

BATH & NORTH EAST SOMERSET CORE STRATEGY EXAMINATION

COUNCIL RESPONSE TO INSPECTOR'S PRELIMINARY COMMENTS AND QUESTIONS (ID/1, ID/4 & 4/A): PART 2

This document is the second part of the Council's response to the Inspector's preliminary comments and questions set out in document ID/1 and also addresses his subsequent questions set out in documents ID/4 & ID/4A. The Council has produced a number of documents responding to the Inspector's preliminary questions and comments; the table below lists the Council document dealing with the question areas raised by the Inspector.

Insp. Ref	Question area	B&NES document setting out response
ID/1	Relevance of proposed abolition of Regional Strategies	BNES/1
ID/1	Sustainability Appraisal	BNES/1
ID/1	Evidence Studies	Topic Paper 8: Bath Topic Paper 7: Keynsham and Somer Valley
ID/1	Justification for housing and employment provision	Topic Paper 2 & Topic Paper 9 (<i>latter not yet published</i>)
ID/1	Schedule of Proposed Changes	BNES/1
ID/1	Other Matters: Flood Risk and Sequential Test	BNES/2
ID/1	Other Matters: The Proposals Map	BNES/2
ID/1	Other Matters: Minerals	BNES/1; BNES/2
ID/1	Other Matters: Gypsies and Travellers and Travelling Showpeople	BNES/1; BNES/2
	Annex 1 to ID/4: Stage 2 Report	BNES/1
ID/1	Annex 1: Economic Growth	Topic Paper 2 & Topic Paper 9 (<i>latter not yet published</i>)
ID/1	Annex 1 to ID/4: Housing	Topic Paper 2 & Topic Paper 9 (<i>latter not yet published</i>)
ID/1	Annex 1 to ID/4: Affordable Housing	BNES/2
ID/1	Annex 1 to ID/4: Bath, Infrastructure	Topic Paper 9 (<i>not yet published</i>)
ID/1	Annex 1 to ID/4: Bath, Transportation	BNES/1
ID/1	Annex 1 to ID/4: Bath, Flood Risk	BNES/2
ID/1	Annex 2	Schedule of Proposed Changes (CD5/22)
ID/4	Draft National Planning Policy Framework	BNES/2; Schedule of Potential Changes arising from Draft NPPF (CD5/23)
ID/4	Somer Valley	BNES/2
ID/4	Rural Areas	BNES/2
ID/4	Responding to Climate Change	BNES/2
ID/4	Affordable Housing	BNES/2
ID/4	Monitoring	BNES/2

COUNCIL RESPONSE TO OUTSTANDING ELEMENTS OF ID/1

1. FLOOD RISK AND SEQUENTIAL TEST

- 1.1 This section provides the Council's response to the issues raised by the Inspector in paragraphs 30 and 31 and Annex 1, questions A23 and A24 of his preliminary comments and questions in Document ID/1.

Council Response

Flood Risk Zones and Climate Change:

- 1.2 The flood zones identified for each policy area (Policies B2, B3, KE2, SV2 and SV3) take into account the extent of flood risk including the effects of climate change. The flood zone maps showing the effect of climate change are included in the Council's document Flood Risk Sequential and Exception Test - Appendix B (CD6/D3 and D4). The maps show land where flood risk increases to 1% or greater annual probability of flooding using a 100 year climate change time horizon as agreed with the Environment Agency. Tables in Appendix A of the Flood Risk Sequential and Exception Test Information Paper (CD6/D2) identify the sites with the area affected by climate change.
- 1.3 The proposed Core Strategy Flood Risk Policy (CP5) expects all development in areas at risk of flooding to be safe throughout their lifetime by incorporating on-site defences. Appropriate on-site defences will reduce the actual risk of flooding. As an example, please see Appendix B Part 1 (CD6/D3): the BWR site (SHLAA Sites Wid. 23a and Wes. 1) on the SFRA Flood Zones map and SFRA Flood Zones map (taking existing flood defence into account).
- 1.4 In addition, new development should not increase flood risk elsewhere by displacing water in a flood event by new defences on site, therefore new development must also provide storage to offset the volume of water on-site or off-site. This volume of displaced water was estimated based on the development sites above the 1% annual probability plus 20% flood level in the Flood Risk Management Strategy.(CD4/FR2) i.e. FZ3 (1 in100 year) plus taking into account the effects of the climate change flood level. This meets the requirements of PPS25.

Sequential Test and land in the Green Belt (Bath):

a) Wider sustainable development consideration;

- 1.5 The overriding objective of the Core Strategy is to locate new development in the most sustainable and accessible locations and the priority is to steer growth to brownfield land in urban areas. PPS25 (paragraph 7) requires that flood risk is considered alongside other spatial planning issues such as regeneration and policies should recognise the positive contribution that management of flood risk can make

to the development of sustainable communities. The approach is broadly re-iterated in the emerging National Planning Policy Framework (NPPF). It also states that flood risk should be integrated effectively with other strategies of material significance such as the Economic Strategies. The B&NES Economic Strategy emphasises the importance of regeneration within Bath City Centre, including the areas with higher flood risk. It also refers to facilitating commercial development in the central area because commercial development does not favour suburban or peripheral locations. Therefore the Council investigated the options for managing flood risk and the key recommendations of the Flood Risk Management Strategy are incorporated into the Core Strategy policies.

- 1.6 The objectives of central area regeneration, including housing provision, is unlikely be achieved through greenfield development in peripheral locations. Regeneration in the Bath Central area and Western Corridor forms a central element of the spatial strategy for Bath. Improvement of environmental quality within this area is the foundation of efforts to boost the city's profile as a more competitive centre. Failure to progress with the regeneration in this area would undermine investment that has already been made and will prejudice future investment.
- 1.7 Furthermore the Core Strategy refers to areas of derelict or underperforming land within the city in need of redevelopment. The realisation of development opportunities in these areas will contribute to improving the city aesthetically, particularly enhancing the appearance of the World Heritage Site.

b) The level of residential development considered;

- 1.8 The Interim Sequential and Exception Test (CD6/O6) has tested the areas for potential urban extensions, and the Sequential and Exception Test (CD6/D2) explains the consideration of such development. As the Inspector notes, it was tested for a larger capacity than the level of development being estimated on higher flood risk zones.
- 1.9 The sites within the Bath River corridor (Policies B2 and B3) are subject to different degrees of flood risk within the flood zones 1, 2 and 3a. They will be developed for mixed uses and the approach is to steer more vulnerable uses (residential) to areas with less risk from flooding through location, layout and design in accordance with PPS25 and the emerging NPPF. This approach should be taken on site as well as within the policies areas. However, it is premature in the Core Strategy to be precise about the residential capacity of development being directed to flood zones 2 and 3. This is the task of the Placemaking Plan, under the framework provided by the Core Strategy. In addition implementation of flood defences will also reduce the extent of actual flood risk as explained above. Therefore it is inappropriate at this stage to specify the housing capacity in the Bath river corridor in flood zone 3 and test the equivalent capacity in Green Belt.

- 1.10 However, smaller scale development in greenfield land was considered on certain sites through the consideration of a contingency housing location as described below.

c) Impact of Greenfield development on sustainability

- 1.11 In response to the Inspector's preliminary comments, the option to identify greenfield land as a housing contingency was considered by the Council in September 2011. This process entailed the re-evaluation of the same four urban extension locations for smaller scale of development. This is because these locations have been identified as the most sustainable locations for growth on the edge of Bath.
- 1.12 The potential impact on sustainability of including greenfield housing contingency sites with smaller capacities was assessed against the Sustainability Appraisal (SA) objectives. The SA report sets out the advantages and disadvantages of these options. The disadvantages include harm to the landscape, ecology, historic environment and lack of social facilities, much of which would be difficult to mitigate. As a result of this re-evaluation, including SA, the Council determined that none of them should be identified as a housing contingency location.
- 1.13 If flood risk was the only issue to consider, then development on greenfield land within flood zone 1 would compare more favourably than brownfield land in higher flood risk areas. However, in order to ensure development is directed to the most sustainable locations flood risk should be considered within a broader spatial planning context.
- 1.14 The spatial strategy advocated by the Council is for the re-development of brownfield sites to be both the focus and priority of the strategy. There are no reasonably available alternative areas elsewhere within flood zone 1 which could facilitate the level and type of development required to achieve the Council's strategy.

The Bath Compensatory Storage Facility

- 1.15 The Core Strategy Flood Risk Policy (CP5) expects all development in areas at risk of flooding to be safe by incorporating on-site defences and to provide upstream storage to offset the volume of water on-site or off-site.
- 1.16 To optimise the development capacity on the River Corridor, the Core Strategy proposes an upstream storage facility as recommended in the Flood Risk Management Strategy. This enhances the viability of the redevelopment River Corridor sites and enables flexible design solutions. The Bath Compensatory Storage Study Phase 1 undertakes a more detailed analysis of the options set out in the Flood Risk Management Strategy in assist in identifying the most appropriate and technically feasible site. This detailed study is due to be completed in October 2011

(a copy will be added to the Core Documents List and submitted to the Inspector once it is available). This investigates the provision of compensatory storage upstream of Bath city centre to balance future loss of flood storage volume when planned developments take place.

- 1.17 The Council intends to consult on the preferred location of the upstream compensatory storage facility in late 2011/early 2012.
- 1.18 The West of England Delivery and Infrastructure Investment Plan prepared with the HCA includes funding for upstream storage facilities. Once the preferred site(s) are agreed, the Council can proceed to a detailed bid to secure funding to implement the Upstream Storage Facilities and the necessary land will be allocated through the Placemaking DPD. The detailed programme will be prepared supporting the programme of development in Bath. This will support meeting the exception test(c).
- 1.19 Once the programme for the Upstream Storage facilities is agreed, it will be monitored and reviewed in line with the Council's monitoring framework and reported through the Annual Monitoring Review.
- 1.20 The Bath Compensatory Storage Study Phase 1 is not finalised but will be available in October.

The contingency if the upstream storage cannot be delivered or is delayed.

- 1.21 The Flood Risk Management Strategy assessed various management options based on strategic, sub-strategic and site specific approaches. As part of the sub-strategic options, the Strategy has identified some smaller sites which can accommodate some level of displaced water. These sites may provide some off-site compensatory storage for neighbouring sites. These sites could be investigated further as part of proposal if the upstream storage facilities cannot be delivered or is delayed.
- 1.22 It is worth noting that the Bath Western Riverside scheme entailing over 2,000 dwellings has already been granted permission and is under construction and has its own arrangements to deal with flood risk, approved by the Environment Agency.

Continuous operation of the Lower Bristol Road

- 1.23 The Core Strategy Policy CP5 expects any development in areas at risk of flooding will be safe throughout its lifetime and should be informed by the information and recommendations of the Flood Risk Management Strategy. This means that new development along the Lower Bristol Road will be required to raise the standard of protection to 1 in 100 years. All new development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed. This will be further considered though the Placemaking DPD and Development Management process. Regarding protecting existing properties, the Environment Agency has powers to improve flood defences to protect existing property using Defra grants. The Council will work closely with

the Environment Agency to monitor the improvements to flood defence infrastructure.

Conclusion

- 1.24 A sequential risk-based approach was taken through the formulation of the Core Strategy policies working closely with the Environment Agency and considering current and potential future risk taking into account the impact of climate change. The Sequential Test report (CD4/D2) disseminates how the high level sequential and exception tests are met to support the Core Strategy policies and the report was endorsed by the Environment Agency.
- 1.25 In order to ensure development is directed to the most sustainable locations flood risk should be considered alongside other spatial planning issues. A smaller scale of development at the urban extension locations has been considered, but they are not suitable or available to facilitate the level and type of development required. The spatial strategy advocated by the Council is still to develop the brownfield sites as both the focus and priority of the strategy. There are no reasonably available sites in flood zone 1 to facilitate the level and type of development required in the policy areas.
- 1.26 The Core Strategy Flood Risk Management Policy (CP5) requires that all development in areas at risk of flooding to be safe by incorporating on-site defences and provide storage to offset the volume of water on-site or off-site. Flood risk has to be taken into account all stages of planning process. High level sequential test has been applied to consider broad locations for new development through the Core Strategy. Site specific sequential tests must be applied through the site allocations and Development Management process. This is consistent with national advice in PPS25.

2.0 THE PROPOSALS MAP

The Issue

- 2.1 This section provides the Council's response to the issues raised by the Inspector in paragraph 32 of his preliminary comments and questions (document ID/1)

Council Response

- 2.2 Appendix 3 of the Core Strategy headed 'Proposals Map Revision Bath City Centre Boundary' shows a proposed city centre boundary to be added to the Proposals Map. The city centre shopping area boundary (Policy S.1 in the Adopted Bath & North East Somerset Local Plan – CD5/1) is not proposed to be amended or deleted by the Core Strategy.

- 2.3 The city centre shopping area boundary is defined to show the extent of the main concentration of retail uses in the city centre and whilst originally defined prior to the publication of PPS6 (now replaced by PPS4 – CD2/5) it equates to a 'primary shopping area'. As such it is used for the purposes of the sequential test in relation to retail proposals. It is proposed that the primary shopping area and the primary retail frontage will be reviewed in the Placemaking Plan.
- 2.4 The Adopted Local Plan does not define a city centre boundary (as required by PPS4) and this policy gap is filled by the proposed city centre boundary in the Core Strategy. This area is wider than the primary shopping area and will be used for the sequential approach for the other main town centre uses referred to in PPS4 i.e. leisure and entertainment facilities, offices and arts, cultural and tourism development. It is defined to reflect the current extent of the city centre, rather than its future extent in 2026 (see Bath section below for response to issue raised in paragraph A16 of ID/1).

3. MINERALS

The Issue

- 3.1 This section provides the Council's response to the issues raised by the Inspector in paragraph 33 of his preliminary comments and questions (document ID/1).

Council Response

- 3.2 Part 1 of the Council response (BNES/1) set out an initial response to the issues raised relating to minerals and identified potential changes to the minerals section of the Draft Core Strategy. The Council has now made a detailed change to the policy approach as set out in the Schedule of Significant Proposed Changes (CD5/22).
- 3.3 The map supplied by the Coal Authority showing the general extent of the surface mining coal resource areas within the District is available as a Core Document (CD4/ENV10).
- 3.4 The Council has discussed the proposed rewording of the Minerals section with the Coal Authority. The Coal Authority is in broad support of the proposed amendments and their observations are reflected in the proposed changes to the Minerals section which were agreed by Council on 15th September 2011 (see CD5/22, FPC11-17).

4. GYPSIES & TRAVELLERS & TRAVELLING SHOWPEOPLE

The Issue

- 4.1 This section provides the Council's response to the issues raised by the Inspector in paragraph 34 of his preliminary comments and questions (document ID/1).

Council Response

- 4.2 Part 1 of the Council response (BNES/1) dated 15th July 2011 set out an outline response to the issues raised in respect of gypsies, travellers and travelling showpeople and identified some potential changes to the section of the Draft Core Strategy relating to this issue for formal consideration. Proposed changes to the Gypsies, Travellers and Travelling Showpeople section of the Core Strategy were agreed by the Council at its meeting on 15th September 2011 as set out in the Schedule of Significant Proposed Changes (September 2011) (CD5/22, FPC18-22).

5. ANNEX 1 TO THE INSPECTOR'S NOTE ID/1

Affordable Housing

The Issue

- 5.1 The issues raised are set out in Annex 1, paragraphs A14 and A15 of the Inspector's preliminary comments and questions (document ID/1).

Council Response

- 5.2 The spread sheet attached as Appendix 1 shows the likely prospects for affordable housing delivery in the context of the Core Strategy's overall housing target of 11,000 and the application of policy CP9. It is based on the SHLAA of May 2011.
- 5.3 The spread sheet also addresses the credibility tests listed in paragraph A15, points a) to d) as set out in the paragraphs below.
- 5.4 The summary sheet shows that 6,659 overall units have been built or have planning permission of which 1,592 are or will be affordable (net gain). About 300 of these are or will be on 100% schemes (as identified in the spread sheet). The outline planning permission for BWR secures 25% affordable housing. Of the remaining supply of 4,445 units yet to enter the planning system, 1,552 would be affordable if 35% was achieved on each qualifying site. Based on the current SHLAA the best possible outturn is estimated to be 3,144.
- 5.5 There is insufficient site specific information to undertake a detailed discounting calculation to take account of financial viability. However, if an average of 30% was achieved on future sites the best possible outturn would reduce to about 3,000.
- 5.6 In relation to A14 (d) there are not any other 100% schemes beyond those set out in the SHLAA.
- 5.7 The Council concludes that performance against affordable housing provision should be measured against a figure of 3,000 units. The Submission Core Strategy (and the recently advertised significant proposed changes) is internally inconsistent

on this matter. Paragraph 1.34 refers to a figure of 3,000, whereas Policy DW1 and the proposed change to the monitoring framework (FPC29 in CD5/22) refers to 3,400. The correct figure is 3,000

- 5.8 Please note that the anticipated outturn does not take into account the affordable housing that may be secured from future small windfall sites of between 5-9 units (where up to 17.5% will be sought). This part of the policy is unlikely to secure more than 100 units. This is based on analysis of the proportion of small site completions over the last 5 years accounted for by sites of 5-9 dwellings and applying 17.5% to the same proportion of future trend based potential small windfall completions.

Bath

The Issue

- 5.9 This section provides the Council's response to the issues raised by the Inspector in Annex 1, paragraphs A16 and A17 of his preliminary questions (document ID/1).

Council Response

- 5.10 The current extent of the 'city centre' of Bath is defined in Appendix 3 and is illustrated in Diagram 7. Diagram 7 also introduces the concept of a wider 'Central Area'. This wider area includes 'edge of centre' locations which represent the only suitable areas where significant change can come forward to complement the redevelopment of sites within the city centre itself. Undoubtedly, the city centre will need to expand in order to respond to projected development potential / needs, the key question is how this might best be managed. Whilst Policy B2 covers the entire Central Area, the definition of a tighter city centre and a wider Central Area enables the LPA to exert a greater degree of control in relation to the primacy of the sites within the city centre i.e. those closest to the public transport interchange and primary shopping area.
- 5.11 Where Clause 3 of Policy B2 refers to 'in the context of PPS4' this is a signpost to amongst other things, the sequential approach of PPS4. The drawing of a tight city centre boundary is therefore important as it gives a greater measure of control to the LPA to ensure that edge of centre locations do not come forward first, unless justified in relation to the availability or otherwise of city centre sites. This is necessary in order to maintain the compact and walkable nature of the city centre and deflect 'satellite' commercial developments that might threaten the viability and demand for investment in the core, potentially leaving key areas undeveloped
- 5.12 As the Core Strategy period progresses and new development takes place, both within and adjoining the city centre, the city centre boundary can be expanded via an amendment to the Proposals Map. This will be in response to observable change in the character, role and function of areas adjoining the existing city centre. This will be undertaken through the 1st review of the Core Strategy programmed 5 years after its adoption.

- 5.13 The 3rd part of diagram 8 that refers to a series of new and enhanced pedestrian bridges is taken from the Council's adopted Public Realm and Movement Strategy (see CD4/UDL13). They are proposed projects, subject to funding.

Transportation: Bath Transport Package

The Issue

- 5.14 The issues raised are set out in Annex 1, paragraphs A19 to A22 of the Inspector's preliminary comments and questions (document ID/1).

Council Response

- 5.15 The Council outlined its initial response to the Inspector's questions in BNES/1. This response requires updating in some respects to reflect progress and the significant proposed changes to the Draft Core Strategy agreed by Council on 15th September 2011 (see CD5/22).
- 5.16 The Council's initial response referred to successful bids to DfT for funding by the Council, with its West of England partners, to help it pursue and deliver its transport aims. Information relating to the Local Sustainable Transport Fund (set out in paragraph 8.18 of BNES/1 needs updating as follows (underlined text represents updated information): The Council, with its West of England partners, continue to successfully bid to DfT for funding. The Council has recently received £750,000 from the Local Sustainable Transport Fund, part of a £5m Key Component award to the West of England, for promoting behavioural change. In addition, the Council has been successful in winning approval to make a further bid for £25.5 million from the Local Sustainable Transport fund by the Department for Transport. This bid will be submitted in December this year with the final award due in the summer of 2012. The success of this bid should provide significant funding to encourage continued mode shift away from the car.
- 5.17 Since its initial response to the Inspector's preliminary comments and questions in BNES/1 the Council has undertaken work reviewing the Draft Bath Parking Strategy to take account of changes to the BTP agreed by Council on 14th July 2011. The reviewed Draft Bath Parking Strategy which has been considered by the Council's Planning, Transport and Environment Policy Development & Scrutiny Panel in September 2011 has informed the Council's significant proposed changes to the Core Strategy (CD5/22). The elements of the initial response set out in BNES/1 relating to the Bath Parking Strategy (see paragraphs 8.19 to 8.22 of BNES/1) are replaced and superseded by the response in paragraphs 5.19 to 5.23 below.
- 5.18 The Draft Bath Parking Strategy having been considered by Planning, Transport and Environment Policy Development and Scrutiny Panel is currently being updated. After completion of further work the draft Strategy will be resubmitted to the

Overview and Scrutiny Committee prior to wider public consultation. Final approval of the Strategy will be made by the Council's Cabinet.

- 5.19 The Draft Bath Parking Strategy aims to meet national and local objectives for transport and land use, which seek to protect the environment and promote economic growth. Parking policies form an integral part of LTP3; the Local Development Framework (including the Core Strategy and the Placemaking Plan); air quality targets; and implementation of the Public Realm and Movements Strategy (PR&MS) for Bath.
- 5.20 Conclusions emerging from the Draft Bath Parking Strategy have informed the assessment of the potential availability of some city centre car parking sites for redevelopment, through the Strategic Housing Land Availability Assessment and the Bath Economic Regeneration Delivery Plan. The Draft Parking Strategy is currently based on the assumed expansion of existing P&R sites as set out in the best and final bid for the BTP following its amendment by Council on 14th July 2011.
- 5.21 The draft Parking Strategy states that city centre parking levels will have to be broadly maintained at current levels. Redevelopment of city centre car parking sites can still be supported provided parking levels are maintained either on or off site
- 5.22 The Council will be assessing possible sites for an East of Bath Park and Ride site and will continue to pursue this important intervention. Should a site be identified in the short to medium term the Parking Strategy would be reassessed as would the potential effect on redevelopment sites within Bath City centre.

Flood risk

- 5.23 The Council's response to the issues raised by the inspector in questions A23 and A24 of ID/1 is set out in section 1 above (see paragraphs 1.15 – 1.23).

COUNCIL RESPONSE TO ID/4

6. DRAFT NATIONAL PLANNING POLICY FRAMEWORK

The Issue

- 6.1 This sections sets out the Council's response to the issues raised by the Inspector in paragraphs 2.1 to 2.3 of his further preliminary comments and questions (document ID/4).

Council Response

- 6.2 The Council has assessed the implications of the draft National Planning Policy Framework (NPPF) for the Core Strategy. It has concluded that the draft Core

Strategy broadly conforms with the draft NPPF. However, an area of concern for the Council is the proposed requirement for a 5 year Housing land supply+ 20% to which the Council is objecting. It should also be noted that some of the Significant Proposed Changes published for consultation from 19th September to 21st October will also help to ensure greater alignment with the draft NPPF. However, should the draft NPPF be adopted in its current form the Council considers that some further changes and clarifications to the draft Core Strategy would be necessary. Given the draft nature of the NPPF these changes are not formally proposed by the Council at this stage. Rather they are potential changes that would need to be made if the NPPF is adopted in its current form.

- 6.3 The Schedule of Potential Changes Arising from the Draft NPPF (CD5/23) has been submitted and been made available for public comment alongside consultation on the Schedule of Significant Proposed Changes (CD5/22). Consultees have also been invited to give their views more generally on the implications for the draft Core Strategy of the draft NPPF and whether any further changes are needed. In light of the timing of the NPPF, any consequential changes will need to be considered through the examination process

7. SOMER VALLEY

The Issue

- 7.1 This sections sets out the Council's response to the issues raised by the Inspector in paragraphs 3.1 of his further preliminary comments and questions (document ID/4).

Council Response

How would the requirement for employment benefit work in practice?

- 7.2 Core Strategy Policy SV14b seeks to restrict new housing coming forward above the exiting commitments (plan period completions, planning permissions and site allocations). This is a response to the issues identified through the evidence gathered and options consultation. The key issues identified include the current significant imbalance between jobs and homes, high level of out-commuting and lack of local employment. The existing infrastructure, including the road network, is not sufficient to support substantial housing development without significant improvement and investment. However, this is highly unlikely given the current limitations on public funding. In order to finance these major infrastructure improvements through new development, the Somer Valley would have to accommodate much larger levels of growth with significant new housing development resulting in major town expansion. This does not accord with the Vision for the area developed with the local community through the Plan making process. Most significantly it would not address the imbalance between jobs and homes (especially in the short term) because of the difficulties of generating new employment in the area.

- 7.3 The Vision for the Somer Valley is to become more self-reliant, facilitated by economic-led regeneration and enhancing the role of Midsomer Norton and Radstock Town Centres as key employment centres. The Core Strategy seeks to accommodate housing development in a way that supports sustainable communities with increased employment. There are some development opportunity sites in the town centres and housing provision is supported if residential value provides the basis for overall viability to deliver employment-led mixed used schemes or there are other economic benefits. Therefore, the emphasis of the strategy and development delivery is employment led in response to the particular circumstances in this part of the District.
- 7.4 Potential housing development sites identified in the Somer Valley through the SHLAA are primarily in Midsomer Norton and Radstock town centres, the disused Alcan Factory (Planning application received for mixed use with 172 dwellings) and as part of the Town Park. Therefore, new housing development proposals above exiting commitments should either provide employment provision on site or make financial contribution through planning obligations to economic objectives. Once the Council adopts the Community Infrastructure Levy, contributions may be made through the CIL process.

Town Park: Is a Town Park required to make additional housing development acceptable?

- 7.5 Lack of formal open space is a strategic issue in Midsomer Norton and Radstock. Whilst there are no formal national standards for the provision of formal town parks, the local communities have had a long time desire for a Town Park. The area is unusual in terms of the absence of such a facility in the towns. The proposal is therefore described as '*desirable*' infrastructure in paragraph 4.25 of the Core Strategy as opposed to '*essential*'. In the interests of facilitating delivery of the Town Park, the Council is prepared to accept an element of additional housing.
- 7.6 The CIL regulations differ to s.106 in that they do not have the same test between developer contributions and the development – CIL is more akin to a development tax and being a priority for the Council, it will include the Town Park in its CIL Regulation 123 statement (infrastructure investment). However, this scheme would be more appropriately secured through a s.106 legal agreement than CIL.

8. RURAL AREAS

The Issue

- 8.1 This sections sets out the Council's response to the issues raised by the Inspector in paragraphs 4.1 to 4.9 of his further preliminary questions (document ID/4).

Council Response

Relationship of RA1 with saved Local Plan Policy SC.1

- 8.2 The Inspector is unclear as to which villages are suitable for more than infilling because Policy SC.1 of the Local Plan is saved and appears to overlap with Core Strategy policy RA1 (those villages listed as meeting the criteria in RA1 represent only some of the settlements listed as R.1 villages in the Local Plan). In relation to residential development there is no overlap. Villages that are suitable for more than infilling are those which are covered by Core Strategy policies RA1 and RA2. The villages where development is limited to infilling are those which are washed over by the Green Belt. These villages are identified in Local Plan policy SC.1 as R.3 settlements and residential development proposals will continue to be determined against the provisions of saved Local Plan policy HG.6.
- 8.3 It is necessary to save Local Plan policy SC.1 as the Core Strategy does not set out the policy framework for considering residential development proposals in villages washed over by the Green Belt. This policy framework continues to be provided by saved Local Plan policy HG.6. In relation to R.1 and R.2 settlements Local Plan policy HG.4, which stipulated what was suitable in terms of residential development, has not been saved. Therefore, Local Plan policy SC.1 is not relevant in relation to residential development in R.1 and R.2 settlements. Residential development proposals will be determined against the Core Strategy policies that will replace HG.4 i.e. policies RA1 and RA2 for villages not washed over by the Green Belt.

Taking account of changing circumstances in the villages, demonstrating local community support criterion and the indicative list

- 8.4 The Inspector has queried what is meant by 'This indicative list will be included in the review of the Core Strategy'. This is not redundant text from a previous draft and alludes to the flexibility of the policy. It is recognised that the villages which meet the criteria listed in a - c in policy RA1 will change over time and local communities were keen for this to be recognised in the Core Strategy. Policy RA1 also sets out the criteria by which residential development proposals will be assessed. Proposals which meet the criteria (and otherwise do not conflict with National Policy or other parts of the Core Strategy) would normally be approved. The Core Strategy is different to the Local Plan in that it does not seek to 'set in stone' those villages which are identified as suitable for a higher level of residential development for the whole plan period. This was a deficiency in the Local Plan e.g. if a local facility closes, the village may no longer be a suitable location for residential development in the interests of sustainability. The list of villages only indicates those villages which meet the criteria according to the facilities survey undertaken in 2010.
- 8.5 The indicative list is meant to be just that – an indicative list, and not a definitive list. The Council will list the villages that meet the criteria each year in its AMR. The criteria in Policy RA1 will be applied at the time an application is submitted which

allows for changes in the circumstances of villages to be reflected. This includes demonstrating criterion C. The views of parish councils may change over time and identification of a village in the 'indicative list' in the draft Core Strategy represents the position of the relevant parish council at the time of the submission. The proposed change to the wording at Paragraph 5.18 (FPC4 in CD5/22) aims to clarify the flexibility of the policy and associated indicative list of villages.

- 8.6 The Inspector has also questioned the use of the principle of community support as a criterion in relation to development at the villages only and not in relation to development in Bath or at the towns. The strategy is based on focussing development to meet the needs of the district in the urban areas and applying restraint in the rural areas in line with national policy. Allocations for development will be made in Bath and the towns to meet this strategic need through the Placemaking Plan, and a local support criterion is considered to be inappropriate within this strategic context. The small scale development proposed for the rural areas, however, aims to meet local need and there is greater scope for such a criterion. In addition, during development of the Core Strategy the Parish Councils raised concern about Policy RA1 status being imposed upon villages without potential for reconsideration until formal review of the Core Strategy. With the proposed abolition of the RSS and the emerging localism ethos, it is considered appropriate to provide the vehicle to reflect these community aspirations by including the community support criterion in relation to the rural areas.

Relationship of villages listed as inset from the Green Belt at Para 6.64

- 8.7 Paragraph 6.64 in the draft Core Strategy refers to villages that are inset from the Green Belt as the most sustainable rural locations for accommodating limited new development. These villages are not the same as those listed as R.1 settlements under Local Plan Policy SC.1. However, development in accordance with policy RA1 could be appropriate where they meet the criteria listed in the policy. Reference to the villages inset from the Green Belt as being the most sustainable rural locations for development is confusing. Therefore, in the Proposed Changes the wording of the paragraph has been amended to clarify its meaning (see FPC10 in CD5/22). The villages inset from the Green Belt are those which are most sustainable within the area of the District covered by the Green Belt and as such are appropriate for development more than infilling in accordance with either policy RA1 or RA2. With regard to the two villages inset from the Green Belt, Farmborough is currently included in the indicative list of villages meeting the criteria of policy RA1, whereas Saltford does not and would therefore, be subject to policy RA2. All other villages in the area covered by the Green Belt are washed over by it and development is limited to infilling.

Housing Development Boundaries

- 8.8 The purpose of the review of Housing Development Boundaries (HDBs) will be to assess how future local housing needs can be best met. The review of HDBs will take place through the Placemaking Plan and will be undertaken in consultation with the

Parish Councils as representatives of the local communities. The review will also need to reflect the emerging localism and NPPF context relating to neighbourhood plans and the provision of affordable housing in rural areas. Whilst the scope of the HDBs review will be a decision for the Placemaking Plan it is likely that it will relate to all RA1 and RA2 villages. This will include the two villages inset from the Green Belt. The potential effect on the Green Belt inset boundary for these villages will be considered via the Placemaking Plan, however, current indications suggest that a change to the inset boundary for either village is unlikely. In relation to villages in and washed over by the Green Belt HDB reviews may not be necessary, but where undertaken they would redefine the area of the village within which infill housing development is acceptable.

Rural exceptions policy

- 8.9 It is considered that allowing a small proportion of market housing to cross subsidise affordable housing where essential for viability is not contrary to PPS3. The approach is considered to be pro-active and it responds to the identified need to improve the viability of delivering rural exception sites as required at PPS3 Para 30. In addition, the draft NPPF at paragraph 112 supports the direction of the Core Strategy policy by suggesting that local planning authorities should consider allowing some market housing in rural areas where it would facilitate provision of affordable housing to meet local needs.

Conversion or replacement of agricultural buildings to residential

- 8.10 The requirement for conversion or replacement of underutilised agricultural buildings to residential where it can be demonstrated that the building is not required for local food production is a local priority. This is stated in the vision and objectives of the Core Strategy. The vision states that 'The potential for the rural area to play an important role in local food production will be promoted' and objective 6 includes 'encouraging and facilitating increased local food production'.
- 8.11 The wording referred to by the Inspector (at Core Strategy Para 5.36) is not policy; it is intended to set the direction for detailed policy to be developed in the Placemaking Plan. It is considered that inclusion of detailed policy or criteria relating to this would be inappropriate within the Core Strategy.
- 8.12 It is not considered that this approach is in conflict with national policy. In PPS3, EC.6 (c) it is stated that local authorities should support conversion and re-use of existing buildings for economic development. Based on the local priority identified the Council wishes to place particular emphasis on economic development relating to local food production.

9. RESPONDING TO CLIMATE CHANGE

The Issue

- 9.1 This sections sets out the Council's response to the issues raised by the Inspector in paragraphs 5.1 to 5.7 of his further preliminary questions (document ID/4).

Council Response

Evidence Base

- 9.2 In paragraph 5.1 of ID/1, the Inspector notes that the justification for the policy approaches taken with reference to the evidence is complex, and that the link between policy and evidence is not clear. The links between the policy and the evidence are summarised in more detail below:
- 9.3 In relation to Policy CP2, the required standards draw on evidence in the renewable energy studies CD4/S7 and CD4/S8, the Code for Sustainable Homes requirements are tested in the Viability Study (CD4/H8). The 2010 Renewable Energy Study concludes that:

"The resource analysis shows that, when combined with improving energy efficiency measures, there is adequate local resource to achieve mandatory BRegs carbon reduction for residential property to progressively move to the achievement of zero carbon by 2016; and for non-residential property by 2019. It should also therefore be possible for developers to achieve the parallel Code for Sustainable Homes from 2013 onwards, up to Level 6 by 2016 and BREEAM Excellent by 2019."

(CD4/S8 recommendation 3, pages 8-9)

- 9.4 The increased emphasis on energy in the revised CfSH further serves to ensure that the building regulations element is a major element of meeting the Code (CD4/S8 page 4). Further detail on the approach in the studies is included in paragraphs 9.8 and 9.9 in this response.
- 9.5 Policy CP3 sets the district-wide renewable energy targets. The evidence in the Renewable Energy and Planning Research study (CP4/S7) and Renewable Energy Research Update study (CP4/S8) assessed renewable energy potential on two bases; firstly, an assessment of technical potential; and secondly, on the basis of the target potential.
- 9.6 The 'Technical' potential relates to the maximum renewable energy that would be technically possible within B&NES. This is the total of the maximum potential for each of the individual technologies considered, giving a current upper limit on the likely renewable energy potential for B&NES. In comparison, the 'Target' potential is the renewable energy potential that remains after a number of constraints have been applied to the 'Technical' potential. These include constraints such as

landscape and environmental issues. Therefore whilst it is challenging, it provides a reasonable prospect of being met and making a contribution to national renewable energy targets. This 'Target' potential formed the basis for the district-wide target in Policy CP3.

- 9.7 In relation to Policy CP4, as outlined in Table 2 of the Topic Paper (CD6/S4) the initial recommendation for the Council to consider District Heating potential as a way of enabling particularly urban brownfield sites to meet zero carbon in future was initially raised in the Renewable Energy Research (CD4/S7). A more detailed District Heating Feasibility study followed (CD4/S1-5), upon which the policy is based. As outlined in Table 2 of Topic Paper 3 – Climate Change (CD6/S4) the fifteen district heating opportunity areas included in the Core Strategy are identified as clusters with potential for District Heating in the study (Figure 10, page 30 of CD4/S1-5) and the study directly supports the inclusion of this policy (para 5.3, CD4/S4).

Sustainable Construction

- 9.8 In paragraph 5.2, the Council is asked to consider its approach in light of the draft NPPF. Should the draft NPPF come into effect in its current form it will have different impacts on Policies CP1-4. In relation to Policies CP1, CP3 and CP4 it is considered that these policies would be further supported by national policy (NPPF para 152). In relation to Policy CP3, the approach in terms of using national standards and consistency with national requirements would also generally conform with the policy approach, although it remains ambiguous as to whether the NPPF would enable local standards to be set (NPPF para 150).
- 9.9 In paragraph 5.3, it is noted that the Council's evidence base (CD4/S8 para 7.4) does not support bringing sustainable construction standards in advance of national requirements. The Council's policy at CP2 is generally in line with this as it does not seek to advance the requirement for zero carbon by 2016 (residential) and 2019 (non-residential), but it seeks for the whole of the Code for Sustainable Homes to be met in line with the introduction of energy elements via building control. The viability study acknowledged this would incur additional costs on development and this has been modelled and considered when setting the affordable housing policy. The costs modelled reflect both national data available at the time, and the locally specific cost information developed in the renewable energy study (CD4/H8 para 3.40-3.42).
- 9.10 Furthermore, later in paragraph 5.3 the need to justify the local policy in light of the tests in the PPS1 supplement (para 32) is raised. The policy position in relation to these tests is outlined in the following table:

<p>PPS1 Supplement When proposing any local requirement for sustainable buildings planning authorities should:</p>	
<p>Test 1: Focus on development areas or site specific opportunities</p>	<p>When setting the sustainable construction policy CP2 the Council has used evidence which considers the site profiles in the district, in terms of typologies urban brownfield small scale and larger scale, Keynsham brownfield development, Norton Radstock brownfield development, and rural (see CD4/S7 pages 7-8; pages 27-28). Therefore, although the policy is district wide in nature the evidence that has been developed is local site typology specific.</p> <p>The recommended Code Levels in line with the national standards and stepping up of Building Regulations, have been tested in this study in terms of the technical capability of these standards to be achieved on the local site profiles (in particular in relation to zero carbon).</p> <p>In terms of viability the Council’s Viability Study models the Code level requirements, in full i.e. not just building regulations elements (CD4/H8 paras 3.40-3.45), as a standard cost across the district and this has been considered as a given in setting the affordable housing policies. The viability model only considers costs up to Code 4; this approach is justified in the study (CD4/H8 paragraphs 3.44-45).</p> <p>The Code level requirements are also being built into the base assumptions for the CIL Charging schedule.</p> <p>The requirement for BREEAM Excellent (to include zero carbon) for non-residential reflects the Government’s intention to introduce the requirement for all non-domestic development to be zero carbon by 2019 (CD4/S7 page 16).</p>
<p>Test 2: Specify the requirements in terms of achievement of nationally described sustainable building standards (e.g. Code for Sustainable Homes)</p>	<p>Policy CP2 does relate to nationally described standards Code for Sustainable Homes and BREEAM.</p>

<p>Test 3: Ensure the requirement is consistent with their policies on decentralised energy</p>	<p>Policy CP2 and CP4 are entirely compatible. The B&NES Renewable Energy study considers the site profiles in the district and identifies that for the brownfield urban sites district heating will be a good way of meeting future zero carbon requirements (CD4/S7 paras 7.4, 7.1.5, 7.2.4.1). CP4 as an encouraging policy should therefore support the delivery of zero carbon schemes in the future.</p>
<p>Test 4: Does not require local approaches for a building’s environmental performance on matters relating to construction techniques, building fabrics, products, fittings or finishes, or for measuring a building’s performance unless for reasons of landscape or townscape.</p>	<p>Policy CP2 does not include this.</p>

Retrofitting

9.11 In response to paragraph 5.4, it is the intention that the requirement in relation to Masterplanning applies only to buildings within the scheme area. To clarify this in the policy, the Council has advertised a wording change, in the Schedule of Significant Proposed Changes to the Draft Core Strategy for Comment, September 2011 (CD5/22) as change “PC80 as amended”.

District Heating

9.12 Set out below is the Councils response to paragraph 5.5, as to why Policy CP4 applies to all 15 potential clusters identified in the study as “district heating priority areas” (CD4/S2) and not just the three clusters where more detailed technical and financial modelling has been undertaken (CD4/S3).

9.13 All of the 15 clusters shown by the study to have potential for district heating are identified in the Core Strategy. The study considered: heat density, presence of anchor loads, building types, future plans and building ownership. This is the standard approach used to identify district heating potential areas, and closely accords with methodologies employed in other cities such as Birmingham, London, Southampton and Bristol. The approach is also supported in guidance on strategic heat planning included in the TCPA’s *Community Energy: Urban Planning for a Low Carbon Future*, 2008 (<http://www.tcpa.org.uk/data/files/ceg.pdf>).

9.14 The more detailed technical and financial modelling was additional to the standard evidence for district heating, and considered the more complex areas with highest

demand in multiple ownership i.e. Keynsham Town Centre, Bath City Centre and Bath Riverside. This was undertaken to act as a catalyst to the Council considering the implementation and potential to take an active role in facilitating district heating networks in these locations. It also serves as additional evidence for the viability and feasibility of these more complex networks.

- 9.15 Other clusters, with significant delivery potential are in single ownership or are less complex, for example Royal United Hospital which is already seeking to implement a district heating scheme and Bath Spa University, which recently included an application for a new energy centre and district heating network as part of its planning application for campus redevelopment. More detail on district heating schemes already being considered and implemented in the district can be provided as necessary.
- 9.16 In other cases areas demonstrate potential but there may be some delivery issues. In these cases a consideration of thermal planning should assist to improve the potential for these networks. Furthermore, this is an encouraging policy rather than a requiring policy which allows developers to make the case that it is not the most appropriate solution to reducing carbon emissions.
- 9.17 In response to paragraph 5.6, "infrastructure for district heating" would be decided on a site by site basis, as appropriate, for example in some cases this might be an energy centre, or space for an energy centre, insulated pipes, or appropriate low cost measures to future proof should be included e.g. capped off connections to the internal heating system, consideration of location of plant room to facilitate potential future use as a District Heating energy centre, provision of a trench or capped plastic sleeve under building to allow a point of entry for pipework without significant future intervention (see paragraph 4.6 of CD4/S3).

Viability

- 9.18 In response to paragraph 5.7 and the issue of development viability, explicit reference to viability issues as a consideration has been advertised as a wording change in the Schedule of Significant Proposed Changes to the Draft Core Strategy for Comment, September 2011 (CD5/22) as changes "PC81 as amended", "FPC7" and "PC82 as amended".

10. AFFORDABLE HOUSING

The Issue

- 10.1 This sections sets out the Council's response to the issues raised by the Inspector in paragraphs 6.1 to 6.5 of his further preliminary questions (document ID/4).

Council Response

- 10.2 The Council's response to the issues raised in paragraph 6.1 is set out in paragraphs 5.2 – 5.8 above.
- 10.3 In paragraph 6.2 of ID/4, the question arises as to whether the policy is sufficiently clear or whether it should specify differential affordable housing rates for different areas. This issue has been considered in some detail and the Council's position is set out in the Affordable Housing Topic Paper, dated May 2011, section 7, table 2 (CD6/S6). It is considered that the intention that affordable housing provision will range from below the average target of 35% and rise up to a maximum of 45%, subject to viability, with this being an integral part of the decision making process.
- 10.4 In response to the comments made by the Inspector in paragraphs 6.3 and 6.4, the Council has advertised the suggested wording change, in the Schedule of Significant Proposed Changes to the Draft Core Strategy for Comment, September 2011 (CD5/22) as change "PC91".
- 10.5 In terms of the issues raised in paragraph 6.5, these are considered in turn below:

i) Affordable Rent

In response to the creation of "affordable rent" as a new type of affordable housing by the Government, the Council has advertised a suggested wording change in the Schedule of Significant Proposed Changes to the Draft Core Strategy for Comment, September 2011 (CD5/22) as change "PC91 as".

This reflects the findings of the Council's recent study "The Impact of Affordable Rents on the Viability of Residential Development with Affordable Housing Planning Obligations (June 2011)" (CD4/H15). This was a piece of research undertaken by Planning and Housing Departments to understand the viability economics and affordability issues for occupants together. Headline findings were as follows:

- "Affordable rent tenure" does not necessarily impact positively on viability in lower value housing market areas (e.g. Midsomer Norton & Radstock). This is particularly the case for smaller 1-2 bed units in these areas.
- "Affordable rent tenure" has a positive impact on viability of family housing in high value housing market areas (e.g. Bath). But this in turn makes these units less affordable for the occupier as rents are high, being linked to market rents.
- Affordable rents in B&NES are likely to be significantly more expensive than social rents – particularly in areas with higher market rents (e.g. north Bath) and for family housing
- Registered providers see a number of issues with the new tenure model and are pricing this "risk" at the current time

Considering the research and the limitations of the "affordable rent" tenure, it is considered that no change to the tenure split included in the policy is made, i.e. retain the 75% social rent and 25% intermediate split.

ii) Smaller Site Percentage

In relation to the application of the 17.5% provision of affordable housing on small sites, the provision is little different from any other percentage in terms of it often resulting in a fraction. It is normal to round up or down to the nearest whole number where on site provision is sought. It will also be possible to allow for fractions to be calculated on small sites between 5 and 9 dwellings where a commuted sum is to be acceptable in lieu of on-site provision.

iii) Staircasing

The Council agrees that arrangements can be put in place to secure the recycling of staircasing receipts in order that the same number of affordable dwellings remain available for future eligible households. A minor wording change to clarify that it is the number of affordable homes rather than the "unit" itself that is being protected, has been advertised in the Schedule of Significant Proposed Changes to the Draft Core Strategy for Comment, September 2011 (CD5/22) as change "PC91 as".

11. MONITORING

The Issue

- 11.1 This sections sets out the Council's response to the issues raised by the Inspector in paragraph 7.1 of his further preliminary questions (document ID/4).

Council Response

- 11.2 In response to the Inspector's request to review the effectiveness and usefulness of the monitoring framework the Council has proposed a number of changes to the draft Core Strategy monitoring framework to make it more effective (see Schedule of Significant Proposed Changes – CD5/22, FPC 23 - 32). In the draft Core Strategy a 'target' was only included where it was quantifiable (termed 'Quantification of objective'). However, having reviewed both the draft Core Strategy framework and those in other adopted Core Strategies it is considered appropriate to also include a range of qualitative targets. Therefore, for a number of indicators, where sufficient evidence is not available to set a quantitative target, qualitative targets are now proposed which give a clear indication of the direction of travel. For other indicators a new or revised quantitative target is proposed. The relevant quantitative targets and the reason for their inclusion are set out in the table below:

New/revised quantitative target	Reason for inclusion
At least 80% of new housing provided between 2006 and 2026 should be on previously developed land	Amended from reference to national target of 60% as draft NPPF proposes to remove it. B&NES target derived from SHLAA.
3,400 affordable homes completed by 2026	Reference in policy DW1 now transferred into monitoring framework (see paragraphs 5.2 – 5.8 above for further explanation of how the figure is derived)
Delivery of 22 permanent and 20 transit pitches for Gypsies and Travellers by 2016	Accommodation need as derived from West of England Gypsy & Traveller Accommodation Assessment which is now referred to in Core Strategy.
By 2016 within the Bath AQMA and Keynsham AQMA annual average concentrations of Nitrogen Dioxide (NO ₂) not to exceed 40µg/m ³	This target is derived from the Bath and Keynsham AQMAs (see CD4/ENV1 and CD4/ENV 4 respectively).

APPENDIX 1

B&NES SUMMARY OF AFFORDABLE HOUSING ANALYSIS

	Built or Committed Sites			Future Sites			Total Sites		
	Total Units	Affordable Units	%	Total Units	Affordable Units	%	Total Units	Affordable Units	%
Bath	3713	828	22%	2510	876	34%	6223	1704	27%
Keynsham	604	184	30%	935	327	35%	1539	511	33%
Somer Valley	1787	491	27%	755	263	30%	2542	754	28%
Total	555	89	16%	245	86	35%	800	175	22%
B&NES	6659	1592	24%	4445	1552	35%	11104	3144	28%

BATH SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Totals	3713	828	22%	2510	876	35%	6223	1704	27%	822
Remainder of Crest OPA.1	2288	570	25%	286	100					294
Crest Phase DPA.1	299	121	40%							
Remainder of Crest OPA.1	1982	449	23%							
B F I Waste Systems	7	0	0%							
>Westmark				120	42	35%				36
>Argos River Frontage				15	5	35%				4.5
>Onega Centre				36	13	35%				10.8
>Comfortable Place				61	21	35%				18.3
>Hinton Garage				54	19	35%				16.2
B1: Bath Western Riverside East				347	121	35%				104.1
> Green Park Station				97	34	35%				29.1
> BWR East excluding Help Hire				250	88	35%				75
> <i>Helphire (210 units Post 2026)</i>										

BATH SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Large Sites Built	639	191	30%							
St Martins Court	12	0	0%							
237 Englishcombe Lane	11	0	0%							
225 Haycombe Drive	8	8	100%							
Sutcliffe House	14	0	0%							
St Peters Church	20	6	30%							
B5: Solsbury Park	71	22	31%							
B3: Rush Hill	139	39	28%							
B13: St Martins Hospital	128	33	26%							
Gibbs Garage, Bathwick Street	14	0	0%							
Post Office, New Bond Street	10	0	0%							
New Burnt House, Odd Down	18	18	100%							
Manor Road, Weston	13	0	0%							
Bruton Avenue Garages, Bear Flat	12	0	0%							
Lymore Yard	10	0	0%							
St Peters Hall	10	0	0%							
Holcombe Green (Net)	4	4	100%							
Southlands	24	24	100%							
Day Crescent	12	12	100%							
7-9 Broad Street	10	0	0%							
B4: Souhtgate	99	25	25%							

BATH SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Large Sites with PP	168	52	31%							
Smile Stores, St Georges Place	12	0	0%							
Marjorie Whimster House	29	29	100%							
Telephone Exchange, Lansdown	9	0	0%							
88 Coronation Avenue	11	0	0%							
43 Upper Oldfield Park	14	0	0%							
Former Garage, Piccadily Place	11	0	0%							
Southbourne Gardens	10	0	0%							
Byways, Bathwick Street	12	0	0%							
14-16 Monmouth Place	14	0	0%							
B18: Haysfield Playing Field, Frome Rd	18	18	100%							
5 - 13 Somerset Place	28	5	18%							
Small Sites Built	393	15	4%							
Small Sites with PP	225	0	0%							

BATH SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
SHLAA River Corridor Housing Potential				455	156	34%				101.4
Twerton Riverside (Bath Press)				10	4	35%				
Walcot Yard				8		0%				
B16: Podium and Hilton				48	17	35%				14.4
Avon Street Car/Coach Parks				90	32	35%				27
Manvers Street				30	11	35%				
1-3 James Street West				10	4	35%				
Saw Close				10	4	35%				
Alexander House, Norfolk Place				19	7	35%				
Travis Perkins, Renault & Toyota Dealerships				90	32	35%				27
Twerton Riverside (Roseberry Place)				65	23	35%				19.5
Twerton Riverside (Unigate Dairy)				30	11	35%				
Twerton Riverside (Carrs Mill)				45	16	35%				13.5
SHLAA Outer Bath Housing Potential				1422	498	35%				426.6
MoD Foxhill				700	245	35%				210
MoD Enleigh				350	123	35%				105
MoD Warminster Road				140	49	35%				42
Land at Royal United Hospital				50	18	35%				15
Lambridge Harvester				50	18	35%				15
B7: 89-123 Englishcombe Lane				40	14	35%				12
Hope House, Lansdown Road				35	12	35%				10.5
Bath Lawn Tennis Club, Park Lane				15	5	35%				4.5
Nursery Building, Powelett Court				12	4	35%				3.6
Lime Grove School				15	5	35%				4.5
B14: St Mary's School				15	5	35%				4.5

KEYNSHAM SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future Sites			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Totals	604	184	30%	935	327	35%	1539	511	33.20%	
Key Development Sites with PP	285	100	35%							
K2: South West Keynsham (Eastern, Houses)	230	81	35%							
K2: South West Keynsham (Eastern, Flats)	55	20	35%							
Key Development Sites with no PP				845	296	35%				
K2: South West Keynsham (Western)				245	86	35%				73.5
K1: Somerdale				600	210	35%				180
Large Sites Built	90	65	72%							
Cinema	14	0	0%							
Hawthorns House	23	23	100%							
Yard at Pool Barton	11	0	0%							
12A Caernarvon Road (net)	15	15	100%							
Amberley Close (net)	27	27	100%							
Large Sites with PP	60	0	0%							
Fairholm Manor, 130 Wellsway	12	0	0%							
Rear of 94-96 Temple Street	14	0	0%							
Temple Infant School	10	0	0%							
Temple Junior School	11	0	0%							
The Grange Hotel	13	0	0%							
Small Sites Built	115	19	17%							
Small Sites with PP @ 31st March 2010	54	0	0%							

KEYNSHAM SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future Sites			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
SHLAA Housing Potential				90	31	34%				27
Fire Station				20	7	35%				6
Riverside				35	12	34%				10.5
High Street Core				35	12	34%				10.5

SOMER VALLEY SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future Sites			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Total all Somer Valley	1787	491	27%	755	263	35%	2542	753.5	30%	
Total MSN	841	251	30%	755	263	35%	1596	514	32%	
Total P&P	946	240	25%	0	0	0%	946	240	25%	
Large Sites Built	298	97	33%							
NR9: Chilcompton Road I	4	0	0%							
NR9: Chilcompton Road II	43	11	26%							
NR7: Kilmersdon Road	34	0	0%							
WAN: Somermead	19	0	0%							
Wishord Mews	14	0	0%							
Greenacres	30	30	100%							
NR5: Mount Pleasant Hostel, Queens Road	14	14	100%							
NR4: St Peters Factory/Jewsons	107	32	30%							
77 Charlton Road	12	0	0%							
Plovers Rise	11	0	0%							
Builders Yard, Frome Road	10	10	100%							
Large Sites with PP	399	149	37%							
NR9: Chilcompton Road II	2	2	100%							
Land to rear of 52 High Street	23	23	100%							
Rear Of No 43, Elm Tree Avenue, Westfield	28	28	100%							
NR15: Cautletts Close	112	39	35%							
NR2: Radstock Railway Land Area 2	83	23	28%							
NR2: Radstock Railway Land Area 1	56	15	27%							
NR2: Radstock Railway Land Area 3	71	19	27%							
NR11: Hazel Terrace	24	0	0%							

SOMER VALLEY SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future Sites			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Small Sites Built	84	5	6%							
Small Sites with PP @ 1st April 2011	60	0	0%							
SHLAA Potential Supply				755	263	35%				195
Radstock County Infants (Pco)				14	5	35%				
Old Pit Yard, The Downs Clandown (PCo)				30	11	35%				9
St Peter's Park				14	5	35%				
NR4: St Peters Factory, Phase II				60	21	35%				18
NR13: Coomb End				30	11	35%				9
NR14: Welton Bibby and Barron				100	35	35%				30
Chesterfield House				10	4	35%				
Martins Block				10	4	35%				
South Road Car Park				10	4	35%				
The Hollies				80	28	35%				24
Alcan				150	53	35%				45
Charltons				50	18	35%				15
Old Bakery, Waterloo Road				40	14	35%				12
Post Office				20	7	35%				
Library/Youth Club/ Church Street Car Park				15	5	35%				4.5
Fortescue Road				10	4	35%				
Coomb End North A				45	16	35%				13.5
Coomb End North B				5	0	0%				
Clandown Scrap Yard (Bidwells):				12	4	35%				
Town Park Option				50	18	35%				15

SOMER VALLEY SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future Sites			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Large Sites Built	159	59	37%							
Sunnyside House, Frederick Avenue	25	25	100%							
Delkor, Paulton	14	0	0%							
V3: Polestar Purnell I, Paulton	120	34	28%							
Large Sites with PP	787	181	23%							
Paulton Builders Merchants	10	0	0%							
Heal House, High Street, Paulton (Pco)	10	0	0%							
V3: Polestar Purnell I, Paulton	41	0	0%							
V3: Polestar Purnell II, Paulton (Phase a)	39	15	38%							
V3: Remainder of EOUT Polestar Purnell II, Paulton	382	133	35%							
V3: Polestar Purnell III, Paulton	210	0	0%							
V7: Wellow Lane, Peasdown	95	33	35%							
Small Sites Built	58	0	0%							
Small Sites with PP @ 1st April 2011	42	0	0%							

RURAL AREA SHLAA SITES: AFFORDABLE HOUSING ANALYSIS

	Built or Committed			Future Sites			Total			30% on Future
	Total	Affordable	%	Total	Affordable	%	Total	Affordable	%	
Total	555	89	16%	245	86	35%	800	175	22%	
Large Sites Built	65	27	42%							
Parsonage Farm, West Harptree	11	11	100%							
V10: Goosard Lane, High Littleton	16	4	25%							
V8: Radford Retail, Chew Stoke	38	12	32%							
Large Sites with PP	69	30	43%							
Freshford Mill, Freshford	21	0	0%							
Goldney House, Temple Cloud	20	20	100%							
Wheeler & Co, Timsbury**	28	10	36%							
Large Site Applications	30	10	33%							
V9: Brookside Drive, Farmborough	30	10	33%							
Small Sites Built	212	22	10%							
Small Sites with PP @ 1st April 2011	179	0	0%							
Units to be identified in RA.1 Villages				245	86	35%				73.5