

Statement of Common Ground
B&NES Core Strategy – Alternative Strategic Site
Land West of Twerton, Bath

Prepared by
Woolf Bond Planning LLP
on behalf of
The Duchy of Cornwall
and
Bath & North East Somerset Council

13th February 2014

1 Introduction

- 1.1 In his note of 3rd January 2013 (ID/44) the Inspector outlined his requirements in terms of Statements of Common Ground that he would like to be prepared in advance of his preparation for the hearings in March/April 2014. He has also confirmed the dates and scope of coverage for these hearing sessions.
- 1.2 The Inspector has requested that the Council and the various owners/developers/promoters of the Green Belt sites proposed for allocation in the November 2013 Amendments should prepare Statements of Common Ground relating to delivery and environmental impact of those allocations as per the Council's proposals in the following revised policies:
- B3A Land Adjoining Odd Down, Bath
 - B3B Land Adjoining Weston, Bath
 - KE3A Land Adjoining East Keynsham
 - KE4 Land Adjoining South West Keynsham
 - RA5 Land at Whitchurch
- 1.3 The deadline for submission of hard copies of these Statements of Common Ground to the Inspector is noon on 14th February 2014; the Council has a working deadline of 7th February in order to ensure timely completion.
- 1.4 The Inspector has specified that the Statements of Common Ground, should include (but not be limited to), this template covers these issues accordingly:
- Delivery: Availability/start on site/likely annual completions (assuming that the Core Strategy is adopted by Autumn 2014).
 - Evidence already submitted relating to the main documents, including the evidence from landowners/developers included in the Core Documents or submitted with representations to the November consultation.
 - The Statement of Common Ground should make clear which parts of evidence are agreed and where there is disagreement briefly the main reasons for that disagreement.
- 1.5 The Inspector has suggested that the Statements of Common Ground may need to involve parties not currently active in the Examination, but they will only have a right to be heard if they have already made representations at an appropriate opportunity. The Council considers that this relates primarily to landowners who have not previously been involved in the examination process prior to Nov-Dec 2013.
- 1.6 In addition, Statements of Common Ground between the Council and other promoters in relation to their suggested alternative or enlarged proposals are welcomed by the Inspector as separate submissions. **This Statement of Common Ground relates to an alternative proposal.**

2 Description of the Site

General

- 2.1. The Duchy of Cornwall owns approximately 2,532ha of land to the south and west of Bath which includes 88ha of land located to the west of Twerton, adjoining the urban area of Bath. The 88ha is edged red on the plans included in the Urban Extension Development Proposal document (Feb 2011) (CD4/UE1) submitted with our representations upon the Submission Draft Core Strategy and identified at diagrams 26 and 27 of the Spatial Options Document, October 2009 (CD5/4). The site is also edged red on Plan WBP1 included as **Appendix 1**.
- 2.2. The site is broadly triangular in shape, extending from the Globe roundabout (the junction of the A39 and A4) to the west to Twerton to the east. The northern boundary is formed by the A4 and the Bristol to London railway whilst Whiteway Road/Pennyquick define the southern boundary to the site. This is a main road serving the village of Newton St Loe, as well as providing a link to the south of Bath.

Landscape and Policy Designations

- 2.3. As shown on the new Plan on the Core Document list (CD13/19), the site is not within the Cotswold AONB or the World Heritage Site (“WHS”), although it is located within the Green Belt. The landowner notes that this position is unchanged since the site was identified as the Council’s Preferred Option for an Urban Extension to Bath in 2009.
- 2.4. The Council considers that the site is located within the setting of the World Heritage Site.

Sustainability and Connectivity

- 2.4. The site is located within 2 miles of the City Centre.
- 2.5. Public bus routes run along the A4, connecting to Bath, both Universities and beyond to Bristol. Services would be enhanced as part of the masterplan proposals for the site.
- 2.6. There are a number of existing Public Rights of Way that cross the site and a series of tunnels underneath the railway that allow access to the river valley and direct links with the shared path which forms part of National Cycle Route No.4.

3 Delivery

3.1 The West of Twerton site is included in the Council's SHLAA as site F18 (CD10/E19), and is identified as potentially available for development.

3.2 The landowner considers that the west of Twerton site represents an opportunity to provide for a sustainable mixed use urban extension in the form of a new neighbourhood (contained on the plateau of the site) to provide for up to 2,000 dwellings together with employment provision (at a ratio of up to 1 job per dwelling), open space, community facilities and sustainable linkages to the city centre in a sympathetic manner, within a landscaped setting thus respecting the location of the site in this urban edge location.

3.3 The site is entirely owned by the Duchy and the landowner considers that there are no known technical impediments to bringing the site forward for development during the plan period.

3.4 The landowner has prepared a Master plan (CD4/UE1), which has been informed by a number of technical reports which include, but are not limited to the following considerations:

- Landscape
- Heritage
- Urban design
- Archaeology
- Sustainability/Highways
- Flood and drainage
- Grounds conditions and stability
- Ecology
- Drainage

3.5 The landowner considers that the site is available for development now and that there could be 500 dwelling completions or more achieved within five years (from the grant of permission) as a first phase of development of the site, the major part of the site is developable subject to achieving an allocated status through the plan making process.

3.6 Against the above background the landowner considers that the Masterplan:

- Addresses archaeology, following full excavations and evaluation
- Preserves the hillside approach from the west by restricting development to the plateau thus avoiding impact on the setting of Newton St Loe and protecting the valley land to the north of the ridge line to Seven Acre Wood
- Preserves views to Seven Acre Wood from the WHS

- Creates sustainable linkages between Bath Spa University at Newton Park and Bath through the site. There is also the potential to make existing bus routes more viable and the possibility of creating a future rail halt.

4. Key Relevant Evidence

Key Evidence produced by the Council

- 4.1. The key evidence prepared by the Council in relation to land West of Twerton is as follows:

<p>Key evidence 2012 (Taken from BNES 47)</p>	<ul style="list-style-type: none"> • Summary of key evidence to 2009 included in the <i>New neighbourhood in an urban extension to South / South West Bath - Information Paper (October 2009)</i> CD6/O2 • Core Strategy Spatial Options Consultation (CD5/4) • B&NES Urban Extension Environmental Capacity Appraisal: Land within the AONB surrounding Bath (2007) CD4/UDL23 • B&NES Urban Extension Environmental Capacity Appraisal (2006) CD4/UDL22 • B&NES Landscape and World Heritage Study of the Potential for an Urban Extension to the South/South West of Bath (2006) CD4/UDL21 • Slope, Geological Instability and Undermining Study, Arup (March 2010) CD4/ENV6 • Core Strategy – Post Submission Changes (Report to Council 15th September 2011) CD5/24 – in particular Annex 1 • Core Strategy – Post Submission Changes (Minutes of Council Meeting 15th September 2011) CD5/25 • World Heritage Setting SPD, Bath & North East Somerset Council (2012/2013) CD9/W1 • Previous iterations of SHLAA • Representations made during consultations • Previous B&NES Submissions to the hearings include: <ul style="list-style-type: none"> - B&NES 11: Green Belt - B&NES 25: Statement of Common Ground between B&NES and the Duchy: Major Alternative Sites in the Green Belt - B&NES 27: Statement of Common Ground on the Evidence Base in relation to WHS setting impact of an urban extension to Bath, between Bath & North East Somerset Council and the Duchy of Cornwall & The Princes Foundation <p>NB Much of this earlier evidence is in part superseded by more detailed evidence prepared to support the allocations as outlined below.</p>
<p>Evidence prepared within Core Strategy</p>	<ul style="list-style-type: none"> • Sustainability Appraisal Annex L (CD9/A1/5) • Arup Green Belt Review Stage 1 Report (CD9/E2) • Arup Development Concept Option Report for west of Twerton CD9/CO10

suspension (Taken from BNES 47)	<p>NB As per BNES/47 the Council is of the view that the Arup Concept Options were part of the investigative process but not conclusive of the development capacity. They do not represent a comprehensive assessment of all development constraints.</p> <ul style="list-style-type: none"> • Arup Transport Evaluations of alternative locations (CD9/I2/1-25 – in particular Appendix D CD9/I2/5) • Assessment of Locations in Annex 1 of the Council Report, 4 March 2013 (CD9/PC3)
Additional evidence to support proposed change Submitted alongside BNES 47 (Sept 2013)	<ul style="list-style-type: none"> • Stage 2 Green Belt Review, Arup CD9/E9 • WHS Setting and AONB Landscape and Visual Impact Assessment for West of Twerton CD9/LV/4 • English Heritage Spatial Options Representation CD8/1
Documents associated with the Core Strategy strategic site allocation Submitted (Nov 2013)	<ul style="list-style-type: none"> • SHLAA CD10/19
Assessments	<ul style="list-style-type: none"> • Sustainability Appraisal – in particular Annex L • Habitat Regulations Assessment

Landowner Evidence

- 4.2 The landowner has prepared a number of detailed technical reports on matters relating to highways, landscape and visual impact, heritage assets, ecology etc. Key evidence is summarised below:

Key landowner evidence	<ul style="list-style-type: none"> • Urban Extension Development Proposal (Masterplan) CD4/UE1 • Buro Happold – Review of Arup Instability Report (Jan 2011) CD4/ENV6 • Heritage & Landscape Report (Oct 2011) CD13/17
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- 4.3 Following the Core Strategy Examination hearings in early 2012, the Duchy of Cornwall asked the Prince's Foundation to undertake an independent study on the impact of development on Heritage Assets.

- 4.4 The Prince’s Foundation instructed independent consultants, including Architectural Historians Gavin Stamp, Dan Cruickshank and the Landscape Architect Michael Lear to undertake an assessment of the evolution of the Bath World Heritage Site. In particular their Brief was larger than the Twerton site itself: it was intended to assess the evolution of the Bath WHS – the entire City – over time, to address issues of setting and landscape and to identify key issues which might affect the desirability or design of an urban extension.
- 4.5 A Draft Bath Heritage Study was published in 2012 and a hard copy was made available to the Council and English Heritage. The landowner considers that this study considers the extent to which there would be any adverse impact on the defined heritage importance of Bath and the WHS.

New landowner evidence	<ul style="list-style-type: none"> • Draft Bath Heritage Study (2012) CD13/16 • Landscape Designations Plan (February 2014) CD13/19
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- 4.6. The landowner has stated that English Heritage is yet formally to respond in relation to the form and content of the Draft Heritage Study Report 2012.
- 4.7. Paragraph 134 of the NPPF sets out the approach to assessing a development proposal on a designated heritage asset which matter the landowners have addressed in previous submissions, noting in particular paragraphs 3.29 to 3.40 of their May 2013 representations upon the Proposed Changes to the Core Strategy). Extracts are attached as **Appendix 2**.

5 Summary of Agreed Matters

5.1. The following are matters agreed between the parties:

- The Council's Sustainability Appraisal identifies Bath as the most sustainable location for meeting housing needs in the District. The landowner considers that this omission site would contribute to meeting this need.
- The site was identified in the 2009 Spatial Options Document (CD5/4) reflecting the requirements of the RSS and was the Council's Preferred Option for an urban extension adjoining the urban area of Bath.
- The site could provide a mix of house types and tenures, including a significant proportion of affordable housing.
- The site represents a sustainable location in transport and accessibility terms adjoining the urban area of Bath.
- The West of Twerton site is not located in the floodplain, with the exception of the eastern edge of the site around Newton Brook, which lies within flood zone 3.
- Detailed desk-based and field surveys have been undertaken to help understand the potential buried archaeological constraints at the site. The scope of this work was agreed with the Council. Further discussions are proposed with the relevant parties to agree a suitable strategy to manage the archaeological constraints at the site.
- The Duchy of Cornwall has prepared and submitted an Urban Extension Development Proposal (CD4/UE1) which details the evolution of the Master plan proposals for the site.
- The site is comprised mainly of monoculture arable fields and as shown at Appendix 1.
- The findings of the Habitats Regulations Assessment of the 2009 Core Strategy Spatial Options (CD4/A9) did not identify any likely significant effects of development at West of Twerton (SWB1 in CD5/4).
- The Council notes that the landowner proposes that the scale of development proposed in their Masterplan for the West of Twerton site would result in an element of self-containment with a ratio of one job per dwelling.

6. Summary of Matters in Dispute

6.1. There continues to be dispute between the parties on the following matters:

Spatial Strategy

- The landowner considers that the site should be allocated in the Core Strategy; however, the Council considers that based on existing evidence, allocating the site would be contrary to the NPPF.
- The landowner considers that the site should be considered as a reserve allocation, to provide for a flexible and responsive supply of housing land. The Council considers that based on existing evidence that allocating the site would be contrary to the NPPF.
- Whilst the Council is of the view that the Core Strategy as submitted is sound, should the Inspector conclude that it is unsound in respect of either the level of housing and economic development it plans for, the choice of preferred strategic allocations or the degree of flexibility required there is disagreement between the parties regarding the suitability of the site to contribute to the resolution of these issues.
- The landowner considers that the Council's Sustainability Appraisal is predicated on the English Heritage objection.

World Heritage Site Setting & Landscape and Visual Impact

- The landowner and the Council are in disagreement about the landscape/visual impacts of development in this location, and impact on the setting of the World Heritage Site. The landowner considers the master plan approach to development at West of Twerton has an acceptable relationship with the World Heritage Site. The Council consider that development of the West of Twerton site would lead to substantial harm to the significance of the World Heritage Site and its setting.
- The landowner considers that its independent Bath Heritage Study (Draft 2012) CD13/16) provides important new evidence to justify the proposed development of a sustainable urban extension on land west of Twerton in relation to the impacts on the WHS, for the reasons outlined in detail in their representations. For the purpose of this Statement of Common Ground the Council has not had the opportunity to review a finalised Heritage Study.
- The draft Heritage Study was submitted to the Council in 2013. In general, the Council disputes the methodology used in the study, considering the approach flawed for the purposes of assessing the impact of development on the World Heritage Site and its setting. The Council is relying on its own evidence (as outlined in the previous Statement of Common Ground on this issue B&NES 27 and the more recent evidence in particular CD8/1

(English Heritage Representations) and the further WHS setting and AONB impact study CD9/LV/4.

- The Duchy of Cornwall is of the view that its independent assessment of the origins and current importance of the heritage status of Bath (Draft Bath Heritage Study, 2012) would not be significantly or adversely affected by the proposed development West of Twerton. As regards the planning balance set out in the NPPF the potential benefits of the scheme in terms of providing additional housing and employment opportunities, together with the potential to revitalise the Twerton area are all then factors to be taken into account which can be considered in the context of the advice in the NPPF.
- The Duchy of Cornwall is of the view that the application of the planning balance in relation to WHS considerations (as set out at paragraph 134 of the NPPF) in relation to the minimisation of adverse impacts are to be balanced against the positive way that a sustainable urban extension can address other core planning principles, including meeting identified need within a mixed tenure, mixed use community, providing amenities and service to the adjacent area of Twerton, enhancing existing public transport links to Newton Park, and meeting housing need without impacting on the AONB.
- The Council considers that in line with the NPPF substantial harm to the WHS and its setting must be avoided and that its evidence shows that the proposed development would cause substantial harm. The balance of harm with public benefit therefore does not apply, as it only relates to less than substantial harm. This assessment is disputed by the landowner for the reasons set out in the representations to the Examination and for the reasons set out on the Draft Heritage Study.
- The Council is of the view that there are additional landscape and visual impacts of development at this location as highlighted in its evidence base which are harmful including impacts on the Cotswold Area of Outstanding Natural Beauty, on the Kelston Conservation Area and the grade II* listed Kelston Manor and grade II* Historic Park and Garden. The landowners consider that these matters have been addressed in the preparation of the masterplan.

Instability/Undermining

- The significance of issues presented by slope instability and undermining of land West of Twerton (SWB1 in CD5/4) is in dispute. The Arup report commissioned by the Council (CD4/ENV6) sets out an assessment of the slope, geology and stability conditions of the urban extension options, including land west of Twerton. The study prepared by Buro Happold for the Duchy of Cornwall (CD4/ENV6) sets out an alternative conclusion as to the acceptability of the site for development in slope stability terms. The landowner considers that the proposed development in their

Masterplan is shown to be provided within the site and it is not proposed to build on the steeper land.

Archaeology

- The landowner considers that the findings of their Archaeological desk based and field studies have informed preparation of the Masterplan.

7. Declaration

7.1. The content of this document is agreed for the purposes of the B&NES Core Strategy hearing 2014.

Signed on behalf of Woolf Bond Planning LLP for the Duchy of Cornwall

Jeremy Woolf
.....

Position: *Agent*

Date: *14/2/14*

And

Signed on behalf of Bath & North East Somerset Council:

Simon de Beer
.....
Position: *Planning Policy & Environment Manager*

Date: *18/2/14*



APPENDIX 2:

Extracts from WBP Representations upon the Proposed Changes to the Core Strategy (May 2013)

Bath & North East Somerset
Proposed Changes to the Core Strategy
Public Consultation

Representations Prepared by:

Woolf Bond Planning LLP

On Behalf of:



DUCHY *of* CORNWALL

May 2013

WBP Ref: 6353

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Appendices

Annex 1 Housing Allocations Plan

Sustainability Appraisal

- 3.21. Annex L to the Sustainability Appraisal sets out an assessment of the alternative sites as well as an assessment of an alternative housing requirement (including a higher figure than the 12,700 now proposed).
- 3.22. Stage 2 sets out an assessment of the Bath environs, recommending areas 3ii, 4, 14 and 17 to be assessed in more detail through the stage 3 assessment (site specific assessments).
- 3.23. The proposed allocations at Keynhsam, Whitchurch, MOD Ensleigh, Odd Down and Summer Valley are assessed in the SA as is land west of Twerton.
- 3.24. The stage 3 assessments provide a critique of the merits of the sites against the SEA/SA objectives.
- 3.25. The assessments identify adverse impacts associated with certain of the proposed allocations including in relation to landscape considerations namely the AONB¹.
- 3.26. Development, particularly at Odd Down and Weston will have related impacts upon the setting of the Bath World Heritage Site ("WHS").
- 3.27. Based upon the scoring matrix used to assess the suitability of land to the west of Twerton, the authors do not appear to have been provided with the site material previously submitted to the Examination which includes, but is not limited to, Annex A to our Issue 3 Statement concerning site specific matters nor Annex 3 to our submission upon the Significant Changes consultation, the content of which sets out an assessment of the site having regard to, inter alia, landscape and sustainability matters. These are significant considerations that do not appear to have been included in the SA, which material has been submitted, is in the public domain, should be on the Council's database and which is a material consideration of significant weight.
- 3.28. It is for the reasons set out above that we question the findings of the SA in relation to the site.

¹ Paragraph 115 of the NPPF makes it clear that great weight should be given to conserving Areas of outstanding Natural Beauty which have the highest status of protection in relation to landscape and scenic beauty.

World Heritage Site

- 3.29. In so far as it relates to the site specific considerations concerning the urban extension at Twerton, the conclusion in the SA is predicated upon English Heritage's objection to the site having regard to the perceived impact of development in this location on the World Heritage Site ("WHS") and the Council's interpretation of their objection.
- 3.30. In short, there is suggested to be a perceived threat or adverse impact on the Bath WHS and its setting which matter English Heritage have previously commented upon. The Council sought to summarise the English Heritage views in BANES11.
- 3.31. Following the Core Strategy Examination in early 2012, the Duchy of Cornwall wished to satisfy itself with respect to the implications of development at the West of Twerton site on the World Heritage City of Bath, and asked The Prince's Foundation to address questions of impact on the site and the setting through a study.
- 3.32. The Foundation instructed independent consultants, including Architectural Historians Gavin Stamp, Dan Cruickshank and the Landscape Architect Michael Lear to undertake an assessment of the evolution of the Bath World Heritage Site. In particular their Brief was larger than the Twerton site itself: it was intended to assess the evolution of the Bath WHS – the entire City – over time, to address issues of setting and landscape and to identify key issues which might affect the desirability or design of an urban extension.
- 3.33. The Heritage Report was published in 2012 and copies have already been made available to the Council and English Heritage (see paragraph 3.40 below).
- 3.34. The WHS is a designated heritage asset.
- 3.35. Paragraph 134 of the NPPF sets out the approach to assessing a development proposal on a designated heritage asset, stating:
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”**
- 3.36. The Study provides a context for consideration of the West of Twerton proposals in relation to WHS considerations.

- 3.37. In considering the test thus defined by the NPPF the starting point, in appraising the suitability of the west of Twerton option, is to consider the extent to which there would be any adverse impact on the defined heritage importance of Bath and the WHS. For this reason the independent assessment referred to above concerning the Study of Bath has been commissioned and prepared on behalf of the Duchy.
- 3.38. The Heritage Study is a comprehensive review of the architectural and landscape character of Bath and its evolution at a citywide scale. This is appropriate and is the first time it has been done. The Setting Study looked at the area outside of the Site, and at Roman and Georgian Bath as have the Management Plans. The entire City is within the Site and this study is unique in focusing attention on the character and essential qualities of later development as well. The Prince's Foundation commissioned the consultants to undertake the study through LIDAR mapping, extensive photographic documentation of views and character, and examination of primary historic documents and ephemera.
- 3.39. The Heritage Study, along with the draft Setting Study, has important implications for the consideration of an urban extension to Bath. These are the following:
- Any sense of arrival into Bath through countryside is mitigated by the completely ordinary character of the twentieth century ribbon and light industrial development one finds along the roadside for two miles before entering any area of Georgian character.
 - As a living city, it is appropriate for Bath to grow, and if it does it should strive to do so in a way that reflects continuity with the way that the World Heritage Site- the entire City- has grown and developed over the past three hundred years. Interestingly, it has been achieved to date through the individual actions of landowners and speculative developers, acting within a shared architectural language but without a central plan.
 - The view from Kelston Park is a borrowed landscape, not a designed one, as it has been in separate ownership from the beginning. The view has altered considerably over time, with the introduction of railways and roads, the winding up of quarrying activities and development along the roundabout. The setting could be enhanced through restoring grazing patterns and field boundaries.

- There are important clues in how to develop well that can be derived for studying the evolution of Bath: buildings on slopes with and across contours, the use of local stone cladding, vertical proportioning, and leaving hilltops open to capture views. These can be applied in any future development within or near to the World Heritage Site. In fact, doing so at the West of Twerton site could enhance a sense of arrival to Bath.
- 3.40. A hard copy of the Heritage Report has previously been made available to the Council and English Heritage. It is unclear from the Council's site assessment as to whether this document has informed their decision making.
- 3.41. As evidenced in documentation provided to English Heritage, land west of Twerton represents an opportunity to provide for a sustainable mixed use urban extension in the form of a new neighbourhood to provide for up to 2,000 dwellings together with employment provision (at a ratio of 1 job per dwelling), open space, community facilities and sustainable linkages to the city centre in a sympathetic manner, thus respecting the setting of the site.
- 3.42. The technical studies that have been undertaken to date, including that in relation to heritage considerations, have either been prepared in order to inform the masterplan approach or to confirm and support its acceptability including having regard to, inter alia, impact of the WHS.
- 3.43. The masterplan has evolved having regard to the aforementioned technical reports which include (the following list is not exhaustive):
- Landscape
 - Heritage
 - Urban design
 - Archaeology
 - Sustainability/Highways
 - Flood and drainage
 - Grounds conditions and stability
 - Ecology
 - Drainage

3.44. Against the above background the masterplan as now proposed:

- Addresses archaeology
- Preserves the hillside approach from the west by restricting development to below the plateau thus avoiding impact on the setting of Newton St Loe
- Preserves views to 7 acre wood from the WHS
- Creation of sustainable linkages between Bath Spa University at Newton Park and Bath through the site. There is also the potential to make existing bus routes more viable and the possibility of creating a future rail halt.

3.45. The position taken by English Heritage in 2010 was informed by the planning guidance current at the time together with the availability of information relation to the matter.

3.46. The NPPF now provides a new planning context, one which sees heritage as an element in an integrated approach to sustainable development, alongside other core planning principles. Authorities must plan to meet objectively identified needs unless adverse impacts demonstrably outweigh the benefits.

3.47. The Inspector has found that the 2010 Plan failed to meet housing needs, and any new examination must address the opportunity to meeting housing and related growth needs informed by the requirements of the NPPF.

3.48. Furthermore, the Heritage Study provides important new evidence which argues that the impact of development at this site is in keeping with the continued growth and evolution of Bath. It also but suggests qualities of development in Bath that can be taken on board to ensure that the character of the World Heritage Site is not degraded.

3.49. This minimisation of adverse impacts must be balanced against the positive way that a sustainable urban extension can address other core planning principles, including meeting identified need within a mixed tenure, mixed use community, providing amenities and service to the adjacent area of Twerton, enhancing existing public transport links to Newton Park, and meeting housing need without impacting on the AONB.

3.50. It is apparent from this analysis that the independent assessment of the origins and current importance of the heritage status of Bath would not be significantly or adversely affected by the proposed development West of Twerton. As regards the planning balance set out in the NPPF the potential benefits of the scheme in terms of providing additional housing and employment opportunities, together with the potential to revitalise the Twerton area are all then factors to be taken into account which can be considered in the context of the advice in the NPPF.

Summary: Suggested Changes

3.51. In arriving at a higher annualised housing requirement figure , the LPA have commissioned a number of reports and have had to consider the perceived GB and WHS impacts together with the relative sustainability merits of the potential sites and then arrived at an overall planning balance.

3.52. If the inputs into the assessment have been erroneous from the outset, the then end result will be prejudiced and the conclusion will be unsound.

3.53. Against the above background, we are concerned about the Council's overall approach to assessing the sites to be identified for housing in meeting the increased housing requirement.

3.54. Our concerns may be summarised as relating to:

- The failure to undertake a robust and/or appropriate review of the GB in order to allow the boundaries to endure beyond the plan period, as required by the NPPF.
- The lack of a detailed comparative assessment of the potential allocation sites having regard to their respective impact on the WHS.
- The weight placed on the assessment of AONB impacts.
- The erroneous planning balance that has been applied as a result.

3.55. Should the Inspector be of the view that the Core Strategy fails to provide for sufficient flexibility in meeting identified housing needs and/or finds the Plan unsound in relation to the planning balance and judgments applied to the Green Belt Review and the subsequent site selection, the Duchy of Cornwall's land continues to be available to

meet identified housing needs and can provide for a sustainable urban extension for around 2,000 dwellings together with associated employment and infrastructure provision as well as sustainable linkages to Twerton and beyond to the centre of Bath.