

Planning Policy
Planning Services
Bath & North East Somerset Council
PO Box 5006
Bath
BA1 1JG

FAO Mr S. Emerson
C/O Chris Banks
Programme Officer
Bath & N.E. Somerset Core Strategy
C/O Banks Solutions
21 Glendale Close
Horsham, West Sussex
RH12 4GR.

Direct line:(01225) 477548

Minicom: (01225) 477535

E Mail: planning_policy@bathnes.gov.uk

Date: 3rd October 2013

Our ref:

Your ref:

Dear Mr Emerson

Re: B&NES RESPONSE TO INSPECTOR'S NOTE ID/40

Thank you for your note reference ID/40 relating to Green Belt matters and possible Further Changes to the Core Strategy. The Council's response is set out below.

The Council agrees that the hearings cannot proceed on the basis of the provisional programme set out in your note ID/38A. A suggested programme is set out in this letter below for your consideration. In light of the concerns you have raised regarding the delivery of development the Council also confirms that it intends to propose further changes to the Core Strategy to allocate strategic sites for development at the Green Belt locations currently identified in the Core Strategy.

The Council is keen for the examination to progress in a timely way but is aware of the procedural issues you have raised in ID/40, particularly that the hearings should enable you to undertake proper preparation for the hearings and fairness to all parties, as well as to provide you with a clear cut way forward on specific issues.

In the provisional programme (ID/38A) you suggest that the hearings would be grouped such that both housing requirement and supply (with the exception of Green Belt supply) are held together, followed by (possibly after a gap) hearings on the Green Belt locations. In order to progress the hearings on housing requirement and supply it is made clear in ID/40 that prior publication of key information is required (para 34 of ID/40). This information includes an updated SHLAA.

To enable the Council to respond to the issues raised in ID/40, to publish an updated SHLAA and to facilitate the smooth running of the hearings, the Council suggests an alternative grouping of hearings as follows:

- Group 1 – housing requirement (SHMA), relating to both market and affordable housing

- Group 2 – housing supply:
 - a) SHLAA/5 year land supply and related delivery issues e.g. flood risk
 - b) Green Belt supply i.e. Green Belt locations/sites
- Group 3 – other issues

This enables the issue of housing land supply, including 5 year housing land supply, to be considered in the round. The Council agrees that starting the hearings at the end of November is now unrealistic. It is requested that Group 1 of the hearings set out above takes place within the dates currently provisionally programmed in December (between 10 and 13 December). In order to facilitate this, a programme is proposed below.

As you will be aware the Council held a SHMA Seminar in September with representatives of the development industry. This seminar was a useful discussion which identified some key SHMA methodological assumptions that needed further testing. The primary outputs from the seminar were Addendum 1(c) to the SHMA and the Council's commentary in BNES/48. The related Statement of Common Ground will take the form of a set of issues setting out areas of disagreement on the SHMA assumptions that would benefit from more detailed exploration at the hearings. The Council is preparing this in conjunction with the development industry, as far as the participants are able to contribute further to their representations and their input at the Seminar. This would help to inform the preparation of pre-hearing questions and an agenda for the hearings.

The proposed programme to enable the housing requirements hearings to commence on 10 December is as follows:

- 16/10: Council submits to the Inspector the list of outstanding issues of disagreement on the SHMA assumptions
- 25/10: Inspector issues pre-hearing questions
- 14/11: deadline for submission of participant's hearing statements
- 3/12: Inspector issues hearing agenda (having reviewed statements)
- 10/12: hearings commence

However, should the above programme not give sufficient time for your preparation the Council would welcome using the hearing slots from 7th – 9th January 2014 that are currently in the provisional programme (although ID/40 indicated that you were not working on the B&NES Examination in January due to other commitments).

The timetable for the subsequent groups of hearings will be driven by the Council's programme for the further proposed changes needed to address the Inspector's concerns. The proposed programme is set out in the table below:

Dates	Tasks
11 Nov	Council publishes all proposed further changes and supporting evidence for public consultation. Further changes will include Green Belt strategic site allocations policies, incorporating place-making principles. Supporting evidence will include the updated SHLAA.
11 Nov – 21 Dec	6 weeks public consultation on the further proposed changes, including consultation exhibitions/events in the areas affected by the strategic site allocations
By end of Jan 2014	Schedule of comments received on the Proposed Changes (grouped by strategic site) to be supplied to the Inspector and to be made available on the Council's website

Through this work the Council will address many of the specific issues raised in ID/40, including the development capacity of Weston and confirmation of the non-strategic Green Belt site allowance (as supported by the updated SHLAA).

It is suggested that the second group of hearings on housing supply, including SHLAA and Green Belt locations/sites would probably need to be programmed for March 2014. This should allow sufficient time for you to analyse the comments received, issue pre-hearing questions and for participants to prepare their statements. The third group of hearings would then follow later in March or in early April 2014.

Yours sincerely,

Simon De Beer
Policy & Environment Manager