

BATH & NORTH EAST SOMERSET CORE STRATEGY EXAMINATION

COUNCIL NOTE ON INFORMATION SUBMITTED TO THE INSPECTOR FOR THE EXAMINATION HEARINGS IN MARCH/APRIL 2014 IN RESPONSE TO INSPECTOR'S NOTE ID/44

1.0 INTRODUCTION

- 1.1 The Inspector has confirmed through his note ID/44 that the Examination into the B&NES Core Strategy will progress and has outlined dates and topics to be covered by hearings in March/April 2014. The Inspector has also outlined the programme of preparation for these hearings. Specifically the Inspector requested Statements of Common Ground (SCG) between the Council and owners/developers/promoters of the Green Belt sites proposed for allocation in the November 2013 Amendments to the Core Strategy. The Inspector has also confirmed that he would welcome SCG between the Council and promoters of their suggested enlarged or alternative proposals. The Inspector has requested that the SCG and other information, including the representations received in response to the consultation on the Schedule of Core Strategy Amendments, is submitted to him by 14th February.
- 1.2 This note explains the information submitted to the Inspector on 14th February and progress on any outstanding information, comprising the following:
- Representations on the Schedule of Core Strategy Amendments
 - SCG on allocated sites and enlarged/alternative sites proposed by promoters
 - Further evidence, primarily associated with the Green Belt sites, prepared by both owners/developers and the Council

2.0 REPRESENTATIONS ON SCHEDULE OF CORE STRATEGY AMENDMENTS

- 2.1 The Inspector has been supplied with the following:
- Set of paper copies of the original duly made representations on the Schedule of Core Strategy Amendments (November 2013)
 - Schedule of representations/comments categorised by Change Reference Number

It should be noted that a set of paper copies of the representations/comments (with respondent address/contact details redacted) is available for public view in the Council's offices in Lewis House, Manvers Street, Bath and the schedule of representations is also available on the Council's website at www.bathnes.gov.uk/corestrategy

- 2.2 In order to facilitate clarity and ease of use for the Inspector and other parties the principles below have been applied in categorising the representations/comments:
- Representations relating the Core Strategy review have been categorised as change reference CSA14, unless specified by the respondent as relating to CSA53
 - Unless specified by the respondent as relating to change reference CSA14 (Policy DW1) the representations raising the following issues have been categorised CSA6:
 - Objections to the Council boosting the supply of market housing in order to deliver the total affordable housing requirement
 - 5 year housing land supply methodology/requirement

- Spatial distribution of housing across the District (total, as well as market and affordable)
- Representations that object to the principle of development in the Green Belt (not site specific) have been categorised as CSA1
- For representations relating to the Green Belt sites proposed to be allocated or enlarged areas at these sites:
 - Representations relating to the principle of development or the placemaking principles have been categorised by the relevant site policy change reference e.g. Land adjoining Odd Down is change reference CSA22
 - Representations relating to the site boundary and/or Green belt boundary have been categorised by the relevant site Policies Map amendment e.g. land adjoining Odd Down is change reference CSA24
 - Representations specifically relating to the Concept diagram have been categorised as the relevant Concept Diagram e.g. land adjoining Odd Down is change reference CSA23
- Representations promoting alternative sites (other than those consulted on by the Council) have been categorised as 'Alternative Sites'

2.3 The Council has also added to the Core Documents List and submitted to the Inspector the Core Strategy Amendments (November 2013) – Consultation Report (CD12/20).

3.0 STATEMENTS OF COMMON GROUND

3.1 Listed in table 1 below are the Statements of Common Ground (SCG) that have been prepared, agreed and submitted in hard copy form to the Inspector by 14th February deadline. This list is ordered in the following categories:

- a) SCG between the Council and stakeholders (other than developers/owners/promoters) on Green Belt sites adjoining Bath
- b) SCG with developers/owners/promoters of sites proposed for allocation in Core Strategy Amendments
- c) SCG with promoters of enlarged sites
- d) SCG with promoters of alternative sites

3.2 As instructed by the Inspector the Council has prioritised preparation and agreement of SCG for the sites proposed for allocation. This has been followed by a focus on SCG relating to enlarged sites and finally, SCG for the alternative sites.

3.3 The Council led the preparation of SCG relating to the sites proposed for allocation. It should be noted the Council prepared a draft SCG relating to the land proposed to be safeguarded for development beyond the plan period to the east of Keynsham (south of the proposed allocated site). This land is in the control of Taylor Wimpey, but they have not responded to the draft SCG. The Council update the inspector if this situation changes.

3.4 The preparation of SCG for the enlarged and alternative sites has been led by the site promoters. In order to facilitate a co-ordinated approach to their preparation and the Council's engagement in the process, a programme with clear deadlines was outlined at the outset by the Council. This programme has proved challenging to all parties and as a result

some of the SCG relating to enlarged or alternative sites remain outstanding. These SCG are listed in table 2 below, with the anticipated date of submission (where known).

Table 1: SCG submitted to Inspector on 14th February 2014

SCG Ref. Number	Site	Organisation
Non-site promoters		
BNES/53a	Land adjoining Odd Down, Bath; land adjoining Weston, Bath; and land at Whitchurch	English Heritage
BNES/53b	Land adjoining Odd Down and Weston and other Green Belt sites adjoining Bath	Bath Preservation Trust
Proposed Allocations		
BNES/53d	Land adjoining Weston	Mr R. Perry (GL Hearn)
BNES/53e	Land adjoining Weston	Mr & Mrs Comely (Silverwood Partnership)
BNES/53f	Land adjoining Weston	Mr & Mrs Palmer (Stride Treglown)
BNES/53g	Land adjoining East Keynsham	Waddeton Park (Peter Brett Assoc)
BNES/53i	Land adjoining SW Keynsham	JS Bloor (Pegasus)
BNES/53j	Land at Whitchurch	Horseworld (Savills)
BNES/53k	Land at Whitchurch	Barrett Homes (Nathaniel Lichfield & Partners)
BNES/53L	Land at Whitchurch	Sir M. & Mrs B. Gregory (Nathaniel Lichfield & Partners)
Enlarged sites		
BNES/53m	Land adjoining Weston (Area B)	Mr R. Perry (GL Hearn)
BNES/53n	Land adjoining Weston (Area C)	Mr R. Perry (GL Hearn)
BNES/53p	Land adjoining SW Keynsham	JS Bloor (Pegasus)
Alternative sites		
BNES/53r	Land at Old Fosse Road, Odd Down, Bath	G. Jones
BNES/53s	Land at Cranleigh, South Stoke	R. Harrison
BNES/53t	Broadmead Peninsula, Keynsham	River Regeneration Trust
BNES/53u	Land at Hicks Gate	Crest/Key Properties (RPS)
BNES/53v	Land at Hicks Gate	Stratland LLP (Pegasus)
BNES/53w	Land to South of Warminster Road, Bathampton	Messrs Green & Faulkner (Planning Potential)
BNES/53ab	Land at St Francis Road, Keynsham	Mrs B. Fiedor (on behalf of owners 50, 52 & 54 St Francis Road)

Table 2: SCG still under preparation and awaiting submission to the Inspector

SCG Ref. Number	Site	Promoter/organisation	Anticipated date for submission
Allocated sites			
BNES/53C	Land adjoining Odd Down	Hignett Family Trust and owner of Sulis Manor	17.02.14
BNES/53H	Land adjoining East Keynsham	Mactaggert & Mickel (PCL Planning)	17.02.14
BNES/53AC	Land adjoining East Keynsham (safeguarded land)	Taylor Wimpey	17.02.14
Enlarged sites			
BNES/53O	Land adjoining East Keynsham	Mactaggert & Mickel (PCL Planning)	17.02.14
Alternative sites			
BNES/53X	Land at Lays Farm, Keynsham	Redrow Homes	17.02.14
BNES/53Y	Land at Orchard Park, Whitchurch	Robert Hitchens (Pegasus)	17.02.14
BNES/53Z	Land West of Twerton	Duchy of Cornwall (Woolf Bond Planning)	17.02.14
BNES/53AA	Manor Road, Saltford	Crest (Pegasus)	21.02.14

- 3.4 In ID/44 the Inspector makes it clear that if there are outstanding 'technical matters' yet to be resolved this should not delay the submission of SCG and that he will accept supplementary SCG in respect of these issues. With reference to section 4 below the Council has recently published a Highways Impact Assessment of proposed development at Keynsham. The promoters of sites at Keynsham have not had time to review this modelling work or its conclusions. It has been agreed with the promoters of the allocated/enlarged sites that during the lead up to the hearings discussions will continue on transport issues and where possible, supplementary SCG may be submitted.

4.0 FURTHER EVIDENCE

- 4.1 Further evidence relevant to the Examination of the Core Strategy has also been submitted to the Inspector alongside this note and the SCG. This evidence has also been added to the Core Documents List. This evidence is listed in table 3 below. The source of this evidence, its purpose and relationship to the existing evidence base is explained briefly below.

Council Evidence relating to Code for Sustainable Construction and Renewable Energy

- 4.2 The new documents relating to this issue submitted by the Council are outlined below.

1. Two documents relate to the Government's recent consultation on the Housing Standards Review i.e. the Councils' response (CD12/2) and the House of Commons Environmental Audit Committee Review (CD12/3).
2. B&NES Council (with 4 other local authorities) commissioned a study to assess and update the costs of building to the Code for Sustainable Homes Levels previously undertaken by the government (CD12/1). This information supersedes 'Cost of building to the Code for Sustainable Homes Updated cost review, Department for Communities and Local Government (August 2011)' (CD4/S12).
3. Regen SW have produced an updated version of the study '[Renewable Energy Assessment for B&NES Green Belt sites: Assessment](#), Regen SW (CD10/E16). The updated study (CD12/9) supersedes CD10/E16. It updates assumptions, based on the most up to date information on electrical and gas consumption. The consequences of this are:
 - Fewer houses require panels to be installed on their roofs to meet the Merton rule of the development due to lowered average household energy use
 - Lower cost to install to meet energy requirements
 - Resulting year one revenues and other factors have changed
4. Third Party Renewables Evidence - the Council has produced a Statement on Third Party Delivery of Renewables (CD12/8) to highlight existing background evidence that relates to the delivery of the policy requirements for the proposed Green Belt site allocations in relation to Sustainable Construction

Council Evidence relating to Green Belt sites

- 4.3 The Council has submitted to the Inspector on 14th February evidence relating to the Green Belt sites in Keynsham and Whitchurch.

Keynsham Core Strategy Options: Highways Impact Assessment (CD12/18)

- 4.4 With regard to transportation the identification of locations in the Green Belt for development in the March 2013 Proposed Changes to the Submitted Core Strategy was principally based on the analysis set out in the Arup Transport Evaluation Report (TER) and Appendices (CD9/I2/1 - 27). For the proposed allocation of Green Belt sites in the Core Strategy Amendments (November 2013) this evidence was supplemented by further transport information published at that time, primarily relating to access arrangements (see CD10/E8 and CD10/E22).
- 4.5 In relation to Keynsham further transport modelling has been undertaken using a micro-simulation transportation Paramics model. This work was primarily undertaken during 2013. The Report of this modelling (Keynsham Core Strategy Options: Highway Impact Assessment - CD12/18) has been published and submitted to the Inspector on 14th February 2014.
- 4.6 The Paramics modelling has been undertaken to ensure the effects of the Core Strategy proposed development and allocations on the capacity of the highway network in Keynsham are fully understood and to help the Council to test and formulate potential mitigation measures and infrastructure solutions. In addition, the modelling has also been undertaken

to explore and test the impacts of alternative levels of development proposed by land owners/developers of enlarged or alternative sites. The modelling could not be undertaken previously as the coverage of the Paramics model needed to be extended to include the transport network to the east of Keynsham. The evidence from the Paramics modelling supplements the Arup TER and updates it in respect of assumed trip rates. The trip rates used in the Paramics modelling work for development of land adjoining East Keynsham (KE3A) reflect the agreed rates used in assessing the planning application for the Somerdale redevelopment and for land adjoining SW Keynsham (KE4) reflect the agreed rates relating to the planning application for site K2A allocated in the B&NES Local Plan. These trip rates post-date those used in the Arup TER.

Compulsory Purchase Order (CPO) Process Note relating to Whitchurch (CD12/10)

- 4.7 With regard to the site at Whitchurch the proposed allocation requires the provision of a new school playing field in order to facilitate expansion of Whitchurch Primary School. The Council considers that there are compulsory purchase land options that would provide equal and potentially better options for provision of the school playing field and the expansion of the school than allocating development at Orchard Park. Therefore, a note outlining the process and indicative timetable/programme for a CPO has been prepared by the Council and is now submitted to the Inspector (CD12/10).

Orchard Park, Whitchurch S78 Appeal Inquiry Documents (CD12/11 – 12/17)

- 4.8 The landowners/developers promoting the alternative site known as Orchard Park, Whitchurch have through the SCG referred to numerous documents from the recent Section 78 Appeal Inquiry. These documents were previously publicly available, and the relevant documents from the Council's perspective have now been submitted to the Examination Inspector and added to the Core Documents List (see also evidence submitted by developers/land owners below).

Table 3: Council evidence related documents submitted to the Examination (14th February 2014)

Document Title	Core Doc Number
B&NES, Bristol City Council, Swindon Council, Wiltshire Council and Brighton & Hove Council - Costs of building to the Code for Sustainable Homes, Element Energy/Davis Langdon (September 2013) and Appendix 1 (MS Excel Spreadsheet)	CD12/1
B&NES Response to the Housing Standards Review Consultation (October 2013)	CD12/2
House of Commons Environmental Audit Committee – Code for Sustainable Homes and the Housing Standards Review Eighth Report of Session 2013-14 (November 2013)	CD12/3
Report to Planning Committee for Horseworld, Whitchurch Planning Applications 13/02180/FUL (December 2013)	CD12/6
Decision Notice for Horseworld, Whitchurch Planning Application	CD12/7

13/02180/FUL (December 2013)	
Third Party Delivery of Renewable Energy in Bath & North East Somerset (February 2014)	CD12/8
Renewable Energy Assessment: Core Strategy Greenfield Sites - Bath and North East Somerset Council, Regen SW (11 February 2014)	CD12/9
Compulsory Purchase Note: Whitchurch Primary School Playing Field (February 2014)	CD12/10
<p>Land North of Orchard Park S.78 Appeal Inquiry Documents:</p> <ul style="list-style-type: none"> • CD12/11 Land north of Orchard Park, Whitchurch B&NES Proof of Evidence - Landscape • CD12/12 Land north of Orchard Park, Staunton Lane, Whitchurch B&NES Proof of Evidence - Planning Policy • CD12/13 Land north of Orchard Park, Whitchurch B&NES Proof of Evidence - Transport • CD12/14 Land north of Orchard Park, Whitchurch B&NES Proof of Evidence - Education • CD12/15 Land north of Orchard Park, Whitchurch B&NES Proof of Evidence - Development Management • CD12/16 Land north of Orchard Park, Whitchurch Supplemental Proof of Evidence • CD12/17 Land north of Orchard Park, Whitchurch Council's Statement of Case 	CD12/11 – CD12/17
Keynsham Core Strategy Options: Highway Impact Assessment, CH2M Hill (February 2014)	CD12/18

Land Owner/Developer Evidence relating to Green Belt sites

- 4.9 Land owners/developers/promoters of both the allocated and enlarged or alternative sites have submitted a significant amount of new evidence to the Council, associated with their representations on the Schedule of Core Strategy Amendments (November 2013) and the SCG (see section 3 above). This evidence is listed in table 4 below, is included in the updated Core Documents List and has been submitted to the Inspector on 14th February.

Table 4: Land owner/developer evidence submitted to the Inspector

Document Title	Core Doc Number
Stride Treglown Report in relation to the Equestrian Centre, Weston (May 2013)	CD13/1
Archaeological Evaluation for HorseWorld, Whitchurch CgMs Consulting Ltd. On behalf of HorseWorld (August 2013)	CD13/2
Transport Assessment for Horseworld, Whitchurch (December 2013)	CD13/3
Landscape and Visual Impact Appraisal for Horseworld	CD13/4

Land at South West Keynsham - Development Framework, prepared for Bloor Homes by Pegasus (December 2013)	CD13/5
Land South of Parkhouse Lane, South West Keynsham Landscape Capacity Review, prepared for Bloor Homes by Cooper Partnership (December 2013)	CD13/6
Land South West of Keynsham Transport Representations to B&NES Core Strategy, prepared for Bloor Homes by FMW Consultancy Limited (December 2013)	CD13/7
Creating a new parkland community for Keynsham and Saltford - A response to consultation on proposed changes to the B&NES Core Strategy Keynsham, Mactaggart & Mickel Ltd (May 2013)	CD13/8
Housing Delivery Land at East Keynsham, Mactaggart & Mickel Ltd (January 2014)	CD13/9
<p>Land North of Orchard Park S.78 Appeal Inquiry Documents</p> <ul style="list-style-type: none"> • Land north of Orchard Park, Whitchurch Planning Proof of Evidence - M E Dobson (Pegasus Planning) • Land north of Orchard Park, Whitchurch Highways Proof of Evidence - dealing with Highways, Traffic and Transport Related matters – P L Finlayson • Land north of Orchard Park, Whitchurch Landscape and Visual Matters - Proof of Evidence • Land north of Orchard Park, Whitchurch Planning Statement of Common Ground and Addendum • Land north of Orchard Park, Whitchurch Statement of Common Ground - Highways, traffic and Transport-related matters 	CD13/10 – CD13/14
Robert Hitchin's Response to the consultation on the Schedule of Core Strategy Amendments (Nov 2013) with additional evidence: a review of landscape and visual matters by MHP and a transport assessment by PFA	CD13/15
Bath Heritage Study, Lear Associates on behalf of The Duchy of Cornwall (March 2012). <i>Please note: this file is not available online.</i>	CD13/16
Bath Urban Extension Heritage and Landscape Review, The Prince's Foundation for the Built Environment (October 2011)	CD13/17
Bath Urban Extension - Bath context plan for SCG - WBP1 (Appendix 1), The Duchy of Cornwall (February 2014)	CD13/18
Landscape Designations Plan - SCG (Appendix 2), The Duchy of Cornwall (February 2014)	CD13/19
Parcel 8966, Manor Road, Saltford (12/05315/OUT) Committee Report (April 2013)	CD13/20
Statement of Common Ground Land to South of Manor Road, Pegasus Planning Group Ltd. (May 2013)	CD13/21
Land at Lays Farm, Keynsham - Landscape and Visual Appraisal, The Richards Partnership on behalf of Redrow Homes (December 2013)	CD13/22
Avon Valley Farm Access Map, Built4Life (April 2013)	CD13/23

Availability and Deliverability of Housing in A1-A3 report, The River Regeneration Trust (22nd September 2013)	CD13/24
Sections of Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport, Green Belt, Circular Economy), The River Regeneration Trust (30th October 2013)	CD13/25
Overall and Phase 1 summaries for Options A-C, The River Regeneration Trust (21st October 2013)	CD13/26

- 4.10 In the preparing the SCG the site promoters have also referred to additional evidence which has not been published or supplied to the Council in time for the submission of material to the Inspector on 14th February. The additional evidence that promoters have stated they intend to submit is listed in table 5 below. As further evidence is submitted to the Council during the lead up to the Examination hearings in March/April it will be forwarded to the Inspector and added to the Core Document List as appropriate.

Table 5: Land owner/developer evidence not yet submitted

Document Title	Site Promoter
Initial Preliminary Visual Impact Assessments and Transport Statements (for sites at Weston)	GL Hearn (on behalf of Mr. Perry)
New Concept Layout for the Eastfield Avenue development area	Stride Treglown (on behalf of Mr & Mrs Palmer)
Evidence relating to matters of disagreement (documents unspecified)	NLP on behalf of Barrett Homes/Gregory (Whitchurch)
Addendum to Land at Lays Farm, Keynsham - Landscape and Visual Appraisal, The Richards Partnership on behalf of Redrow Homes	Redrow Homes

February 2014