

# Bath and North East Somerset Council Draft Core Strategy

## Representations by Plan Reference: Chapter 7 - Monitoring and Review

Plan Reference: Chapter 7: Monitoring

**Reference:** 222\15

**Respondent:** Duchy of Cornwall

**Representation** It is noted that the Core Strategy will be reviewed 'about every 5 years' and performance will be  
**(soundness):** monitored through the AMR. However, a specific mechanism should be put in place in the event that there is a shortfall in housing provision at 2016.

The Council should take a proactive stance to encouraging site delivery in the early part of the plan period to make good the identified shortfall in supply. The draft strategy fails to provide the necessary flexibility to ensure a continuous supply of deliverable housing land.

As set out in the Housing Needs Assessment, there is an acute housing need across the District. Notwithstanding this need, there is an over reliance of housing delivery from sites within suburban Bath and within the Central Area and Western Corridor where there is no certainty as to their deliverability. Such an approach is unlikely to result in the timely delivery of affordable housing to meet identified needs.

The monitoring strategy needs to provide for the necessary flexibility to ensure housing delivery at the right time and at the right place. A mechanism needs to be in place as part of the monitoring proposals to provide for the release of  
without the need to rely upon a review of the CS which is the suggestion mooted in the policy as drafted.

For the above reasons, the approach to the monitoring of housing delivery should be amended to ensure it is sufficiently flexible to deal with changing circumstances, including the failure or delay in the delivery of the identified components of supply.

**Change sought to make sound:** An urban extension should be identified at West of Twerton.

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 224\62

**Respondent:** Bath Preservation Trust

**Representation** The monitoring framework is not adequate to fulfil the objective described in paragraph 4.47 of PPS 12  
**(soundness):** (to provide early warning that the strategy is starting to fail so that contingency plans can be triggered).  
The indicators identified in Table 9 appear to have been selected because they are easily measurable rather than because they provide genuine information about the success or otherwise of delivering the Core Strategy. In some cases (CP5, percentage of new homes on previously developed land) the selected indicators bear little or no resemblance to the policies described in the Core Strategy. This section requires a complete overhaul.

**Change sought to make sound:** For example:

- the first indicator of success in delivering policy CP1 should be the publication of authoritative guidance for property owners on retrofitting historic buildings. Monitoring thereafter should focus on the number of installations which are in accordance with the guidance
- Policy CP3 can only be successfully implemented if planning guidance is developed to clarify the most appropriate locations for large-scale renewable energy installations. Monitoring thereafter needs to focus on the number of planning applications which comply with the guidance

- Policy CP5 requires as a first step the provision of compensatory flood storage upstream from Bath; delivery (or not) of this vital infrastructure before planning applications come forward for riverside development sites should be the first indicator
- Policy CP6 needs to include indicators for monitoring the historic built environment as well as the natural environment and new housing developments
- Monitoring of the place-based spatial strategies needs to confirm that the policy of exhausting the scope for brownfield development before allowing building on greenfield sites is being achieved. The reference in Table 9 to the national target of 60% of new homes on previously developed land is inappropriate against the background of Policy DW1

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 246\11 S

**Respondent:** Combe Hay Parish Council

**Representation (soundness):** Particular elements of the Core Strategy Publication Version which are strongly supported by Combe Hay Parish Council.

36.Monitoring and Review.  
Page 134 paragraphs 7.02 to 7.05

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 266\27

**Respondent:** The Bath Society

**Representation (soundness):** We agree that the District Wide Strategy ( and the Core Strategy in general) should put emphasis on infrastructure provision as a key issue. The information in Table 2 (pp.22-25) should provide a valuable ‘ checklist’ in monitoring progress on strategy implementation, especially in relation to Policy CP 13.

Perhaps the material in Table 2 should somehow be incorporated into Table 9 Monitoring of strategic objectives ( pp.135-137)

We are pleased to see that an ‘Infrastructure Delivery Programme’ is to be prepared ( page 132)

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 274\4

**Respondent:** Sport England

**Representation (soundness):** 5. COMMENT – Monitoring

Sport England is concerned with the effectiveness proposed to monitor ‘sport and recreation’. The factors and indicators for monitoring should be developed further and possibly include comparison with other local authorities.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 279\10

**Respondent:** English Heritage

**Representation** Section 7 - Monitoring and review

**(soundness):** The section fails to include measures that monitor the impact or effectiveness of the plan in delivering the objectives for the historic environment. Indicators to be applied could include:

- Number/percentage of historic assets at risk;
- The number of up-to-date Conservation Area appraisals and management plans;
- The adoption of a historic environment SPD;
- The delivery of World Heritage Site Management Plan actions;
- The completion of public realm improvement schemes

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 311\6

**Respondent:** Parish Council's Airport Association

**Representation** The Draft Core Strategy lists ways in which its objectives will be monitored. For reasons given above we

**(soundness):** suggest two additional criteria should be included among the "Monitoring of Strategic Objectives", and monitored on an annual basis. These are (i) the green house emissions associated with Bristol airport and its flights, and (ii) the level of "tourist deficit", i.e. the numbers of outward-bound and inward bound tourists.

Note. The various figures and objective statements made in this submission are based on sound evidence, taken from reputable and easily verifiable sources – full detail can be provided if required.

PCAA

January 2011

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 819\6

**Respondent:** Paulton Parish Council

**Representation** 5 How do you plan to police and monitor the elements set out in this document?

**(soundness):**

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

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**Reference:** 821\15

**Respondent:** Cam Valley Wildlife Group

**Representation** The monitoring and review indicators on page 136 are not adequate. The combination will not show

**(soundness):** what the health of the resource is because the building for life good standard has almost no impact on conserving biodiversity; the number of conservation sites enhanced annually does not give any indication of whether the enhancement was beneficial, whether it was wildlife or people that benefited, or what quality of sites have been targeted; there is no standard which enhanced sites are required to meet; and the change in priority habitats also gives no indication of the condition that the priority habitat is to achieve or the condition over all that these habitats are meant to achieve; there is no overall indicator for the monitoring of the biodiversity resource of the District; good brownfield sites

can be better biodiversity resources than many, or most, wildlife sites and are targeted for built development, and there is no indicator for the use of these sites and other habitats that may not fall into the 'priority' category to conserve and enhance biodiversity.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Paragraph 7.01**

**Reference:** 220\3

**Respondent:** Radstock Cooperative Society

**Representation** Finally, RSC would like to emphasise that, for various reasons, a substantial number of committed sites **(soundness):** have, and will continue to be, constrained by economic conditions which threaten the deliverability of sites alongside implications for the timing of delivery. RSC consider the Council should give priority to the close monitoring of the portfolio of existing commitments to ensure an actual rolling five year supply of housing sites.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 223\5

**Respondent:** Transition Bath Food Group

**Representation** Despite the importance of local food production in climate change mitigation, for food security, its role **(soundness):** in the rural economy and locality and the need for local distribution to minimise the environmental costs of transportation, neither local food nor agriculture are mentioned in:  
Objective 1: Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate  
Objective 2: Protect and enhance the District's natural, built and cultural assets and provide green infrastructure  
Objective 3: Encourage economic development, diversification and prosperity  
Objective 4: Invest in our city, town and local centres.

Encouraging and facilitating increased local food production is listed under Objective 6: Plan for development that promotes health and well-being. However, Policy CP13 which is intended to deliver Objective 6, merely refers to 'green infrastructure' to be delivered by collection of Developer contributions, a part of which is channelled to allotment provision (an important, necessary but insufficient delivery method). The policies listed to deliver Policy CP13 are those relating to Air Quality Management Areas, Bath Western Riverside and Keynsham's Spatial Strategy. The Core Strategy states that these will provide the monitoring indicators for "encouraging and facilitating local food production". Instead, the Core Strategy should include specific indicators relating to local food production, distribution and retail; this is readily quantifiable. B&NES could follow the example of towns like Todmorden, which has the objective of becoming self-sufficient in vegetables, orchard fruits and eggs by 2018, and ultimately to source the majority of staple food locally. (The relative proximity of 'local' should also be defined in relation to different food products).

**Change sought to make sound:** Because of the lack of coherence and conceptual clarity in addressing the issue of local food and its cross-cutting role, a new policy is required to deal with it, which should logically support Objective 1: Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate.

NEW POLICY

The Core Strategy is UNSOUND because, while it recognises the importance of local food production and distribution, its policies fail to provide the protection and support to deliver it. The Core Strategy displays a fundamental lack of understanding of the different size, types and systems of production, and the inter-relationship between food production, distribution and retail. Instead, the Core Strategy encourages distant transportation of food and its sale through supermarket chains, with the waste, packaging and CO2 emissions that entails. Even more worryingly, the Core Strategy bases its renewable energy strategy on the use of biomass for CHP. (Land should not be used for energy crops but should be protected for food production. Green waste and manures should be kept for use as fertilisers.)

#### New Policy (CP14?), Local Food Production and Retailing

The Core Strategy recognises that local food production has an important role to play in climate change mitigation and the district's economic development (key strategic issues). The Spatial Vision acknowledges that local food production, distribution and retailing enhance rural-urban linkages and promote health and well-being. The Core Strategy also emphasises the role which agriculture plays in the social networks, place-building and character of the district, as well as ensuring our economic future and food security.

Local food production takes place on different sizes and types of land: urban and rural gardens, the long gardens of traditional miners' cottages in the Somer Valley, allotments, community gardens, rooftops, community orchards, smallholdings and farms. Land suitable for food production should be identified for protection before any areas of search for built development, other infrastructure or renewable energy locations. The overarching framework will be the conservation and productive use of land and water to facilitate food production close to where people live now and close to where they will be living in the future.

Local food production will be supported by encouraging distribution and sale through local, community-level shops.

Agriculture and local food production and processing is acknowledged to be a significant driver of the District's economic growth.

Example target: By 2026, 50% of fruit and vegetables sold in Bath will be grown within the city and its immediate environs. [Similar targets for dairy, eggs, meat and poultry to be defined. Potentially higher targets to be set for Keynsham, the Somer Valley and the rural areas.]

#### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

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**Reference:** 248\15

**Respondent:** Crest Strategic Projects and Key Properties Ltd

- Representation** 1) The monitoring section of the CS provides no mechanism for introducing the contingency provisions  
**(soundness):** set out in paragraph 1.36. It is little wonder; the 'contingency' solution is so inadequate and inflexible that there is no value trying to turn it into an effective policy.
- 2) This CS is unsound on the basis that it is inherently inflexible and has no contingency solution for delivering even the low level of growth it plans to support.

**Change sought to** 1) The CS must provide a policy for delivering contingency solutions that go far beyond the current  
**make sound:** content of paragraph 1.36.

#### **Representation (legal compliance):**

#### **Change sought to make legally compliant:**

**Plan Reference:** Paragraph 7.05

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**Reference:** 188\1 S

**Respondent:** Freshford Parish Council

**Representation (soundness):** Dear Sirs,

The Core Strategy

This Council Boardly supports the Core Strategy and wishes to place on record appreciation of the standard of work and genuine consultation which has applied through to its completion.

We are aware at this juncture that responses will be accepted as consultation only in respect of soundness and legal compliance. However, this Council wishes the Local Authority to note, not necessarily as part of the consultation process, the following which mat be of assistance once the policy becomes active and priorities of application are being considered.

We wish to register particular, priority, support, with comment where necessary, for :

1. Item 7.05. The review of the Strategy in 2016 (Reviewed every 5 years after adoption).

I.S. Campbell  
For Freshford Parish Council.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Plan Reference: Table 9: Monitoring of Strategic Objectives**

**Reference:** 264\10

**Respondent:** Englishcombe Parish Council

**Representation (soundness):** This Parish Council fully and enthusiastically supports the Annual Monitoring Review in 7.04 and the comprehensive 5 yearly reviews in 7.05.

This is in keeping with the principle in the 2010 consultation of 'Plan – Monitor – Manage' which had over whelming support from consultees.

Englishcombe Parish Council strongly believes that it and other like-minded councils actively participate in such reviews.

**Change sought to make sound:**

**Representation (legal compliance):**

**Change sought to make legally compliant:**

**Reference:** 297\18

**Respondent:** Bath Rugby Club

**Representation** Page 135, Table 9, CP2

**(soundness):** AS stated in our representation on Policy CP2, the requirement for non-residential development to meet BREEAM excellent Including zero carbon by 2019 places a significant burden on the developer and could lead to development not taking place for reasons of viability.

AS stated in our representation on Polley CP2, the approach to BREEAM excellent and zero carbon for non-resident ial developments should be applied flexibly in order to take Individual site circumstances Into account.

Page 135, Table 9, CP3

AS stated In our representation on Policy CP The targets for renewable electricity and heat in this strategy may place a significant burden on the developer.  
This could lead to development being unviable.

As stated In our representation on Policy CP3,  
flexibil ity should be Incorporated Into the policy to ensure that the policy accords with the principles of being effective.

Such flexibility should refer to the viability and feasibility meeting the targets in order to take the Individual site circumstances into account.

Page 135, Table 9, CP4

AS stated In our representation for Policy Cp4, The requirements for thermal masterplanning and CHP/CCHP relate to all developments and place an undue burden on the developer which could lead to development not taking place for viability reasons.

As stated In our representation for Policy CP4. in order to ensure that the Core Strategy accords wltN the principles of being effective, flexbliity should be Incorporated Into this approach and refer to the viability and feasibility of meeting the requirements in order to take the individual Site circumstances Into account .

**Change sought to** Further flexibility should be incorporated into the policy to ensure that the policy accords with the  
**make sound:** principles of being effective. Such flexibility should refer to the viability and feasibility of meeting the targets in order to take individual site and development circumstances into account.

**Representation (legal compliance):**

**Change sought to make legally compliant:**