

Bath & North East Somerset Council		
MEETING:	Council	
MEETING DATE:	2 ND December 2010	AGENDA ITEM NUMBER
TITLE:	Bath & North East Somerset draft Core Strategy pre-Submission Document	
WARD:	ALL	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
Appendix 1: Options for Affordable Housing site size threshold		
Appendix 2: Draft Core Strategy Executive Summary		
Appendix 3: The draft Core Strategy can be accessed under the Local Development Framework heading in the Planning Policies section of the Environment and Planning pages on the Council's website via the attached link: Draft Core Strategy		

1 THE ISSUE

- 1.1 This report addresses the arrangements for the publication of the draft Core Strategy

2 RECOMMENDATION

- 2.1 That the Council :
- 2.2 agree the draft Core Strategy for public consultation (Appendix 3)
- 2.3 agree that the consultation period should run from 16/12/2010 to 3/01/2011
- 2.4 agree an approach to affordable housing site thresholds from the options recommended in Appendix 1
- 2.5 grant delegated authority to the Divisional Director for Planning and Transport, in consultation with the Cabinet Member for Service Delivery and the Group Leaders, and having sought advice from the Local Development Framework Steering Group, to;
- agree responses to the public comments received and
 - make changes which in his opinion are non-material to the Core Strategy

2.6 agree that following the public consultation, if there are no material changes to the Core Strategy, it is submitted to the Secretary of State for examination.

FINANCIAL IMPLICATIONS

- 2.1 The Core Strategy is being prepared within the budget agreed for the Local Development Framework in accordance with the Local Development Scheme.
- 2.2 The Core Strategy will have strategic implications for the district in that it will provide the basis for implementing the Council's long term economic growth aspirations for the district. It will have an impact on developer contributions and will determine the target for the forthcoming New Homes Bonus Scheme.

3 CORPORATE PRIORITIES

- 3.1 The Core Strategy will help to make Bath & North East Somerset a better place to live, work and visit and in particular will impact on the achievement of the Council's priorities as set out below. The draft Core Strategy also sets out how it will deliver the Sustainable Community Strategy drivers.

Council Priority	Impact of the Core Strategy
<i>Sustainable growth</i>	<i>Plays a critical role in establishing an appropriate level of growth for the district which meets the our economic aspirations whilst taking account of the particular context of the district</i>
<i>Improving the availability of Affordable Housing</i>	<i>Provides an up-to-date policy framework to maximise provision of affordable housing</i>
<i>Addressing the causes and effects of Climate Change</i>	<i>Sets out measures most appropriate within B&NES for responding to climate change and mitigating the impacts of climate change including the generation of renewable energy.</i>
<i>Improving transport and the public realm</i>	<i>Supports transportation investment and strongly encourages the use of more sustainable modes of travel. The Core Strategy advocates improvements to the districts public realm to help in achieving more successful and better places to live.</i>
<i>Building communities where people feel safe and secure</i>	<i>Prioritises the use and development of land in a way that enhances community well being.</i>
<i>Promoting the independence of older people</i>	<i>Requires that new housing meets the needs of all sectors of the community, especially taking into account the aging population</i>
<i>Improving life chances of disadvantaged teenagers and young people</i>	<i>Is the key Council document that enables sustainable growth throughout Bath and North East Somerset, for the benefit of all its residents.</i>
<i>Improving school buildings</i>	<i>Assists in securing financial contributions for a wide range of community facilities including schools..</i>

4 THE REPORT

Background

- 4.1 The Core Strategy is a key corporate document and is the spatial expression of the Sustainable Community Strategy as outlined in the table above. It will also help to deliver the Council's priorities in Council strategies such as the Economic Strategy and the Vision for Bath.
- 4.2 Whilst Core Strategies are required to conform generally with Regional Spatial Strategies (RSS), the Government intends to abolish RSSs through the Localism Bill and has re-iterated its advice to Local Authorities to have regard to this intention in their decision making. The draft RSS for the South West has not reached adoption and its underlying evidence base has been challenged. This change in circumstances has led to a review of the evidence underpinning the Core Strategy. As a consequence a revised spatial plan for the district has been prepared based on up-to-date evidence instead of the regionally imposed targets. This new basis for the Core Strategy is more deliverable and reflects the results of close working with local communities.
- 4.3 This has provided a new basis for preparing a spatial strategy in order to deliver the community's aspirations, secure funding and resist development proposals which conflict with the more realistic, deliverable and appropriate spatial strategy. There is particular benefit in progressing the Core Strategy in a timely way because the housing requirements in the existing Local Plan expire in March 2011 and without replacement figures in the Core Strategy, the unrevoked RSS may still be argued to carry weight.
- 4.4 A copy of the Government's Chief Planning Officer's letters dated 27 May 2010 and 10 November 2010 form background papers to this report and are available on the Council's website. It is understood that there may be further challenges to the Government's intention to abolish RSSs and in the event of there being further developments an update report will be prepared for this Meeting.

A new basis for the Core Strategy

- 4.5 The approach adopted by Bath & North East Somerset has included;
- a review of the land needed for development in light of revised prospects for economic and household growth taking account of the impact of the recent economic recession, changes in the local economy and revised population projections,
 - consideration of the comments that were received in response to previous consultations and close working with local groups and communities,
 - a re-assessment of the District's development land supply, taking particular account of the deliverability, environmental constraints and infrastructure provision,
 - taking account of the strategies and programmes of neighbouring authorities.

(NB See list of Background papers for more detailed list of evidence)

Core Strategy Preparation principles

- 4.6 The draft Core Strategy has been prepared in light of this new evidence base. It seeks to deliver the drivers in the Sustainable Community Strategy and the Council's priorities. Its preparation has been overseen by the Local Development Framework Steering Group and in line with statutory procedures relating to sustainability appraisal, public consultation. Preparation of the draft Core Strategy has entailed extensive community engagement including formal consultations as well as close working with community groups. Underpinning principles for the preparation of the Core Strategy have been to;
- prioritise brownfield land as far as possible
 - align new development with the necessary infrastructure
 - begin to address the jobs homes imbalance across the district

Affordable Housing

- 4.7 An outstanding issue relates to site size thresholds for securing affordable housing and four options are set out in Appendix 1 for consideration in order to finalise the affordable housing policy in the draft Core Strategy. The options arising from the deliberations of the LDF Steering Group are;
- **Option 1:**
Small Site threshold of 2 dwellings (or 0.1ha)
Large Site threshold of 10 dwellings (or 0.5ha).
 - **Option 2:**
Small Site threshold of 5 dwellings (or 0.25 ha)
Large Site threshold of 10 dwellings (or 0.5ha).
 - **Option 3:**
Small Site threshold of 10 dwellings (and site size 0.5 ha)
Large Site threshold of 15 dwellings (and site size 0.75ha)
 - **Option 4:**
Site threshold of 5 dwellings (and site size 0.25 ha)
Site threshold of 15 dwellings (and site size 0.75ha).

5 RISK MANAGEMENT

- 5.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance. A key risk is highlighted below.
- 5.2 A particular risk to highlight is the implication of delay. The Core Strategy is running a few months behind schedule due to the time needed to review the evidence base in light of the Governments' proposed abolition of the RSS and other delays. The recent High Court decision reversing the revocation of the RSS has resulted in the its re-instatement, albeit in draft form. However, following this High Court decision the Government have reiterated its intention to revoke RSSs through the Local Democracy, Economic Development and Construction Act 2009 and as stated in

paragraph 5.4. of this report if there are any further developments
Members will be advised of these in an update report.

- 5.3 The local plan housing figures expire in March 2011 and therefore timely progression of the Core Strategy avoids the creation of a policy vacuum particularly in relation to the level and location of development. Until the Council provides a new, up-to-date framework in the Core Strategy, the district will be vulnerable to planning proposals unconnected to the preferred overall strategy and potentially not properly aligned with infrastructure. It is considered that the Council's position will be further strengthened once the Core Strategy advances to submission stage in the first half of 2011.

6 EQUALITIES

- 6.1 An equalities impact assessment of the draft Core Strategy was carried out using corporate guidelines and involving officers from equalities and policy and partnerships. A similar assessment was also completed on the Spatial Options document. Overall impact on equality strands was considered to be positive, however opportunities for improvement were raised as actions. The actions arising from both assessments have been considered in the latest version of the draft Core Strategy.

7 CONSULTATION

- 7.1 *Ward Councillor; Cabinet Member; Parish Councils; Town Councils; Overview & Scrutiny Panel; Other B&NES Services; Service Users; Local Residents; Community Interest Groups; Youth Council; Stakeholders/Partners; Other Public Sector Bodies; Section 151 Finance Officer; Chief Executive; Monitoring Officer, LDF Steering group, Faith Groups*
- 7.2 Preparation of the draft Core Strategy has entailed extensive community engagement, both formal and informal. The issues report was published in September 2007 and the Options paper was published in October 2009. Around 3300 comments on the Spatial Options document were received from over 200 respondents.
- 7.3 Alongside these more formal consultations, the Council has worked with community groups, parish councils and local representatives in order to draw up a spatial framework which takes into account local aspirations and concerns but also which is evidence based and entails the formulation of a 'sound' Core Strategy. This front loaded approach is aimed at resolving as many issues as possible early in the process of preparing the Core Strategy.
- 7.4 If agreed by Council at this meeting, the Core Strategy will need to be published for public consultation. This stage of consultation is a more formal, focussed and statutory consultation than that undertaken previously. Respondents are required under the regulations to comment only in relation to legal compliance and soundness. It is therefore

inappropriate to repeat the broad programme of engagement activities undertaken earlier this year as part of the Options consultation. However, efforts will be made to publicise this consultation as widely as possible. The strategy for this consultation must comply with statutory requirements and the requirements of the Council's Statement of Community Involvement.

- 7.5 It is recommended that the draft Core Strategy is published for consultation as soon as possible in order to avoid further delay and the risks outlined in section 5 above. The earliest date considered practicable is the 16th December. The consultation period must run for at least six weeks and because consultation from the 16th December 2010 would include the Christmas period, it is recommended that the consultation is extended to seven weeks. This Consultation would therefore finish on 3rd February 2011.

Examination

- 7.6 The public comments received during the consultation must be submitted to the Inspector alongside the submission of the Core Strategy for public examination. The Council will also provide its responses to the key issues which arise. It may be that changes are needed to the Core Strategy arising from the Council's consideration of the public responses. In order to maintain the Core Strategy timetable and submit it to Government in Spring next year, delegated arrangements are sought to agree non-material changes to the Core Strategy for consideration by the Inspector. This delegation would be in consultation with the Group Leaders and the portfolio Member with advice from the Local Development Framework Steering Group which has overseen the preparation of the Core Strategy.
- 7.7 Any material changes which may arise would to the Core Strategy would require public consultation and will need to be agreed by Council with the consequent impact on the Core Strategy timetable.
- 7.8 The purpose of the examination is to determine whether the Core Strategy is sound. "Sound" means;
- based on evidence (including results of public consultation),
 - the most appropriate option selected in light of the alternatives,
 - prepared in accordance with statutory procedures of consultation and sustainability appraisal,
 - deliverable,
 - in conformity with the Sustainable Community Strategy
- 7.9 The Inspector's report is currently binding and the inspector can come to one of the following conclusions. That the Core Strategy is;
- sound and should be adopted by the Council
 - sound but requires minor amendments before adoption
 - unsound and must be prepared again

8 ISSUES TO CONSIDER IN REACHING THE DECISION

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

9 ADVICE SOUGHT

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

Contact person	<i>David Trigwell (Divisional Director - Planning and Transport) 01225 394125</i>	
BACKGROUND PAPERS		
Brighter Futures Community Plan		2007
Business Growth & Employment Land Study		March 2009
Business Growth & Employment Land Study update		June 2010
Code for Sustainable Homes		December 2006
Core Strategy Publication Version Consultation Statement		November 2010
Core Strategy Publication Version Equalities Impact Assessment		November 2010
Core Strategy Publication Version Habitat Regulations Assessment		November 2010
Core Strategy Publication Version Health Impact Assessment		November 2010
Core Strategy Sequential and Exception Tests Information Paper		November 2010
Core Strategy Publication Version Sustainability Appraisal		November 2010
Core Strategy Spatial Options		October 2009
Cotswolds AONB Management Plan		March 2008
Destination Management Plan		October 2007
District Heat Feasibility Study		November 2010
Economic Strategy		2010
English Heritage At-Risk Register		July 2010
Flood Risk Management Strategy		November 2010
Flood Risk Management Strategy – scoping study		May 2009
Future Housing Growth Requirements to 2026: Stage 2 Report		September 2010
Green Space Strategy		March 2007
Housing and Wellbeing Strategy		2010
Infrastructure Delivery Programme		December 2010
Keynsham Air Quality Management Area		July 2010
Keynsham Town Plan		2004
Local Economic Assessment		May 2010
Local Plan		October 2007
Letters from DCLG to Chief Planning Officers re Abolition of Regional Strategies		20/05/10 & 10/11/10
Making Space for Nature: A review of England's Wildlife Sites and Ecological Network		September 2010
Mendip Hills AONB Management Plan		2009
Planning Obligations SPD		July 2009
Public Realm and Movement Strategy: Creating the Canvas for Public Life in Bath		July 2010

Regeneration Delivery Plans	2010
Renewable Energy Research and Planning	June 2009
Renewable Energy Research Update	December 2010
Residential Review	December 2007
Responding to Infrastructure Delivery and Planning Issues in the West of England	May 2010
Retail Strategy	December 2008
Rural Landscapes of Bath and North East Somerset t SPD	2003
Single Conversation: West of England Delivery & Infrastructure Plan	March 2010
South West Nature Map	2007
Strategic Flood Risk Assessment Level 1	April 2008
Strategic Flood Risk Assessment Level 2 for Bath, Keynsham and Midsomer Norton/Radstock	May/July 2009
Strategic Housing Land Availability Assessment	December 2010
Strategy for 'Smart Economic Growth' Cabinet Report	3 rd November 2010
Student Accommodation Strategy	December 2010
Sustainable Community Strategy	2009
The Future for Bath and North East Somerset	2006
Three Dragons Viability Study	November 2010
UK Renewable Energy Strategy	July 2009
Visitor Accommodation Study	December 2009
West of England Infrastructure Delivery Plan	2009
West of England Strategic Housing Market Assessment	June 2009
Wider Bath and North East Somerset Business Plan	June 2006
WILDthings Biodiversity Action Plan	2006
World Heritage Site Setting Study	October 2009

APPENDIX 1: AFFORDABLE HOUSING SITE THRESHOLD OPTIONS

Introduction

Preparation of the Core Strategy has entailed a review the existing Local Plan policy approach. This has been overseen by the Local Development Framework Steering Group.

Current Policy (Local Plan)

The current policy is that development schemes in Bath, Keynsham, Norton-Radstock, Saltford, Peasedown St John and Paulton require an affordable housing contribution of 35% on sites of 15 or more dwellings (0.5 Ha site). In settlements where the population is 3000 or below, an affordable housing contribution is required on sites for 10 dwellings or more or where the site has an area of 0.5ha or more'.

Revisions to national policy and the new requirement to consider the viability impact of affordable housing policies mean that the existing policy is out of date and not supported by up-to-date evidence. For example, as new evidence shows that Bath relies significantly on smaller sites and is a higher value area, setting the threshold based on settlement size does not relate well to and is not justified by this evidence.

Revised Policy

The proposed new affordable housing policy is set out in Policy CP9 in the draft Core Strategy. The proposed policy approach is to seek on-site affordable housing provision on large sites and either on-site provision or financial contributions (commuted sums) on small sites. These commuted sums on small sites would be set at 50% of the equivalent value of providing affordable housing on-site to avoid discouraging these sites from coming forward. Allowing for both on-site or financial contributions on small sites enables flexibility as in some cases on-site provision may be the most appropriate options.

However, an outstanding issue is the site size thresholds. These site thresholds are either the number of dwellings or site size (in hectares), whichever is the lowest. The options are outlined in the table below.

New Evidence

The Council has undertaken a Viability Study working with leading development and housing viability specialists 'Three Dragons' which assessed the viability impacts of affordable housing policy options and thresholds. The Council must consider the impact of setting thresholds on the delivery of housing development and should also consider practical implementation issues.

The national indicative minimum site size threshold for affordable housing is 15 dwellings; however, Local Planning Authorities can set lower minimum thresholds where needed, viable and practicable. By reducing site size thresholds and 'capturing' more sites from which affordable housing can be sought, the authority can potentially increase the amount of affordable housing delivered through the planning system. However the impact on the delivery and viability of new housing must be taken into account. The following evidence is highlighted:

- Analysis of recent permissions in B&NES (2007-2010) shows that 47% of schemes with planning permission were for fewer than 15 dwellings and 39% were for schemes of fewer than 10 dwellings. This suggests that we have the opportunity to increase the delivery of affordable housing by revising the threshold

downwards. Therefore, if the site threshold is reduced from 15 to 10 dwellings it is estimated that based on current trends that an additional 8% of schemes would be contributing towards affordable housing on-site. This would lead to the delivery of around 3,000 new affordable dwellings during the plan period (NB this includes existing commitments). Additional contributions via commuted sums could also be sought for sites below 10 dwellings which would contribute further to affordable housing delivery.

- Analysis on a geographical basis shows that within Bath small sites make a significant contribution to housing completions, with 57% of all dwellings being built on schemes of less than 15 dwellings. This suggests that reducing the site size threshold for affordable housing will enable an increase in affordable housing delivery particularly within Bath, which is the highest value area and has the greatest affordable housing need. This is particularly importance in a context where the level of grant available for affordable housing is reduced.

POLICY OPTIONS	IMPLICATIONS
<p>Option 1:</p> <p>Small Site threshold of 2 dwellings (or 0.1ha)</p> <p>Large Site threshold of 10 dwellings (or 0.5ha).</p>	<p>The evidence shows that even the smallest of sites are sufficiently viable to make a contribution to affordable housing contributions. However, this option excludes self build by applying a minimum threshold of 2 dwellings.</p> <p>A commuted sum would be often be sought for sites of less that 10 dwellings as there may be practical issues associated with delivering affordable housing on smaller sites. This commuted sum would be set at a reasonable level so as to avoid viability challenge on the vast majority of small sites.</p> <p>This reduced threshold would increase the level of affordable housing negotiations for case officers and may be onerous for very small housebuilders, but would result in the optimised delivery of affordable housing through the planning system enabling the Council to secure financial contributions on an additional 37% of all residential schemes (based on planning permission trend-data from 2007-10).</p>
<p>Option 2:</p> <p>Small Site threshold of 5 dwellings (or 0.25 ha)</p> <p>Large Site threshold of 10 dwellings (or 0.5ha).</p>	<p>A threshold of 5 is not untypical for some local authorities. This approach recognises the demand on resources involved in affordable housing negotiations on virtually all sites. However, should the Council decide to pursue a lower (than 5 unit) threshold, the Three Dragons <i>Viability Study</i> would support that position.</p> <p>This approach would decrease the time spent on negotiation compared to option 2, but would still require negotiations with small scale developers dealing with sites of 5 and above.</p> <p>It would deliver more affordable housing with an estimated extra 21% of dwellings would be covered when compared with the current policy thresholds contained in option 2 but less than option 3.</p>
<p>Option 3:</p> <p>Small Site threshold of 10 dwellings (and site size 0.5 ha)</p> <p>Large Site threshold of 15 dwellings (and site size 0.75ha)</p>	<p>This approach gains additional commuted sum contributions from schemes with 10-15 dwellings. This option will deliver more affordable housing on an estimated extra 8% of developments across the district. This option reflects the national policy minimum site size on which affordable housing can be sought.</p> <p>This is a relaxation of the current Local Plan approach and evidence shows that 39% of development sites fall below the threshold of 10 dwellings (2007-10), so the Council would still be missing out on contributions from a significant number of sites.</p>

<p>Option 4:</p> <p>Site threshold of 5 dwellings (and site size 0.25 ha)</p> <p>Site threshold of 15 dwellings (and site size 0.75ha).</p>	<p>This option increases the level of commuted sums that could be sought. With a threshold of 15 dwellings for on-site delivery and commuted sums at a reasonable level sought for sites between 5 and 15 dwellings. These additional finances would be put in a dedicated affordable housing ‘funding pot’ to be spent on schemes across the district as the Council considered appropriate.</p> <p>Commuted sums would be sought on 29% of residential schemes (based on planning permission trend-data from 2007-10).With significant reductions in grant funding available these funds could be used flexibly to help deliver affordable housing schemes.</p>
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Summary of affordable housing site threshold options

	Option 1 Low Site Size Thresholds	Option 2 Low large site/medium small site size thresholds	Option 3 High site size thresholds	Option 4 High large site / low small site thresholds	
number of dwellings	15+				
	15				
	14				
	13				
	12				
	11				
	10+				
	10				
	9				
	8				
	7				
	6				
	5				
	4				
	3	none	none	none	none
	2	none	none	none	none
	1	no affordable housing contribution sought where single/replacement dwelling proposed			

KEY:

 Large Sites

 Small Sites

APPENDIX 2

DRAFT BATH & NORTH EAST SOMERSET DRAFT CORE STRATEGY

EXECUTIVE SUMMARY

1.0 INTRODUCTION

- 1.1 The Core Strategy is a key policy document for Bath & North East Somerset (B&NES) that puts in place a strategic planning framework to guide change and development in the District over the next 20 years and beyond.
- 1.2 The Core Strategy is the spatial expression of the Bath & North East Somerset Sustainable Community Strategy, and is shaped by the challenges that are specific to the district and the aspirations of its communities. It addresses a number of local concerns, notably the health and wellbeing, community safety, and stronger communities agendas. Also of particular significance is the 'Futures for Bath, Keynsham and the Somer Valley' work which set out the Council's long-term regeneration aspirations for the main urban centres within the District.
- 1.3 The Core Strategy does not set out site-specific proposals; instead it looks at the broad locations for delivering new development. Policies in the Core Strategy do not overlap with each other and therefore, the Core Strategy should be read as a whole. The Core Strategy is the primary document in the Local Development Framework (LDF). The LDF includes other documents, some of which are under preparation. Of note are the Placemaking Plan which will cover site allocations, detailed development management policies as well as local designations for the different places within the district. The structure of the Core Strategy is illustrated in Diagram 1 below.

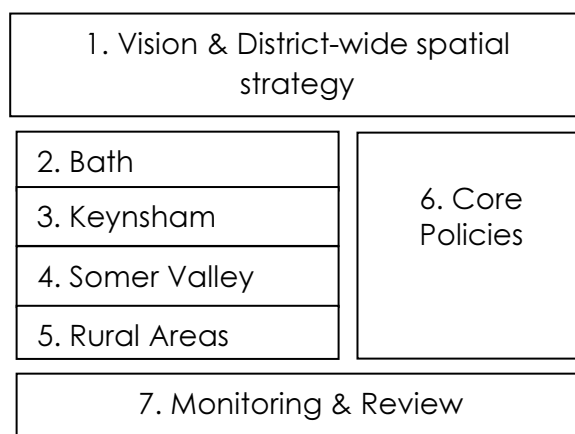


Diagram 1: Structure of the Core Strategy document

3.0 CORE STRATEGY PRINCIPLES

- 3.1 Proposals to abolish the Regional Spatial Strategy (RSS) has necessitated a move away from regionally imposed targets and prepare a strategy more appropriately suited to local circumstances. Formulation of this new overarching policy framework for the District has entailed analysis of up-to-date evidence, assessment

of different options to meet the objectives, engaging with local communities, consideration of environmental impacts, assessing deliverability and co-ordination with neighbouring authorities. It must implement local ambitions as set out in the Sustainable Community Strategy.

- 3.2 Underpinning principles for the preparation of the Core Strategy have been to;
- prioritise brownfield land as far as possible
 - align new development with the necessary infrastructure
 - begin to address the jobs homes imbalance across the district
- 3.3 **Development land supply:** A detailed review has been undertaken of the capacity of the District's settlements for delivery of new housing, jobs and community facilities. This has included identifying suitable and deliverable development sites, understanding the environmental constraints, assessing the appropriate mix of uses and densities and ensuring the necessary infrastructure is in place or can be secured to deliver mixed and balanced communities. Deliverability takes into account viability. It has also looked at the opportunities to re-use empty homes and under-used properties. This analysis is set out in, in part, the Strategic Housing Land Availability Assessment (SHLAA)
- 3.4 **Infrastructure:** An underlying principle in the preparation of the Core Strategy has been the need for new development to be well aligned with the necessary infrastructure, including transport, schools, recreational need and green infrastructure. The Infrastructure Delivery Plan provides an assessment of the infrastructure provision to underpin the spatial strategy.
- 3.5 **Environment:** The district is renowned for its outstanding environment. The environmental impact of various policy proposals and alternative options have been assessed through the sustainability appraisal, the Habitats Regulation Assessment (HRA) and locational studies.
- 3.6 **Climate Change:** The Council has assessed planning measures needed in response to climate change. This includes an assessment of renewable energy generation potential and a flood mitigation strategy.
- 3.7 **The Local communities:** National policy require that the results of public engagement should be treated as evidence. The preparation of the Core Strategy has therefore entailed close working with local groups and communities in order to understand local priorities. This has included various economic, environment and community groups in Bath, the Somer Valley partnership, the Keynsham Development Advisory Group as well as parish and town councils and interest groups. Development must be inspired by the characters and values of each place within the District.
- 3.8 **Development need:** The Council has also undertaken assessments of development need within the district during the plan-period. This includes assessing the space needed for economic growth, housing, retail provision and social needs. This takes account of the Council's objective of promotion of a higher value economy rather than only volume growth. In terms of housing need, the Council has assessed the post recession likely need for new housing, both market and affordable housing, over the plan period up to 2026 based on:

- Projected population change arising from births over deaths and increasing life expectancy
- The likely housing requirement this entails, including rapid decline in household size and separation rates
- The need for housing generated by economic growth (net migration), taking into account likely economic growth rate, productivity changes and sectoral changes,
- provision for non-economically active migrants

3.9 In terms of affordable housing need, Bath has one of the widest house price to earnings ratios outside of London but affordability varies across the district. The Council has therefore undertaken a viability study to inform a new policy framework on securing affordable housing through the planning system.

3.10 **Sub-regional context:** The Spatial strategy for B&NES must be consistent with the strategies and programmes of neighbouring authorities, especially in the West of England.

4.0 SUMMARY OF THE STRATEGY FOR BATH & NORTH EAST SOMERSET

4.1 **Scale and location of growth:** The Core Strategy makes provision for around 11,000 new homes and around 8,700 new jobs. This level of growth excludes “windfall” housing development. Infrastructure deficiencies, environmental constraints and the results of community engagement together affect the level of growth. The strategy is to locate new development in the most sustainable locations and therefore the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley. The level of development delivered through this approach equates with the future likely need for development but it is acknowledged that the District’s particular circumstances constrain the space available. However the Council’s policy of ‘smart growth’ provides scope for pursuing high levels of economic growth without departing from the locational strategy. The broad spatial principles are summarised below and elaborated in the Draft Core Strategy.

4.2 The Core Strategy retains the Green Belt and no changes are proposed to the general extent of the Green Belt, either extensions or deletions.

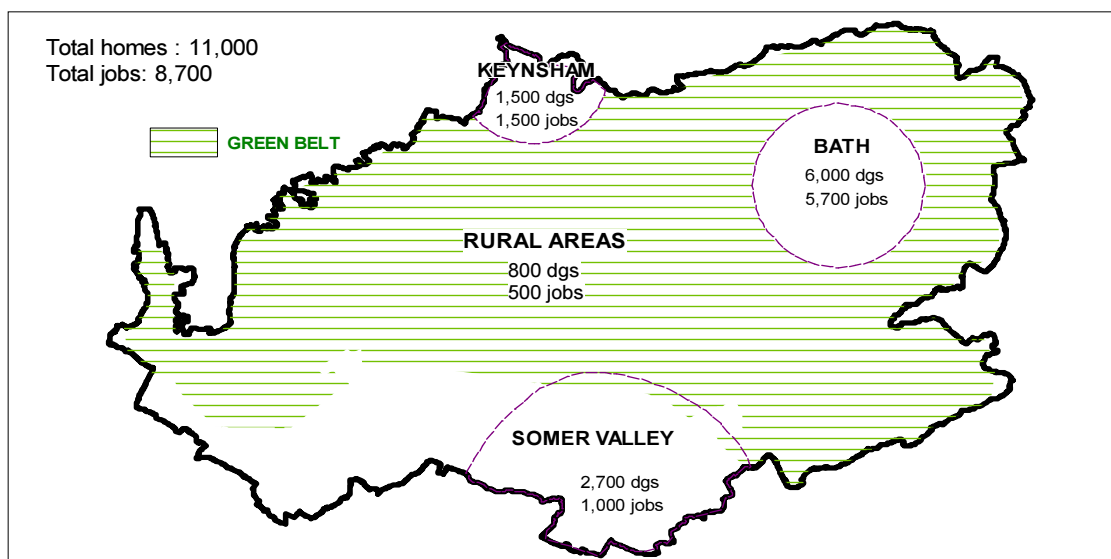


Diagram 2: Locational Distribution of development

SPATIAL STRATEGY FOR BATH

5.0 Key Challenges for Bath include;

- Bath's WHS status can make a positive contribution in driving growth and development. It can act as an incentive to and enabler of growth - however it does require that change is managed sensitively and high quality design is pursued.
- The need to diversify the economy to avoid over-reliance on a few sectors and the need for modern office space and other workspaces within and adjoining the city centre to accommodate growing enterprises and attract higher value jobs.
- Increasing the contribution of the universities to the economy as sources of creativity, innovation and labour.
- Provide for industrial enterprise to sustain a mixed economy for a multi skilled workforce.
- The high cost of housing relative to average wages, high levels of in-commuting. and significant need for affordable housing
- Imbalance in the ratio between the resident workforce (39,000) and jobs (59,000) and the fact that 30% of the resident workforce work outside Bath.
- areas of derelict or underperforming land within the city
- Need for city centre public realm improvements and a better relationship is needed between the city and its river.
- Various factors, including climate change, the price of energy, congestion and pollution on key radial routes, mean that planning and transport policies must enable people to travel around the city with less environment impact.
- Bats are protected under European and UK legislation and care must be taken to ensure that the impact on bats of change and development is taken into account.

The Vision for Bath

Bath's natural, historic and cultural assets, which combine to create a unique sense of place, of international significance, will be secured and enhanced to maintain the city's key competitive advantage and unique selling point as a high quality environment in which to reside, locate and grow a business, visit and invest.

The scope to further improve Bath's environmental quality will form the foundation of efforts boost the city's profile as a more competitive and low carbon economic centre. The realisation of range of development opportunities within the Central Area and Western Corridor will greatly improve the city aesthetically and also enable Bath to position itself as a more entrepreneurial, innovative, creative and business friendly place. Economic development and productivity will therefore be stimulated and facilitated, whilst simultaneously upgrading inherited townscape.

Alongside measures to mitigate and adapt to climate change, the diversification and growth of a low carbon economy are the key changes that are sought for Bath.

The delivery of new housing on brownfield sites will help to create a more sustainable relationship between the city's labour and jobs markets and support Bath's economic potential whilst retaining the integrity of its landscape setting. Parallel investment in public transport infrastructure and walking and cycling will keep the city moving and enable more sustainable travel choices to be made.

Bath's already strong identity as a therapeutic place will be enhanced by boosting its performance as an enjoyable city for leisure, recreation and shopping with a vivacious cultural scene and a highly valued green infrastructure network.

SUMMARY OF THE STRATEGY FOR BATH

Overview

- 5.1 The spatial strategy for the city is depicted on the Diagram 2 below and shows that change will occur primarily the Central Area and Western Corridor. There will be no strategic change to the Green Belt surrounding the City. The strategy plans for growth of about 5,700 jobs and 6,000 new homes.

Central area and Western Corridor

- 5.2 The strategy will enable the expansion of key employment sectors through the development of modern office space within and adjoining the city centre. Industrial land is retained in the Newbridge - Riverside area to sustain a mixed economy to support Bath's multi skilled workforce. The strategy does not vary the principles that have been established to enable the residential-led regeneration of Western Riverside.
- 5.3 The Strategy seeks to achieve a better balance between the overall number of jobs in the city and the resident workforce. An uplift in housing and the associated growth of the labour force could reduce the need for labour to commute inwards. Economic diversification could reduce the need for a significant minority of workers to out-commute to other areas.
- 5.4 The approach to comparison retail is to ensure that Southgate is absorbed into the trading patterns by only allowing for small to medium sized retail development that can demonstrate a complimentary role. In line with national planning policy, convenience retail floorspace (beyond existing commitments) will be focussed within and on the edge of existing centres before considering out-of-centre sites.
- 5.5 The Central area includes the city centre and adjoining locations such as South Keys and BWR East and the Rec. Within this broad zone, the Core Strategy provides for new hotel space, a new rugby stadium and a cultural/performance/arts venue. This

will entail the change of use sites within the central area such as existing car parks and will be accompanied by improvements to the public realm.

- 5.6 In light of the fact that some of Bath's key development locations lie within the river corridor, the Council has demonstrated that there are no reasonably available locations with a lower probability of flooding appropriate to the type of development proposed. The spatial strategy is also underpinned by a flood risk management strategy which entails an upstream flood storage area and also on-site flood defence measures.

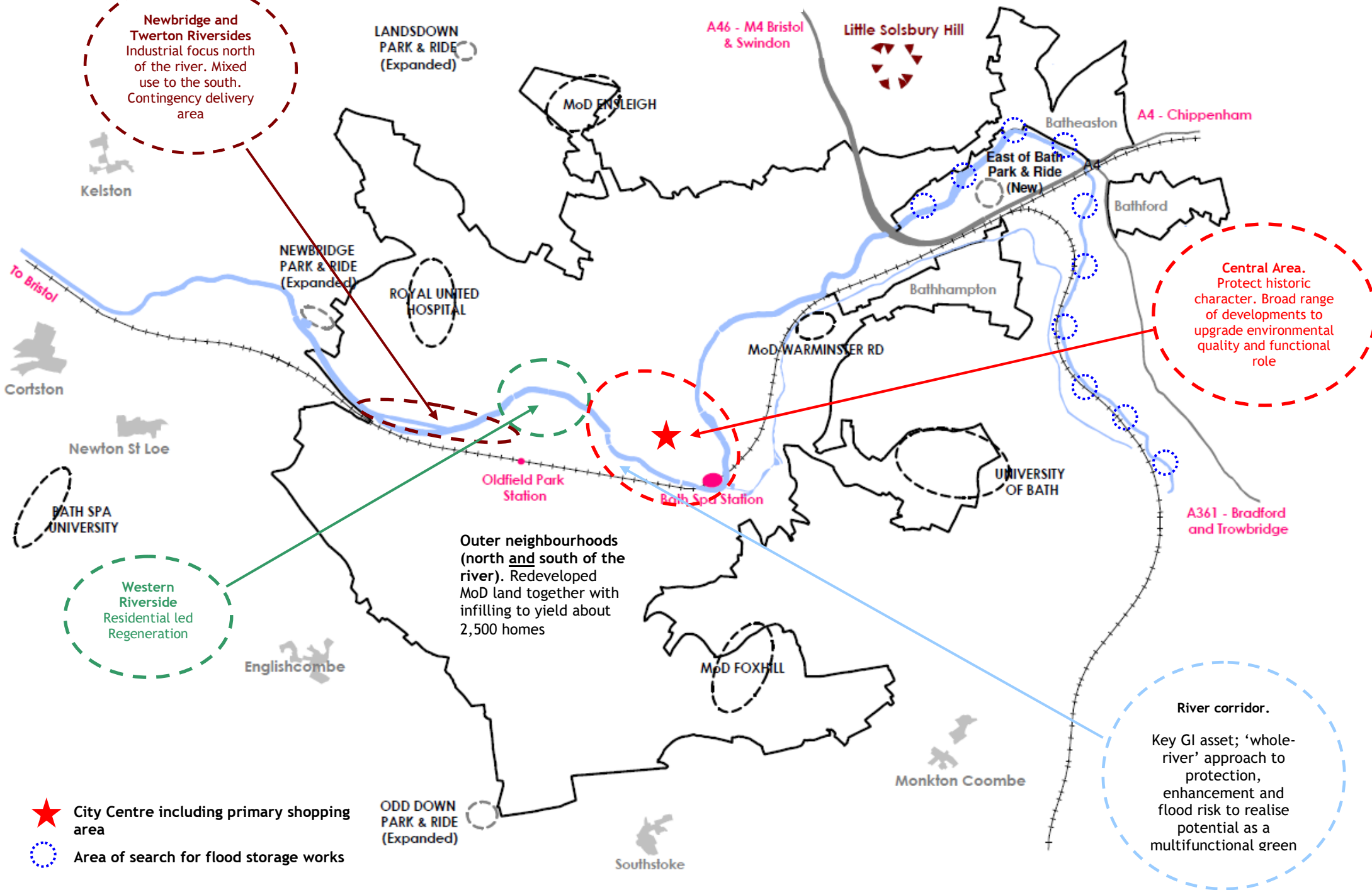
Outer Bath

- 5.7 In the outer Bath neighbourhoods, the Core Strategy does not plan for significant change other than redevelopment of large sites such as surplus Ministry of Defence land. District and local centres will be protected. In relation to Further Education, the policy framework enables the growth of on campus and in-city teaching and research space and also the provision for additional on-campus student bed spaces, enabling growth in the overall number of students. This approach seeks to limit future losses of family accommodation to student housing and facilitate the stabilisation and potential shrinkage of the private lettings market.

Infrastructure and Delivery

- 5.8 The strategy for Bath requires the implementation of necessary transport and other infrastructure including a rejuvenated public transport interchange and improvements to Bath Spa Rail Station. The delivery programme and funding arrangements are set out in more detail in the Infrastructure Delivery Plan.

Diagram 3: Spatial Strategy for Bath



Key Issues in Keynsham;

6.0 Previous consultation has highlighted a number of key issues facing the town:

- Recent and future job losses
- Desire for town centre regeneration
- Affordable housing shortage
- Ageing population
- Traffic congestion & unreliable public transport
- Lack of allotments
- Insufficient emphasis to protecting Keynsham's heritage
- Sewage and stormwater capacity issues
- desire to retain the separate identity of Keynsham & protect the Green Belt

The Vision for Keynsham

Keynsham is a historic town that occupies a strategically important location between Bristol and Bath and is therefore well placed to improve and attract investment. It will continue to act as a market town and service centre for the surrounding area. In responding to the loss of a major employer, it will evolve as a more significant business location. Keynsham will retain its independence and its separate identity within an attractive rural setting. It will become a more sustainable, desirable and well connected place in which to live and work, with an enhanced town centre inspired by its heritage, cherished rivers, park and green spaces.

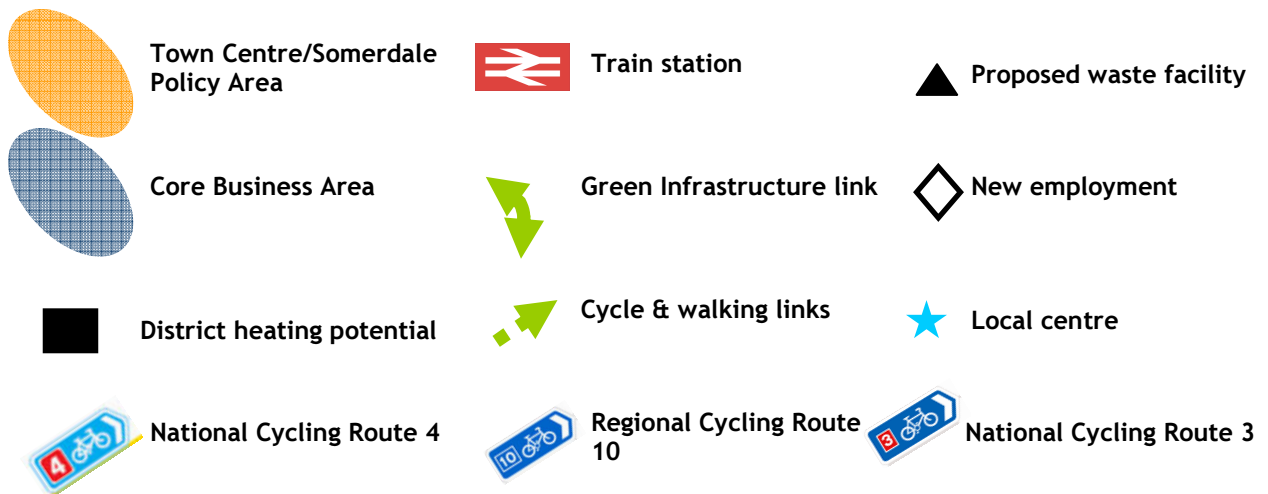
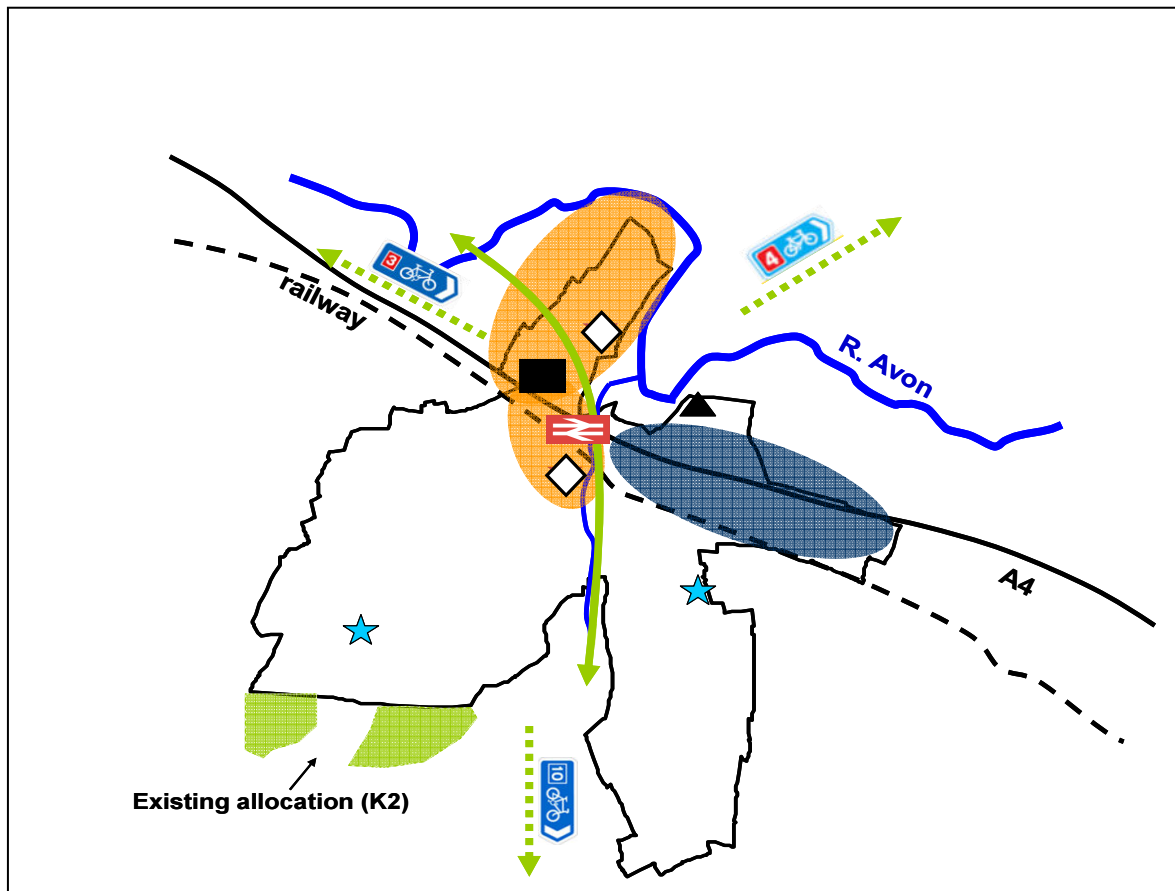
SUMMARY OF THE STRATEGY FOR KEYNSHAM

- 6.1 The spatial strategy for Keynsham, as depicted diagram 4 , focuses change in the town centre and Somerdale. No changes are proposed to the Green Belt boundary around the town. The Core Strategy seeks to address the significant in and out-commuting by promoting the type of employment growth which matches the needs of the resident workers. To achieve this, business space is made available within the town to enable it to become a more significant business location.
- 6.2 The Core Strategy makes provision for around 1,500 new homes of which around 800 homes are already committed. The remaining 700 dwellings are directed towards the town centre and Somerdale. Provision is made for around 1,500 net additional jobs and the Broadmead/Ashmead/Pixash Industrial Estate will; be retained as an area for business activity (use classes B1, B2 and B8) complementing the role of the town centre and enable its intensification through higher density business development. Somerdale is key to the realisation of the strategy for Keynsham and its redevelopment should provide a new high quality, exemplar, mixed-use quarter providing significant employment floorspace and new homes.

6.4 The Strategy provides for larger retail units in the town centre to attract a more varied mix of retailers and protects Queens Road and Chandag Road as local centres because they are an important range of essential day-to-day goods and services for their local neighbourhoods.

- 6.5 Infrastructure required at Keynsham to support this strategy includes;
- Flood protection measures at Somerdale
 - Major Improvements to improve sewerage capacity
 - Secondary road access to the Somerdale site
 - Improvements to Keynsham Train Station and Enhanced Service Frequency
 - improvements to public transport and enhanced connectivity between cycling, public transport and walking routes.

Diagram 4: Spatial Strategy for Keynsham



- 7.0 The Somer Valley Area includes Midsomer Norton, Radstock, Peasedown St John, Paulton, Shoscombe, Camerton, Timsbury, High Littleton and Farrington Gurney. The rural areas section also contains policies which also apply to the villages in the Somer Valley.
- 7.1 Engagement with local communities and research have highlighted a number of key issues facing the town:

Key Challenges

- Vulnerable local economy dependent on a narrow range of industries and a few large employers & a number of large vacant, underused or aging factory sites
- High levels of out-commuting due to lack of local employment opportunities
- Perceived difficulty in attracting economic investment in the area
- Transport congestion and limited opportunities for large scale transport intervention & poor public transport in rural areas
- Competition with neighbouring towns – mixed quality of Midsomer Norton town centre, dominance of road network in Radstock centre
- Access to community facilities – maintaining and enhancing local village centres services
- High level of existing housing commitments i.e. 2,200 dwellings exacerbating imbalance of housing over jobs.
- Lack of formal open space.
- Poor town centre environments and insufficient retail offer

Strengths

- Outstanding natural environment within & surrounding the towns
- Mining heritage provides a basis for recreation (disused rail lines) & tourism (especially Radstock)
- Critical mass of a combined Somer Valley area offers greater potential than towns and villages individually
- Active local communities and existing community networks
- a local hospital and good schools
- Relative lower cost of housing compared to elsewhere in the district
- Basis of a good cycle network

SUMMARY OF THE STRATEGY FOR SOMER VALLEY

Overview

- 7.3 The spatial strategy for the Somer Valley, as depicted in Diagram 4, is to prioritise development on brownfield sites and focus on Midsomer Norton and Radstock Centres and the redevelopment of vacant and underused industrial land. Greenfield development above existing employment and housing commitments will be limited.
- 7.4 The strategy enables up to 2,700 new homes to be built within the Somer Valley but any new housing over and above the 2,200 existing commitments must have employment benefit or facilitate the implementation of the Town Park. New housing provision in Paulton and Peasedown is limited. St. John in light of significant level of housing development committed in these villages.

The Vision for the Somer Valley

'The southern part of the District will become more self-reliant, facilitated by economic-led revitalisation alongside local energy generation, building on its industrial expertise and improving skill levels. Transport connections to other centres, as well as connections between settlements within the Somer Valley area will continue to be improved.

The roles of Midsomer Norton and Radstock Town Centres will be complementary, providing key employment opportunities, services and leisure provision to the communities in the Somer Valley area. Midsomer Norton town centre will continue to be the principal centre with an improved public realm and enhanced townscape and a Town Park. Radstock will continue to provide a focal point for local communities and realise its potential for tourism based on its green infrastructure, mining heritage cycle ways and attractive rural hinterland.

Villages of the Somer Valley will continue to provide for the needs of their local communities.

- 7.5 The Strategy enables the delivery of around 1,000 new jobs through the completion of existing industrial estates and the implementation of the large allocation at Old Mills. Existing business land will be protected and alternative uses are only allowed where there is employment benefit or which contributes to improvements to the town centres and does not lead to an unacceptable loss of employment land.
- 7.6 Improvements of the public realm in the town centres and strengthening the shopping offer in Midsomer Norton town centre will have economic benefits. Out of town shopping proposals will be resisted and the retail role of local centres in Westfield, Paulton and Peasedown St John and elsewhere will be protected.
- 7.7 A key aspect of the strategy for the area is the implementation of the Town Park which may require limited housing development to realise the scheme. Proposals to improve the cycle network will continue.
- 7.8 Key Infrastructure includes the Greater Bristol Bus Network A37 Bristol to Midsomer Norton and Bath and Bath to Midsomer Norton & Radstock. The Core Strategy recognises the limited opportunity for significant transport interventions. Therefore there is a reliance on Encouraging “**Smarter choices**” to facilitate increased movement by sustainable modes of transport. These measures include Travel Plans, Community transport; implementation of Sustainable Transport Routes

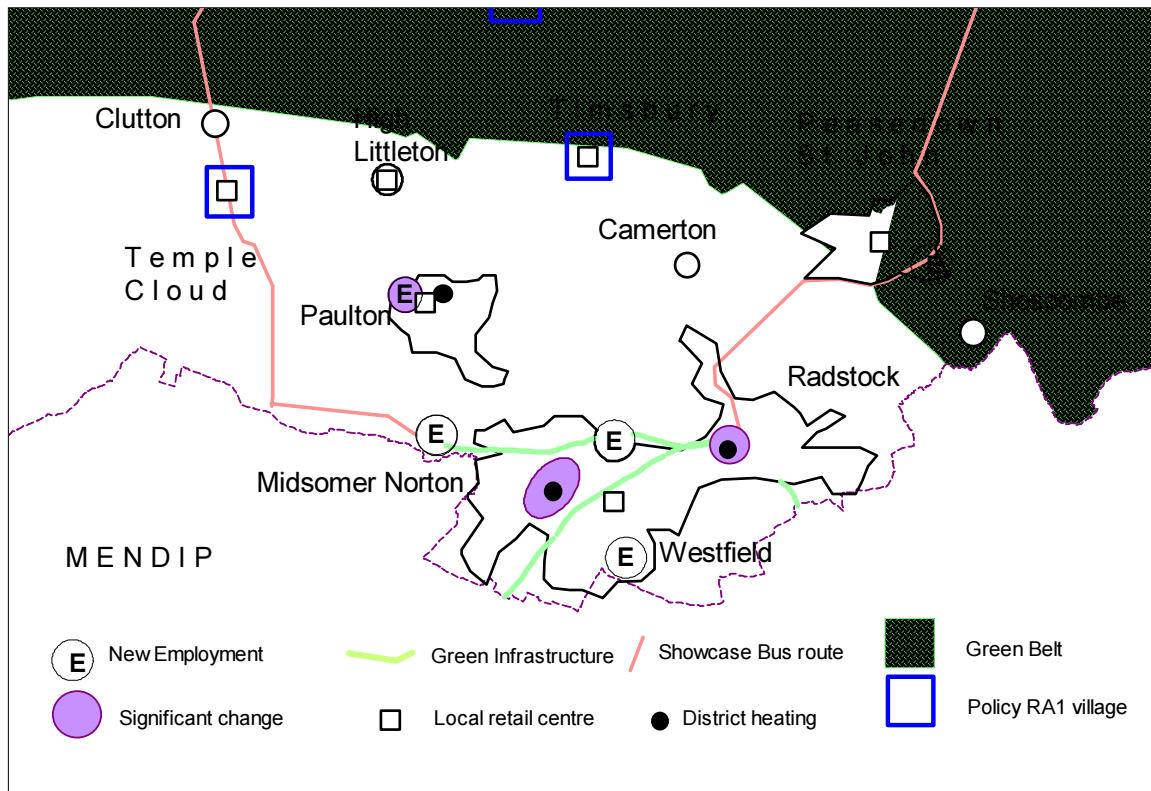


Diagram 5: Spatial Strategy for the Somer Valley

SPATIAL FRAMEWORK FOR THE RURAL AREAS

8.0 Rural Bath & North East Somerset is made up of a wide variety of settlements with locally distinctive character but there are a number of common strategic issues across the rural areas such as:

- Lack of affordable housing to meet local needs.
- poor access to public transport affecting the functionality of the rural economy and leads to isolation.
- Access to facilities, services and shops.
- Reliance of the rural economy on farming, the self employed and small businesses that require support to flourish.
- opportunities to diversify the rural economy e.g. centred around local food production or renewable energy.

Vision for the Rural Areas

The district's rich and diverse countryside will be maintained. Locally identified needs will be met whilst maintaining the individual character of villages. The rural economy will evolve and new types of jobs and ways of working will provide more locally based employment opportunities. The potential for the rural area to play an important role in local food production will be encouraged. Community involvement will help facilitate improvement in the provision of community facilities and public transport.

SUMMARY OF THE STRATEGY FOR RURAL AREAS

- 8.1 In line with a national policy of restraint the Core Strategy allows for only limited development in the rural areas and this is emphasized by the fact that around 2/3rds of the District lies within the Green Belt. The Core Strategy directs small scale housing and employment development to the most sustainable villages. Outside these villages development is more restricted. However, the need for local affordable housing and employment can also be met through the exceptions policy and Local Plan Policy ET.8 on rural diversification as well as the emerging 'Right to Build' proposals. Community facilities and shops are generally acceptable within villages. This approach provides for the development of around 800 homes and 500 jobs in the rural areas, including an additional 250 dwellings over existing commitments. In particular, the Core Strategy;
- Focuses development in those villages with a good range of local facilities, good public transport access, development capacity and with local community support
 - protects the character of the open countryside,
 - maintains the openness of the Green Belt in line with national policy
 - Protects Community Facilities and shops
 - Extends the remit of the affordable housing exceptions site policy to more villages and, where viability is a problem, allows for an element of market housing
 - facilitates economic diversification

CORE POLICIES

- 9.1 In addition to the place based sections, there are a number of district-wide issues which need to be addressed in order to ensure implementation of the vision and spatial objectives.

CLIMATE CHANGE

- 9.2 In the context of national targets the Sustainable Community Strategy commits the Council to providing leadership for **a reduction of the area's CO₂ emissions by 45% by 2026**. The CO₂ reductions should be achieved by application of the energy hierarchy:
- Reduce use of energy
 - Use energy more efficiently
 - Promote energy from renewable and low carbon sources
- 9.3 In addition to the locational strategy which seeks a more sustainable pattern of development and minimising the use of greenfield land, the Core Strategy contains a number of policies to address Climate Change:
- Retrofitting existing buildings*
- 9.4 As 41% of Bath & North East Somerset's carbon emissions come from domestic properties, the Council is seeking to encourage *retrofitting* ie measures in existing building to reduce the demand for energy and resources. The Core Strategy does not set onerous requirements but seeks to encourage retrofitting and adaptability. However, *major* developments should demonstrate that opportunities for the retention and retrofitting of existing buildings have been considered. The Core Strategy will be subject to an early review to take account of changing circumstances and available technology.

Sustainable Construction

- 9.5 National standards for assessing sustainable construction in new buildings are set out in the Code for Sustainable Homes (CfSH) and Building Research Establishment Environmental Assessment Method (BREEAM). Some of these standards are enforced through Building Regulations . Taking account of viability the Core Strategy requires new development to meet those aspects of the national targets not covered by Building Regulations.

Renewable Energy Targets

- 9.6 The UK Renewable Energy Strategy sets out to achieve 15% of energy to be generated from renewable sources by 2020. In 2007, the District's electricity supply from renewable sources was less than 0.1% of energy demand. The Core Strategy seeks to achieve an increase in the level of renewable energy generation in the district by setting a target. Proposals for renewable energy schemes will be assessed against this target and the other policies in the Core Strategy.

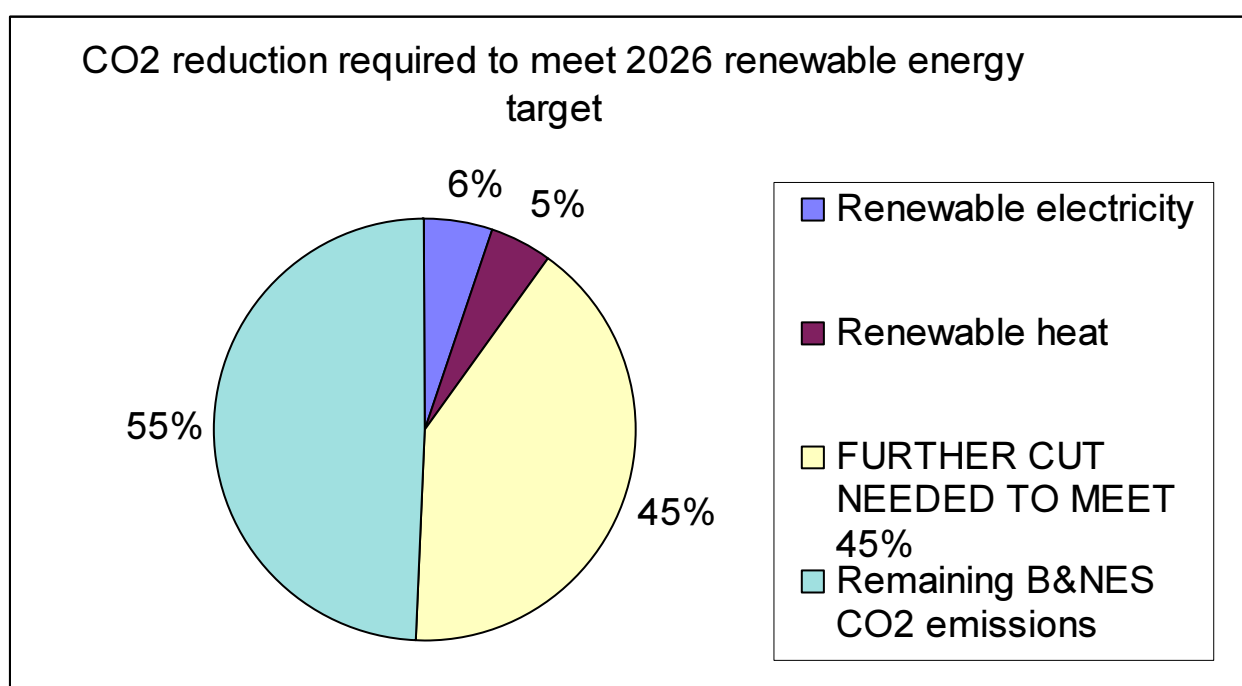


Diagram 6: Renewable Energy target

District heating

- 9.7 District Heating provides heat and hot water to multiple buildings from a local plant. District Heating (including CHP/CCHP) is currently one of the most low cost ways to meet zero carbon objectives, particularly on brownfield sites where the efficiency/appropriateness of other technologies may be constrained. The Core Strategy encourages District Heating in locations with the greatest opportunity such as town and City centres and at large institutions.

ENVIRONMENTAL QUALITY

Natural & Built Environment

- 9.8 In addition to bespoke policies protecting the distinctive attributes of the place-based section, the Core Strategy also contains a policy safeguarding the districts distinctive, character and diversity. In particular it refers to High Quality Design, (including seeking to ensure that all housing schemes meet CABE's Building for Life - BfL) good standard; Historic Environment; Landscape and Nature Conservation.

Green Belt

9.9 The Green Belt will be maintained and its openness protected from inappropriate development.

Waste & Minerals

9.10 The emerging West of England Joint Waste Core Strategy is currently being prepared and will set out the approach to minerals as well as the provision of waste management infrastructure.

Green infrastructure

9.11 The Core Strategy seeks to protect and enhance the integrity, multi-functionality, quality and connectivity of the strategic Green Infrastructure (GI) network. Specific opportunities are identified in the place-based sections

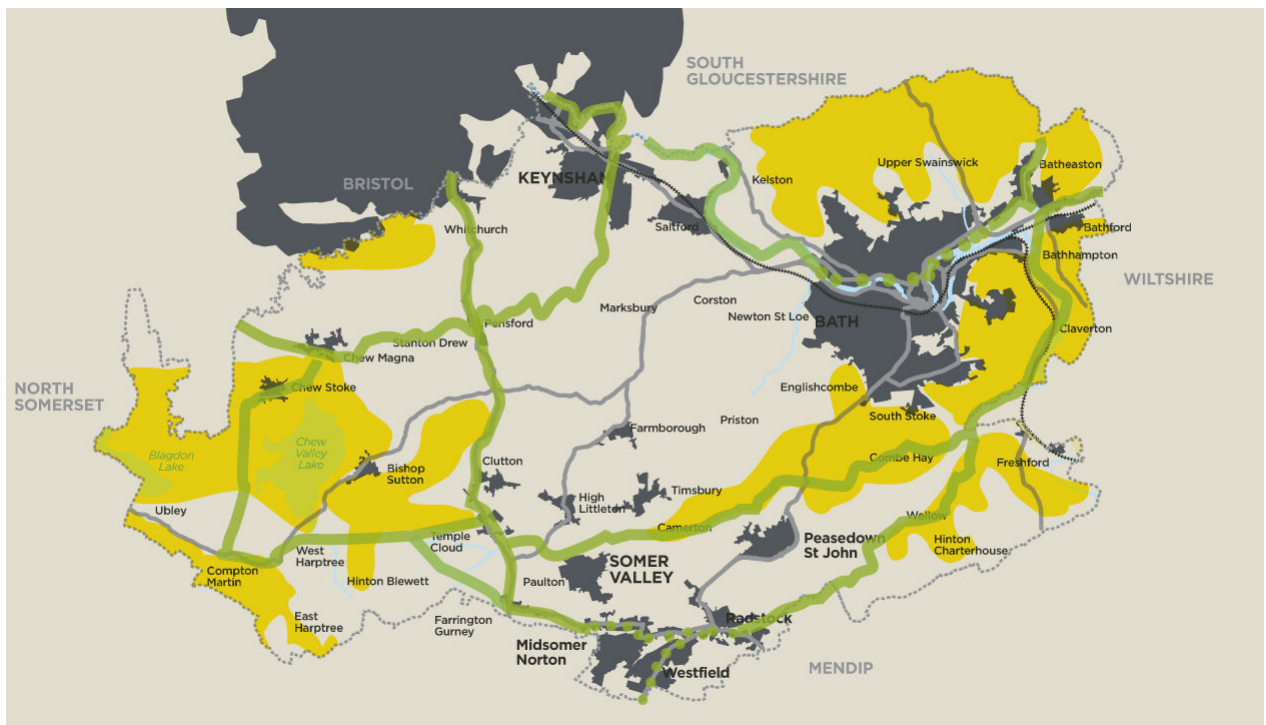


Diagram 7: Green Infrastructure Network

AFFORDABLE HOUSING

Site Thresholds and proportion of sites to be affordable

- 9.12 The Core Strategy seeks to secure at least an average of 35% of all large housing sites for affordable housing. However the evidence reveals that in some parts of the District, development viability could contribute a higher proportion. Likewise, where a scheme is insufficiently viable to meet the 35% target, then the developer can negotiate a lower element where justified by evidence. Taking account of existing commitments, this policy would yield around 3,000 affordable houses over the plan period.
- 9.13 For smaller sites, the Core Strategy also enable either on site provision or a contribution to be made to an affordable housing fund.
- 9.14 In rural areas, the affordable housing exceptions site policy is retained but is now applicable to a greater range of villages and in those circumstances where viability is an issue, allows for an element of market housing

Tenure

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

Mix of housing

- 9.16 A policy is included aimed at ensuring that new residential development provides a range of housing types and needs, to help support mixed and inclusive communities and to respond to demographic change.

Gypsies & Travellers

- 9.17 The Core Strategy sets out the criteria for considering planning applications for sites relating to the Gypsies and Travellers.

A PROSPEROUS ECONOMY

Economic Development

- 9.18 The Core Strategy will support and deliver elements of the Council's Economic Strategy, which aims to create the conditions for jobs growth throughout the district, leading to a more diverse, productive and resilient economy which provides better opportunities for all. In particular the Council is pursuing smart growth i.e. promotion of a higher value economy rather than only volume growth.

Centres and Retailing

- 9.19 Along with Bath City Centre, the district is served by a diverse network of town, district and local centres of varying size. In addition to providing facilities like shops, cafés, pubs, post office and banks, centres also include varying levels of community facilities, work places and leisure facilities. Many centres are a focus for transport services and most offer a chance to access essential facilities close to people's homes. This policy therefore aims to support this network of accessible centres as key focuses for development and as the principal locations for shopping and community facilities as well as offices, local entertainment, art and cultural facilities.
- 9.20 The retail function of the centres within hierarchy will be maintained and enhanced.

TRANSPORT AND MOVEMENT

- 9.21 The Core Strategy policy framework continues the Council's approach of reducing car dependency and working towards making walking, cycling and use of public transport the more attractive options for travel. This approach is embodied in the strategic objectives of the Core Strategy, the locational strategy and the place based strategies.
- 9.22 However the B&NES highway network remains heavily trafficked highlighting the need to undertake transport and access improvements and major infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres.

DELIVERY & CONTINGENCY

Delivery

- 9.23 The scale of new homes entails a significant uplift in past rates of delivery from an average of around 480 to around 550 per annum although as set out in the SHLAA, the overall trajectory of provision will vary year by year. The provision of new jobs is dependent on objectives in the

Council's Economic Strategy being realised through the interventions outlined in the Council's Economic Strategy.

- 9.24 The Infrastructure Delivery Programme, published alongside the Core Strategy, outlines the infrastructure that is needed to ensure the alignment of infrastructure with new development and these are summarised in the place-based sections. It focuses particularly on funding sources and delivery mechanisms in the first 5 years of the Plan period.

Contingency

- 9.25 The Core Strategy recognises the need for contingency in light of future uncertainty. There is the scope for flexibility in the mix of uses and density of some of the large redevelopment sites such as at Somerdale in Keynsham and the MoD sites in Bath. In addition, there is scope in the western corridor in Bath to vary the mix of uses to respond to needs for development. This flexibility maintains the overall strategy of a priority on urban focussed brownfield opportunities. The Council will monitor delivery rates in the plan period which will influence decisions on development proposals. A review of the Core Strategy is also programmed for around 2016 in order to respond to changing circumstances. The Core Strategy includes a monitoring framework in order to assist this process.

APPENDIX 3: DRAFT CORE STRATEGY FOR BATH & NORTH EAST SOMERSET

All Councillors have received a copy of Appendix 3 and it is available for public inspection with the agenda for the Council Meeting at the public access points (see agenda note 2). It may be accessed on the Council's Local Development Framework website via this link:

<http://www.bathnes.gov.uk/SiteCollectionDocuments/Environment%20and%20Planning/Appendix%203%20-%20Draft%20Core%20Strategy%20Publication%20Version.pdf>