCHP) have been selected considering the heat hierarchy in line with the following order of preference:

1. Connection with existing CHP/CCHP distribution networks
2. Site wide CHP/CCHP fed by renewables
3. ~~Gas fired CHP/CCHP or hydrogen fuel cells, both accompanied by renewables~~
4. 3. Communal CHP/CCHP fuelled by renewable energy sources
5. 4. Gas fired CHP/CCHP

Delivery

- 1 *This policy will provide a basis for Development Management to support the principle of CHP, CCHP and District Heating included in planning applications*
- 2 *Planning Applications within the DHPAs will need to demonstrate how they are incorporating district heating and to justify any alternative approach.*
- 3 *Planning Obligations or a Community Infrastructure Levy (CIL) may be able to be used to contribute towards the delivery of the delivery of strategic district heating infrastructure.*
- 4 *Further opportunities for interventions that will increase commercial viability of district heating ~~will be~~ are identified in the B&NES District Heating Feasibility Study and ~~will~~ include actions that the Council and the Private Sector ~~could~~ can initiate.*

Amend Diagrams



Amend key to:

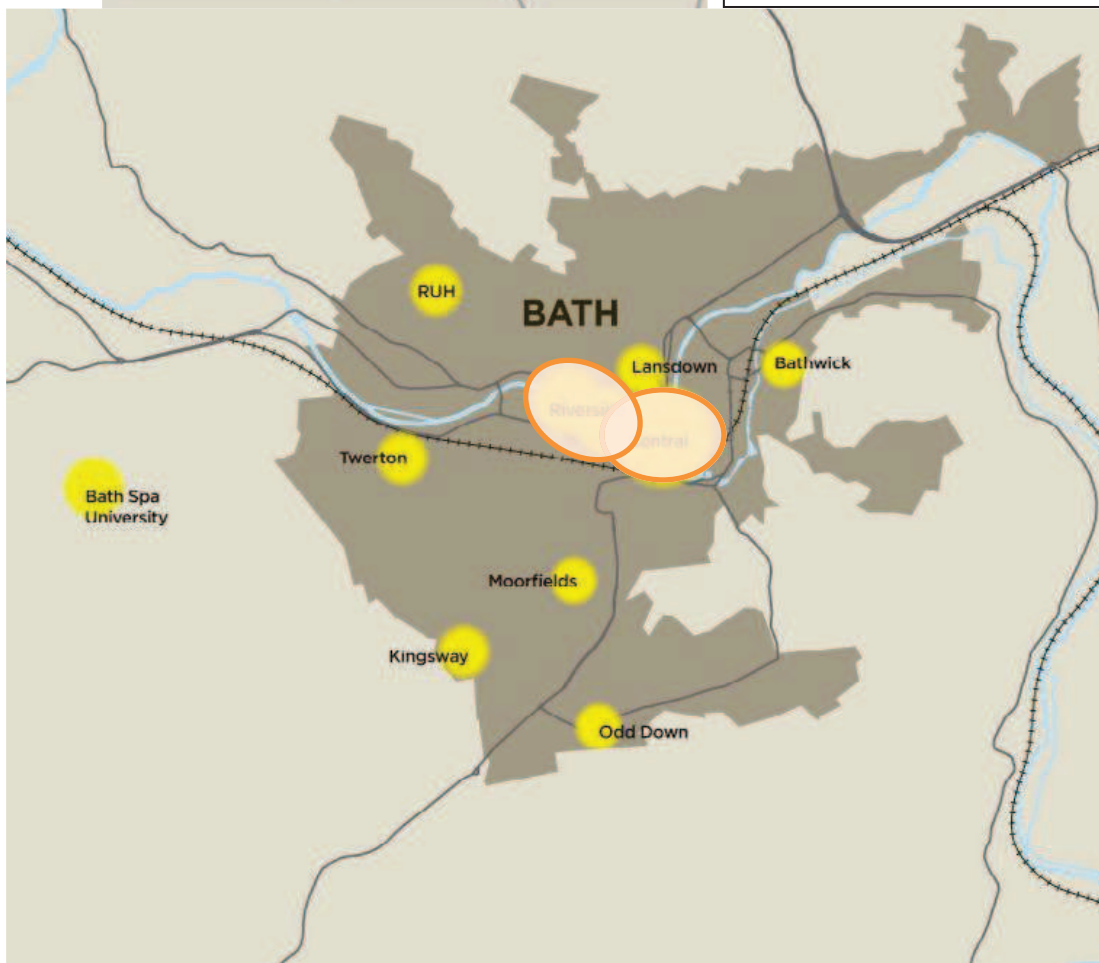
Key

District heating priority areas – orange
District heating opportunity areas – yellow

change Keynsham high street symbol to orange

change Bath Riverside and Bath Central symbol orange

The key diagram on p21 will also need updating to only include the 3 “District Heating Priority Areas” – Bath Central, Bath Riverside and Keynsham Town Centre.



4.0 POLICY CP9: AFFORDABLE HOUSING

Inspector's concerns

4.1 Draft Core Strategy Affordable Housing Policy seeks an average affordable housing percentage of 35% on large sites (developments of 10 dwellings or more, or 0.5 ha or more in area) and 17.5 % on small sites (developments of 5 to 9 dwellings or an area of 0.25ha to 0.49 ha). The Inspector has concluded that the single 35% provision across the District is unsound and recommends setting different percentage requirements in different parts of the District to reflect the viability evidence.

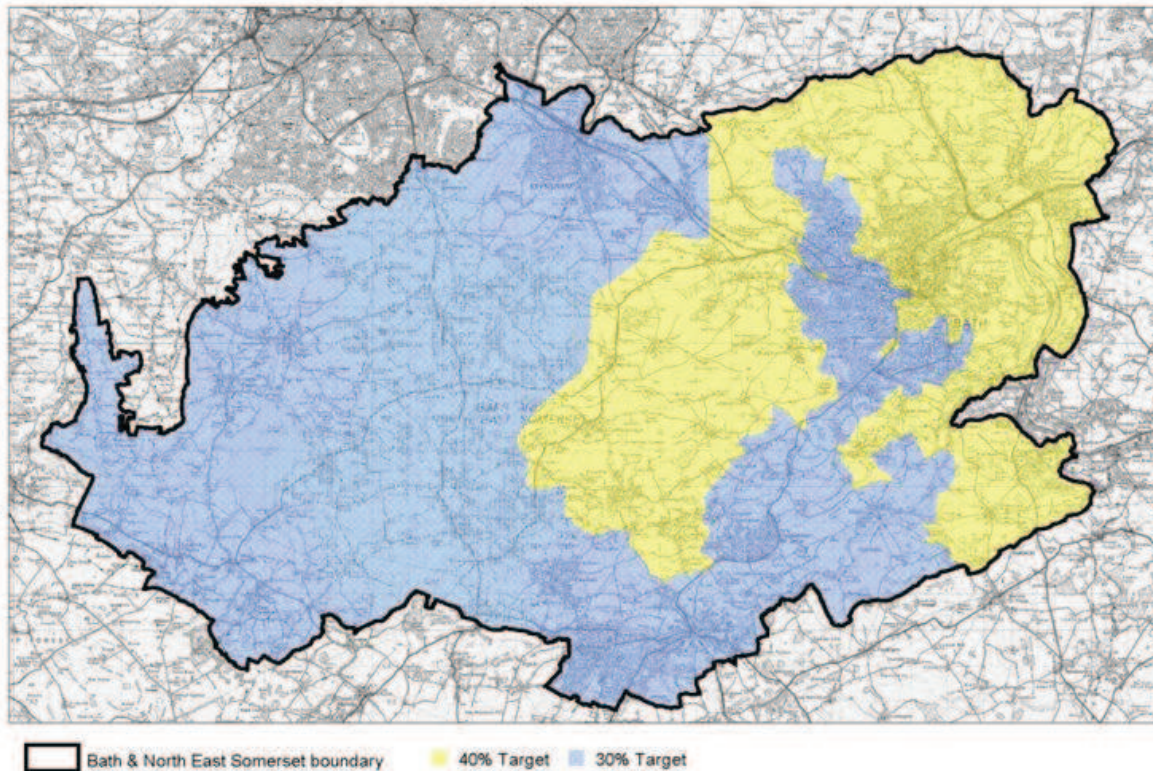
Council response

4.2 To respond to the Inspector's concerns, the viability assessment has been updated. The **B&NES Viability Assessment** provides information and recommendations on the level of affordable housing targets that are financially viable taking into account various development / mitigation costs, national/local standards and likely infrastructure requirements. The latest Viability Assessment takes into account:

- Any changes in the housing market since 2010 (as reflected by property prices);
- Changes in the policy position at the national and local level, with particular reference to tenure mix within the affordable housing element of schemes;
- Changes in development cost variables i.e. Code for Sustainable Homes;
- The finding of the CIL study

4.3 The Updated B&NES Viability Assessment shows that viability and associated proportion of affordable housing that can be provided varies geographically across the District and this is shown on the basis of zones derived from post code sectors. The Viability Assessment identifies three potential policy options, the first is the average 35% requirement across the whole District. The other two options are split target policy options, either a two-way 30% and 40% split (see table and map below) or a five-way split.

| Targets | Sub-markets | Postcode |
|-------------------|--|---|
| AH Area 1 40 % | Prime Bath | BA1 2, BA1 1, BA2 4 |
| | Bath North and East | BA1 5, BA1 6, BA2 6, BA1 7, SN14 8 and SN13 8 |
| | Bath Rural Hinterland | BA1 9, BA1 8, BA2 7, BA2 9, BA2 0, Ba152 and BS30 6 |
| AH Area 2 30 % | Bath North and West | BA1 4 and BA1 3 |
| | Bath South | BA2 3, BA2 2, BA2 1, BA2 5 |
| | Keynsham and Salford | BS31 1, BS31 2, BS31 3, BS15 3, BS4 4 and BS14 8 |
| | Midsomer Norton, Westfield, Radstock, Peasedown St John, Paulton | BS39 7, BA3 2, BA3 3, BA2 8,n BA3 4and BA3 5 |
| | Chew Valley | BS40 6, BS40 8, BS39 4, BS39 5, BS39 6 and BS14 0 |



4.4 The recommended changes to the Policy set out below sets out a two-way split target. This ensures that local variation in viability can be reflected in a way that it is simpler to implement than the five-way split and is in line with the Inspector’s preliminary conclusions.

RECOMMENDED CHANGE TO POLICY CP.9 (AFFORDABLE HOUSING)

Large sites

Affordable housing will be required as on-site provision in developments of 10 dwellings or 0.5 hectare and above (~~whichever is~~ the lower threshold applies). The following percentage targets will be sought:

- AH area 1: 40% in Prime Bath, Bath North and East, Bath Rural Hinterland;
- AH area 2: 30% in Bath North and West, Bath South, Keynsham and Saltford, Midsomer Norton, Westfield, Radstock, Peasedown St John, Paulton and Chew Valley.

~~An average affordable housing percentage of 35% will be sought on these large development sites.~~
This is on a grant free basis with the presumption that on site provision is expected.

Small sites

Residential developments on small sites from 5 to 9 dwellings or from 0.25 up to 0.49 hectare (~~whichever is~~ the lower threshold applies) should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be 20% for AH area 1 and 15% for AH area 2 17.5%, half that of large sites, in order to encourage delivery.

In terms of the 17.5% affordable housing on small sites, the Council will first consider if on site provision is appropriate. In many instances, particularly in the urban areas of Bath, Keynsham,

Midsomer Norton and Radstock the Council will accept a commuted sum in lieu of on site provision. This should be agreed with housing and planning officers at an early stage.

Viability

For both large and small sites the viability of the proposed development should be taken into account, including:

- ~~Whether the site is likely to have market values materially above or below the average for the district~~
- Whether grant or other public subsidy is available
- Whether there are exceptional build or other development costs
- The achievement of other planning objectives
- The tenure and size mix of the affordable housing to be provided

A higher ~~(up to 45%)~~ proportion of affordable housing may be sought where supported by the assessment of viability of the proposed development. ~~or provision below the average of 35% may be accepted.~~

Sub-division and phasing

No change

Tenure

The tenure of the affordable housing will typically be based on a 75/25 split between social rent and intermediate housing.

The Council will only consider the provision of Affordable Rent or other affordable housing products in lieu of social rent ~~when where:~~

- it is proven necessary to improve viability in order to achieve policy position levels of affordable housing and where the housing need for affordable rent can be demonstrated.

Property Size and Mix

No change

Other

All affordable housing delivered through this policy should remain at an affordable price for future eligible households, in the event of any sales or staircasing affecting affordable housing unit(s) delivered through CP9 then an arrangement will be made to recycle the receipts/subsidy for the provision of new alternative affordable housing located elsewhere within Bath and North East Somerset. Affordable Housing should be integrated within a development and should not be distinguishable from market housing.

Delivery

Affordable housing will be delivered in accordance with the Council's Housing Strategy or equivalent.

The quantity, tenure balance and type/size mix of the affordable housing will be agreed with the Council's ~~Affordable Housing Development Enabling~~ Team, or equivalent, through the development management process. Applicants are recommended to hold early conversations with ~~Affordable~~

Housing-~~Development~~-Enabling Team in order to agree the affordable housing provision and in particular the likely availability of public subsidy.

In exceptional circumstances,---- no change.

5.0 POLICY CP11: GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

- 5.1 The Inspector has requested that Policy CP11 and supporting text be amended to take account of the implications of national policy and that Policy CP11 should commit to making appropriate allocations in the Placemaking Plan DPD) to meet the assessed needs, whilst ensuring a five year supply of deliverable sites. 'Planning Policy for Traveller Sites', was published alongside the NPPF in March 2012 and requires that the accommodation needs for Gypsies, Travellers and Travelling Showpeople be assessed and a five year supply of deliverable sites identified. A further five year supply of developable site should also be identified, and where possible for years 11 - 15. The Inspector suggested that if evidence suggests sufficient sites cannot be found through the Site Allocations DPD the criteria in Policy CP11 will need to be more flexible.
- 5.2 The GTAA was updated for B&NES during 2012 and it recommends the following provision is required for Bath & North East Somerset now and over the next 15 years:
- 28 permanent pitches for Gypsies and Travellers
 - 5 transit pitches for Gypsies and Travellers
 - 40 plots for Travelling Showpeople
- 5.3 Policy CP11 and its supporting text are amended as proposed in the Schedule of Main Changes appended, to reflect the outcome of the GTAA review, address the Inspector's concerns and to be aligned with advice in 'Planning Policy for Traveller Sites'.

RECOMMENDED CHANGE TO UPDATE THE ACCOMMODATION REQUIREMENTS OF GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE (SEE ANNEX 3 FOR FULL POLICY)

Amend para before Policy CP11 as follows:

In March 2012 the Government published Planning Policy for Traveller Sites, alongside the NPPF, which seeks to align planning policy for Travellers with other housing. This requires the Council to demonstrate a five year supply of deliverable sites and a further five and where possible, ten year supply of developable sites. The Council has undertaken a refreshed assessment of need which updates the West of England Gypsy and Traveller Accommodation Assessment undertaken in 2007 for the Bath & North East Somerset area. This establishes the level of need for five, ten and fifteen year supply of sites in accordance with Planning Policy for Traveller Sites. The report has identified the need for 28 permanent and 5 transit pitches, and 40 Travelling Showmen's yards to be provided for the period 2012 - 2027. The Council will identify sites to respond to the established accommodation needs gypsies, travelers and travelling showpeople through separate Development Plan Documents (DPDs) for the period to 2011 for the travelling communities residing in or resorting to Bath & North East Somerset as required by national policy in a separate Development Plan Document. Planning Policy for Traveller Sites clarifies that for a site to be considered deliverable it must be available now and offer a suitable location for development now, and be achievable and viable with a realistic prospect it can be delivered within five years.

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Bath and North East Somerset

Schedule of Proposed Changes to the Submitted Core Strategy

March 2013

ANNEX 3 PART 1

Preface

Background

The Core Strategy Examination has been suspended until June 2013 for the Council to undertake further work to address matters of 'soundness' as set out in the Inspector's Preliminary Conclusions (ID/28 and ID/30).

The Inspector has asked the Council to publish and consult on all proposed changes to the Core Strategy that was submitted for Examination in May 2011 which have not already been the subject of consultation, including those changes discussed at the Hearings in 2012 and those suggested by the Council arising from the subsequent work undertaken since the Hearings (ID/28). He has requested that the changes are expressed as changes to the Submitted Core Strategy (ID/29).

Submitted Core Strategy

The Core Strategy submitted for Examination in May 2011 comprises the Draft Core Strategy (December 2010) plus a Schedule of Proposed Changes to the Draft Core Strategy (March 2011) approved under delegated arrangements agreed by Council in December 2010.

Previous changes proposed to the Core Strategy (2011 – 2012)

In response to the Inspector's preliminary comments and questions in ID/1 and ID/4 issued prior to the Hearings the Council consulted on a Schedule of Significant Proposed Changes in September 2011. This schedule included those proposed changes from the Schedule of Proposed Changes (March 2011) submitted with the Draft Core Strategy which the Inspector considered were 'significant' plus others to address matters of soundness. At the same time the Council consulted on a Schedule of Potential Changes arising from the Draft National Planning Policy Framework as requested by the Inspector ID/3.

The Council has since compiled a list of additional suggested 'Rolling Changes' to the 'Submitted Core Strategy' arising from consideration of comments made by the Inspector and objectors on the Core Strategy through discussion at the Examination Hearings in January 2012. They were published February 2012 and comments invited by the Inspector from interested parties but there was no formal consultation on these changes at the time.

Consultation on the Proposed Change to the Submitted Core Strategy (2013)

This schedule lists Proposed Changes to the 'Submitted Core Strategy' including those which the Council considers address the issues raised by the Inspector in ID/28 and ID/30. These Proposed Changes comprise:

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- changes from the Schedule of Significant Proposed Changes (September 2011) that result in a change to the Submitted Core Strategy (see note below)
- all changes from the Schedule of Rolling Changes (February 2012)
- all new changes coming out of Suspension review work 2013 to address issues in ID/28 and ID/30 which includes any further changes to those set out in the September 2011 schedule.

The Proposed Changes to the Submitted Core Strategy are prefixed 'SPC' and the source of each change is indicated in the schedule. The significant proposed changes already consulted on in September 2011 that result in a change to the 'Submitted Core Strategy' are included in the schedule for completeness, but are shaded grey as they are not part of this consultation and comments are therefore not invited on them.

The Inspector has asked for comments on the Proposed Changes to the Submitted Core Strategy so that he has a full range of views when examining the soundness of the Core Strategy. If you wish to submit comments you are strongly encouraged to use the representation form and to submit it by email to planning_policy@bathnes.gov.uk. All comments received between **26th March and 7th May 2013** on these Proposed Changes will be forwarded to the Inspector for his consideration.

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

Please also note the housing and employment figures used in this schedule are indicative at this stage and maybe subject to change.

| Change Ref | Page No in Draft Core Strategy | Plan Ref | Proposed Change to the Submitted Core Strategy | Original change Ref | Reason for change |
|------------|--------------------------------|------------|---|---------------------|--|
| SPC1 | - | 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> | - | The submitted Core Strategy was prepared before the Localism Act 2012. Development management policies and site allocations are planned to come forward in the Placemaking Plan. Under the new Planning Regs and NPPF (2012), local planning authorities are |

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| | | | | | charged with preparing a Local Plan which should now preferably be a single document. The Council is committed to taking forward the Core Strategy to adoption and is also in the process of preparing the Placemaking Plan which will articulate the policy framework set out in the Core Strategy. Effectively these two documents together will form a Local Plan under the new regime - one setting out the strategic plan and the other setting out the detail. It is therefore proposed that the Core Strategy will include the subtitle 'Part 1 of the Local Plan'. The Placemaking Plan will be subtitled 'Part 2 of the Local Plan'. This will help to reinforce the intrinsic relationship between the two documents, and will be in line with the new regime introduced by the NPPF. |
| SPC2 | - | Contents | 6b Responding to a Climate Change | FM1 | Non-material textual change for purposes of clarity |
| SPC3 | - | Policies | B3 <u>Strategic Policy for Twerton and Newbridge Riverside Strategic Policy</u> | FM2 | Non-material textual change for purposes of clarity |
| SPC et seq. | - | Index Diagrams | Insert reference or new diagrams: Diagram 8a <u>Western Riverside</u> Diagram 20a <u>General extent of the surface coal Mineral</u> | FM3 | Non-material textual change for purposes of clarity |

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| | | 8a, 20a, 20 | <u>Safeguarding Area</u> Amend Diagram 20 'Green Infrastructure Network' to ' <u>Illustrative</u> Green Infrastructure Network' | | |
| SPC | 8 | Para 1.03 | <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. | | Change to reflect shift in Plan period. |
| SPC | 8 | Para 1.05 | <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 t<u>The Placemaking Plan, Part 2 of the Local Plan, which</u> 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 and sets out a spatial strategy for dealing with waste including the allocation of sites. The LDF includes <u>Details of other documents, some of which are under preparation</u> are set out in the Local Development Scheme.</p> | - | Change to clarify the relationship between the Core Strategy and the Placemaking Plan as Part 1 and 2 of the Local Plan to align with NPPF, para 153, |
| SPC | 15 - 17 | Objectives | <i>Objectives to be amended to ensure consistency with the NPPF.</i> | - | Changes to ensure consistency with the NPPF. |
| SPC | 17 | Objective 5 | Amend first bullet point of objective 5 to read: <ul style="list-style-type: none"> enabling the delivery of new homes needed to | RC1 | Change arising from the Hearings. |

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| | | | 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 | | |
| SPC | 18 | Para 1.18 | Proposals to abolish the Regional Spatial Strategy (RSS) have provided B&NES with the opportunity to move away from regionally imposed growth targets and establish its own requirements in response to local circumstances. Formulation of this overarching policy framework for the District has entailed analysis of new, up-to-date 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. | - | <i>There will be some minor changes to first sentence of this para to refer to NPPF and its requirements for assessing housing/growth targets.</i> |
| | 18 | Para 1.19 | Development land supply: A detailed, 'bottom up' assessment has been undertaken of the capacity of the District's settlements for delivery of new housing, jobs and community facilities. This has included identifying suitable and deliverable development sites, understanding the environmental constraints including potential flood risk, assessing the appropriate mix of uses and densities and ensuring the necessary infrastructure is in place or can be secured to deliver mixed and balanced communities. It also looked at the opportunities to re-use empty homes and under-used properties. Part of this analysis is set out in the Strategic Housing Land Availability Assessment | - | <i>Para will be amended to reflect the results of SHMA and need to identify 5 year land supply plus 20% buffer (arising from ID/28, paras 2.15 – 2.19)</i> |

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| | | | (SHLAA) | | |
| | 19 | Para 1.26 | <p>Development need: The Council has also undertaken assessments of development need within the district during the plan-period. This includes assessing the space needed for economic growth, housing, retail provision and social needs. This takes account of the Council's objective of promotion of a higher value economy rather than only volume growth. In terms of housing need, the Council has assessed the post recession likely need for new housing, both market and affordable housing, over the plan period up to 2026 <u>2029</u> based on:</p> <ul style="list-style-type: none"> • Projected population change arising from births over deaths and increasing life expectancy • The likely housing requirement this entails, including rapid decline in household size and increased separation rates • The need for housing generated by economic growth (net migration), taking into account likely future growth rate, productivity changes and sectoral changes, • Provision for non-economically active migrants | | <i>Para will need to be amended to reflect the results of SHMA and need to identify 5 year land supply plus 20% buffer (arising from ID/28, paras 2.15 – 2.19)</i> |
| SPC | 19 | Para 1.26 | <p>The Core Strategy makes provision for around 11,000 <u>12,700</u> new homes and around 8,700 <u>10,170</u> new jobs. This level of growth excludes "windfall" housing developments. Infrastructure deficiencies, environmental constraints and the results of community engagement together affect the level of growth. The strategy is to locate new development in the most sustainable locations and therefore the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger</p> | Amends RC2 | Change arising from BNES/26 and to reflect the increase in housing numbers and job figures (see ID/28) |

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| | | | settlements in the Somer Valley. The level of development delivered through this approach equates with the future likely need for development but it is acknowledged that the district's particular circumstances constrain the space available. However the Council's policy of 'smart growth' provides scope for pursuing high levels of economic growth without departing from the locational strategy. The broad spatial principles are summarised below and elaborated in the place-based chapters 2-5. | | |
| SPC | 19 | Para 1.27 | <p>Bath, as the economic driver in the district is the primary focus for new development. The spatial strategy begins to address the existing commuting imbalance (net in-commuting) by directing more homes than jobs to the city. However significant provision is made within Bath for economic growth, particularly modern employment space to meet the changing needs of the economy and take advantage of Bath's competitive position. The Council's policy of 'smart' growth promotes higher value sectors rather than only volume growth. Key areas of change within the city are along the riverside, especially in the western corridor. No changes are proposed to the general extent of the Green Belt around Bath.</p> <p><i>The last sentence to be amended to refer to change to general extent of Green Belt at Bath and will be amended post Council meeting on 4th March 2013 (see Annex 1 of the Council Report).</i></p> | - | Change reflect the increase in housing numbers and job figures (see ID/28) |
| SPC | 19 | Para 1.28 | Keynsham currently has a balance between numbers of resident workers and jobs but experiences significant in and out-commuting in light of the mismatch of resident workforce and available jobs. Although the <u>additional</u> | - | Change reflect the increase in housing numbers and job figures (see ID/28) |

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| Page 89 | | | <p>homes/jobs provision for Keynsham is roughly equal the focus will be to generate a range of jobs more suitable to the resident workforce. The key areas of change in Keynsham will be in the town centre and at Somerdale which has significant implications for the future of the town. <u>In addition limited changes to the Green Belt are proposed to the south west and east of the town in order to provide additional employment floor space and housing. Whilst changes to the Green Belt are proposed</u> No changes are proposed to the Green Belt boundary around Keynsham and the Core Strategy seeks to maintain the town's separate identity.</p> <p><i>This paragraph will further changed to refer to key areas of change including removal of land from Green Belt to deliver both housing and additional employment floor space post Council meeting on 4th March 2013 (see Annex 1 of the Council Report).</i></p> | | |
| | SPC | 18 | Para 1.29 | <p>In the <i>Somer Valley</i> there is significant net outcommuting due to lack of available jobs but there are also significant residential commitments. The area does not have an operating rail link, there are no direct links to the motorways and there is limited scope to change this. The strategy therefore recognises this position, and seeks to <u>ensure facilitate economic-led regeneration enabling job growth in larger settlements.</u> further residential development is only allowed where it brings employment or other community benefit. Residential development is expected following the closures of some of the large employment sites. The focus for change will be in the town centres and on vacant and under-used sites but some development on new green field locations will be</p> | - |

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| | | | required to meet housing needs. <u>The Housing Development Boundary will therefore be reviewed in the Placemaking Plan.</u> | | |
| SPC | 19 | Para 1.31 | <p>The Green Belt is shown on the Key Diagram. No changes are proposed to the general extent of the Green Belt, in the form of either extensions or deletions. <u>The detailed inner and outer boundaries of the Green Belt will be reviewed in the Placemaking Plan in order to address minor anomalies or other necessary minor adjustments. Exceptional circumstances will need to be demonstrated through this review process in order for the detailed boundary to be changed.</u></p> <p><i>This paragraph will be further changed to refer to key areas of change including removal of land from Green Belt to deliver both housing and additional employment floor space post Council meeting on 4th March 2013 (see Annex 1 of the Council Report).</i></p> | Amends RC3 | Change arising from Hearings and representations |
| SPC | 19 | Para 1.33 | <p>The scale of new homes entails a significant uplift in past rates of delivery from around 380 to around 550 <u>700</u> per annum although as set out in the SHLAA, the overall trajectory of provision is determined by the performance of individual locations. The provision of new jobs is dependent on objectives in the Council's Economic Strategy being realised through the interventions outlined in the Council's Regeneration Delivery Plans, in particular the objective for economic growth of 8,700 <u>10,170</u> jobs. There is scope with the spatial strategy to deliver an even greater number of jobs in line with the Economic Strategy through....</p> | Amends RC4 | Change arising from BNES/26 and to reflect revised housing requirement/delivery rate. |

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| SPC | 19 | Para 1.34 | The need for affordable housing in the district is high and the Core Strategy seeks to maximise the provision within the context of the spatial strategy and deliverability. This would provide around 3,000 <u>3,110</u> affordable homes during the plan period. | - | Change to affordable housing provision to reflect new housing requirement. |
| SPC | 19 | Para 1.36 | Contingency: The Core strategy recognises the need to be responsive in light of future uncertainty and unforeseen circumstances. There is the scope for flexibility in the mix of uses and density of some of the large redevelopment sites such as at Somerdale in Keynsham and the MoD sites in Bath. In addition, there is scope in Bath's western corridor to vary the mix of uses to respond to needs for development. This flexibility maintains the overall strategy of a priority on urban focussed brownfield opportunities. The Council will monitor delivery rates in the plan period which will shape the early review of the Core Strategy programmed for around 2016. <i>This para will be replaced with para relating to flexibility within the strategy to respond to changing circumstances.</i> | - | Change arising from issues raised in ID/28, para 3.32. |
| SPC | 20 | Policy DW1, clause 2: | 2: Making provision for a net increase of 8,700 <u>10,170</u> jobs and <u>12,700</u> homes between 2006 <u>2011</u> and 2026 <u>2029</u> , of which around 3,400 <u>3,110</u> affordable homes will be delivered through the planning system. | Amends RC6 | Changes arising from BNES/26 and BNES/2 and to amend Plan period dates and to respond to ID/28 in the context of the shift in Plan period |
| SPC | 20 | Policy DW1, clause 4 | 4: retaining the general extent of Bristol – Bath Green Belt within B&NES with no strategic change to the boundaries <u>changing the general extent of the Green Belt in x locations to provide opportunities for additional housing and employment floor space provision.</u> <i>Draft wording to refer to relating to removal of land from</i> | Amends RC7 | Change arising from Hearings and representations |

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| | | | <i>Green Belt to deliver both housing and additional employment floor space to be finalised post Council meeting on 4th March 2013 (see Annex 1 of the Council Report).</i> | | |
| SPC | 20 | Policy DW1 | Amend Policy DW1 by inserting the following clause between existing clauses 5 and 6 (to be renumbered in the final version of the Core Strategy): <u>'Protecting, conserving and enhancing the district's nationally and locally important cultural and historic assets'</u> | RC5 | Change arising from English Heritage's representations (see BNES/18) |
| SPC | 20 | Policy DW1 | In order to respond to changing circumstances, flexibility in the nature, density and mix of uses in the Western Corridor of Bath and on MoD sites will provide contingency in line with the principles of the overall strategy. | Amends RC8 | Text deleted from Policy DW1 as reference to flexibility in the strategy will be made in the text (para 1.36). Change made in respond to issues raised in ID/28, para 3.32. |
| SPC | 20 | Policy DW1 (Last para only) | Add to Policy DW1: <u>The Core Strategy will be reviewed around every five years and changes made to ensure that both:</u> a. <u>the objectives are being achieved, particularly the delivery of the housing and work space targets set out in Table 9; and</u> b. <u>the Core Strategy is planning for the most appropriate growth targets, particularly housing and employment space/jobs.</u> | RC9 | Changes arising from the discussions at the Hearings as explained in BNES/24 |
| SPC | - | NEW POLICIES and | <i>See Council report 4th March 2013(see Annex 1).</i> | - | Changes relating to the inclusion of proposed urban extensions to address issues raised in ID/28. |

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| | | supporting text for proposed urban extensions | | | |
| SPC | 21 | Diagram 4 | Remove notation for all Policy RA1 villages <i>[see page (i) for proposed changes to Diagram 4 appended to this schedule]</i> | RC10 | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |
| SPC | 21 | Diagram 4 | <i>Amend the housing and employment figures for Bath, Keynsham, the Somer Valley and the Rural Areas post Council meeting on 4th March 2013.</i> <i>[see page (i) for proposed changes to Diagram 4 appended to this schedule]</i> | Amends RC11 | Change arising from BNES/26 |
| SPC | 21 | Diagram 4 | Amend urban area of Bath/Green Belt in the vicinity of Odd Down so that it more accurately illustrates the general extent of the Green Belt (to show the park & ride site and adjoining land within the Green Belt) <i>[see page (i) for proposed changes to Diagram 4 appended to this schedule]</i> | RC12 | Change arising from Hearings and representations. |
| SPC | 21 | Diagram 4 | <i>Change to illustrate general extent of Green Belt as proposed to be amended [see Annex 1 of the Council Report for 4th March]</i> <i>[see page (i) for proposed changes to Diagram 4 appended to this schedule]</i> | - | Change arising from removal of land from Green Belt to allow for urban extensions to address issues raised in ID/28. |
| SPC | 21 | Diagram 4 | Amend to only include the three "District Heating Priority Areas" – Bath Central, Bath Riverside and Keynsham | - | Consequential change arising from Change made in response to the Inspector's queries raised in ID/30 |

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| | | | Town Centre <i>[see page (i) for proposed changes to Diagram 4 appended to this schedule]</i> | | (paras 2.1-2.3) | | | | |
| SPC | 22 | Table 2 | <p>Key District-wide Infrastructure</p> <p><i>Change list of key infrastructure requirements as result of increased housing requirement/urban extensions to be made post Council meeting on 4th March 2013.</i></p> <p>Date changes</p> <table border="1"> <tr> <td>IDP Refs</td> <td>Phasing</td> </tr> <tr> <td>DWI.2, DWI.4, DWI.7, DWI.10, DWI.12</td> <td>2010-2026 2029</td> </tr> </table> | IDP Refs | Phasing | DWI.2, DWI.4, DWI.7, DWI.10, DWI.12 | 2010- 2026 2029 | - | Changes to list of key infrastructure requirements needed as result of increased housing requirement/ urban extensions. |
| IDP Refs | Phasing | | | | | | | | |
| DWI.2, DWI.4, DWI.7, DWI.10, DWI.12 | 2010- 2026 2029 | | | | | | | | |
| SPC | 24 | Table 3 | <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 National Planning Policy Framework</i></p> | - | Changes to reflect change in national planning policy guidance. | | | | |
| SPC | 28 | Para 2.01 | <p><u>2a Setting the Agenda for the early 21st Century Historical Context</u></p> <p><i><u>"continuous development over two millennia"</u></i></p> <p><u>World Heritage Site Statement of Significance (2010)</u></p> <p>From its early history as a Celtic place of reverence and as a spa during Roman occupation, Bath evolved into a Saxon 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</p> | - | Change made for the purposes of accuracy and clarity. | | | | |

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| | | | Rapid expansion in the Georgian period era created an enduring architectural legacy and made saw Bath become the foremost fashionable resort of the 1700s, and created an enduring architectural legacy attracting increasing numbers of visitors. | | |
| SPC | 28 | Para 2.02 | For the next 150 years, the The Victorian city struggled to cope with its Georgian legacy. At the beginning of Victoria's reign Bath was the 9th largest town in England with a population of nearly 50,000 The city experienced continued growth but relative decline, refining 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 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 establish Bath as a leading therapeutic centre. | - | Change made for the purposes of accuracy and clarity. |
| SPC | 28 | Para 2.03 | The 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 can be characterized by economic depression alongside | - | Change made for the purposes of accuracy and clarity. |

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| | | | <p>a great deal of inter war house building <u>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 new neighbourhood development were connected to the centre by the Bath Electric Tramway.</u> 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 <u>within the city</u> 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 <u>Bath should change and develop change and development should be managed</u> and what 'sustainability' means for the city and its future.</p> | | |
| SPC | 29 | Bath Strategic Issues 2 | <p>2. The conservation and enhancement of the World Heritage Site (WHS) <u>and its setting and of the 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 <u>growth prosperity</u>. – however, it does require that contemporary change is managed sensitively and that high quality design is achieved.</p> | - | Change made for the purposes of accuracy and clarity. |
| SPC | 29 | Bath Strategic | <p>7. There is a significant imbalance between the resident workforce and <u>jobs in the city</u>. The main place of</p> | - | Change made for the purposes of |

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| | | Issues 7 | 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> | | accuracy and clarity. |
| SPC | 29 | 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 communities. | FM4 | Minor change for the purposes of updating the draft Core Strategy. |
| SPC | 30 | Para 2.05 | World Heritage, Regeneration, <u>Enterprise</u> 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 <u>value</u> (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 <u>derives from</u> <u>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</u> . 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 <u>town and country</u> . | Amends FM5 | Minor change for the purposes of updating the draft Core Strategy. |
| SPC | 30 | Para 2.06 | In 2006 the Council published 'The Future for Bath' which <u>in which it sought to</u> defines the essence of the city - its | - | Change made for the purposes of accuracy and clarity. |

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| | | | DNA. It articulates a suite of regenerative | | |
| SPC | 30 | Para 2.07 | The Bath spatial strategy has been prepared with <u>against</u> the background of 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. | - | Change made for the purposes of accuracy and clarity. |
| SPC | 31 | Para 2.08 | 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: | - | Change made for the purposes of accuracy and clarity. |
| SPC | 32 | Vision for Bath | The Vision <i>What the spatial strategy is seeking to achieve,</i> 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 <u>to live,</u> locate and grow a business, visit and invest. The scope to further improve Bath's environmental quality will form the foundation of efforts to boost the city's profile | - | Change made for the purposes of accuracy and clarity. |

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| Page 99 | | | <p>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 <u>Enterprise Area</u> 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. <u>The delivery of new housing 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.</u> whilst retaining the integrity of its landscape.</p> <p><u>The need for more housing will enable the regeneration of many areas within the city. Where development is needed on the edge of Bath it will be positioned, master planned and designed to sustain the 'significance' of Baths heritage assets and the integrity of its landscape setting.</u> Parallel investment in public transport infrastructure and walking and cycling <u>routes</u> will keep the city moving and enable more sustainable travel choices to be made.</p> | | |

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| | | | Bath's already strong identity as a therapeutic place will be enhanced by boosting its performance as an enjoyable city for leisure, recreation and shopping with a vivacious cultural scene and a highly valued green infrastructure network. | | |
| SPC | <i>to be added</i> | Bath Chapter | <i>Changes to the Bath chapter, as necessary, to reflect conclusions of further flood sequential approach/mitigation work (incl. to Table 5 on Infrastructure).</i> | - | Change to respond to ID/28 (paras 3.4 and 3.10 – 3.24) |
| - | 33 | Diagram 5 | <ul style="list-style-type: none"> • Delete notation and label for East of Bath Park & Ride • Add Combe Hay • Change notation of Bath Spa University so that it is the same as The University of Bath (i.e. white dotted circle rather than black). • Amend southerly extent of area of search for flood storage facility to exclude land outside B&NES. Move line illustrating the area of search further to the east of the railway. | PC15 as amended | <p>Included for information and not part of the current consultation.</p> <p>Change made in response to the Inspector's queries.</p> |
| SPC | 33 | Diagram 5 | <p>Bath's Neighbourhoods label to be amended to reflect revised policy wording.</p> <p><i>[see page (ii) for proposed changes to Diagram 5 appended to this schedule]</i></p> | Updates PC15 as amended | Consequential change arising from amendments to Policy B2. |
| SPC | 33 | Diagram 5 | <p>Indicate areas where land will be released from the Green Belt to accommodate additional dwellings and employment floorspace.</p> <p><i>[see page (ii) for proposed changes to Diagram 5 appended to this schedule]</i></p> | - | Consequential changes arising from the need to release land from Green Belt to allow for urban extensions and address issues raised in ID/28. |

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| SPC | 33 | Diagram 5 | Amend the area of search for location of flood storage facility to extend westwards following the line of the river. <i>[see page (ii) for proposed changes to Diagram 5 appended to this schedule]</i> | - | Change to address issues raised in ID/28. |
| SPC | 33 | Diagram 5 | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. <i>[see page (ii) for proposed changes to Diagram 5 appended to this schedule]</i> | RC17 | Response to ID/24 Following the outer bend follows the existing approach for the Central Area as one that seeks to embrace the riverside and the interaction of people and development with it. Any concern that the delineation of the Central Area along the eastern bank of the river, would, in this location, bring with it the possibility of a wide range of commercial uses (identified within Policy B2) along the river frontage is unfounded. Any 'arena' type development at the Recreation Ground in the context of Policy B1 (b) could (at the interface of the Rec and the riverside) bring associated uses. These may be acceptable but will be considered on their merits. |
| SPC | 34 | Policy B1(1) | Amend Policy B1(1) to read: 1. 'Natural and Built Environment a. Protect, conserve, and where appropriate, <u>Sustain and enhance the significance of the city's heritage assets.</u> | Amends RC13 | Change arising from English Heritage's representations (see BNES/18), and further changes for clarity and accuracy and to ensure |

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| | | | <p><u>including::</u></p> <p>a: The Outstanding Universal Value of the <u>City of Bath</u> World Heritage Site and its setting including that part which is designated as Cotswolds Area of Outstanding Natural Beauty.</p> <p>b: Listed buildings, the <u>Bath</u> conservation area and their settings.</p> <p>e: Archaeology, scheduled ancient monuments, <u>and</u> historic parks and gardens.</p> <p>f: Non-designated heritage assets of local interest and value.</p> <p><u>b: Give great weight to conserving landscape and scenic beauty in the Cotswolds Area of Outstanding Natural Beauty</u></p> <p>e: The network of green spaces and wildlife corridors including the River Avon and Kennet and Avon Canal, Local Nature Reserves, formal and informal parks and recreational areas, trees and woodlands.</p> <p>f: The biodiversity resource including species and habitats of European importance.</p> | | the policy is NPPF compliant. |
| SPC | 34 | Policy B1 (2) | Insert the following text after Objective 1 in Policy B1: <u>'All of the following objectives will be considered in the context of part 1 of this policy.'</u> | RC14 | Change arising from English Heritage's representations (see BNES/18) |
| SPC | 34 | Policy B1 (2)(a) - (e) | <p>Economic Development</p> <p>a: Plan for an overall net increase in jobs from of about 5,200, rising from 61,700 60,200 in 2006 2011 to 67,400 65,400 in 2026 2029, with significant gains in</p> | Amends PC17 | To reflect up to date evidence. |

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| | | | <p>business services tempered by losses in defence and manufacturing.</p> <p>b: Plan for the expansion of knowledge intensive and creative employment <u>sectors</u> by enabling the stock of office premises to increase from about <u>240,000m² 173,000 m² in 2006 2011</u> to about <u>340,000m² 213,000m² in 2026 2029</u>.</p> <p>c: Achieve the net additional increase to the stock of office premises <u>of 40,000 m²</u> by enabling the development of <u>85,000 100,000m² 50,000 m²</u> of new space, linked to a managed release of <u>45,000 30,000m² 10,000m²</u> of that which is qualitatively least suitable for continued occupation.</p> <p>d: Focus new office development within and adjoining the city centre <u>and enable appropriate levels of business space in mixed use out-of-centre development sites.</u></p> <p>e: Plan for a contraction in the demand of industrial floor space from about <u>240,000m² 167,000m² in 2006 2011</u> to about <u>210,000m² 127,000m² in 2026 2029</u> but sustain a mixed economy to support Bath's multi-skilled workforce and multi-faceted economic base by retaining <u>a presumption of favour of</u> industrial land in the Newbridge Riverside area.</p> | | |
| SPC | 34 | Policy B1 (3)(a) | <p>Housing</p> <p>(a) Enable the development of <u>about 6,000 7,000</u> new homes within the city, increasing the overall stock of housing from <u>40,000 to 46,000 47,000</u>. <u>The following distribution of housing will be planned for.</u></p> <p><u>Large sites in the Central Area and Enterprise Area –</u></p> | RC15 | To reflect that SHLAA identified supply is 6000-6,500 and intent to count off-campus student cluster flats towards supply. |

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| | | | <p><u>3,000</u></p> <p><u>Large sites in the outer neighbourhoods, including former MoD land – 2,000.</u></p> <p><u>Small scale intensification distributed throughout the existing urban area -1,000</u></p> <p><u>Green Belt at Weston - 300</u></p> <p><u>Green Belt adjoining Odd Down - 300</u></p> <p>b. Of these new homes about 3,500 will be delivered within the Central Area and Western Corridor, focused on 'Western Riverside' and about 2,800 homes will come forward within Bath's outer neighbourhoods where surplus Ministry of Defence land will play a major role alongside smaller scale suburban infilling and redevelopment.</p> <p>4. The Relationship between Population, Labour Supply and Employment</p> <p>a: At the margin of delivery, Achieve a better balance between the overall number of jobs in the city and the resident workforce. An <u>A sufficient</u> increase in housing delivery and the associated growth of the labour force will reduce the need for labour to be imported from neighbouring locations. Economic diversification will reduce the need for a significant minority of resident workers to out-commute to other areas.</p> <p>b: Reduce the proportion of the resident workforce who out commute and enable a shift in the level of self-containment from 70% to nearer 80%.</p> <p>5. Previously developed land</p> <p>a: Regenerate and repair a number of areas within the</p> | | |

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| | | | <p>Central Area and Western Corridor <u>Enterprise Area</u> to create new areas of attractive and productive townscape and a much improved relationship between the city and its river.</p> <p>b: Transform the Western Riverside area into a contemporary residential neighbourhood</p> <p>c: Redevelop surplus Ministry of Defence land at Foxhill, Warminster Road and potentially Ensleigh to optimise the contribution that these areas can make to the city's development needs.</p> <p>6. Shopping</p> <p>a: Ensure that the primary shopping area successfully absorbs Southgate into the trading patterns and character of the city centre by not making provision for a further large scale comparison retail project</p> <p>b: Enable small to medium sized comparison retail development that improves the shopping offer and enhances the reputation of the city centre.</p> <p>c: Protect and where possible enhance the vitality and viability of district and local centres.</p> <p>d: Focus additional convenience retail floorspace (beyond existing commitments) within and on the edge of existing centres before considering out-of-centre sites that might improve the spatial pattern of provision across the city.</p> <p><u>e: enable the provision of neighbourhood retail services at Ensleigh, Warminster Road, Foxhill, Weston Green Belt and at Odd Down Green Belt.</u></p> | | |

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| | | | <p>7. Higher Education</p> <p>a: Enable the provision for additional on-campus student bed spaces <u>at the University of Bath and at Bath Spa University</u>, facilitating growth in the overall number of students and/or shrinkage <u>a slowdown in the growth</u> of the private student lettings market.</p> <p>b: Enable provision of additional on campus and in-city teaching and research space.</p> | | |
| SPC | 35 | Policy B1 (8) | <p>Tourism, Culture and Sport</p> <p>a: Manage the provision of 500-750 new hotel bedrooms to widen the accommodation offer for the city, increase overnight stays and the competitiveness of the Bath as a visitor and business destination.</p> <p>(b) Enable the development of a new stadium and associated uses within the Central Area <u>At the Recreation Ground, and subject to the resolution of any unique legal issues and constraints, enable the development of a sporting, cultural and leisure arena. Associated uses may be acceptable but will be considered on their merits.</u></p> | Updates RC16 (amends PC19) | Change made in response to ID/24 and arising from discussion at the Hearings (see also ID/30) |
| SPC | 35 | Policy B1 10(d) | <p>Implementing an upstream flood storage facility <u>flood mitigation solutions</u> to enable development in vulnerable areas of the Central Area and Western Corridor <u>Enterprise Area</u></p> | Amends PC20 | Change made in response to issues raised in ID/28 |
| SPC | 36 | Para 2.12 | <p>Within this area flood risk is a key constraint. The strategy for Bath is in accordance with the sequential/exceptions test requirements set out in PPS25 of the NPPF. The Central Area Western Corridor and Enterprise Area <u>is regarded as the most suitable location within the District</u></p> | - | Change made for the purposes of accuracy and clarity. |

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| | | | for the scope of activities envisaged and this justifies development within an area of flood risk subject to acceptable <u>where suitable</u> flood mitigation measures being delivered (see infrastructure and delivery section on page 56). | | |
| SPC | 37 | Para 2.13 | <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). | - | Change made for the purposes of accuracy and clarity. |
| SPC | 37 | Para 2.14 | The Core Strategy sets out a clear, firm and enduring vision of change for these areas upon which to base site specific delivery proposals. | - | Change made for the purposes of accuracy and clarity. |
| SPC | 37 | Para 2.15 | <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 the Enterprise Area 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 | - | Change made for the purposes of accuracy and clarity. |

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| | | | <ul style="list-style-type: none"> • 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 | | |
| SPC | 37 | Diagram 6 | <p>Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road.</p> <p><i>[see page (iii) for proposed changes to Diagram 6 appended to this schedule]</i></p> | RC17 | <p>Response to ID/24</p> <p>Following the outer bend follows the existing approach for the Central Area as one that seeks to embrace the riverside and the interaction of people and development with it.</p> <p>Any concern that the delineation of the Central Area along the eastern bank of the river, would, in this location, bring with it the possibility of a wide range of commercial uses (identified within Policy B2) along the river frontage is unfounded.</p> <p>Any 'arena' type development at the Recreation Ground in the context of Policy B1 (b) could (at the interface of the Rec and the riverside) bring associated uses. These may be acceptable but will be considered on their merits.</p> |

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| SPC | 38 | Para 2.16 | The Central Area of Bath lies at the heart of the World Heritage site <u>and much of it lies within the Bath Conservation Area.</u> ‡ The Central Area comprises the city centre and neighbouring locations at South Quays and Western Riverside East to the south and east. <u>A key objective of the plan is for the city centre to expand to encompass the entire Central Area. The precise extend of the city centre boundary is identified on the Proposals Map. This boundary will be reviewed every 5 years based on observable change.</u> | RC18 | Change made for the purposes of accuracy and clarity. |
| SPC | 38 | Diagram 7 | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. <i>[see page (vi) for proposed changes to Diagram 7 appended to this schedule]</i> | RC17 | Response to ID/24 Following the outer bend follows the existing approach for the Central Area as one that seeks to embrace the riverside and the interaction of people and development with it. Any concern that the delineation of the Central Area along the eastern bank of the river, would, in this location, bring with it the possibility of a wide range of commercial uses (identified within Policy B2) along the river frontage is unfounded. Any 'arena' type development at the Recreation Ground in the context of Policy B1 (b) could (at the interface of the Rec and the riverside) bring associated uses. These may be acceptable but will be considered on their merits. |

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| SPC | 38 | Diagram 7 | Amend notation Central Area – City Centre (<u>indicative boundary only - detailed boundary is shown on the Proposals Map</u> <i>[see page (vi) for proposed changes to Diagram 7 appended to this schedule]</i> | RC26 | To improve clarity (see BNES/7, 6.1.2) |
| SPC | 39 | Policy B2 (2) | Placemaking Principles Change within the Central Area should reinforce and contribute to the City's unique character and identity. 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> | - | Text amended to improve clarity. |
| SPC | 39 | Policy B2 (2)(n), (o) & (u) | Risks to the Central Area 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: 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> o: There are areas where the river acts as a barrier to pedestrian and cycling desire lines <u>and further crossings</u> | - | Public Realm and Movement Strategy |

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| | | | <p><u>would be beneficial in respect of enable sustainable transport choices and for the enjoyment of the city.</u></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> | | |
| SPC | 40 | Policy B2 (3)(f) | <p><u>3. Key Development Opportunities</u></p> <p>Figure 7 illustrates the general extent of the city centre, identifies neighbouring areas with the most capacity for significant change and key regeneration opportunities. The precise extent of the city centre, including that of the primary shopping area is shown in the proposals map (see Appendix 3). Within the context of PPS4 <u>the NPPF</u>, economic development led mixed use development proposals at the following locations that accord with parts 1 and 2 of policy B2 and contribute to the scope and scale of change listed in part '4' of this policy will be welcomed.</p> <p><i>City Centre</i></p> <p>a: North of Pulteney Bridge (Cornmarket, Cattlemarket, Hilton Hotel, and The Podium)</p> <p>b: Manvers Street Car Park, Avon & Somerset Police Station and Royal Mail Depot area</p> <p>c: Green Park Road (Green Park House)</p> <p>d: Bath Quays North (Avon Street Car and Coach Park and City College)</p> <p>e: Kingsmead (Kingsmead House, Telephone Exchange, Plymouth House and land in the vicinity of Kingsmead Square)</p> <p><i>Neighbouring the City Centre</i></p> | Amends RC19 and PC26 as amended | <p>Original change was for clarification. Subsequent changes made in response to the Inspector's queries</p> <p>Reference to The Recreation Ground and Leisure Centre deleted in response to Inspector's query in ID/24</p> <p>Further change to update the reference to national planning policy guidance.</p> |

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| | | | <p>f: The Recreation Ground and Leisure Centre</p> <p>g: Bath Quays South (Stothert and Pitt to Travis Perkins)</p> <p>h: The Green Park Station area</p> <p>i: The Homebase area including the Pinesway industrial estate and gyratory.</p> | | |
| SPC | 40 | Policy B2 (4)(b) | <p>b: 75,000–100,000 A net increase of about 40,000 sq.m of modern office floorspace and creative workspace, to enable the growth of sectors targeted in the Economic Strategy</p> | - | LEP Growth Aspiration, Oxford Economics Projections and BANES floorspace calculations. Also revised HCA employment density guidance. |
| SPC | 40 | Policy B2 (4)(h) | <p>(h) a new sports stadium with associated uses including conferencing and banqueting facilities and active riverside frontage</p> <p>(h) <u>Existing uses within the Central Area that remain compatible with its future role and the scope and scale of change envisaged for it, should, where appropriate, be reincorporated as part of redevelopment proposals, unless this is not viable or would significantly reduce the capacity of the Central Area to accommodate jobs or housing development. In such circumstances reasonable efforts should be made to ensure such uses are relocated elsewhere.</u></p> | RC20 (amends PC28) | <p>At the hearings concern was expressed that the second part of Policy GDS.1/B1 no longer applied to the Central Area and BWR East and only to the Western Riverside Zone. This is not the case as (despite the name changes to various land parcels in this area) GDS.1/B1 still overlays BWR East as part of the Central Area.</p> <p>However, for clarity a change is proposed which extends the principle in the second part of GDS.1/B1 to the entire Central Area. The emphasis here is on land uses and mixed used development rather than specific businesses and the approach does not favour leaseholders over landowners. The ending of a lease for a specific business is commercial reality,</p> |

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| | | | | | whereas the desirability of creating appropriate mixed use environments is a key planning matter. See also changes RC16 and RC17 above. |
| SPC | 42 | Para 2.17 | The Central Area in 2026 <u>2029</u> The implementation and delivery of this strategic policy over the lifetime of the Core Strategy will mean that the Central Area will have changed by 2026 <u>2029</u> as set out in Diagram 8. <u>It is anticipated that the extent of the city centre boundary will expand westwards as key development sites within the existing city centre and edge of centre areas are redeveloped to fully optimise their locations and generate more intensive activity.</u> | - | Clear expression of intent |
| SPC | 42 | Diagram 8 | Amend heading for Diagram 8 as follows: The Central Area in 2026-2029 <i>[see page (v) for proposed changes to Diagram 8 appended to this schedule]</i> | - | Change to reflect shift in plan period. |
| SPC | 42 | Diagram 8(i) | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. <i>[see page(v) for proposed changes to Diagram 8(i) appended to this schedule]</i> | RC17 | Response to ID/24 Following the outer bend follows the existing approach for the Central Area as one that seeks to embrace the riverside and the interaction of people and development with it. Any concern that the delineation of the Central Area along the eastern bank of the river, would, in this location, bring with it the possibility |

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| | | | | | <p>of a wide range of commercial uses (identified within Policy B2) along the river frontage is unfounded.</p> <p>Any 'arena' type development at the Recreation Ground in the context of Policy B1 (b) could (at the interface of the Rec and the riverside) bring associated uses. These may be acceptable but will be considered on their merits.</p> |
| SPC | 44 | Western Riverside | <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> | Amends PC29 | Change to improve accuracy and clarity. |
| SPC | 47 | Policy B3 (1) - (2) | <p>Strategic Policy for Twerton and Newbridge Riversides</p> <p><u>1. Role of Newbridge and Twerton Riversides (including the Bath Press)</u></p> <p>This part of the Western Corridor will function predominantly as an economic development area to support the overall employment structure the city. It will complement but not compete with the Central Area as the City's focus for business and enterprise.</p> <p>Specifically this will mean that:</p> <p>a There is a presumption in favour of Newbridge Riverside retaining its function as a place for industrial activity.</p> <p>b Twerton Riverside will function primarily as a multi-use economic development area. Its already reduced role as a</p> | | Changes to make the policy more effective in response to advice in ID/28 |

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| | | | <p>place for industrial activity will be allowed to contract further subject to the criterion at Part 4 (a)(iii) of this policy.</p> <p>Proposals for development at either location will be subject to the considerations set out in parts 2-4 of Policy B3.</p> <p><u>These locations form the western extent of the City of Ideas Enterprise Area</u></p> <ul style="list-style-type: none"> • <u>Newbridge Riverside will function as Bath's primary location for industrial enterprise, providing about 12 ha of land at Locksbrook Road, Brassmill Lane and the Maltings for a range of activities including advanced manufacturing. There is therefore a presumption in favour of retaining land and premises in the B1 use class where this remains a viable use of land and is supported by market signals that there is demand for continued occupation that cannot reasonably be accommodated elsewhere.</u> • <u>Twerton Riverside has contracted as an industrial location in recent decades. This area is suitable for broader range of uses and there is scope to redevelop the area to provide new business (B1a-c) premises and housing. The area presents an opportunity to host business that is displaced as a consequence of the residential led development of Western Riverside and the growth of the intensification of the Central Area into BWR East. Whilst Newbridge Riverside will remain the core industrial location, Twerton Riverside can provide additional flexibility. It will therefore necessary to maintain an appropriate level of land in this area for B1c uses alongside office uses and housing.</u> | | |

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| Page 116 | | | <p>2. Placemaking Principles</p> <p>Assets of Newbridge and Twerton Riverside Development proposals must be informed and shaped by the following characteristics</p> <p>a. Newbridge Riverside functions as Bath's primary location for industrial enterprise, providing about 12 hectares of land at Locksbrook Road, Brassmill Lane and the Maltings for a range of activities including advanced manufacturing.</p> <p>b. There is a strong relationship between the industries and occupations at Newbridge Riverside and the skills and labour prevalent in surrounding neighbourhoods.</p> <p>c. a. The eastern part of Twerton Riverside lies in close proximity to the Western Riverside Policy Area which will experience a significant uplift in its environmental quality and will act as a catalyst for investment in the wider area. Western Riverside will experience a significant uplift in its environmental quality during the lifetime of the Core Strategy and will act as a catalyst for investment in the wider area.</p> <p>b. There are a number of heritage and non-designated heritage assets in the area pertaining to its industrial past, including Brunel's Great Western Railway and the façade of the Bath Press.</p> <p>c. Views in and out of the area e.g. to Newbridge Hill and Bath City Farm are important.</p> <p>d. The river including its banks and open land at the western section of the area are an important wildlife</p> | | |

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| | | | <p>resource.</p> <p>g-e 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. 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 currently result in the underutilisation of land with reasonably good accessibility credentials.</p> <p>c. There are areas of conflict between.....</p> | | |
| SPC | 47 | Policy B3 (4)(a)&(b) | <p>4. Scope and Scale of Change</p> <p><i>Newbridge Riverside</i></p> <p>(a i) There is a presumption in favour of retaining land at Newbridge Riverside for industrial use. Refurbishment, redevelopment or intensification will be welcomed.</p> <p>(a ii) Refurbishment, redevelopment or intensification for industrial use will be welcomed at Twerton Riverside.</p> <p>(a iii) Proposals for the loss of industrial land and floorspace at Twerton Riverside will be assessed against evidence of current and future demand, the availability of suitable alternative provision within Bath for displaced</p> | Amends RC21 (amended PC33) | Follows from changes above |

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| Page 118 | | | <p>occupiers and the benefits of the alternative uses being proposed.</p> <p><i>Offices, other workspaces and other economic development uses</i></p> <p>(b) Proposals for offices, other workspaces and other economic development uses (including retailing) must have regard to the sequential and impacts tests of PPS4.</p> <p><i>Non-economic development uses</i></p> <p>(c i) Proposals for residential and other non-economic development uses will be acceptable as part of mixed-use employment led proposals.</p> <p>(c ii) Residential led or non-economic development led proposals will be acceptable only where economically led development would fail the sequential and impact tests of PPS4 or is not commercially viable.</p> | | | |
| | SPC | 48 | Para 2.19 | 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. | - | Text amended to improve clarity. |
| | SPC | 48 | Para 2.20 | 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..... | - | Text amended to improve clarity. |
| | SPC | 48 | Para 2.21 | It is beyond the remit <u>scope</u> of this chapter of the Core Strategy to consider local aspects of change within outer Bath and to present a bespoke neighbourhood plan for each area. <u>This can be achieved through Neighbourhood Planning and by the Placemaking Plan.</u> Core Strategy Policy in relation to a number of generic matters /topics is | Updates PC34 as amended | Change made to clarify text in the draft Core Strategy. Subsequent change made in response to the Inspector's queries. |

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| | | | covered in the Core Policies section. The spatial strategy focuses on key areas or issues requiring strategic guidance. Crucially, suburban Bath is expected to yield about 2800 new homes <u>on large sites and will account for the majority of the 1,000 units forecast to come forward on small sites throughout the city</u> , Outer Bath will therefore making <u>make</u> a significant contribution to the overall target of 6,000 <u>7,000</u> new homes for the city and contains a district centre and local centres that need to be identified as part of the retail hierarchy. | | |
| SPC | 48 | Para 2.22 | <p>Ministry of Defence of Land</p> <p>Within Bath's outer neighbourhoods the Ministry of Defence occupy three sites <u>have sold and are in the process of vacating</u>, Foxhill (<u>Odd Down</u>), Ensligh (<u>Lansdown</u>), and Warminster Road (<u>Bathwick</u>). <u>Together the sites amount to some 36ha in area. In July 2011 it was confirmed that all MoD personnel would be relocated (mostly to Abbeywood, Bristol) by March 2013 and that the sites would then be disposed of. These have been purchased by housing providers and private developers. In advance of the sale of the sites the Council prepared concept statements setting out its aspirations in respect of what it expected each area to deliver. It is anticipated that Warminster Road and Foxhill will become surplus to requirements within the next few five years as the MoD consolidates its operations at Ensligh Abbey Wood, Bristol. It is also likely that the majority, if not all, of Ensligh will be vacated. Drawing on the The Strategic Housing Land Availability Assessment identifies that these sites can deliver well in excess of 1,000 new homes. Drawing on this strategic assessment</u> the Placemaking</p> | Updates RC22 (amends PC35) | Update to supporting text to reflect MoD/ Defence Estates Statement on Issue 2 re certainty about Ensligh, confirmation of timetable for disposal and position on capacity. |

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| | | | Plan <u>and/or Development Management process</u> will refine the <u>optimum</u> housing capacity <u>of these sites</u> and consider <u>their overall</u> prospects for these sites in more detail, including the scope for business space and measures to enable sustainable travel to the city centre and local centres. For the purposes of the Core Strategy it is sufficient to highlight <u>confirm</u> their suitability and availability <u>of the MoD sites</u> for redevelopment and to observe that <u>delivery by 2026</u> within the plan period is an achievable proposition <u>prospect</u> . <u>The Placemaking Plan may reveal that a higher level of development here is appropriate than could be evidenced during the preparation of the Core Strategy.</u> | | |
| SPC | 49 | Para 2.24 | 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. | - | Text amended to improve clarity. |
| SPC | 49 | Para 2.25 | 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 | - | Text amended to improve clarity. |
| SPC | - | Para | The Council will support investment in the development of | Amends | Text amended to improve clarity. |

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| | | 2.26A | 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. | PC38 | |
| SPC | - | 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> | - | SHLAA and correspondence with BATH FC |
| SPC | 50 | Diagram 10 | Indicate the location of Twerton Park on Diagram 10 and add new notation to the key. <i>[see page (vi) for proposed changes to Diagram 10 appended to this schedule]</i> | - | Indicating the location of Twerton Park is a consequential change arising from new para 2.26B |
| SPC | 51 | Para 2.30 | 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 | - | Text amended to improve clarity. |

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| | | | facilities. | | |
| SPC | 52 | Para 2.31 | <p>2e The World Heritage Site and its Setting</p> <p>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 is summarized in paragraph 2.05 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 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.</p> | - | Text amended to improve clarity. |
| SPC | 52 | Para 2.32 | <p>The setting of the WHS <u>World Heritage Site</u>, beyond its designated boundary, is important as inappropriate development here can could 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 World Heritage Site Setting Study SPD provides the information needed to assess whether a proposed development falls within the setting,</p> | Updates RC23 (amends PC41) | Change arising from Hearings and representations and further changes for purposes of clarity. |

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| | | | 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. | | |
| SPC | 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 development within or to the setting of the World Heritage Site.</u> 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 to the Outstanding Universal Value of the World Heritage Site.</u> | Amends PC42 | Text amended to improve clarity. |
| SPC | 54 | Policy B5 | Bath Spa University – Newton Park Campus Within the context of a strategic framework for all twelve sites that the University occupies <u>the University's entire estate</u> the strategy seeks the redevelopment and intensification of the Newton Park campus to provide additional study bedrooms and academic space. Proposals should <u>accord with the NPPF, paragraph 89 and seek to optimise opportunities for educational use and</u> | RC24 (amends PC47) | Change relating to environmental capacity and significance of heritage assets arising from English Heritage's representations (see BNES/18). Wording in BNES/18 slightly amended following response to issues raised in other representations. |

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| | | | student accommodation within the current boundary of the campus existing Major Existing Developed Sites in The Green Belt in accordance with Policy GB.3 of the BANES Local Plan before seeking to justify very special circumstances for development beyond it <u>them</u> or a change to the MEDS development boundaries, having in all circumstances regard should be had to the sites environmental capacity, the significance of heritage assets and the optimum development of the campus in this regard. The Placemaking Plan DPD will review the MEDS development boundaries and determine whether there are exceptional circumstances that justify a change. | | changes regarding review of MEDS boundary derive from NPPF |
| SPC | 54 | Policy B5 | Off-Campus Student Accommodation Proposals for off-campus student accommodation will be refused within the Central Area, Western Corridor <u>Enterprise Area</u> and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development. | Amends PC47 | Text amended to improve clarity. |
| SPC | 56 | Para 2.44 | The Council's T transport S strategy for Bath is one of reducing the use of cars for travelling to and within the city, by progressing improvements to public transport and making walking or cycling within the city the preferred option for short trips. This will be achieved through a variety of measures including: •Bath Transport Package – comprising a range of measures including three extended Park & Ride sites; upgrading nine bus routes to showcase standard including upgrades to bus stop infrastructure and variable message signs on key | Amends RC25 (amended PC51) | Additional changes in response to objection from FoBRA. Change relating to specifying the measures being taken to reduce HGV through traffic responds to the fact that HGV's (including buses) is responsible for 54.7% of nitrogen oxides on London Road. A disused rail line between Brassmill |

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| | | | <p>routes into the city displaying information about car parking availability</p> <ul style="list-style-type: none"> •Improvements to the bus network through the Greater Bristol Bus Network major scheme including key routes from Bristol and Midsomer Norton, •Rail improvements, such as the electrification of Great Western Railway mainline by 2016; the new 15 year GWR franchise (including the Greater Bristol Metro Project); and increasing the capacity of local rail services travelling through Bath Spa rail station, improving ease of access to and attractiveness of rail travel to and from Bath •The West of England authorities (including B&NES) have been awarded Local Sustainable Transport Fund key component funding for a number of measures and also been invited by the Department for Transport to submit a major bid to the Local Sustainable Transport Fund for £25.5 million •Creating a more pedestrian and cyclist-friendly city centre through the introduction of access changes on a number of streets and expansion and enhancement of pedestrian areas. •Other improvements to walking and cycling infrastructure through the Councils Integrated Transport annual settlement and the implementation of 'Smarter Choices' for transport e.g. Proposed Change Reason for change through the development of travel plans for new and existing sites and the expansion of car clubs | | <p>Lane and Windsor Bridge, Sustainable Transport route for walking cycling only reflect revised Bath Transport Package as BRT option not pursued</p> |

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| | | | <ul style="list-style-type: none"> • <u>seeking to reduce nitrogen dioxide levels in Bath by, for example, reducing the level of heavy goods vehicle (HGV) traffic in the city through:</u> <ul style="list-style-type: none"> <u>i) the continued support & promotion of the Council's Freight Consolidation Centre for deliveries to central Bath; and</u> <u>ii) by implementing an experimental weight restriction to remove through HGV traffic (of greater than 18 tonnes) from London Road.</u> • <u>Creation of one or more Park & Ride sites on the eastern side of the city to reduce commuter traffic</u> • <u>disused rail line between Brassmill Lane and Windsor Bridge, Bath is safeguarded as a Sustainable Transport route. It will provide a high quality and safe cycling and pedestrian route through to Western Riverside that extends the Bristol to Bath Railway path, the Two Tunnels Greenway, and provides a wider choice of sustainable transport routes for local communities to efficiently connect to the city centre and to Bath's Enterprise Area.</u> <p><u>The provision of this route will be complementary to the current riverside path. It will help to reduce pressure and potential conflict between cyclists and pedestrians, and enable the riverside to be properly enhanced as an environmental asset and an important part of the city's green infrastructure network. This will help to redefine the image and identity of the Western Corridor as an economically prosperous area that complements the offer of the Central Area, is set within a high quality</u></p> | | |

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| | | | <u>natural environment, and is accessed by a comprehensive sustainable cycling and pedestrian network."</u> | | |
| | 56 | Para 2.45 | <p>2.45 The proposals will help to enable the programme of development set out in the spatial strategy in conjunction with further measures to enable convenient and sustainable circulation and access within the city. In addition the Council is committed to reducing the need to use cars for many trips within Bath. Therefore improvements to other public transport, walking and cycling infrastructure and the implementation of 'Smarter Choices' for transport will be pursued e.g. through the development of travel plans for new and existing sites and the expansion of car clubs.</p> <p><u>To complement these public transport and cycling/walking improvements the Council will update its Parking Strategy for Bath which will broadly maintain central area car parking at existing levels in the short term and continue to prioritise management of that parking for short and medium stay users. This is necessary in order to discourage car use for commuting and provide sufficient parking to help maintain the vitality and viability of the city centre as a shopping and visitor destination. It will also result in a relative reduction in the amount of central area parking that is available as the economy grows, jobs are created and demand increases.</u></p> | FPC1 | <p><i>Included for information and not part of the current consultation.</i></p> <p>Change made in response to the Inspector's queries.</p> <p>Change is supported by the Draft Bath Parking Strategy (considered by Planning, Transport & Environment Policy Development and Scrutiny Panel on 13 September 2011) (see CD4/T11)</p> |
| | 56 | Para 2.46 | The Greater Bristol Metro Project will allow for increased train frequencies serving Bath and Oldfield Park rail | FPC2 | <i>Included for information and not part of the current consultation.</i> |

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| | | | <p>stations.</p> <p><u>The proposals set out above will help to enable the programme of development set out in the spatial strategy to be delivered in a way that minimises travel related environmental and air quality harm whilst providing convenient and sustainable access within the city.</u></p> | | Change made in response to the Inspector's queries. |
| SPC | 56 | Para 2.48 | <p>The strategy proposes the provision of on-site flood defences combined with upstream compensatory storage. New development must provide storage to offset the volume of water that would be displaced in a flood event by the defences on-site. In order to meet this requirement, a flood storage area of 345,000m³ is required as this is equivalent to the total combined volume of the footprint of the potential development sites. Provision of compensatory storage off-site is more cost effective than providing it on-site and allows for greater flexibility in masterplanning, increasing the prospects of commercial investment in the city centre and the prospects of achieving responsive urban design solutions.</p> <p><i>Additional text to be included to reflect the findings of the Black and Vetch (Bath Flood Risk Management Project Feb 2013) which recommends on-site defence combined with conveyance mitigation schemes, details to be agreed through the Placemaking Plan.</i></p> | - | Change made in response to issues raised in ID/28 |
| SPC | 57 | Para 2.53 | <p>Delivery Contingency: Newbridge Twerton Riverside</p> <p>Although this area provides important land for light industrial uses, it is significantly under utilised in terms of the prevailing built form (single story buildings etc.) and that there is scope to intensify this area and to do so in a way that allows a better response to the riverside</p> | Amends PC53 | No longer relevant |

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| | | | <p>environment. The spatial strategy seeks to focus new 'town centre' employment office generating uses development within the Central Area. However, should it be demonstrable that supply is not keeping pace with demand the Newbridge Twerton Riverside area presents a deliverable out-of-centre alternative. Further, should housing development fall behind schedule delivery require additional land, this area provides presents an option close to Western Riverside.</p> | | |
| Page 129 | 57 | Table 5 | <p>IDP Ref Key Infrastructure Phasing Cost Funding and Delivery</p> <p>BI.1 Transport Proposals for Bath:</p> <ul style="list-style-type: none"> • Rapid Transit Routes • New showcase bus corridors • New and eExtended park and ride sites • <u>Upgraded bus stop infrastructure on 9 service routes</u> • Safe routes for pedestrians and cyclists • Other essential transport links and improvements <p>2011-16 £50.4m <u>£31.85m</u></p> <p>Discussions are underway with DfT in the light of the Comprehensive Spending Review 2010 regarding how this essential infrastructure can be brought forward at the</p> | PC54 as amended | <p><i>Included for information and not part of the current consultation.</i></p> <p>Original change made to clarify text in the draft Core Strategy. Subsequent change made in response to the Inspector's queries.</p> <p>Change is supported by updated cost of Bath Transportation Package in the Best & Final Funding Bid for the Bath Transportation Package, September 2011 (see CD4/T12)</p> |

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| | | | <p><u>earliest opportunity. Bath Transport Package accepted into 'development pool' of schemes by DfT. Final-bid to be submitted for funding to DfT in September 2011. DfT decision anticipated in December 2011.</u></p> <p>BI.2 Improvements to Flood Defences of Bath City Centre and Riverside 2010-26 £7.6m Flood Risk Management Strategy – ongoing work between B&NES and Environment Agency. Options for on-site compensatory flood mitigation measures within the river corridor or introduction of a more strategic flood storage area.</p> <p>BI.3 Public Investment into Bath Western Riverside 2010-15 £27.6m Homes and Communities Agency Funding through the West of England Single Conversation: West of England Delivery and Infrastructure Plan.</p> <p>BI.4 Improvements to Bath Train Station and Enhanced Service Frequency from Bath and Oldfield Park to Bristol 2017-2020</p> | | |

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| | | | £19.7m for Greater Bristol Metro Rail Project Network Rail with Bath & North East Somerset Council. Evidence included in the Great Western Mainline Route Utilisation Strategy (2010). The Council Will continue to press for this urgently needed investment through its Memorandum of Understanding with the Rail industry. | | |
| SPC | 61 | Para 3.08 | <p>The spatial strategy is also informed by the current Town Plan, 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><u>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:</u></p> <ul style="list-style-type: none"> •<u>Improving the Shopping Experience</u> •<u>Creating New Jobs</u> •<u>Improving the Park</u> | Updates PC55 | Text amended to improve clarity. |
| SPC | 61 | Para 3.10 | 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 | - | Textual updates for accuracy. |

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| | | | 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 http://www.westofengland.org/waste-planning) | | |
| SPC | 62 | Vision | <p>The Vision <i>What the spatial strategy seeks to achieve.</i> Keynsham is a historic town that occupies a strategically important location between Bristol and Bath and is therefore well placed to improve and attract investment. It will continue to act as a market town and service centre for the surrounding area. In responding to the loss of a major employer, it will evolve as a more significant business location. Keynsham will <u>expand to accommodate a growing population, ensuring it retains</u> its independence and its separate identity within an attractive rural setting. It will become a more sustainable, desirable and well-connected place in which to live and work, with an enhanced town centre inspired by its heritage, cherished rivers, park and green spaces.</p> | - | Consequential change to the Vision to reflect the re-consideration of housing requirement and need for flexibility in strategy for Keynsham. |
| SPC | 63 | Para 3.13 | The spatial strategy set out in Policy KE1 seeks to deliver the vision for Keynsham and the strategic objectives for the District (set out in Chapter 1). The strategy <u>allows changes to be made to</u> maintains the Green Belt boundary surrounding Keynsham <u>to accommodate both employment floorspace and housing, but maintains the key Green Belt purposes of preventing the town from merging with Bristol</u> | - | Changes arising from re-consideration of housing requirement and need for flexibility in strategy for Keynsham in context of ID/28 (paras 3.36 and 3.44). |

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| | | | and Saltford, and helping to preserve its individual character, identity and setting. The Green Belt will continue to provide opportunities for residents of Keynsham to access outdoor sport, recreation and the open countryside. Access to the Green Belt will be enhanced with an improved green infrastructure network running through and surrounding the town, principally using the valleys of the Rivers Chew and Avon. | | |
| SPC | 63 | Para 3.14 | 4,500 <u>2,000</u> new homes will be built between 2006 <u>2011</u> and 2026 <u>2029</u> to support economic growth of the town and accommodate a growing population. Approximately 800 <u>700</u> homes are already accounted for, having either already been built since 2006 <u>2011</u> , have planning permission, or are allocated in the Local Plan. The Local Plan allocations include the 500+ dwelling development in South West Keynsham known as 'K2'. Development requirements are outlined in the Local Plan, including the need for satisfactory vehicular accesses. The remaining 700 dwellings are directed towards the town centre/Somerdale policy area (Policy KE2) which will serve as the focus of future development within Keynsham. Green Belt releases will be made to the east of Keynsham (north of the A4) to accommodate 250 dwellings and employment floorspace, and to the south west of Keynsham to accommodate 250 dwellings. | - | Changes arising from re-consideration of housing requirement and need for flexibility in strategy for Keynsham in context of ID/28 (paras 3.36 and 3.44) and the shift in plan period. |
| SPC | 63 | Para 3.15 | 4,500 <u>1,800</u> new jobs will be created between 2006 <u>2011</u> and 2026 <u>2029</u> primarily by increasing the stock of office floorspace in the town, <u>complemented by an extension to Ashmead Industrial Estate</u> . This supports the vision in establishing Keynsham as a more significant business location and enabling the town to recover from recent job | - | Changes arising from re-consideration of housing requirement and need for flexibility in strategy for Keynsham in context of ID/28 (paras 3.36 and 3.44) |

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| | | | losses. Attracting more Higher Value Added jobs will help to reduce the current pattern of outcommuting by groups such as professional workers, managers, senior officials and administrative workers, allowing better opportunities to live and work in the town. This will help to counteract the closure of Somerdale. The role of the town centre and Somerdale as the main focus for business activity will be complemented by the Broadmead/Ashmead/Pixash Industrial Estate area. | | |
| SPC | 64 | Policy KE1 | <p>The Strategy for Keynsham is to:</p> <p>1. Natural and Built Environment</p> <p>a: Maintain the Green Belt surrounding Keynsham, <u>allowing limited releases of Green Belt land to the east and south west of Keynsham to accommodate employment and housing growth.</u></p> <p>b: Make better use of the existing green and blue infrastructure (for example parks and rivers) running through and surrounding the town which will be enhanced, made more accessible and linked up.</p> <p>2. Housing</p> <p>a: Make provision for around 1,500 <u>2,000</u> new homes (net) between 2006 and 2026 <u>2011 and 2029</u>. This will include affordable housing, and an appropriate housing mix giving more choice of housing to meet the needs of the local community.</p> <p>b: Allow for residential development if it is within the housing development boundary defined on the proposals map or it forms an element of Policies KE2 <u>or KE3</u></p> | - | <p>Changes arising from re-consideration of housing requirement and need for flexibility in strategy for Keynsham in context of ID/28 (paras 3.36 and 3.44)</p> <p><i>Policy KE3 potential policy number relating to extensions to Keynsham</i></p> |

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| | | | <p>3. Economic Development</p> <p>a: Plan for about 4,500 <u>1,800</u> net additional jobs between 2006 and 2026 <u>2011 and 2029</u></p> <p>b: Make provision for the changes in employment floorspace set out below:</p> <ul style="list-style-type: none"> • <u>Office floorspace: from about 20,000m2 in 2006 2011 to about 30,000m2 in 2026-2029</u> • <u>Industrial/Warehouse floorspace: no net change by 2026 from level of from about 50,000m2 in 2006 2011 to 75,000 – 80,000 in 2029 to address future requirements arising in Keynsham and Bath</u> <p>c: Enable development which supports the town to continue to function as an independent market town. The scale and mix of development will increase self-containment and help develop the town as a more significant business location.</p> <p>d: Retain the Broadmead/Ashmead/Pixash Industrial Estate as an area for business activity (use classes B1, B2 and B8) complementing the role of the town centre and enable its intensification through higher density business development</p> <p>4. Shopping</p> <p>a: Provide larger retail units in the town centre to attract a more varied mix of retailers,</p> <p>b: Retain and encourage enhancement of Queen Road and Chandag Road as local centres to complement the town centre because they provide an important range of essential day-to-day goods and services for their local neighbourhoods.</p> | | |

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| | | | <p>5. Transport, cycling and walking</p> <p>a: Provide for improvements to public transport and enhance connectivity between walking, cycling and public transport routes. (Transport infrastructure measures are set out in the 'Infrastructure and Delivery' section on page 72)</p> <p>b: Implement a reviewed Parking Strategy.</p> <p>6. Energy conservation and sustainable energy generation</p> <p>a: Enable renewable energy generation opportunities including a new district heating network within Keynsham, potentially anchored by the Centre/Town Hall redevelopment.</p> | | |
| SPC | 65 | Diagram 12 Keynsham Spatial Strategy | <p>Indicate areas where land will be released from the Green Belt to accommodate 2,000 dwellings and employment floorspace.</p> <p><i>[see page (vii) for proposed changes to Diagram 12 appended to this schedule]</i></p> | - | Consequential change arising from re-consideration of housing requirement and need for flexibility in strategy for Keynsham in context of ID/28 (paras 3.36 and 3.44) |
| SPC | 68 | Para 3.19(a) | <p>'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 historic grain and character, loss of traditional shop fronts and loss of small building frontages and is therefore on the national Heritage at Risk Register.' Also at risk is the Dapps Hill Conservation Area, which is described on the Register as</p> | Amends RC27 | Change arising from English Heritage's representations (see BNES/18). Text also updates to include reference to Dapps Hill Conservation Area being 'at risk'. |

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| | | | <u>being in a poor condition and deteriorating.</u> | | |
| SPC | 71 | Policy KE2 (2)(b) | <p>2. Scope and Scale of Change</p> <p>b: A new high quality, exemplar, mixed-use quarter at Somerdale, providing significant employment floorspace, new homes, leisure, open space, sport and recreational uses. <u>The sequential and exception tests for flood risk would have to be met to justify any dwellings in higher risk parts of the site.</u></p> | - | Change to acknowledge flood risk constraint to development of Somerdale site (see ID/28, paras 3.40-3.44). |
| SPC | 72 | Para 3.21 | <p>The desirable infrastructure items, of importance to the town include:</p> <ul style="list-style-type: none"> • Green infrastructure: river/canal corridor, formal and informal green spaces and allotments. • <u>Improvements to Keynsham Train Station and Enhanced Service Frequency to Bath and Bristol</u> • Pedestrian/cycling bridge over..... | - | Transferred from Table 6 as identified as a Key Infrastructure Requirement for Keynsham. |
| SPC | 73 | Para 3.22 | <p>The main sources of public sector funding to help support the delivery of infrastructure and the strategy itself are as follows:</p> <ul style="list-style-type: none"> • HCA 'single conversation': West of England Delivery and Infrastructure Delivery Programme – Includes £0.3million of public investment by 2015 in support of planning work to enable the proposals for Keynsham town centre and Somerdale to come forward. | - | Change to reflect incorporation of this funding into the West of England Revolving Infrastructure Fund. |
| SPC | 73 | Para 3.23 | <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 | - | Text updated for accuracy. |

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| | | | <p>Document (SPD)</p> <ul style="list-style-type: none"> • Placemaking Plan • Community Infrastructure Levy • Proposal by B&NES Council to r Redevelop the Town Hall / Centre site by B&NES Council. • 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 Revolving Infrastructure Fund) that may become available to support development and enable the Council to maximise the potential of its physical assets. | | | | | | | | | | | | | | | | | |
| SPC | 73 | Table 6 | <table border="1"> <thead> <tr> <th>IDP Ref</th> <th>Key infrastructure item</th> <th>Phasing</th> <th>Cost</th> <th>Funding and Delivery</th> </tr> </thead> <tbody> <tr> <td>K1.1</td> <td>Public Investment in Site Preparation & Planning for Keynsham Town Centre</td> <td>2010-2015</td> <td>£0.3m</td> <td>Homes and Communities Agency Funding through the West of England Single Conversation: West of England Delivery & Infrastructure Plan</td> </tr> <tr> <td>K1.2 K1.1</td> <td>Flood Protection Measures for</td> <td>Necessary enabling works to precede</td> <td>Not quantified</td> <td>On site works necessary to obtain planning permission</td> </tr> </tbody> </table> | IDP Ref | Key infrastructure item | Phasing | Cost | Funding and Delivery | K1.1 | Public Investment in Site Preparation & Planning for Keynsham Town Centre | 2010-2015 | £0.3m | Homes and Communities Agency Funding through the West of England Single Conversation: West of England Delivery & Infrastructure Plan | K1.2 K1.1 | Flood Protection Measures for | Necessary enabling works to precede | Not quantified | On site works necessary to obtain planning permission | - | Changes to reflect updated IDP. |
| IDP Ref | Key infrastructure item | Phasing | Cost | Funding and Delivery | | | | | | | | | | | | | | | | |
| K1.1 | Public Investment in Site Preparation & Planning for Keynsham Town Centre | 2010-2015 | £0.3m | Homes and Communities Agency Funding through the West of England Single Conversation: West of England Delivery & Infrastructure Plan | | | | | | | | | | | | | | | | |
| K1.2 K1.1 | Flood Protection Measures for | Necessary enabling works to precede | Not quantified | On site works necessary to obtain planning permission | | | | | | | | | | | | | | | | |

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| | | | | Cadbury's Somerdale Site | development at Somerdale | | | |
| | | | K1.3 KI.2 | Major improvements to increase sewerage capacity | Necessary enabling works to precede development in the <u>Green Belt at Somerdale east of Keynsham and south west of Keynsham</u> | Not quantified <u>Dependent on scheme design</u> | Wessex Water Business Plan (2010-15) 5-year cycles of investment agreed with Ofwat. Keynsham treatment plant upgrade – land needs to be safeguarded for expansion (improvements to critical sewer capacity and <u>Keynsham STW</u>); on-site mains and sewers to be provided by the developer; off-site connecting works delivered through <u>requisition arrangements</u> | |
| | | | K1.4 KI.3 | Enhance Keynsham Hams as wetland habitat | Necessary enabling works to precede development at | Not quantified | On site works required as part of development requirements | |

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| | | | | | Somerdale | | | | |
| | | | K1.5 K1.4 | Secondary road access to the <u>Highways Infrastructure</u> associated with the Somerdale Site | Necessary enabling works to precede development at Somerdale | Not quantified | | On site works necessary to obtain planning permission | |
| | | | K1.6 | Improvements to Keynsham Train Station and Enhanced Service Frequency to Bath and Bristol | 2017-2020 | £19.7m (at 2012 prices) for Greater Bristol Metro Rail Project | | Network Rail with Bath and North East Somerset Council. Evidence included in the Great Western Mainline Route Utilisation Strategy (2010). The Council will continue to press for this urgently needed investment through its Memorandum of Understanding with the Rail Industry | |
| | | | K1.5 | New early years | Necessary enabling | c.£5,000,000 | | On site works necessary to | |

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| | | | | <u>facility and primary school at Somerdale</u> | <u>works to precede development at Somerdale</u> | | <u>obtain planning permission</u> | |
| | | | <u>KI.6</u> | <u>Additional early years, primary and secondary education capacity in Keynsham</u> | <u>2011-2029</u> | <u>Dependent on delivery strategy and phasing</u> | <u>S106 capital; potential for CIL capital</u> | |
| SPC | 80 | Diagram 15 | Remove notation for all Policy RA1 villages <i>[see page (viii) for proposed changes to Diagram 15 appended to this schedule]</i> | | | | RC28 | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |
| SPC | 81 | Para 4.14 | Whilst there is <u>land available with</u> capacity within the Somer Valley to provide more than 2,000 jobs, it is unlikely that any more than around 1,000 of these jobs will come forward in the Plan period. Their delivery will require strong partnership with public and private sectors. With limited resources available, targeted efforts will be required as set out in the Economic Strategy. | | | | - | Changes needed to address points raised in ID/28, paras 3.48 – 3.64 |
| SPC | 81 | Para 4.15 | In light of the high level of existing housing commitments, new housing will only be acceptable if it has direct economic, employment and community benefits to Midsomer Norton, Radstock and Westfield or contributes to the implementation of the Town Park. New housing will be limited in Paulton and Peasedown St. John in light of significant level of housing development recently built and | | | | - | Changes needed to address points raised in ID/28, paras 3.48 – 3.64 |

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| | | | <p>already committed in these villages.</p> <p><u>There is already a significant number of housing commitments (2,000) in the Somer Valley and a limited capacity to generate new jobs. New housing in the Somer Valley will therefore be restrained in the interest of sustainability but some additional housing will be needed to meet the District Housing land requirement. The HDB will be reviewed in the Placemaking Plan to enable an additional 300 homes to come forward in the Plan period in addition to existing commitments.</u></p> | | |
| SPC | 82 | Policy SV1 (and supporting text) | <p>3 Economic Development</p> <p>a: <u>Enable the delivery of around 4,000 900 net additional jobs between 2006 2011 and 2026 2029 and facilitate further jobs if economic circumstances allow.</u></p> <p>b: Encourage the retention and expansion of local companies and the growth of new businesses by making provision for the changes in employment floorspace set out below:</p> <p>Office floorspace: from about 30,000m2 in 2006 2011 to about 40,000m2 in 2026 2029</p> <p>Industrial/Warehouse floorspace: from about 110,000m2 in 2006 2011 to about 100,000m2 in 2026 2029</p> <p>New employment floorspace will be focussed at:</p> <ul style="list-style-type: none"> the Westfield Industrial Estates, Midsomer Norton Enterprise Park and Bath Business Park in Peasedown St John Old Mills in Paulton (Local Plan Policy GDS.1 V4) Midsomer Norton and Radstock Town Centres | - | Changes needed to address points raised in ID/28, paras 3.48 – 3.64 and to reflect shift in plan period. |

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| | | | <p>c: Protect land in existing business use and only allow alternative uses where there is employment benefit or which contributes to improvements to the town centres <u>consider alternative use where this is no reasonable prospect of a site being used for that purpose</u> and does not lead to an unacceptable loss of employment land.</p> <p>4. Housing a: Review the HDBs to enable up to around 2,700 <u>2,300</u> new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John. This will include affordable housing, providing more choices of housing to meet the needs of the local communities. (Policies RA1 and RA2 are applicable to the other settlements in Somer Valley.)</p> <p>b: Ensure that any new housing above the existing commitments of 2,200 dwellings is within the Housing Development Boundary and has either employment benefit or contributes to the implementation of the Town Park.</p> | | |
| SPC | 84 | Policy SV2 | <p>2.Scope and Scale of Change</p> <p>Make provision for:</p> <p>a: About 200 homes (including existing commitments). <u>residential development as part of mixed use schemes</u></p> | Amends PC66 | Changes needed to address points raised in ID/28, paras 3.48 – 3.64 and to reflect shift in plan period. |
| SPC | 87 | Policy SV3 | <p>2. Scope and Scale of Change</p> <p>Make provision for:</p> <p>a: About 200 homes (including existing</p> | - | Changes needed to address points raised in ID/28, paras 3.48 – 3.64 and to reflect shift in plan period. |

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| | | | commitments)-residential development as part of mixed use schemes | | |
| SPC | 93 | Para 5.09 | In the central part of the district, the extensive plateau from Hinton Blewitt Blewett to Newton St Loe includes the key villages of Clutton, Temple Cloud, High Littleton, Timsbury and Farmborough. The form of the 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. | FM8 | Non-material change for the purposes of updating the draft Core Strategy. |
| SPC | 93 | Para 5.12 | <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</u> | RC28a | Change arising through Hearings to clarify broadband is a strategic issue for the Rural Areas |

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| | | | <p><u>business</u></p> <ul style="list-style-type: none"> Potential opportunities to diversify the rural economy e.g. centred around local food production or renewable energy. | | |
| SPC | 95 | Diagram 18 | <p>Remove notation for Policy RA1 villages</p> <p>Amend title to key on Diagram 18 as follows:</p> <p>Indicative Policy RA1 Villages <u>Rural Villages</u></p> <p><i>[see page (ix) for proposed changes to Diagram 18 appended to this schedule]</i></p> | RC29 (amends PC72) | Response to Inspector's questions 8.2 and 8.3 to clarify policy RA1 (see BNES/9) |
| SPC | 96 | Para 5.17 | <p>A number of villages have been identified <u>There are a number of villages</u> where:</p> <ul style="list-style-type: none"> access to facilities and public transport is best there is capacity for development there is community support for some small scale development <p>These villages are to be the focus for new small scale development under Policy RA1.</p> | RC30 (amends FPC3) | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |
| SPC | 96 | Para 5.18 | <p>The villages which currently meet these criteria set out in policy RA1 and that have some capacity for development are: Batheaston, Bishop Sutton, Farmborough, Temple Cloud, Timsbury and Whitchurch. These villages are shown on the diagram 18. This indicative list of villages may be subject to change over the lifetime of the Core Strategy. It will be formally reviewed as part of will be included in the review of the Core Strategy and consideration will be given to any demonstrated change of circumstances against the criteria in the interim. Local</p> | RC31 (amends FPC4) | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |

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| | | | community support for the principle of development is demonstrated by the views of the Parish Council as the locally elected representative of those communities or through alternative mechanisms introduced in the Localism Bill. | | |
| SPC | 96 | Para 5.19 | The inclusion of Farmborough in this list is subject to provision of a sustainable transport link to local shopping facilities. Paulton and Peasedown St John are not identified in this list. This is <u>In</u> accordance with the Spatial Strategy for the Somer Valley (Policy SV1) <u>Paulton and Peasedown St John are not considered under the rural areas strategy.</u> A significant level of residential development is already committed at Paulton and Peasedown St John and the strategy does not make additional provision for housing. | RC32 | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |
| SPC | 96 | Para 5.20 | Policy RA1 should be considered alongside Core Policy CP8 Green Belt. Proposals for development that adjoin housing development boundaries in the Green Belt will therefore not be acceptable unless very special circumstances for development can be demonstrated. | Amends RC33 | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |
| SPC | 96 | Para 5.21 | The 250 <u>200</u> additional dwellings to be accommodated within the rural areas under the District-wide spatial strategy will be distributed as appropriate with small scale housing developments of up to and around 30 <u>50</u> dwellings at each of the villages which meet the criteria referred to in Para 5.17 (see of Policy RA1). This will be considered in more detail through the Placemaking Plan <u>in conjunction with Parish Councils as the locally elected representatives of their communities.</u> The Housing Development Boundaries shown on the Proposals Map | RC34 (amends FM9) | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) and to reflect increase level of development. |

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| | | | (saved from the existing Local Plan) will also be reviewed as part of the Placemaking Plan <u>to incorporate the sites identified. Sites identified in adopted Neighbourhood Plans that adjoin the housing development boundary of villages meeting the criteria of Policy RA1 will also be appropriate and these may come forward for inclusion as a part of the Placemaking Plan or subsequent to it.</u> | | |
| SPC | 96 | Para 5.22 | To complement this approach, some limited residential development <u>of around 15 dwellings</u> will be allowed in those villages not meeting the criteria and located outside the Green Belt. Such development will only be permitted within the housing development boundary defined on the Proposals Map (see Policy RA2). In those villages washed over by the Green Belt development proposals will be considered in the context of national policy set out in PPG2 <u>the NPPF</u> . In addition the rural exceptions site Policy RA4 will provide the opportunity for affordable housing based on local needs. | - | Change to reflect the need to provide additional dwellings in Policy RA2 villages and to update the reference to national planning policy guidance. |
| SPC | 96 | Para 5.25 | 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> . | - | Change to update the reference to national planning policy guidance. |
| SPC | 96 | Policy RA1 | POLICY RA1 Development in the villages meeting the listed criteria Proposals <u>at the villages outside the Green Belt</u> for residential and employment development of a scale, character and appearance appropriate to the village and its setting will be acceptable <u>within in and adjoining</u> the housing development boundary provided the proposal is in | RC35 | Response to Inspector's questions 8.2 and 8.3 in ID/7 to clarify policy RA1 (see BNES/9) |

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| Page 148 | | | <p>accordance with the spatial strategy for the District set out under policy DW1 and the village has:</p> <p>a: at least 3 of the following key facilities within the village: post office, school, community meeting place and convenience shop, and</p> <p>b: at least a daily Monday-Saturday public transport service to main centres, and</p> <p>c: local community support for the principle of development can be demonstrated.</p> <p><u>At the villages which meet these criteria, development sites will also be identified in the Placemaking Plan and the housing development boundary will be reviewed accordingly to enable delivery of 1,110 dwellings identified on the Key Diagram. Residential development on sites adjoining the housing development boundary at these villages will be acceptable if identified in an adopted Neighbourhood Plan.</u></p> <p><u>Proposals at villages outside the Green Belt for employment development of a scale, character and appearance appropriate to the village and its setting will be acceptable within and adjoining the housing development boundary.</u></p> | | |
| | 96 | Policy RA2 | <p>In villages outside the Green Belt with a housing development boundary defined on the Proposals Map and not meeting the criteria of policy RA1 proposals for <u>some limited residential development</u> and employment development will be acceptable where:</p> | - | Change to reflect the need to provide additional dwellings in Policy RA2 villages |

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| | | | <p>a they are of a scale, character and appearance appropriate to the village</p> <p>b: in the case of residential development they lie within the housing development boundary</p> <p>c: in the case of employment development they lie within or adjoining the housing development boundary</p> <p><u>At the villages which meet the above criteria, residential development sites may also need to be identified in the Placemaking Plan and the housing development boundary reviewed accordingly to enable delivery of 1,110 dwellings identified on the Key Diagram. Limited residential development on sites adjoining the housing development boundary at these villages will be acceptable if identified in an adopted Neighbourhood Plan.</u></p> | | |
| - | 99 | Para 5.29 | <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> | FPC5 (duplicated PC76) | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |

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| SPC | 101 | Para 5.43 | 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. | RC36 | Change arising through Hearings to factually update text |
| - | 101 | Para 5.49 | 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. | FPC6 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |
| SPC | 104 | Para 6.01 | 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> | RC37 | Change arising through the Hearings for clarification. |
| SPC | - | New para 6.02a | <u>Sustainability Principles</u> <u>Central to national planning policy is the presumption in favour of sustainable development. The Council is committed to help achieve sustainable development and will give favourable consideration to proposals which will contribute towards delivering a strong, flexible and</u> | - | Inclusion of an over-arching policy and supporting text relating to the presumption in favour of sustainable development to comply with NPPF (see ID/30, para 6.1). |

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| | | | <u>sustainable economy; the protection and enhancement of our natural, built and historic environment, the prudent use of natural resources and which mitigate and adapt to climate change; and which support strong, vibrant and healthy communities. This approach is embodied in Policy SD1 and is reflected in all policies in the Core Strategy and planning decisions made by the Council.</u> | | |
| SPC | - | New Policy SD1 | <p><u>POLICY SD1: Presumption in favour of sustainable development</u></p> <p><u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</u></p> <p><u>Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</u></p> <p><u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u></p> <ul style="list-style-type: none"> <u>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits.</u> | - | Inclusion of an over-arching policy and supporting text relating to the presumption in favour of sustainable development to comply with NPPF (see ID/30, para 6.1). |

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| | | | <p><u>when assessed against the policies in the National Planning Policy Framework taken as a whole; or</u></p> <ul style="list-style-type: none"> • <u>Specific policies in that Framework indicate that development should be restricted.</u> | | |
| SPC | 105 | Para 6.03 | 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. | - | Change to reflect shift in plan period. |
| - | 106 | Policy CP1 | <p>Retrofitting existing buildings</p> <p>Retrofitting measures to existing buildings to improve their energy efficiency and adaptability to climate change and the appropriate incorporation of micro-renewables will be encouraged.</p> <p>Priority will be given to facilitating carbon reduction through retrofitting at whole street or neighbourhood scales to reduce costs, improve viability and support coordinated programmes of improvement.</p> <p>Masterplanning and 'major development' (as defined in the Town & Country Planning (Development Management Procedure (England) Order 2010) in the district should demonstrate that opportunities for the retention and retrofitting of existing buildings <u>within the site</u> have been included within the scheme. All schemes should consider retrofitting opportunities as part of their design brief and measures to support this will be introduced.</p> <p>Retrofitting Historic Buildings</p> | PC80 as amended | <p><i>Included for information and not part of the current consultation.</i></p> <p>Original change made to clarify text in the draft Core Strategy. Subsequent change made in response to the Inspector's queries.</p> |

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| | | | <p>The Council will seek to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings <u>and buildings of solid wall or traditional construction</u>) and in conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.</p> <p>Proposals will be considered against <u>Policy HE1 of PPS5 national planning policy</u>.</p> | | |
| SPC | 106 | Policy CP1 | <p>Add the text below at the end of the policy:</p> <p><u>The policy will be supported by the Council's Sustainable Construction and Retrofitting Supplementary Planning Document</u></p> | RC38 | Change arising through the Hearings. |
| SPC | 106 | Delivery section related to Policy CP1 | <p>Amend point 2 to state:</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>. <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</u></i></p> | RC39 | Change arising from the Hearings |
| SPC | 106 | Delivery section related to Policy CP1 | <p>Amend point 4 to state:</p> <p><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></p> | RC40 | Change arising from the Hearings |

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| - | 107 | Policy CP2 | <p>Sustainable design and construction will be integral to new development in Bath & North East Somerset. All planning applications should include evidence that the standards below will be addressed:</p> <ul style="list-style-type: none"> • Maximising energy efficiency and integrating the use of renewable and low-carbon energy (<u>i.e. in the form of an energy strategy with reference to policy CP4 as necessary</u>); • Minimisation of waste <u>and maximising of recycling of any waste generated</u> during construction and in operation' • Conserving water resources and minimising vulnerability to flooding; • Efficiency in materials use, including the type, life cycle and source of materials to be used; • Flexibility and adaptability, allowing future modification of use or layout, facilitating future refurbishment and retrofitting; • Consideration of climate change adaptation. <p>Applications for all development other than major development will need to be accompanied by a B&NES Sustainable Construction Checklist</p> <p><u>Major Development</u></p> <p>For major development a BREEAM and/or Code for Sustainable Homes (CfSH) (or equivalent) pre-assessment will be required alongside a Planning Application. Post-construction assessments will also be required. These assessments must be undertaken by an accredited assessor. <u>Major development as defined in the Town & Country Planning (Development Management Procedure</u></p> | PC81 as amended | <p><i>Included for information and not part of the current consultation.</i></p> <p>Original change made in response to issues raised in representations on the draft Core Strategy. Subsequent change made in response to the Inspector's queries.</p> |

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| | | | <p><u>(England) Order 2010).</u></p> <p>The standards set out in the table below will be requirements for major development over the plan period: <u>An exception to these standards will only be made where it can be demonstrated that meeting the provisions of this policy would render development unviable.</u></p> | | | | | | | | | | | | | | | | | |
| SPC | 107 | Policy CP2 | <p>Amend the table in policy CP2 as follows:</p> <table border="1"> <thead> <tr> <th>Type of development</th> <th>201-2012</th> <th>2013</th> <th>2016</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>Residential Development</td> <td>Code for Sustainable Homes Code 3 (in full)</td> <td>Code for Sustainable Homes code 4 (in full)</td> <td>Code for Sustainable Homes Code 6 (in full i.e. zero carbon) <u>Government Zero Carbon Standard for Homes</u></td> <td>n/a</td> </tr> <tr> <td>Non-Residential</td> <td></td> <td></td> <td></td> <td>BREEAM Excellent (to include zero carbon)</td> </tr> </tbody> </table> | Type of development | 201-2012 | 2013 | 2016 | 2019 | Residential Development | Code for Sustainable Homes Code 3 (in full) | Code for Sustainable Homes code 4 (in full) | Code for Sustainable Homes Code 6 (in full i.e. zero carbon) <u>Government Zero Carbon Standard for Homes</u> | n/a | Non-Residential | | | | BREEAM Excellent (to include zero carbon) | RC41 | Change arising from the Hearings. |
| Type of development | 201-2012 | 2013 | 2016 | 2019 | | | | | | | | | | | | | | | | |
| Residential Development | Code for Sustainable Homes Code 3 (in full) | Code for Sustainable Homes code 4 (in full) | Code for Sustainable Homes Code 6 (in full i.e. zero carbon) <u>Government Zero Carbon Standard for Homes</u> | n/a | | | | | | | | | | | | | | | | |
| Non-Residential | | | | BREEAM Excellent (to include zero carbon) | | | | | | | | | | | | | | | | |

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| SPC | 108 | Policy CP3 | <p><i>Amend first para as follows:</i></p> <p>Development should contribute to achieving the following minimum level of Renewable Electricity and Heat generation by 2026 <u>2029</u>.</p> | - | Change to reflect shift in plan period. |
| - | 109 | New para 6.25 | <p><u>Any impact of this policy on the viability of schemes will be given careful consideration.</u></p> | FPC7 | <p><i>Included for information and not part of the current consultation.</i></p> <p>Change made in response to the Inspector's queries.</p> |
| SPC | 110 | Policy CP4 | <p>The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the <u>three</u> identified "district heating priority areas", shown on diagram 19 (<u>Bath Central, Bath Riverside and Keynsham High Street</u>), development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable.</p> <p><u>Within the remaining 12 "district heating opportunity areas" shown on diagram 19, (Radstock, Midsomer Norton, Paulton, Bath Spa University, Twerton, Kingsway, Bathwick, Moorfields, Odd Down, Lansdown, RUH & Keynsham Somerdale), development will be encouraged to incorporate infrastructure for district heating, and will be expected to connect to any existing suitable systems (including systems that will be in place at the time of construction), unless it is demonstrated that this would render development unviable.</u></p> <p>Masterplanning and major development in the district</p> | Amends PC82 as amended | Change made in response to the Inspector's queries raised in ID/30 (paras 2.1-2.3) |

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| | | | <p>should demonstrate a thermal masterplanning approach considering efficiency/opportunity issues such as mix of uses, anchor loads, density and heat load profiles to maximise opportunities for the use of district heating.</p> <p>Where a district heating scheme is proposed as part of a major development the Council will expect the scheme to demonstrate that the proposed heating and cooling systems (CHP/CCHP) have been selected considering the heat hierarchy in line with the following order of preference:</p> <ol style="list-style-type: none"> 1. Connection with existing CHP/CCHP distribution networks 2. Site wide CHP/CCHP fed by renewables 3. Gas-fired CHP/CCHP or hydrogen fuel cells, both accompanied by renewables 4. 3. Communal CHP/CCHP fuelled by renewable energy sources 5. 4. Gas fired CHP/CCHP <p>Delivery</p> <p>1 <i>This policy will provide a basis for Development Management to support the principle of CHP, CCHP and District Heating included in planning applications</i></p> <p>2 <i>Planning Applications within the DHPAs will need to demonstrate how they are incorporating district heating and to justify any alternative approach.</i></p> <p>3 <i>Planning Obligations or a Community Infrastructure Levy (CIL) may be able to be used to contribute towards the delivery of the delivery of strategic district heating infrastructure.</i></p> <p>4 <i>Further opportunities for interventions that will increase commercial viability of district heating will be are identified</i></p> | | |

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| | | | <i>in the B&NES District Heating Feasibility Study and will include actions that the Council and the Private Sector could can initiate.</i> | | |
| SPC | 110 | Diagram 19 | Amend Diagram 19 to distinguish between 'Distinct Heating Priority Areas' (Bath Central, Bath Riverside and Keynsham Town Centre) and 'District Heating Opportunity Areas' and amend Key accordingly. <i>[see page (x) for proposed changes to Diagram 19 appended to this schedule]</i> | - | Change made in response to ID/30 (paras 2.1-2.3) |
| SPC | 112 | Para 6.26 | PPS25 The NPPF requires that new development is located in sustainable locations, at the least risk of flooding, taking into account vulnerability to flooding. | - | Change made to reflect change in Government policy. |
| SPC | 112 | Para 6.27 | PPS25 The NPPF and its associated Practice Guide 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 June 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. 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 | Amends FM10 | Non-material change for the purposes of updating the draft Core Strategy. Further change made to reflect change in Government policy. |

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| | | | district. | | |
| SPC | 112 | Para 6.28a | <p>The Flood Risk Management Strategy (June 2010) has identified and assessed a range of flood risk management options to enable development in vulnerable areas without increasing the flood risk elsewhere. The Strategy has concluded that there is no strategic solution to reducing peak flow through Bath which is either technically or economically viable. As such the Strategy proposes the provision of compensatory storage upstream combined with on site flood defences. New development must provide storage to offset the volume of water that would be displaced in a flood event by the defences on site. <u>New development should be safe and not increase risk elsewhere.</u></p> <p><i>Text to be amended to reflect the findings of the Black and Vetch (Bath Flood Risk Management Project Feb 2013).</i></p> | Amends PC83 | Change made in response to issues raised in ID/28 |
| SPC | 112 | Para 6.28b | <p>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 the Technical Guidance to</p> | - | Change to update the reference to national planning policy guidance. |

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| | | | the <u>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. | | |
| SPC | 112 | Para 6.29 | 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. | - | Change to update the reference to national planning policy guidance. |
| SPC | 112 | Para 6.30 | 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). | - | Change to update the reference to national planning policy guidance. |
| - | 113 | Policy CP5 | Development in the district will follow a sequential approach to flood risk management, avoiding inappropriate development in areas at risk of flooding and 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>). | NPPF3 | <i>Included for information and not part of the current consultation.</i> Change made to reflect change in Government policy. |

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| - | 114 | Para 6.37 | All development schemes with a residential component Housing schemes will be assessed using the expected to demonstrate how they have been designed to meet Building for Life 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. | FPC8 | Included for information and not part of the current consultation. Change made in response to the Inspector's queries. |
| SPC | 114 | Para 6.30 | 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 PPS25 the NPPF and the Building Regulations, Part H). | - | Change to update the reference to national planning policy guidance. |
| SPC | 116 | Para 6.42 | National policies in PPS5 the NPPF complemented by Core Strategy Policy CP6 together with more detailed saved policies in the Local Plan will provide the context for considering development proposals. | - | Change to update the reference to national planning policy guidance. |
| SPC | 117 | Policy CP6(1) | Amend Policy CP6(1) to read: 1. High Quality Design The distinctive quality, character and diversity of Bath and North East Somerset's environmental assets will be promoted, protected, conserved or enhanced through: a: high quality and inclusive design of schemes, including transport infrastructure, which reinforces and contributes to its specific local context, creating attractive, inspiring and safe place. b: assessing all major development schemes with a | RC42 (amends FPC9) | Original change made in response to the Inspector's queries 1(a) Change arising from English Heritage's representations (see BNES/18) 1(b) change to amend grammatical error |

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| | | | residential component should be assessed using the Building for Life design assessment tool (or equivalent methodology). As a guide development should meet its "good" standard. | | |
| SPC | 117 | Policy CP6(2) | <p>Amend Policy CP6(2) to read:</p> <p>2. Historic Environment</p> <p>The cultural and historic environment will be preserved or enhanced, and sites, buildings, areas and features of recognised national and local importance and their settings will be protected.</p> <p><u>The sensitive management of Bath & North East Somerset's outstanding cultural and historic environment is a key component in the delivery of sustainable development. The Council will protect, conserve and seek opportunities to enhance the historic environment including the character and setting of designated and other heritage assets.</u></p> <p><u>The sensitive reuse and adaptation of historic buildings and spaces will be supported, and in areas where regeneration is required the imaginative integration of new development with the historic environment will be promoted.</u></p> <p>Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against any harm to the significance of the heritage asset.</p> <p><u>The Council will continue to develop strategies and guidance which ensure the historic environment and its</u></p> | RC43 (amends PC86) | Change arising from English Heritage's representations (see BNES/18) and to bring it into line with the NPPF |

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| | | | <u>significance is understood, recorded, promoted and enjoyed, and is sensitively and proactively managed, including those historic assets most under threat. A positive and proactive conservation strategy will be promoted through the Placemaking Plan.</u> | | |
| SPC | 117 | Policy CP6 Delivery | <p>Historic Environment</p> <p><i>Delivery will be principally through the Development Management process. And Conservation Area Appraisals and other supplementary planning documents and guidance will be <u>prepared and</u> used to guide decisions on development proposals that affect the historic environment. Working in partnership with bodies such as English Heritage, Mendip Hills and Cotswolds AONB Services and local groups; and with conservation, archaeology and landscape experts will also be necessary to ensure effective delivery of the policy. The preparation of management plans and other <u>positive and proactive strategies will be encouraged developed to support policy delivery. The strategy for the historic environment will include:</u></i></p> <ul style="list-style-type: none"> <i>-<u>maintaining and applying an up-to-date and available Historic Environment Record and evidence base</u></i> <i>-<u>producing and promoting guidance that will encourage good practice such as the World Heritage Site Setting SPD, Retrofitting & Sustainable Construction SPD and Bath Building Heights Strategy SPD</u></i> <i>-<u>working with partners to resolve long standing high profile heritage assets at risk (including The Wansdyke and Cleveland Pool in Bath)</u></i> <i>-<u>reducing the volume of traffic using historic streets and</u></i> | RC44 | Change arising from English Heritage's representations (see BNES/18) |

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| | | | <p><u>spaces (see Para 6.103) by implementing the Bath Public Realm and Movement Strategy</u></p> <ul style="list-style-type: none"> -<u>seeking to ensure that Conservation Area Appraisals and management plans are kept up-to-date</u> -<u>implementing the World Heritage Site Management Plan</u> -<u>ensure the Bath Urban Archaeological Assessment is used to inform management strategies and SPDs</u> -<u>conserving significance heritage features via the Green Infrastructure Strategy</u> -<u>consideration of the preparation of a 'local list' to ensure non-designated assets are sustained and conserved</u> -<u>consideration of use of Article 4 Directions as one measure for resolving conservation issues when appropriate</u> - <u>Seek contributions from development, where appropriate, to support the delivery of the above.</u> | | |
| SPC | 118 | Para 6.55 | <p>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 is capable of delivering a wide range of environmental and quality of life benefits for local communities' (PPS42 NPPE). The wider benefits of GI for B&NES will be set out in the Council's Green Infrastructure Strategy (see below).</p> | - | Change to bring the text into line with the national planning policy guidance. |
| SPC | 120 | Para 6.63 | <p>Add the following text at the end of para 6.63</p> <p><u>The Core Strategy retains the general extent of the Green Belt in B&NES. The detailed boundaries will be reviewed through the Placemaking Plan.</u></p> <p><i>This para will need to change to refer to exceptional circumstances existing to change general extent of Green</i></p> | Amends RC45 | Change arising from discussion at the hearings and consideration of representation. |

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| | | | <i>Belt and dependent on Council decision on locations, amended post Council meeting on 4th March 2013 (see Annex 1 of the Council Report).</i> | | |
| SPC | 120 | Para 6.64 | In light of the opportunities for development in the plan period, <u>most of the urban area of Keynsham</u> continues to be excluded from the Green Belt and an Inset boundary is defined on the Proposals Map. There are a number of villages which meet the requirements of national policy in PPG2 'Green Belts' Para 2.11 the NPPF and continue to be insets within the Green Belt as established in the Bath & North East Somerset Local Plan. These villages are the most sustainable villages in the Green Belt for accommodating some limited new development in the plan period under the provisions of either policy RA1 where the criteria are met, or where not, policy RA2. <u>The Inset boundaries will be reviewed through the Placemaking Plan and through Neighbourhood Planning. Exceptional circumstances will need to be demonstrated through this review process in order for any changes to the Inset boundaries to be made.</u> Some sites may come forward in the Green Belt under the Government's proposals for Community Right to Build. | RC46 (amends FPC10) | Response to Inspector's question 8.4 in ID/7 (see BNES/9) Further change to bring the text into line with the national planning policy guidance. |
| SPC | 120 | Para 6.64a | <u>Within the Green Belt a number of Major Existing Developed Sites (MEDS) are defined on the Proposals Map. Within the MEDS policy GB.3 in the Bath & North East Somerset Local Plan allows for limited redevelopment or infill which does not harm the openness of the Green Belt or affect the purposes of including land within it. The</u> | RC47 | Change arising from the Hearings to clarify scope of Placemaking Plan. |

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| | | | <u>Council will be reviewing the designated MEDS and the site boundaries through the Placemaking Plan.</u> | | |
| - | 121 | Para 6.66 | Minerals Limestone is the principal commercial mineral worked in the District. There are currently two active sites – one surface workings and one underground mine. Upper Lawn Quarry at Combe Down in Bath and Hayes Wood mine near Limpley Stoke both produce high quality Bath Stone building and renovation projects. <u>Bath & North East Somerset also has a legacy of coal mining and there are also still coal resources within Bath & North East Somerset which are capable of extraction by surface mining techniques. Although no longer worked, there are potential public safety and land stability issues associated with these areas. The general extent of the surface coal Mineral Safeguarding Area within the District is illustrated in Diagram 20a.</u> | FPC11 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |
| - | 121 | Para 6.67 | 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. <u>The approach to this is set out in Policy 26 of the Joint Replacement Structure Plan. This approach is consistent</u> | FPC12 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |

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| | | | <u>with national planning policy advice for minerals.</u> | | |
| - | 121 | Para 6.68 | 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. | FPC13 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |
| - | 121 | Para 6.69 | Development proposals relating to minerals resources will continue to be considered within the context of national minerals planning policy and the saved minerals policies in the B&NES Local Plan until reviewed through the Placemaking Plan. Minerals Safeguarding Areas will be defined in the Placemaking Plan as will other minerals allocations and designations. Policy CP8a, which sets out the strategic approach to minerals in the District, will ensure that mineral resources within the district continue to be safeguarded. Minerals Safeguarding Areas will be designated in a separate Development Plan document the Placemaking Plan following the methodology set out in the British Geological Survey document and defined on the Proposals Map. Although there is no presumption that the resources will be worked this will ensure that known mineral resources are not needlessly sterilised by non-mineral development. | FPC14 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |
| - | 121 | Para 6.69a | <u>It is proposed that more detailed guidance on minerals related issues will be developed in the relevant Development Plan Document as will issues of land instability, which it is recognised is wider than just minerals, and restoration proposals to accord with national minerals planning policy advice. This will take place</u> | FPC15 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |

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| | | | alongside the review of <u>existing</u> minerals allocations and designations. | | |
| SPC | 121 | Para 6.69 footnote | 'A guide to minerals safeguarding in England', BGS (2007) 'BGS/Coal Authority Guide to Minerals Safeguarding in England 2011' | RC48 | Factual change to footnote to Para 6.69 in response to The Coal Authority's request (response to Proposed Changes 19 October 2011) |
| - | 121 | Policy CP8a | <p><u>Mineral sites and allocated resources within Bath & North East Somerset will be safeguarded to ensure that existing and future needs for building stone can be met.</u></p> <p><u>The production of recycled and secondary aggregates will be supported by safeguarding existing sites and identifying new sites.</u></p> <p><u>Minerals Safeguarding Areas will be designated to ensure that minerals resources which have a potential for future exploitation are safeguarded and not needlessly sterilised by non-mineral developments. Where it is necessary for non-mineral development to take place within a Minerals Safeguarding Area the prior extraction of minerals will be supported.</u></p> <p><u>Potential ground instability issues, including those associated with the historical mining legacy, and the need for related remedial measures should be addressed as part of the proposal in the interests of public safety.</u></p> <p><u>Mineral extraction that has an unacceptable impact on the environment, climate change, local communities, transport routes or the integrity of European wildlife sites which cannot be mitigated will not be permitted. The scale of operations should be appropriate to the character of the area and the roads that serve it.</u></p> | FPC16 | <p><i>Included for information and not part of the current consultation.</i></p> <p>Change made in response to the Inspector's queries.</p> |

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| | | | <p><u>Reclamation and restoration of a high quality should be carried out as soon as reasonably possible and proposals will be expected to improve the local environment.</u></p> <p>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.</p> | | |
| - | 121 | Diagram 20a | Include new Diagram 20a showing general extent of the surface coal Mineral Safeguarding Area. | FPC17 | <p><i>Included for information and not part of the current consultation.</i></p> <p>Change made in response to the Inspector's queries.</p> |
| SPC | 122 | Para 6.74 | <p>Affordable housing is defined as housing that meets the needs of households whose income does not allow them to rent or buy at prevailing local market prices. It comprises:</p> <ul style="list-style-type: none"> -social rented housing: i.e. rented housing owned and managed by local authorities or Registered Social Landlords for which guideline target rents are determined through the national rent regime), or -<u>affordable rented housing: let by local authorities or private registered providers of social housing to households who are eligible for social rented housing.</u> -intermediate housing: where housing prices and rents are above social rent but below market prices or rents. <u>Examples can include shared equity (shared ownership and equity loans), but not affordable rented housing. Examples of intermediate housing include</u> | - | Changes for the purposes of clarity. |

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| | | | shared ownership (part rent / part sale), equity loan and intermediate rent. | | |
| SPC | 122 | Para 6.75 | <u>In order to understand the local housing market and assess current and future housing requirements and need for Bath & North East Somerset the Council commissioned a SHMA which was published in 2013. The SHMA shows that the need for affordable housing in B&NES is high and that the affordability gap between local incomes and market house prices is very wide. The Strategic Housing Market Assessment (SHMA) estimates that typically less than 50% of households where the head of household is under 35 years old could afford to buy or rent within the district over the period 2010-2026-2029. This affordability gap results in high levels of housing need which are not being met by vacancies in the existing stock of affordable housing or by recent new supply.</u> | - | Change to reflect updated evidence – 2013 SHMA |
| SPC | 122 | Para 6.76 | <u>To better understand the workings of housing markets at the sub-regional and local level the Council jointly commissioned a SHMA which appraised the housing market across the subregion of the West of England. The SHMA shows that an increasing proportion of the total dwelling stock is accounted for by the private rented sector. The increase in the private rented sector over the last decade may have played a role in meeting some of the affordable housing need arising within the District. Taking account of this increased role the SHMA estimates that around 36% of the requirement for overall housing between 2011 and 2031 is for affordable homes. The</u> | - | Change to reflect updated evidence – 2013 SHMA |

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| | | | assessment, published in 2009, has demonstrated a high level of need for affordable housing throughout the district, taking account of current and future projected market conditions. The level of unmet affordable housing need is high and based on the evidence from the SHMA the Council could theoretically require 100% of all future planned residential development to be affordable housing. | | |
| SPC | 122 | Para 6.77 | The assessment also provides a profile of this need in terms of likely tenure split between rented and intermediate affordable housing and the likely type / size requirements. The SHMA suggests that in B&NES a tenure split of 93%/7% social rent to intermediate housing is appropriate. This is based on the evidence of housing need and does not take in to account the need to create balanced communities and therefore the Council believes a 75%/25% tenure split to be more sustainable. | - | Needs to be updated to reflect 2013 SHMA and clarify tenure split/Affordable Rent Tenure. |
| SPC | 122 | Para 6.78 | 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 Update (December 2012) have 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. | - | Change arising from the Hearings (see ID/30, paras 3.1-3.7). |
| SPC | 122 | Para 6.79 | The study has identified some geographical variance in viability across the district. <u>This supports geographical variation in the proportion of affordable housing that should be sought (as outlined in the table below).</u> and hence any | - | Change arising from the Hearings (see ID/30, paras 3.1-3.7) and to reflect the recommendations of the updated Affordable Housing Viability |

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| | | | district wide policy must reflect the fact that any affordable housing target is seen as an average with some higher value areas capable of delivering more affordable housing and some less. | | | | Study (2012). |
| SPC | - | New Table | Targets | Sub-markets | Postcode | - | Consequential change arising from policy changes for the purposes of clarity. |
| | | | AH Area 1 40 % | Prime Bath | BA1 2, BA1 1, BA2 4 | | |
| | | | | Bath North and East | BA1 5, BA1 6, BA2 6, BA1 7, SN14 8 and SN13 8 | | |
| | | | | Bath Rural Hinterland | BA1 9, BA1 8, BA2 7, BA2 9, BA2 0, BA152 and BS30 6 | | |
| | | | AH Area 2 30 % | Bath North and West | BA1 4 and BA1 3 | | |
| | | | | Bath South | BA2 3, BA2 2, BA2 1, BA2 5 | | |
| | | | | Keynsham and Salford | BS31 1, BS31 2, BS31 3, BS15 3, BS4 4 and BS14 8 | | |
| | | | | Midsomer Norton, Westfield, Radstock, Peasedown St John, Paulton | BS39 7, BA3 2, BA3 3, BA2 8, BA3 4 and BA3 5 | | |
| Chew Valley | BS40 6, BS40 8, BS39 4, BS39 5, BS39 6 and BS14 0 | | | | | | |
| SPC | 123 | Policy CP9 Large sites | <p>Large sites</p> <p>Affordable housing will be required as on-site provision in developments of 10 dwellings or 0.5 hectare and above (whichever is the lower threshold applies). <u>The following percentage targets will be sought:</u></p> <p><u>-40% in Prime Bath, Bath North and East, Bath Rural Hinterland;</u></p> <p><u>-30% in Bath North and West, Bath South, Keynsham and</u></p> | | | RC49 (updates PC91 as amended) | Change arising from the Hearings (see ID/30, paras 3.1-3.7) and to reflect the recommendations of the updated Affordable Housing Viability Study (2012). |

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| | | | <p><u>Saltford, Midsomer Norton, Westfield, Radstock, Peasedown St John, Paulton and Chew Valley.</u></p> <p>An average affordable housing percentage of 35% will be sought on these large development sites. This is on a grant free basis with the presumption that on site provision is expected.</p> | | |
| SPC | 123 | Policy CP9 Small sites | <p>Small sites</p> <p>Residential developments on small sites from 5 to 9 dwellings or from 0.25 up to 0.49 hectare (whichever is the lower <u>threshold applies</u>) should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be <u>20% for AH area 1 and 15% for AH area 2</u> 47.5%, half that of large sites, in order to encourage delivery.</p> <p>In terms of the 47.5% affordable housing on small sites, the Council will first consider if on site provision is appropriate. In many instances, particularly in the urban areas of Bath, Keynsham, Midsomer Norton and Radstock the Council will accept a commuted sum in lieu of on site provision. This should be agreed with housing and planning officers at an early stage.</p> | - | Change arising from the Hearings (see ID/30, paras 3.1-3.7) and to reflect the recommendations of the updated Affordable Housing Viability Study (2012). |
| SPC | 123 | Policy CP9 Viability | <p>Viability</p> <p>For both large and small sites the viability of the proposed development should be taken into account, including:</p> <ul style="list-style-type: none"> Whether the site is likely to have market values materially above or below the average for the district | RC50 (updates PC91 as amended) | Change arising from the Hearings (see ID/30, paras 3.1-3.7) and to reflect split target policy approach. |

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| | | | <ul style="list-style-type: none"> Whether grant or other public subsidy is available Whether there are exceptional build or other development costs The achievement of other planning objectives The tenure and size mix of the affordable housing to be provided <p>A higher (up to 45%) proportion of affordable housing may be sought <u>where supported by the assessment of viability of the proposed development.</u> or provision below the average of 35% may be accepted.</p> | | |
| SPC Page 174 | | Policy CP9 Tenure | <p>Tenure</p> <p>The tenure of the affordable housing will typically be based on a 75/25 split between social rent and intermediate housing.</p> <p>The Council will <u>only</u> consider the provision of Affordable Rent <u>Tenure</u> or other affordable housing products in lieu of social rent <u>when where:</u></p> <ul style="list-style-type: none"> it is proven necessary to improve viability in order to achieve policy position levels of affordable housing and where the housing need for affordable rent can be demonstrated. | updates PC91 as amended | Changes for the purposes of clarity. <i>Further wording changes to be made to clarify position on tenure split emerging from updated SHMA.</i> |
| SPC | 123 | Policy CP9 Other | <p>Other</p> <p>All affordable housing delivered through this policy should remain at an affordable price for future eligible households, <u>in the event of any sales or staircasing affecting affordable housing unit(s) delivered through CP9 then an arrangement will be made to recycle the receipts/subsidy for the provision of new alternative affordable housing</u></p> | RC51 (updates PC91 as amended) | Response to Inspector's question 11.9 in ID/7 (see BNES/12) |

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| | | | <u>located elsewhere within Bath and North East Somerset.</u> Affordable Housing should be integrated within a development and should not be distinguishable from market housing. | | |
| SPC | 123 | Policy CP9 Delivery | Affordable housing will be delivered in accordance with the Council's Housing Strategy or equivalent. 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. In exceptional circumstances..... | - | Changes for the purposes of clarity. |
| SPC | 124 | Policy CP10 | Add the following text to the end of Policy CP10: <u>The specific accommodation needs of older people will be addressed through the Placemaking Plan, including considering the allocation of appropriate sites.</u> | RC52 | Change arising from the Hearings. |
| SPC | - | New Diagram 20b | Heading: <u>Geographic two-way split for affordable housing (indicative)</u> Show the geographic two-way split for affordable housing across the district. <i>[see page (ix) for new Diagram 20b appended to this schedule]</i> | - | Subsequent change arising from response to ID/30, paras 3.1-3.7. |

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| SPC | 124 | Para 6.81 | Gypsies, Travellers & Travelling Showpeople 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. | Amends FPC18 | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |
| SPC | 124 | Para 6.81a | 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. | Amends FPC19 | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |
| SPC | 124 | Para 6.81b | The West of England Gypsy and Traveller Accommodation Assessment (WoE GTAA) undertaken in 2007 recommends that 19 permanent pitches and 20 transit pitches are found for the gypsy and travelling communities in Bath & North East Somerset for the period to 2011. The WoE GTAA also indicates that one plot is provided travelling showpeople in Bath & North East Somerset for this period. | Amends FPC20 | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |
| SPC | - | Para 6.81c | <u>In March 2012 the Government published Planning Policy for Traveller Sites, alongside the NPPF, which seeks to align planning policy for Travellers with other housing. This requires the Council to demonstrate a five year supply of deliverable sites and a further five and where possible,</u> | Amends FPC21 | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |

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| | | | <p><u>ten year supply of developable sites. The Council has undertaken a refreshed assessment of need which updates the West of England Gypsy and Traveller Accommodation Assessment undertaken in 2007 for the Bath & North East Somerset area. This establishes the level of need for five, ten and fifteen year supply of sites in accordance with Planning Policy for Traveller Sites. The report has identified the need for 28 permanent and 5 transit pitches, and 40 Travelling Showmen's yards to be provided for the period 2012 - 2027. The Council will identify sites to respond to the established accommodation needs gypsies, travelers and travelling showpeople through separate Development Plan Documents (DPDs) for the period to 2011 for the travelling communities residing in or resorting to Bath & North East Somerset as required by national policy in a separate Development Plan Document. Planning Policy for Traveller Sites clarifies that for a site to be considered deliverable it must be available now and offer a suitable location for development now, and be achievable and viable with a realistic prospect it can be delivered within five years.</u></p> | | |
| SPC | - | New para 6.81d | <p><u>Planning Policy for Traveller Sites states that Traveller sites should be guided towards making effective use of previously developed, untidy or derelict land. It also states that development in the open countryside away from existing settlements or outside areas allocated in the development plan should be strictly limited. It does recognise, however, that some rural areas may be suitable for traveller's sites providing the scale of these sites does not dominate the nearest settled community and avoid placing an undue pressure on local infrastructure.</u></p> | - | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |

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| SPC | 124 | New para 6.82 (includes part of previous para 6.81c) | <u>The NPPF establishes a presumption against inappropriate development in the Green Belt unless very special circumstances can be demonstrated and the harm caused can be outweighed by other considerations. Planning Policy for Traveller Sites reiterates that sites in the Green Belt are inappropriate development.</u> The criteria in Policy CP11 will be used to guide the identification of suitable sites for allocation in the relevant DPD and to identify sites to meet <u>respond to</u> future accommodation needs when assessed. These criteria will also to be used when considering planning applications that may happen before the DPDs are prepared or in addition to sites being allocated. | Amends FPC21 | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |
| SPC | 124 | Policy CP11 | POLICY CP11 Gypsies, Travellers & Travelling Showpeople The following criteria will be used to guide the identification and allocation of suitable, <u>available and deliverable or developable</u> sites <u>in a Development Plan Document</u> to respond to the established accommodation needs of Gypsies, Travellers and Travelling Showpeople to 2011 and their accommodation needs beyond 2011 once assessed for the Plan period. Proposals for sites for Gypsies, Travellers and Travelling Showpeople accommodation will be considered against the following criteria <u>permitted provided:</u> a: <u>the site is suitably located to allow access to local community services and facilities, including shops, schools and health facilities, and employment opportunities should be accessible by foot, cycle and public transport by sustainable modes of transport</u> | Amends FPC22 | Changes to Policy CP11 and supporting text to address Inspector's concerns in ID/30 (paras 4.1 & 4.2). |

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| Page 179 | | | <p>b: satisfactory means of access can be provided and the existing highway network is adequate to service the site</p> <p>c: the site is large enough to allow for adequate space for on-site facilities and amenity <u>amenities including play provision, parking and manoeuvring, as well as any commercial activity/live/work pitches if required to enable traditional lifestyles</u></p> <p>d: the site <u>is well-designed and well-landscaped</u> does not harm <u>and has no unacceptable adverse impact on the character and appearance of the surrounding area</u></p> <p>e: adequate services including utilities, foul and surface water and waste disposal can be provided as well as any necessary pollution control measures</p> <p>f: use of the site must have <u>there is no harmful unacceptable impact on the amenities, health and well-being of occupiers of the site or on neighbouring occupiers as a result of the development</u></p> <p>g: the site should avoid areas at high risk of flooding and have no adverse impact on protected habitats and species, <u>nationally recognised designations, landscape designations and heritage assets and their settings</u> and natural resources</p> <p>h: <u>the scale of the development does not dominate the nearest settled community nor place undue pressure on the local infrastructure</u></p> <p>i: <u>the site does not lie within the Green Belt unless there are very special circumstances.</u></p> <p>Delivery:</p> | | |

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| | | | <i>Delivery will be through the Development Management process. Sites will be identified through the Gypsies and Travellers DPD to meet identified accommodation needs up to 2011 and beyond once assessed for the Plan period.</i> | | |
| SPC | 126 | Para 6.87 | <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> | - | Change to reflect shift in plan period. |
| SPC | 128 | CP12 Delivery section | <p><i>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.</i></p> <p><i>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.</i></p> <p><i>An updated retail study will be undertaken during 2010/11 to support future planning decisions and guide the Placemaking Plan.</i></p> <p>PPS4 'Planning for Sustainable Economic Development'</p> | Amends NPPF4 | Original amended to bring terminology used in the Delivery section into line with NPPF, para 24. |

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| | | | 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. <u>Main town centre uses will be subject to the sequential and impact tests set out in the NPPF.</u> | | |
| SPC | 129 | Para 6.101 | 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> . | - | Change to update the reference to national planning policy guidance. |
| Page 181 | - | 134 | Para 7.04 | FPC23 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |

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| SPC | 134 | Para 7.05 | <p>The Core Strategy is anticipated to be reviewed about every 5 years after its adoption. The review process will commence around 2 to 3 years in advance of the review date in order to enable the timely and considered preparation and adoption of revised policies.</p> <p>New Para 7.05a: <u>Delivery</u> <u>If, after the first 5 years following adoption, monitoring demonstrates that the planned housing provision, including affordable housing, is not being delivered at the levels expected and there would be no reasonable prospect of the delivery of 12,800 homes to 2029, then the review of the Core Strategy will entail changes to rectify the housing shortfall taking account of the impact of the performance of the economy on the need for housing. This will include implementing the contingencies referred to in para 1.36 of the Core Strategy but may also include changes to the spatial strategy if required.</u></p> <p>New Para 7.05b: <u>Review of growth targets</u> <u>The Council will also monitor economic growth rates, to assess whether targets being planned continue to be appropriate. If required that Council we agree revised targets and make any necessary changes to the spatial strategy to meet the new targets</u></p> <p>New Para 7.05c (to include some text formerly in Para 7.05): <u>Duty to Co-operate</u></p> | Amends RC53 | Initial change in response to Inspector's question 2.16 in ID/7 (see BNES/5 and further changes to this wording set out in BNES/24). |

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| | | | <u>These reviews</u> will be undertaken in <u>co-operation</u> with neighbouring authorities, particularly in the West of England <u>in accordance with the Duty to Co-operate to ensure that cross-boundary issues are addressed.</u> This <u>will</u> to include a review of the plan period. The timetable for preparing other Local Development Documents is set out in the Council's Local Development Scheme. | | |
| - | 135 | Table 9 | Amend heading of column 4 from 'Quantification of objective' to ' <u>Target</u> ' | FPC24 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |
| SPC | 135 | Table 9 Monitoring of Strategic Objectives | Amend Indicator relating to Policy CP1 by adding the following text: <ul style="list-style-type: none"> •<u>Number of Listed Building Consents issued annually for installation of insulation, secondary glazing, double glazing, solar photovoltaic cells, new boilers, wood burners and heat pumps</u> | RC54 | Change arising from the Hearings |
| - | 135 | Table 9 | Amend the 'Target' column for the respective indicators for strategic objective 1 and Policy CP1 to read: <u>Increase in the number of residential and non-residential properties that have installed photovoltaic cells</u> | FPC25 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |
| SPC | 136 | Table 9 | Amend the 'Target' column for the respective indicators for strategic objective 2 and Policy CP6 to read: <u>Maintain or increase the area of priority habitats by 2026 2029</u> <u>Annual increase in the proportion of assessed housing schemes that meet the Building for Life (BfL) good</u> | Updates FPC26 | Change made in response to the Inspector's queries and updated to reflect in shift in Plan period. |

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| | | | <p><u>standard</u></p> <p><u>Reduce the number of principal listed buildings recorded as 'at risk' on the Council's Buildings at Risk Register</u></p> <p><u>Increase the number of up to date Conservation Area Appraisals and Management Plans in place</u></p> | | |
| SPC | 136 | Table 9 Monitoring of Strategic Objectives | <p>Amend Indicator and Target for Strategic Objective 3 (policies DW1, B1, KE1, SV1 and RA1 &2) as follows:</p> <p>Indicator</p> <ul style="list-style-type: none"> •Amount of floor space developed type (office/ industrial) in sq.m. by place annually and total since 2006 <u>2011</u>. Gains, losses and net. •Amount of floor space on previously developed land by type (office/industrial) in sq.m. by place annually and total since 2006 <u>2011</u>. Gains, losses and net. •Employment land available by type •<u>Change in work place jobs by sub-area</u> •Number of planning consents for business premises in rural areas •<u>Economic growth forecasts from the Office of Budget Responsibility (OBR) as well as from bodies such as Oxford Economics, Cambridge Econometrics, NIESR</u> <p>Target</p> <p>Deliver space to provide 8,700 <u>11,000</u> net additional jobs between 2006 <u>2011</u> & 2026 <u>2029</u> as set out in the places below</p> | Amends RC55 | <p>Changes arising from BNES/24 and consequential changes to reflect amended office requirements and shift in Plan period</p> <p><i>Further changes needed to reflect policy revisions.</i></p> |

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| Change Ref | Page No in Draft Core Strategy | Plan Ref | Proposed Change to the Submitted Core Strategy | Original change Ref | Reason for change |
|------------|--------------------------------|----------|---|---------------------|--|
| | | | <p><u>Bath: 2006 2011-2026 2029</u></p> <ul style="list-style-type: none"> •Office floor space – net gain of 70,000 to 100,000m² •Industrial floor space – net loss of about 30,000 m² •Net increase in 5,700 jobs <p><u>Keynsham: 2006 2011 – 2026 2029</u></p> <ul style="list-style-type: none"> •Office floor space – net gain of about 10,000 m² •Industrial floor space – no net change •Net increase in 1,500 jobs <p><u>Somer Valley: 2006 2011-2026 2029</u></p> <ul style="list-style-type: none"> •Office floor space – net gain of about 10,00 m² •Industrial floor space – net loss of about 10,000 m² •Net increase in 1,000 jobs | | |
| - | 136 | Table 9 | <p>Amend the 'Indicator' column for strategic objective 4 and Policy CP12 to read: <u>Health of the centres as indicated by retail floorspace losses, vacancy rates and land use mix changes in each of the centres listed in the hierarchy (city/town centres – annually and district/local centres – periodically)</u></p> <p>Amend the 'Target' column for the indicator above for strategic objective 4 and Policy CP12 to read: <u>Health of each centre as measured by the indicators specified is maintained or enhanced</u></p> <p>Amend the 'Indicator' column by adding the following indicator for strategic objective 4 and Policy CP12: <u>Market share of comparison goods spending in Bath city centre and the town centres</u></p> <p>Amend the 'Target' column for the indicator above to read: <u>The market share of comparison goods spending as measured by household surveys undertaken about every</u></p> | FPC27 | <p><i>Included for information and not part of the current consultation.</i></p> <p>Change made in response to the Inspector's queries.</p> |

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| | | | <u>5 years is maintained or enhanced</u> | | |
| SPC | 136 | Table 9 Monitoring of Strategic Objectives | Amend Target for Strategic Objective 5 (policy DW1) as follows: Deliver 41,000 <u>12,800</u> homes by 2026 <u>2029</u> Calculation of housing land supply (expressed in years) The five year housing land supply position after 2015/2016 will be used as a strong indication of the achievability of housing delivery to the end of the plan period in accordance with the Core Strategy | Amends RC56 Updates PC97 | Change arising from BNES/26 |
| SPC | 137 | Table 9 Monitoring of Strategic Objectives | Amend Target for Strategic Objective 5 (policy B1) as follows: Bath Deliver 6,000 <u>7,000</u> homes between 2006 <u>2011</u> & 2026 <u>2029</u> Keynsham Deliver 1,500 <u>2,100</u> homes between 2006 <u>2011</u> & 2026 <u>2029</u> Somer Valley Deliver 2,700 <u>2,400</u> homes between 2006 <u>2011</u> & 2026 <u>2029</u> Rural Areas Deliver 800 <u>1,000</u> homes between 2006 <u>2011</u> & 2026 <u>2029</u> Edge of Bristol <u>Deliver 200 homes between 2011 & 2029</u> | Amends RC57 | Change arising from BNES/26 and housing figures and consequential changes to reflect revised housing requirement and shift in Plan period. |

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ANNEX 3 PART 1

| Change Ref | Page No in Draft Core Strategy | Plan Ref | Proposed Change to the Submitted Core Strategy | Original change Ref | Reason for change |
|------------|--------------------------------|----------|---|---------------------|--|
| | | | <i>Housing figures to be finalised post Council meeting on 8th March 2013.</i> | | |
| SPC | 136 | Table 9 | Amend the 'Target' column for the respective indicator for strategic objective 5 and Policy DW1 to read: <u>National target of 60%</u> <u>At least around 80% of new housing provided between 2006 2011 and 2026 2029 should be on previously developed land</u> | Updates FPC28 | Change made in response to the Inspector's queries and updated to reflect in shift in Plan period. |
| SPC | 136 | Table 9 | Amend the 'Target' column for the respective indicator for strategic objective 5 and Policy CP9 to read: <u>3,400 3.110 affordable homes completed by 2026 2029</u> <u>Average of 35% of all homes provided on large sites across the District should be affordable homes</u> <u>Large sites:</u> <u>40% in Area 1 and 30% in Area 2</u> <u>Small sites:</u> <u>20% in Area 1 and 15% in Area 2</u> | Updates FPC29 | Change arising from the Hearings (see ID/30, paras 3.1-3.7) and to reflect the recommendations of the updated Affordable Housing Viability Study (2012). |
| SPC | 136 | Table 9 | Amend the 'Target' column for the indicator for strategic objective 5 and Policy CP11 to read: <u>Delivery of 28 permanent and 5 transit pitches for Gypsies and Travellers and 40 plots for Travelling Showpeople by 2016-2027</u> | Updates FPC30 | Change made in response to the Inspector's queries and updated to reflect figures from GTAA review. |
| - | 136 | Table 9 | Amend the 'Target' column for the Air Quality indicator for strategic objective 6 and Policy CP13 to read: <u>By 2016 within the Bath AQMA and Keynsham AQMA annual average concentrations of Nitrogen Dioxide (NO₂)</u> | FPC31 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. |

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|-------------------------|----------------------------------|--|--|-------------------------|---|----------------------------------|---|---------------------------------|--|---|---|
| | | | not to exceed 40µg/m ³ | | | | | | | | |
| - | 136 | Table 9 | Amend the 'Indicator' column for strategic objective 7 to read: 17 11 transport related targets <u>indicators</u> are monitored as part of JLTP3. http://www.travelplus.org.uk/media/187017/12%20targets%20and%20monitoring.pdf(page2) | FPC32 | <i>Included for information and not part of the current consultation.</i> Change made in response to the Inspector's queries. | | | | | | |
| SPC | 139 | Appendix 1 | Amend Appendix 1 (Replaced Local Plan policies) by adding policy HG.1 as follows: <table border="1" data-bbox="622 687 1397 1142"> <thead> <tr> <th>B&NES Local Plan Policy</th> <th>Topic</th> <th>Replaced by Core Strategy Policy</th> </tr> </thead> <tbody> <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> </tbody> </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> | - | Change made to clarify that Local Plan Policy ET.1 is replaced by Core Strategy policies DW1, B1, KE1 and SV1 which set a new framework for the expansion and managed reduction of employment floorspace. |
| 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> | | | | | | | | | |
| SPC | 139/140 | Appendix 1 and 2 | Amend Appendix 1 (Replaced Local Plan policies) by adding policy HG.1 as follows: <table border="1" data-bbox="622 1246 1382 1377"> <tbody> <tr> <td>B&NES Local Plan Policy</td> <td>Replaced by Core Strategy Policy</td> </tr> </tbody> </table> | B&NES Local Plan Policy | Replaced by Core Strategy Policy | FM11 | Non-material change for the purposes of updating the draft Core Strategy. | | | | |
| B&NES Local Plan Policy | Replaced by Core Strategy Policy | | | | | | | | | | |

ANNEX 3 PART 1

| Change Ref | Page No in Draft Core Strategy | Plan Ref | Proposed Change to the Submitted Core Strategy | Original change Ref | Reason for change | | | | | | |
|-------------------------|--|--|--|-------------------------|--|----------------------------------|-------------|--|--|------|---|
| | | | <table border="1"> <tr> <td><u>ES.1</u></td> <td><u>energy proposals</u></td> <td><u>CP3 Renewable Energy</u></td> </tr> </table> <p>Delete policy ES.1 from Appendix 2 (Saved Local Plan Policies):</p> <p>ES.1 Renewable energy proposals</p> | <u>ES.1</u> | <u>energy proposals</u> | <u>CP3 Renewable Energy</u> | | | | | |
| <u>ES.1</u> | <u>energy proposals</u> | <u>CP3 Renewable Energy</u> | | | | | | | | | |
| SPC | 139/140 | Appendix 1 and 2 | <p>Amend Appendix 1 (Replaced Local Plan policies) by adding policy HG.1 as follows:</p> <table border="1"> <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> <p>Delete policy HG.1 from Appendix 2 (Saved Local Plan Policies):</p> <p>HG.1 Meeting the District housing requirement</p> | 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> | FM12 | Non-material change for the purposes of updating the draft Core Strategy. |
| 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> | | | | | | | | | |
| SPC | 140 | Appendix 2 | <p>Delete policy ET.1 from Appendix 2 (Saved Local Plan Policies):</p> <p>ET.1 Employment Land Overview</p> | - | Change made to clarify that Local Plan Policy ET.1 is replaced by Core Strategy policies DW1, B1, KE1 and SV1 which set a new framework for the expansion and managed reduction of employment floorspace | | | | | | |

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| Change Ref | Page No in Draft Core Strategy | Plan Ref | Proposed Change to the Submitted Core Strategy | Original change Ref | Reason for change |
|------------|--------------------------------|------------|---|---------------------|---|
| SPC | 140-142 | Appendix 2 | <p>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:</p> <p><u>WM.1 (Development of waste management facilities)</u></p> <p><u>WM.3 (Waste reduction and the reuse in development proposals)</u></p> <p><u>WM.5 (Waste transfer stations and material recovery facilities)</u></p> <p><u>WM.6 (Recovery of materials from waste brought to landfill)</u></p> <p><u>WM.7 (Household waste recycling centres)</u></p> <p><u>WM.8 (Composting facilities)</u></p> <p><u>WM.10 (Thermal treatment with energy recovery)</u></p> <p><u>WM.12 (Landfill)</u></p> <p><u>WM.13 (Landraising)</u></p> <p><u>WM.14 (Agricultural land improvement schemes)</u></p> <p><u>WM.15 (Time extensions for landfill, landscaping or agricultural land improvement schemes)</u></p> | FM13 | Non-material change for the purposes of updating the draft Core Strategy. |

Proposed changes to the Core Strategy Diagrams

| Diagram | Change Ref | Proposed Change | Page |
|--|----------------------------|---|------|
| Diagram 4 (Key Diagram) | SCPxx (see p.12) | Remove all Policy RA1 notation and amend the key | i |
| | SPC (see p.12) | Amend the housing and employment figures for Bath, Keynsham, the Somer Valley and the Rural Areas | |
| | SPC (see p.13) | Amend urban area of Bath/Green Belt in the vicinity of Odd Down so that it more accurately illustrates the general extent of the Green Belt (to show the park & ride site and adjoining land within the Green Belt) | |
| | SPC (see p.13) | Illustrate general extent of Green Belt as proposed to be amended & add new development locations | |
| | SPC (see p.13) | Update to only include the three “District Heating Priority Areas” – Bath Central, Bath Riverside and Keynsham Town Centre | |
| Diagram 5 Bath Spatial Strategy | SPC (see p.20) | Indicate areas where land will be released from the Green Belt to accommodate additional dwellings and employment floorspace. | ii |
| | SPC (see p.20) | Bath’s Neighbourhoods label to be amended to reflect revised policy wording. | |
| | SPC (see p.20) | Amend the area of search for location of flood storage facility to extend westwards following the line of the river. | |

ANNEX 3 - PART 2: DIAGRAMS

| Diagram | Change Ref | Proposed Change | Page |
|--|--------------------------|--|------|
| | SPC (see p.20) | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. | |
| Diagram 6 The Central Area and Western Corridor | SPC (see p.27) | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. | iii |
| Diagram 7 General Extent of the Central Area | SPC (see p.28) | Amend notation Central Area – City Centre (<i>indicative boundary only - detailed boundary is shown on the Proposals Map</i>) | |
| | SPC (see p.29) | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. | iv |
| Diagram 8i The Central Area of 2026 | SPC (see p.32) | Amend the heading for Diagram 8 as follows: The Central Area of 2026-2031 | |
| | SPC (see p.32) | Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road. | v |
| Diagram 10 Bath's Neighbourhoods | SPC (see p.40) | Indicate the location of Twerton Park on Diagram 10 and add new notation to the key. | vi |
| Diagram 15 | SPC | Remove all Policy RA1 notation and amend the key | viii |

ANNEX 3 - PART 2: DIAGRAMS

| Diagram | Change Ref | Proposed Change | Page |
|---|--------------------------|---|------|
| Somer Valley Strategy | (see p.59) | | |
| Diagram 18 Policy RA1 Villages | SPC (see p.63) | Remove all Policy RA1 notation and amend the key Amend title to key on Diagram 18: Indicative Policy RA1 Villages <u>Rural Villages</u> | ix |
| Diagram 19 District Heating Priority Areas | SPC (see p.75) | Amend Diagram 19 to distinguish between 'Distinct Heating Priority Areas' (Bath Central, Bath Riverside and Keynsham Town Centre) and 'District Heating Opportunity Areas' and amend Key accordingly. | x |
| Diagram 20b Geographic two-way split for affordable housing (indicative) | SPC (see p.92) | Show the geographic two-way split for affordable housing | xi |

Diagram 4: Bath and North East Somerset: The Key Diagram

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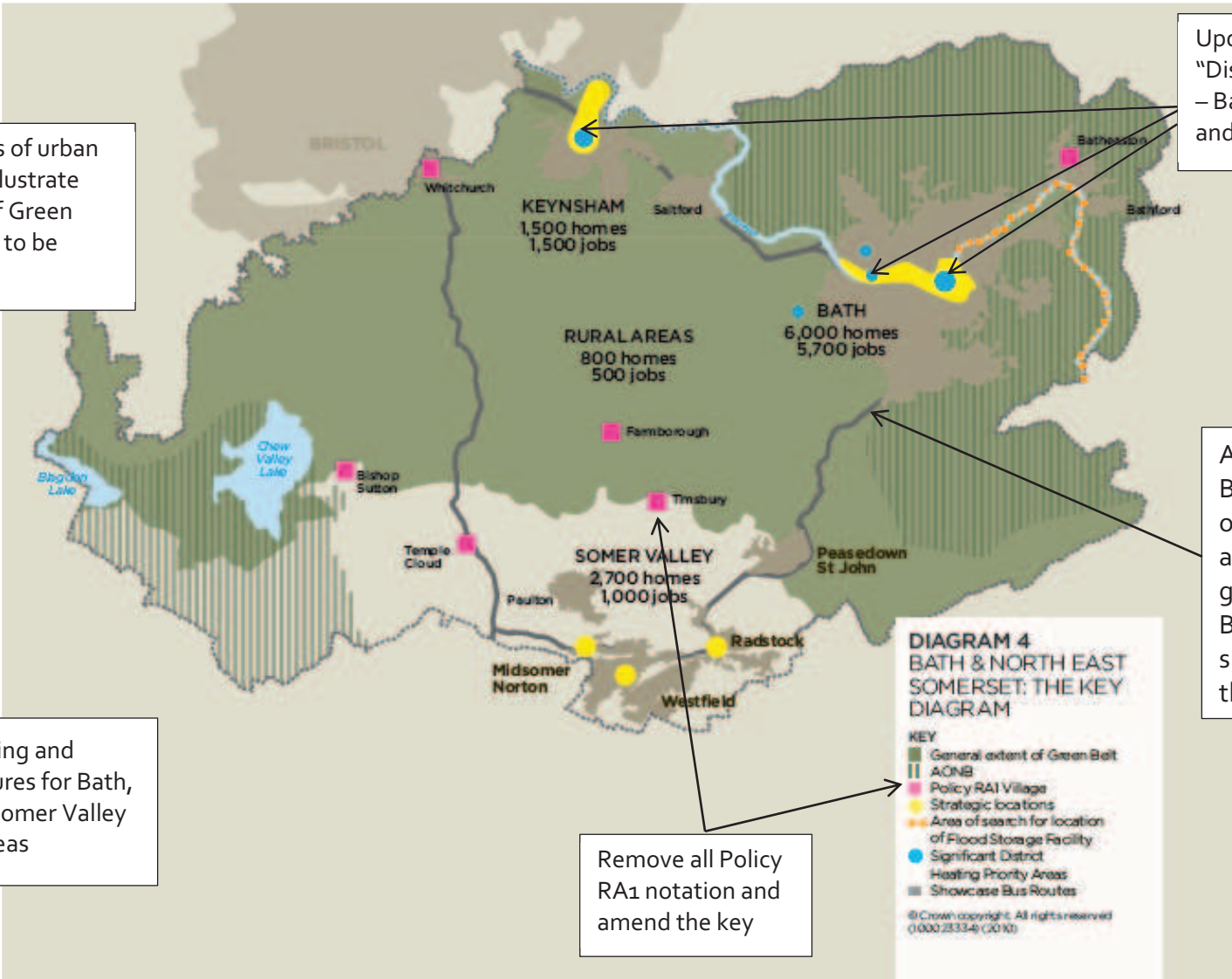
Identify locations of urban extensions and illustrate general extent of Green Belt as proposed to be amended

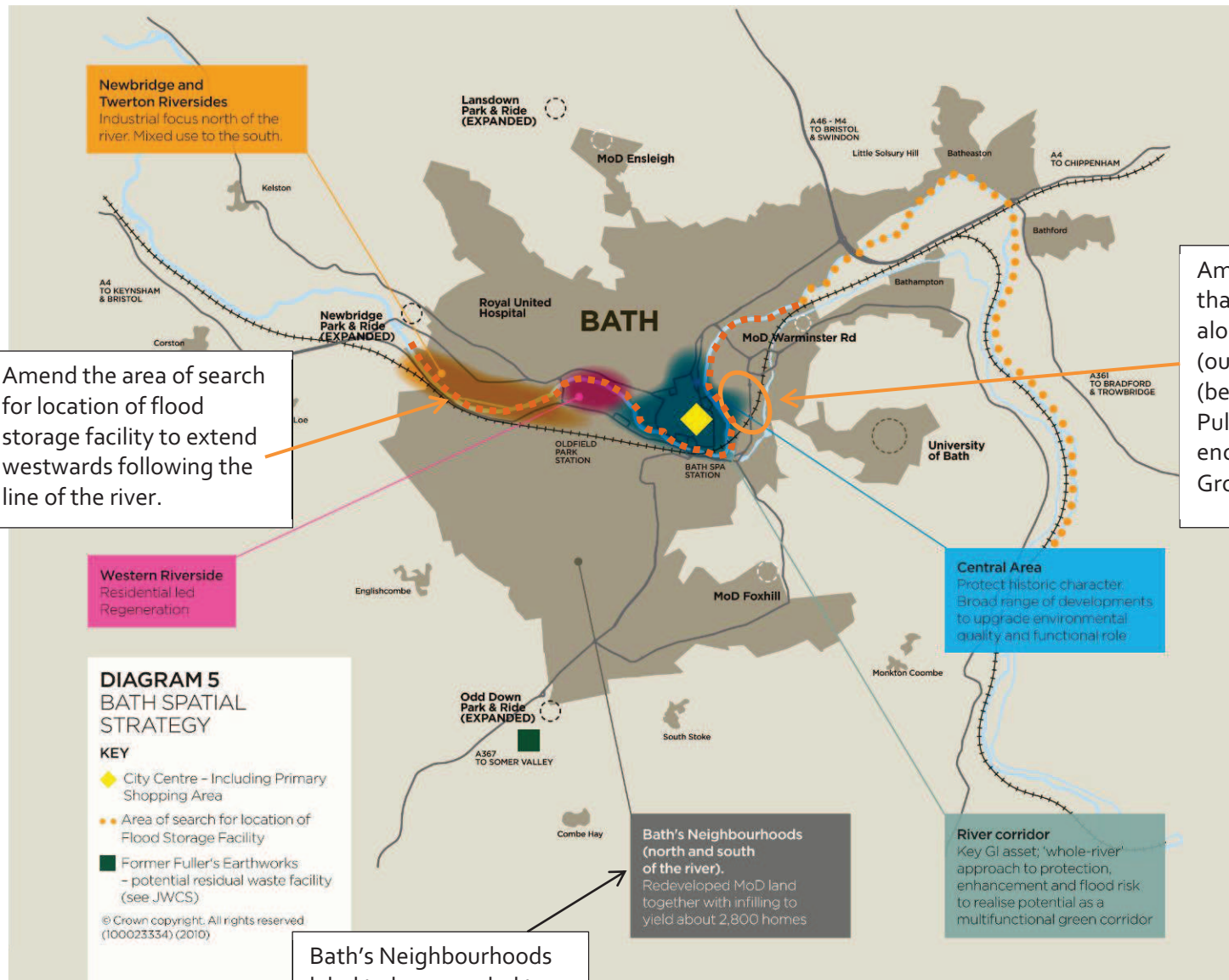
Update to only include the three "District Heating Priority Areas" – Bath Central, Bath Riverside and Keynsham Town Centre

Amend urban area of Bath/Green Belt in the vicinity of Odd Down so that it more accurately illustrates the general extent of the Green Belt (to show the park & ride site and adjoining land within the Green Belt)

Amend the housing and employment figures for Bath, Keynsham, the Somer Valley and the Rural Areas

Remove all Policy RA1 notation and amend the key

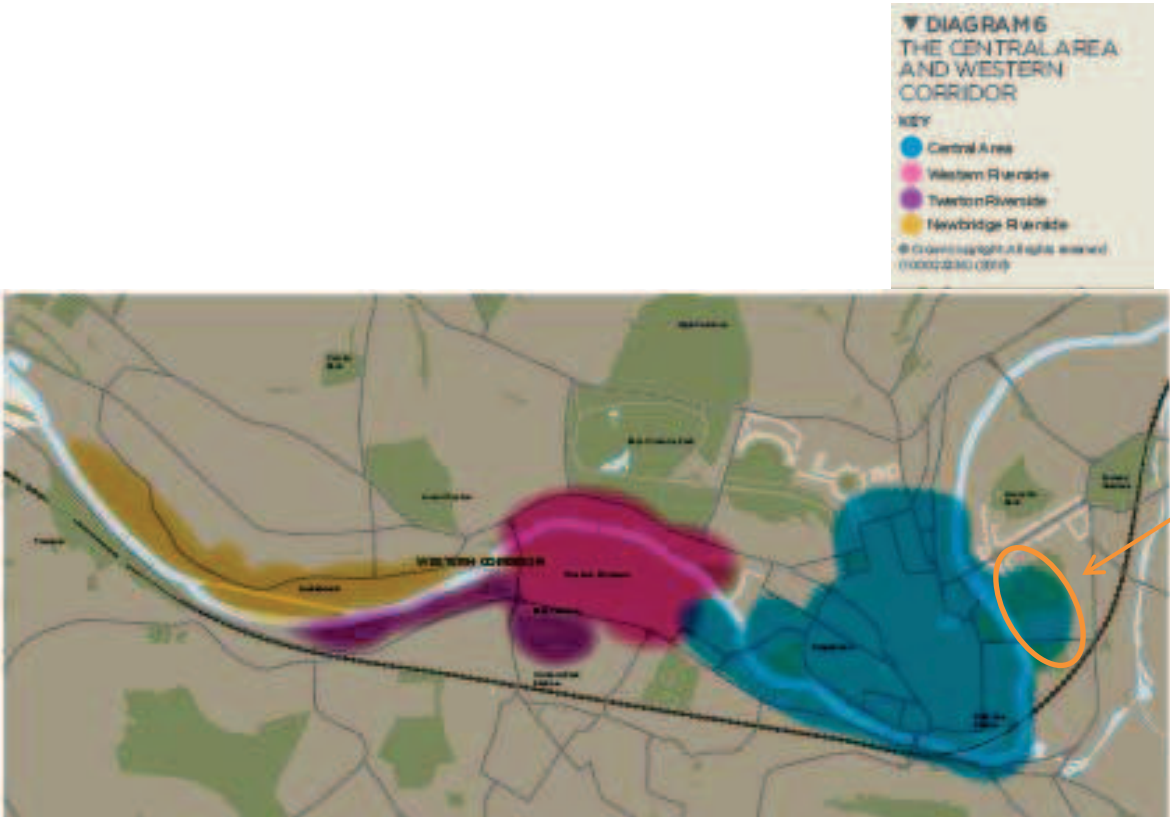




Bath's Neighbourhoods label to be amended to reflect revised policy wording.

Indicate areas where land will be released from the Green Belt to accommodate additional dwellings and employment floorspace.

Diagram 6: The Central Areas and Western Corridor



Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road.

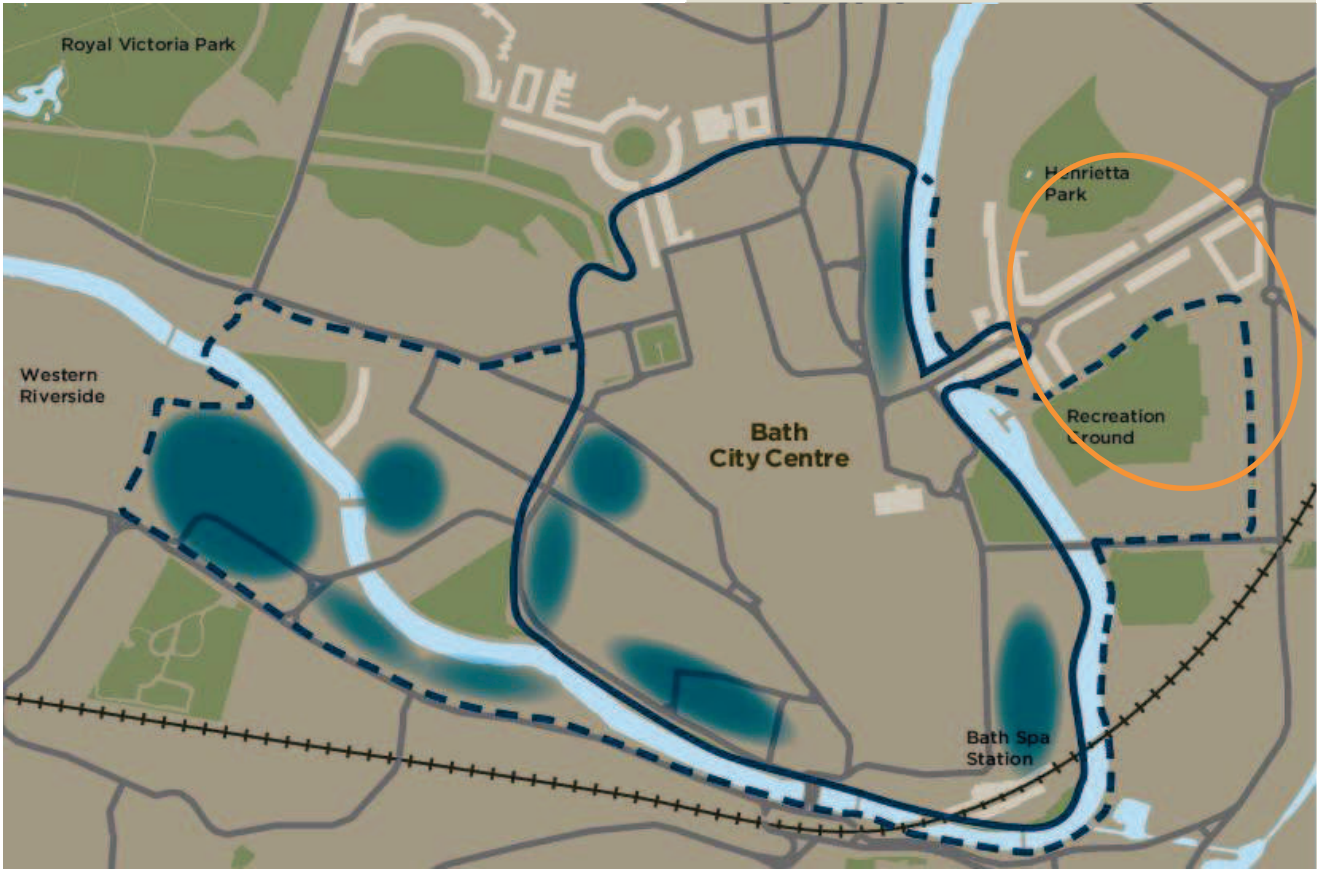
Diagram 7: General Extent of the Central Area

▼ **DIAGRAM 7**
 GENERAL EXTENT OF THE CENTRAL AREA
 KEY

- Central Area - City Centre
- - - Central Area - Areas Neighbouring the City Centre
- Key Development Hotspots

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Amend Central Area notation:
 City Centre (*indicative boundary only - detailed boundary is shown on the Proposals Map*)



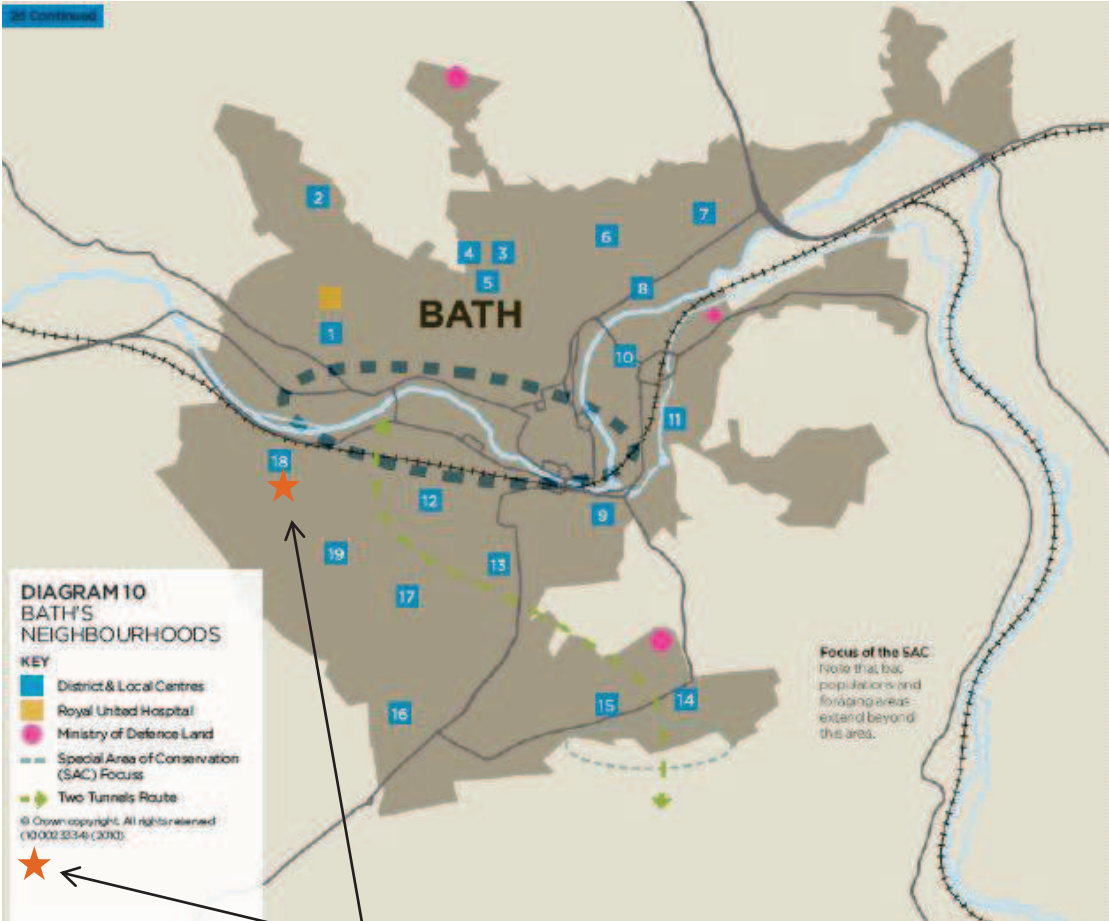
Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road).

Diagram 8: The Central Area of ~~2026~~2031



Amend Central Area boundary so that it follows the riverside walk along the eastern riverside walk (outer bend) of the River Avon (between North Parade and Pulteney Bridge, rather than encompassing the Recreation Ground/North Parade Road.

Diagram 10: Bath's Neighbourhoods



Indicate the location of Twerton Park on Diagram 10 and add new notation to the key.

Diagram 15: Somer Valley Strategy

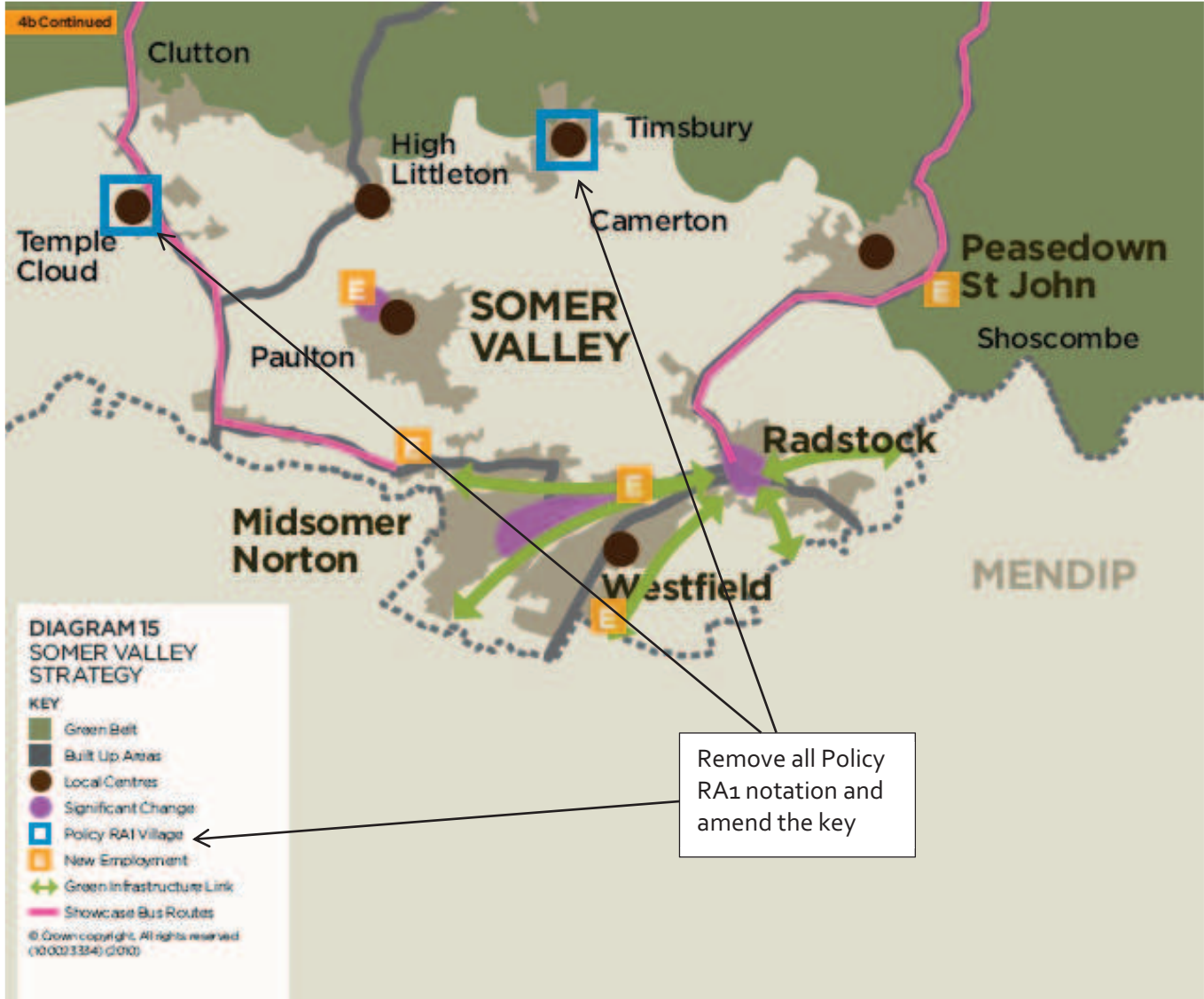
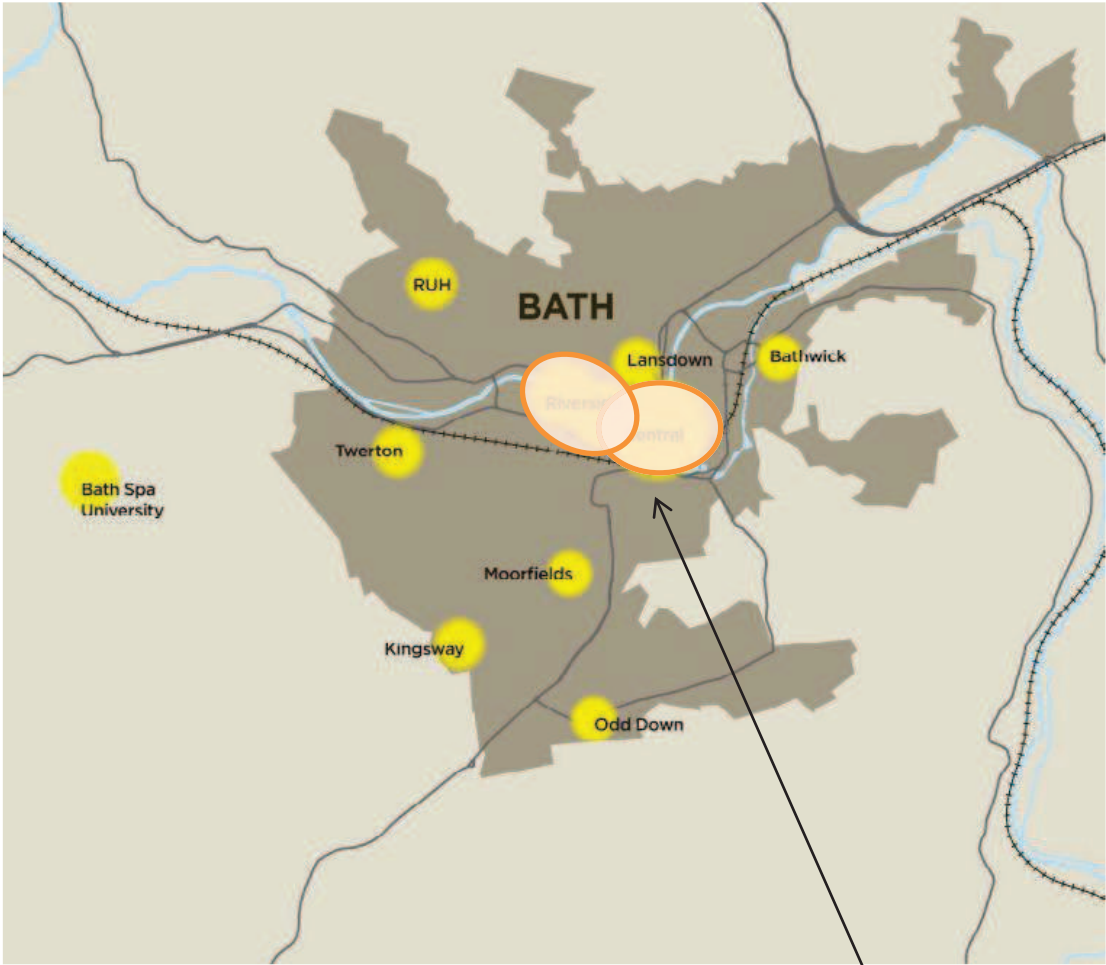


Diagram 18: Indicative Policy RA1 Villages Rural Villages



Diagram 19: District Heating Priority Areas



Amend key to as follows:

'District heating priority areas'



'District heating opportunity area's



Amend Diagram 19 to distinguish between 'Distinct Heating Priority Areas' (Bath Central, Bath Riverside and Keynsham Town Centre) and 'District Heating Opportunity Areas'.

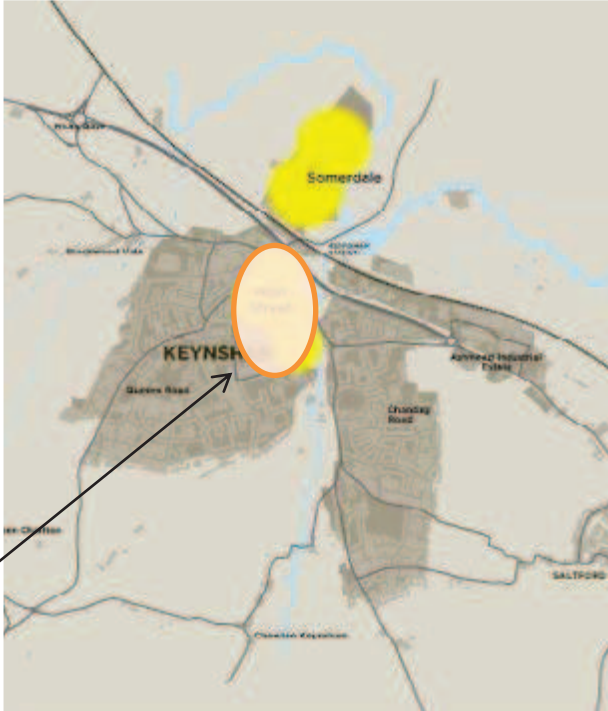
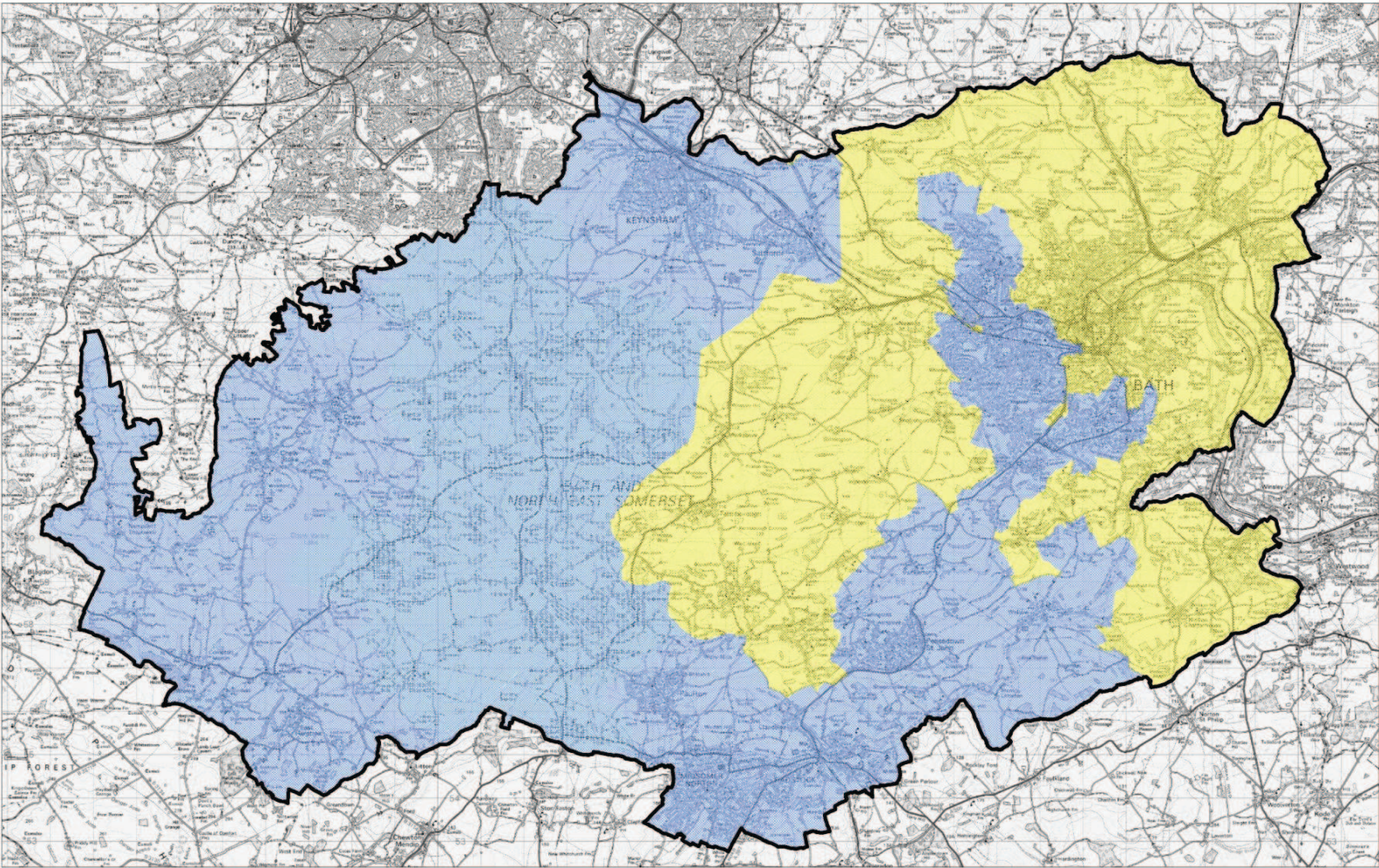


Diagram 20b: Geographic two-way split for affordable housing (indicative)



□ Bath & North East Somerset boundary ■ 40% Target ■ 30% Target

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ANNEX 4: CONSULTATION STRATEGY

1. The proposed strategy for the public consultation on the changes to the Core Strategy is outlined below.

Scope

2. Due to the stage in the process of the core strategy, the aims and objectives of consultation are to involve residents, community groups and stakeholders through two main methods:

Information

3. Communicating changes to the Core Strategy using a range of approaches as set out in the Neighbourhood Planning Protocol such as email bulletins, council website, local publicity, local press, guidance material, and events.

Consultation

4. In light of the fact that the Plan is still at examination stage, feedback from the community will be submitted directly to the Inspector to assist in his preparation for the hearings. This differs from the Council's usual approach consultations such as those that took place through the stages of production of the draft document, where the Council would first consider and respond to public comments made
5. Feedback from the consultation will be collated by the council and key issues will be identified before the examination resumes. The Council will provide support and information on how to make a representation on the proposed changes to the Core Strategy through guidance material and a series of events across the district. Expectations must be managed through clearly stated objectives about what can and can't be influenced by the consultation.

Process Outline

6. Based on previous approaches to consultation and the scope of the consultation together with the timescale available, a basic process is outlined below:

| Consultation element | Detail |
|--------------------------|---|
| Open drop-in 'surgeries' | <p>The Core Activity. Open surgery events to be held at local venues across the district over the consultation period. These will provide an opportunity for residents and community groups to talk with council officers, understand the proposals, the examination and how to comment.</p> <p>The locations will be decided following the selection of locations for additional development by full Council. A maximum of 10 surgery events are planned within existing resources and staffing,</p> <p>An event with additional support on offer in terms of submitting responses to the Inspector is planned for an accessible location within Bath – this is in response to the Equalities Impact Assessment.</p> |

| | |
|-------------|--|
| Information | <p>Providing a regular flow of information across a range of channels and in a range of formats. Information will include:</p> <ul style="list-style-type: none"> - Website - Guidance on how to make representations and about the examination - Summary information - Mailouts - Media coverage - Local advertising of open surgeries - Council communication channels will be utilised e.g. e-mail bulletins, tweets and Council connect - Copies of documents will be placed in the deposit stations (Council libraries and key offices) |
| Press | <p>A full press briefing will be provided to coincide with the publication of the papers for full Council.</p> |