

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

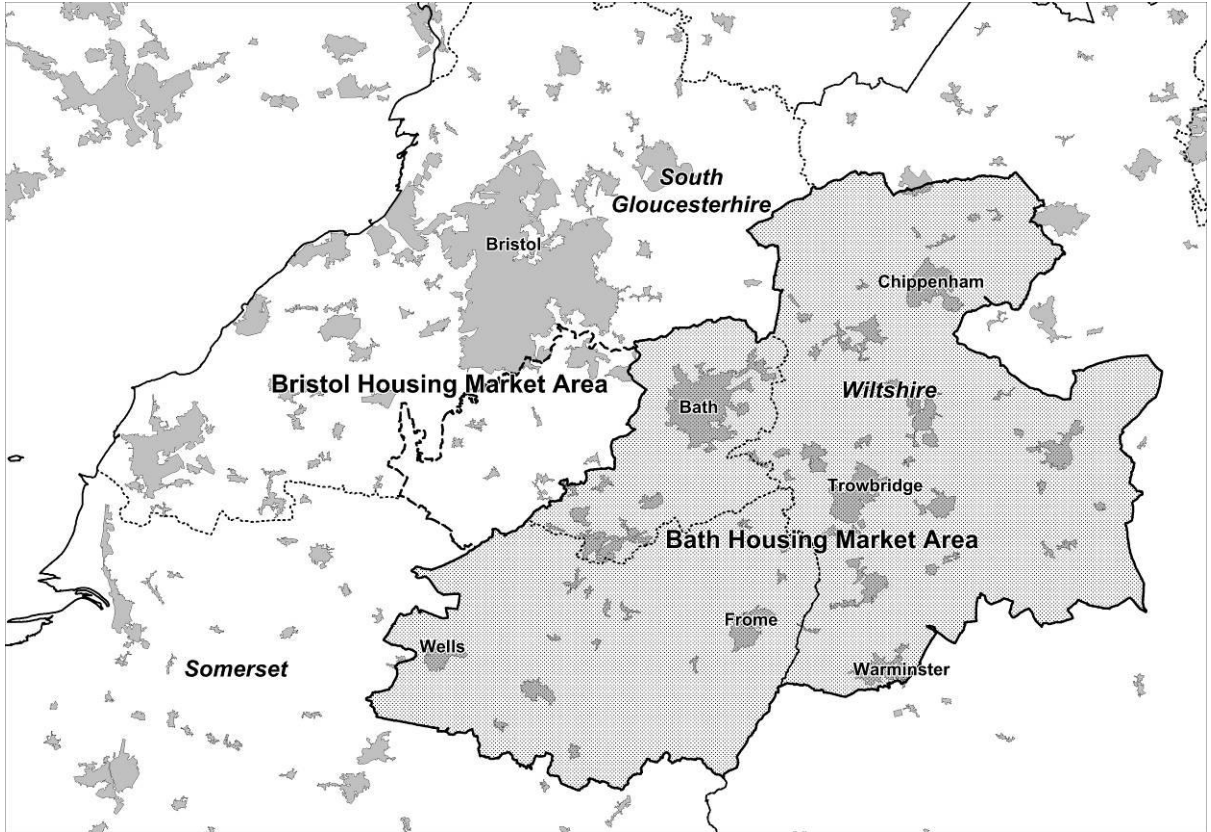
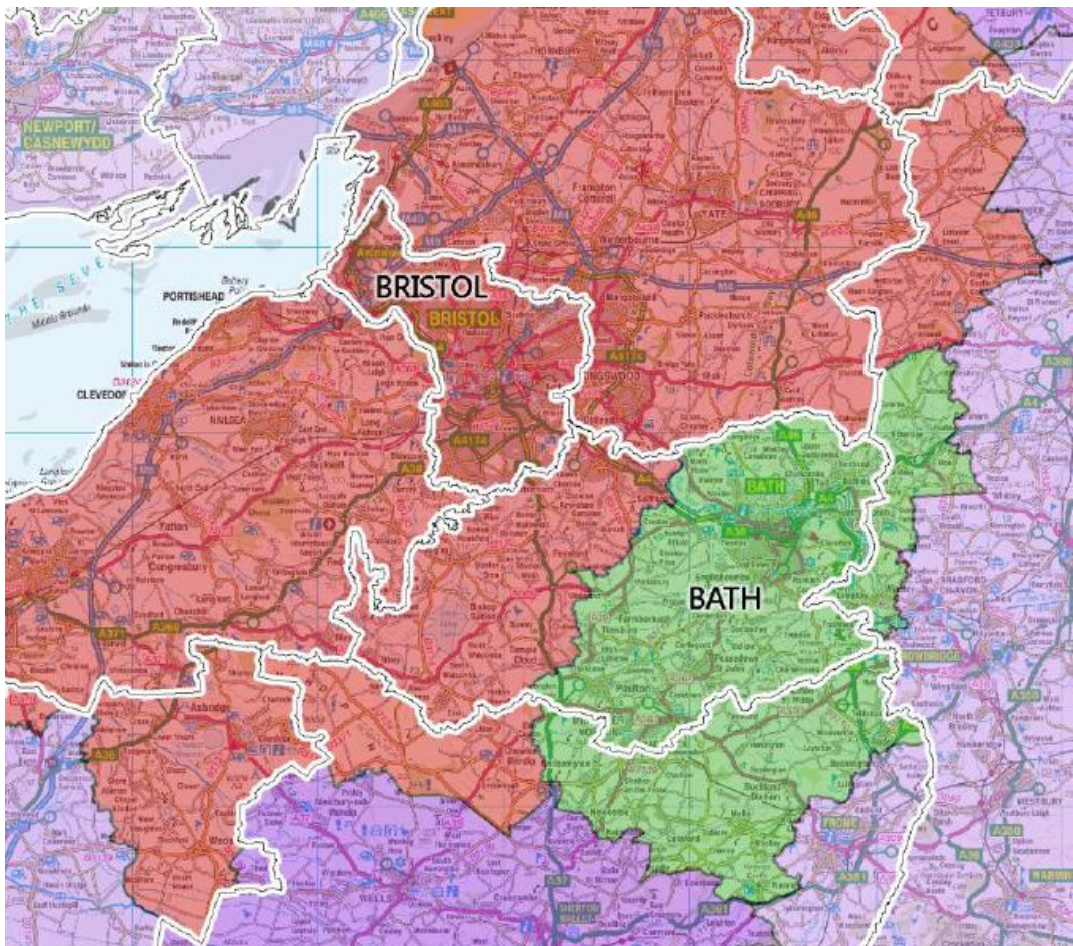


Figure 2: ORS SHMA Housing Market Areas



- 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.

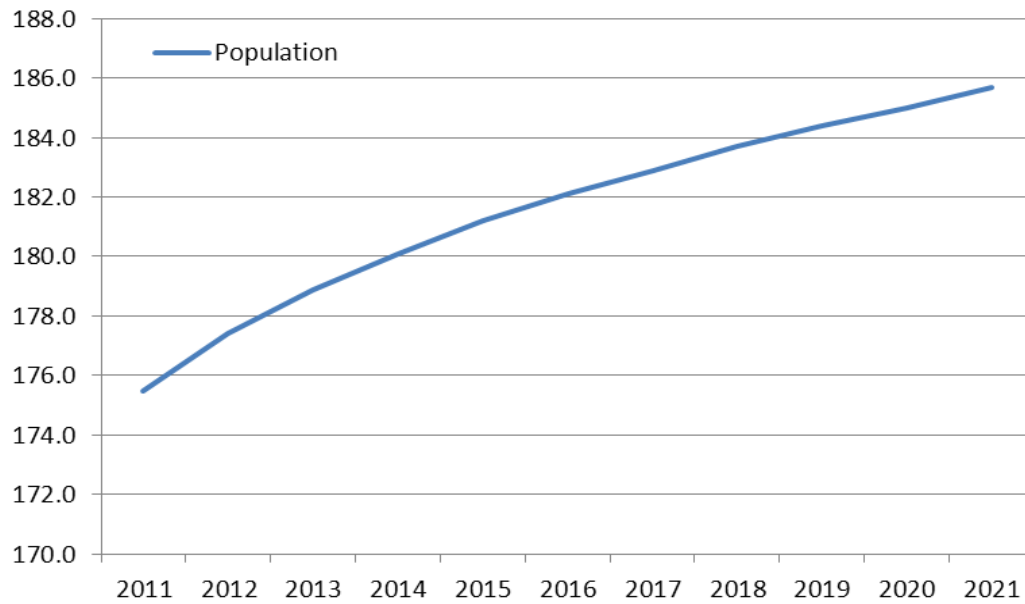
Developing Housing Growth Scenarios

- 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

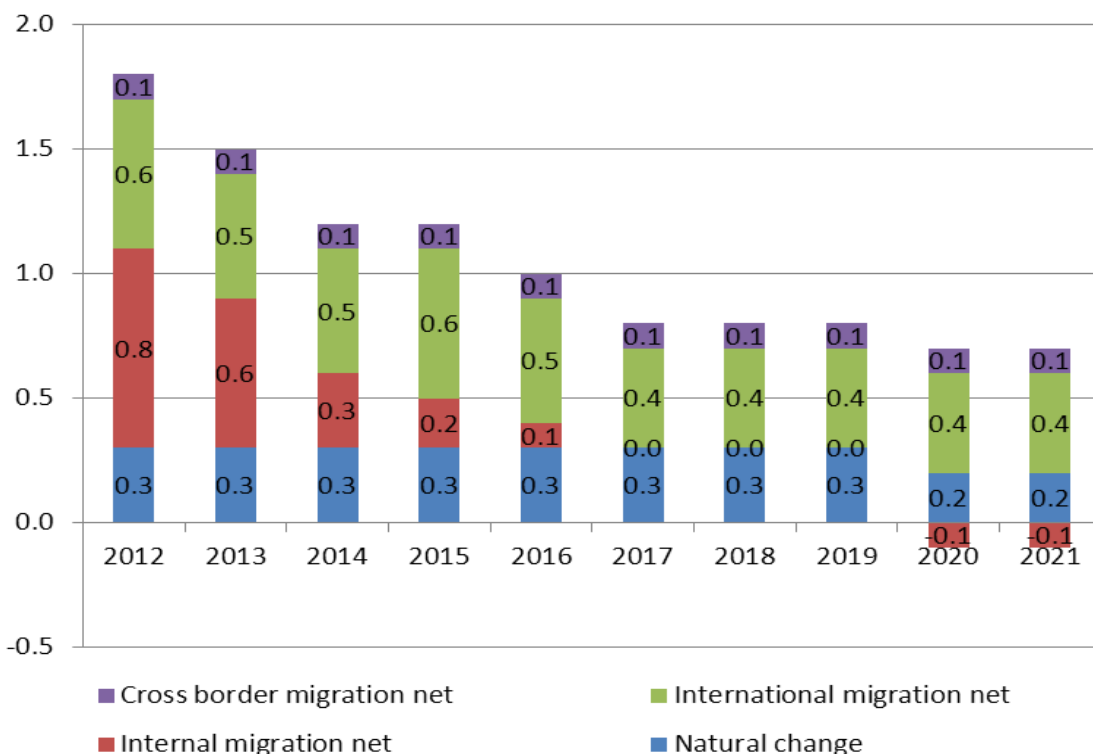
- 3.9 The only official population and household projections that run to 2029 are those that were published before the 2011 census was undertaken. These include 2008 based population and household projections and 2010 based population projections. The results of the census cast doubt on these projections 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.

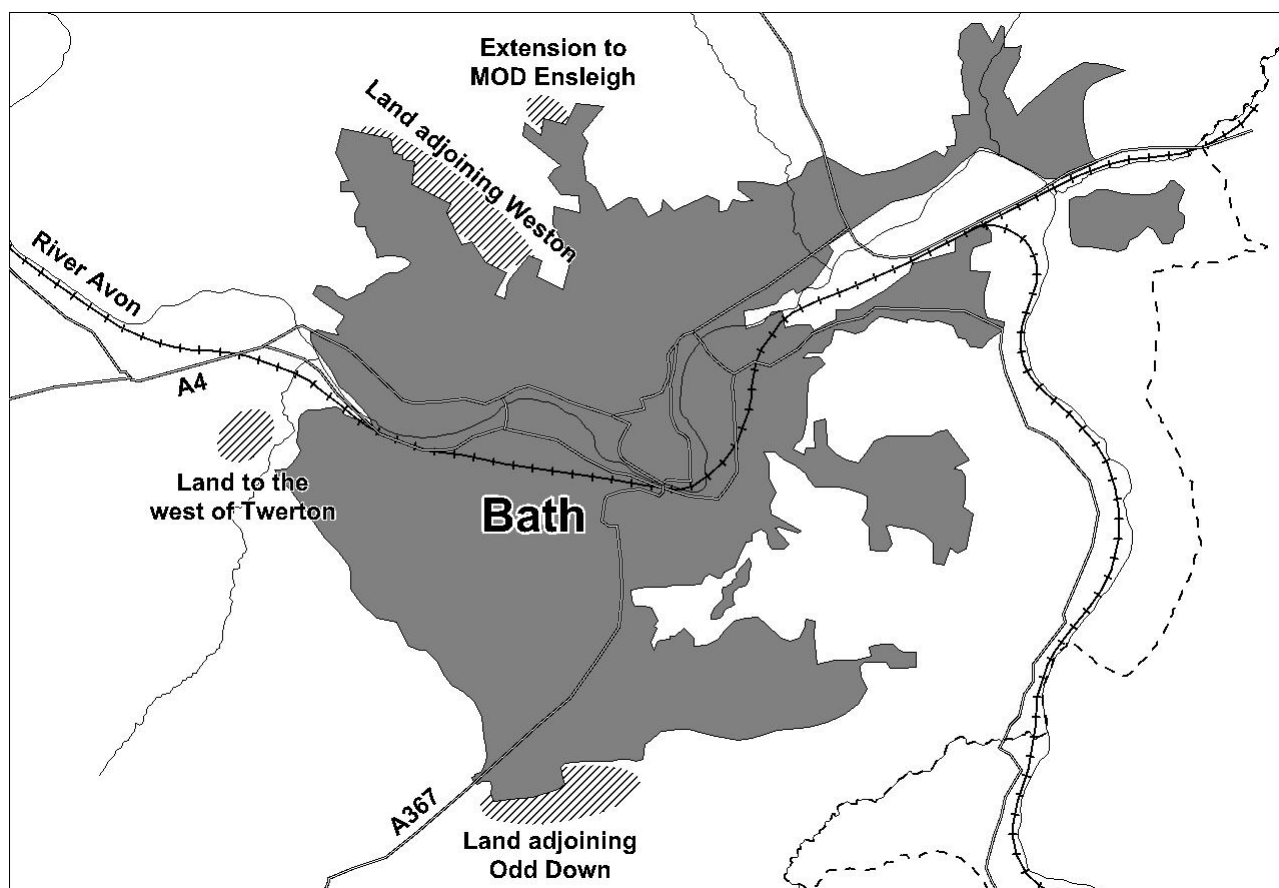
Bath

- 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.

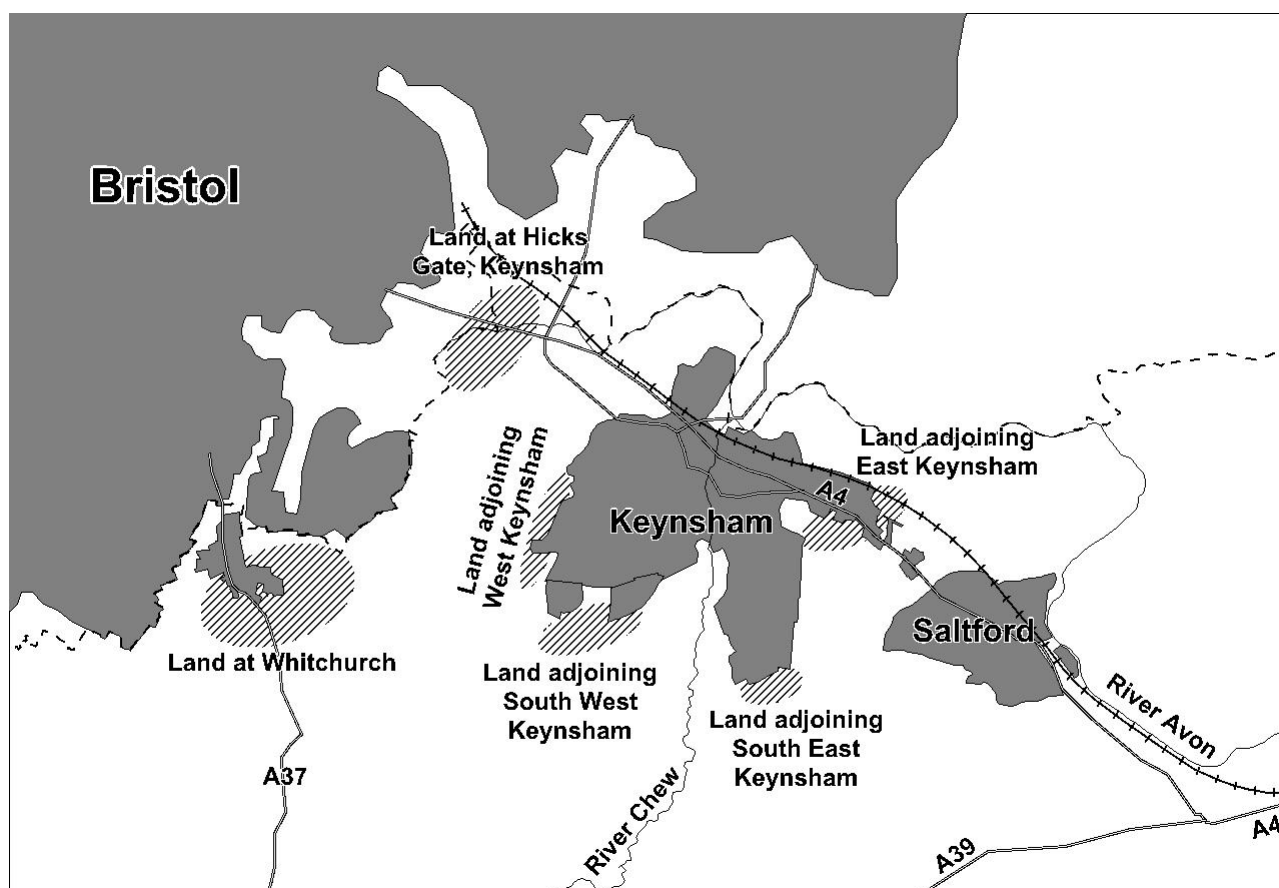
4.15 There options at Keynsham identified in the SA stage 2 analysis are;

- 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
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	<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.

<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

<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.

	<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 -

	<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.

	<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

<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
	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, Enleigh

- 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 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 detractors 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 extant 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
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