BATH & NORTH EAST SOMERSET CORE STRATEGY EXAMINATION

COUNCIL RESPONSE TO ISSUES ARISING DURING MARCH/APRIL 2014 HEARINGS

1.0 INTRODUCTION

1.1 During the course of the March/April 2014 Examination hearings a number of issues emerged that require a response to the Inspector from the Council as follows:

- Further potential changes to the Core Strategy reflecting the Council's articulated position at the hearings
- Additional documents referred to at the hearings that need to be added to the Core Documents List
- Factual notes requested by the Inspector on specific issues

1.2 This note outlines the information supplied to the Inspector.

2.0 POTENTIAL CHANGES TO THE CORE STRATEGY

2.1 At the hearing into the housing requirement, delivery and housing land supply on 26th March 2014 the Council accepted changes to Policy DW1 and the associated supporting text should be made in respect of the housing requirement and the calculation of the 5 year housing land supply. As requested by the Inspector the Council's proposed wording (shown as changes to the text/Policy published in November 2013) is attached as **Appendix 1.** The Council has also included in this Appendix consequential changes to the Core Strategy in Plan order. This includes;

- Amendments to the Somer Valley Policy SV.1 to reflect that the additional greenfield housing has now already been identified through the planning applications and appeals and so further greenfield sites would be unsustainable. However the Policy should still enable brownfield sites to come forward for development where appropriate. New housing will therefore only be appropriate within Housing Development Boundaries (to be reviewed in the Placemaking Plan) which is more in line with Policy RA.1.

- Changes to the monitoring section 7, Table 9. Whilst the 5 year land supply is no longer disaggregated to market and affordable housing, it is still relevant to monitor overall delivery of both elements against identified needs.

2.2 Through the discussion at the hearings on the strategic allocations the Council agreed that some further changes to the Policy wording and/or Concept Diagrams for Policies KE3A and RA5, as published and consulted on in November 2013, should be made in order to clarify the Placemaking Principles and their delivery. These changes are set out in **Appendix 2** (changes to Policy KE3A and the Concept Diagram) and **Appendix 3** (changes to the Concept Diagram relating to Policy RA5).

2.3 As requested by the Inspector the changes to the Concept Diagram relating to Policy RA5 have been discussed and agreed with representatives of the landowners/developers i.e. Savills representing Horseworld and Nathaniel Lichfield & Partners representing Barratt Homes and Mr. and Mrs. Gregory.

3.0 ADDITIONAL CORE DOCUMENTS

3.1 At the March/April hearings a number of documents were referred to which the Inspector agreed should be added to the Examination Core Documents List. These documents are listed in the table below, along with their Core Document reference number. The documents have been published on the Council's Examination website.

Title	Core Document No.
South Stoke Conservation Area Appraisal (March 2014, B&NES Council)	CD12/29
Cumulative impacts of regulations on house builders and landowners (DCLG)	CD12/30
Community Infrastructure Levy: Viability Study (BNP Paribas for B&NES Council)	CD12/31

3.2 The South Stoke Conservation Area Appraisal (March 2014) is on the Council's Forward Plan for a Single Member Cabinet Decision in May 2014 to be formally adopted by the Council for planning purposes.

4.0 FACTUAL NOTES

4.1 During the Examination hearing on 9 April 2014, in relation to the Odd Down site on the edge of Bath, Savills (representing the Hignett Family Trust) drew comparisons between build costs used in the BNP Paribas Real Estate Community Infrastructure Levy 'Viability Study' (CD12/31) and those used in the 'Strategic greenfield allocations – viability testing' report (CD10/E7). The Inspector has requested that the build costs used in both studies be set out in a table. This table which has been agreed with Savills is set out below:

Strategic greenfield allocations – viability testing report November 2013 (see para 3.3) (CD10/E7)

Base build costs (houses)	External works allowance	Code for Sustainable Homes level 4	All-in build cost	Lifetime homes (per unit)
£883	£132	£35	£1,050	£600

CIL viability study March 2012 (see para 4.22 and Table 4.22.1) (CD12/31)

Location	Base build costs (houses)	External works allowance	Code for Sustainable Homes level 3	Lifetime homes	All-in build cost	All-in build cost for Strategic (150 units or more)[1]
Bath City Centre	£1,565	£235	£0	£0	£1,800	£1,620

[1] Paragraph 4.24 of the CIL Viability Study: "On larger site types (150 units or more), we have reduced the base build costs by 10% to reflect the economies of scale that a developer is typically able to achieve on such sites".

Bath rural/Bathavon	£1,183	£177	£0	£0	£1,360	£1,224
Bath North and East	£1,096	£164	£0	£0	£1,260	£1,134
Bath North/West/South and Chew Valley East	£1,096	£164	£0	£0	£1,260	£1,134
Keynsham	£783	£117	£0	£0	£900	£810
Norton Radstock	£783	£117	£0	£0	£900	£810

4.2 The Inspector also requested that the Council clarifies the status of the Council's School Organisation Plan.

4.3 'Primary and Secondary School Organisation Plan 2013 – 2017 including Longer Term Place Planning within the Core Strategy Plan Period' outlines the current level of primary and secondary provision, detailed projected pupil numbers based on births and resident population data over the next four years up to admissions in September 2017 and projected pupil numbers as a consequence of the future planned housing development within the Core Strategy Plan period.

4.4 The Plan was approved at the Cabinet meeting on 9th April and can be implemented following the end of the day statutory 5 day call-in process.

POTENTIAL CHANGES TO POLICY DW1, SUPPORTING TEXT AND CONSEQUENTIAL CHANGES TO THE CORE STRATEGY

1.26 ***Scale and location of growth:***

1.26a The objectively assessed need for housing ~~and the requirements of the plan are 8,727~~ is about 10,000 dwellings ~~which includes~~ comprising ~~5,437~~ 6,832 market homes and 3,290 affordable homes (Table 1A below). ~~It is these figures against which the implementation of the plan will be monitored. A five year land supply of specific deliverable sites will be maintained against this disaggregated District-wide requirement for both market and affordable housing. In order to meet the economic growth aspirations, the strategy also needs to enable the delivery of around 10,300 new jobs.~~

Table 1A – ~~Housing Requirements~~ Objectively assessed need for housing

	Local Plan Backlog 1996-2011	Newly Arising Need 2011-2029	Total Housing Need
Market housing	757	~~4,680~~ 6,075	~~5,437~~ 6,832
Affordable housing	410	2,880	3,290
Total housing	1,167	~~7,560~~ 8955	~~8,727~~ 10,122

~~**1.26b** The supply of market and total housing that will be delivered (See Table 1B) is significantly greater than objectively assessed requirements. This is because the supply of market housing has been boosted to enable the delivery of the total affordable housing requirement.~~

1.26b However, the housing requirement figure of the Plan is about 13,000 (Table 1B). The supply of market housing has been increased to enable to enable the delivery of the assessed need for affordable housing. This is necessary as much of the supply of market housing (built and committed) will not yield affordable housing, and, the small site windfall allowance is not expected yield any affordable housing. It is against the Plans housing requirement figure of 13,000 that a five-year supply of housing will be maintained. 13,000 is not a cap on housing. For example, it may prove to be the case that additional previously developed windfall sites come forward for development or that the small sites windfall allowance can be exceeded.

1.26c In order to meet the economic growth aspirations, the Plan also enables the delivery of around 10,300 new jobs.

Table 1B – Housing ~~Land Supply~~ Requirement

	Total Housing Delivery
Market housing	9,646
Affordable housing	3,290
Total housing	12,956

~~**1.26c** This does not mean that all 12,956 homes are needed to deliver all 3,290 affordable homes. Much of the supply of market housing is on sites that will not yield any affordable housing. This reinforces the justification for identifying a 5 year land supply of specific deliverable sites against the disaggregated requirements for market and affordable housing.~~

1.26d *[no further change]*

Table 1C – spatial distribution of the housing requirement

	Market housing	**Affordable housing**	**Total housing**
Bath	5,130	1,890	7,020
Keynsham	1,580	570	2,150
Somer Valley	1,870	600	2,470
Rural Areas	930	190	1,120
Whitchurch Green Belt	140	60	200
Total	9,650	3,310	12,960

Actual supply figures in November 2013 SHLAA trajectory have been rounded to the nearest 10

1.27 *[no further change]*

1.28 *[no further change]*

1.29 In the *Somer Valley* there is significant net out-commuting due to ~~lack of available jobs~~ the size of the employment base but there are also significant residential commitments on both greenfield and brownfield sites. The area does not have an operating rail link, there are no direct links to the motorways and there is limited scope to provide substantial infrastructure improvements in the Plan period. The strategy therefore recognises this position, and seeks to facilitate economic-led regeneration enabling job growth in the area. The focus for change will be in the town centres and on vacant and under-used sites ~~but some development on new green field locations will be required to meet housing needs.~~ The Housing Development Boundary will be reviewed in the Placemaking Plan.

1.30 *[no further change]*

1.30A *[no further change]*

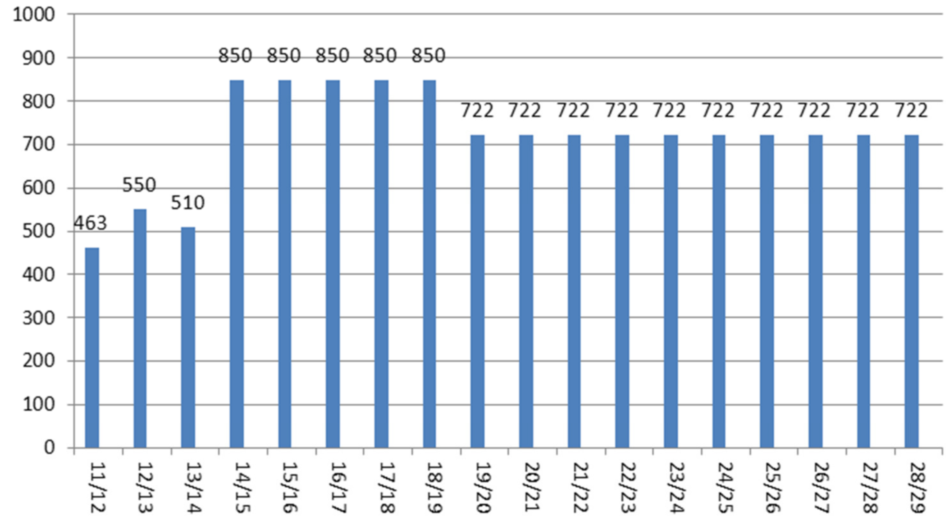
1.31 *[no further change]*

1.32 *[no further change]*

1.33 ***Delivery***: The scale of new homes entails a significant uplift in past rates of delivery from around 380 (2001-11) to an annualised average of 700+ (2011-29) ~~to over 800 in the first five years and over 600 thereafter for the Plan period although as set out in the SHLAA, the overall trajectory of provision is determined by the performance of individual locations.~~ Diagram x below sets out the proposed housing trajectory as at adoption of the Plan. Completions during 2011-2013 have been below the required annual average so there is already a shortfall in delivery. To recover from this shortfall, the annual rate of delivery required for the first five year period from adoption (2014-19) has been increased to 850 pa (4,250 dwellings over the 5 year period). A 20% buffer will be needed in the calculation of the 5 year housing supply at least for this first Plan period. Subject to delivery performance, this may decrease to 5% later in the plan period.

1.33a The ~~provision of new jobs~~ take up of floorspace for economic development and the generation additional employment is dependent on national economic performance as well as planning policy and local and sub-regional economic strategies ~~and objectives in the Council's Economic Strategy being realised through the interventions outlined in the Council's Regeneration Delivery Plans, in particular the objective for economic growth of 10,300 jobs. There is scope with the spatial strategy to deliver an even greater number of jobs in line with the Economic Strategy through 'smart growth' and Enterprise Area proposals and where this does not unacceptably harm the District's environment.~~ The jobs figure in the Plan is not a cap and additional growth will be enabled, if possible, where development would be sustainable.

Diagram x
Housing Trajectory from adoption



Note: completions for 2013/14 are those subsequent are provisional pending the completion of full year monitoring.

1.34 *[deleted previously]*

1.35 *[no further change]*

1.36 *Flexibility:* The Core strategy recognises the need to be responsive in light of future uncertainty and unforeseen circumstances. The spatial strategy therefore enables the identification of a 5 year land supply initially with a 20% buffer to reflect previous under delivery. The required buffer may reduce to 5% subject to performance. The level of housing being planned for also provides significant flexibility and choice of sites. The Council will monitor delivery rates in the plan period which will shape the first review of the Core Strategy programmed for around 2016 to co-ordinate with the other West of England districts.

POLICY DW1 District-wide spatial Strategy

The overarching strategy for B&NES is to promote sustainable development by:

1: *[no further change]*

2: making provision to accommodate;

a. a net increase of 10,300 jobs;

b. an increase in the supply of housing by around 13,000 homes

~~the objectively assessed requirements for homes, including affordable homes, for the Plan period (2011 to 2029), as set out in the table below; and.~~

	~~Total Housing Requirement~~
~~Market housing~~	~~5,437~~
~~Affordable housing~~	~~3,290~~
~~Total housing~~	~~8,727~~

~~c. an increase in the total housing supply to around 13,000 homes to enable the delivery of the affordable housing requirement.~~

3: - 9: *[no further change]*

Consequential changes arising from amendments to Policy DW1 and supporting text

SOMER VALLEY

4.09 The Somer Valley has a number of strengths and challenges which the Core Strategy seeks to address in order to realise the area's potential.

Challenges

- High level of existing housing commitments ~~estimated capacity on large brownfield sites and windfall sites~~ of about ~~2,100~~ 2,470 dwellings, exacerbating imbalance of housing over jobs.

(Bullet points 1 -9 and 11 & 12 no further change)

4.15 There is already a significant number of housing commitments in the Somer Valley and a limited capacity to generate new jobs. New housing in the Somer Valley will therefore be restrained in the interest of sustainability but some additional housing ~~will be needed to meet the District housing land requirement.~~ is likely to come forward on brownfield sites. ~~The Core Strategy plans for 300 homes to come forward in the Plan period in addition to existing commitments estimated capacity on large brownfield sties and windfall sites.~~ The HDB will be reviewed in the Placemaking Plan to facilitate this and to reflect recent planning permissions on greenfield sites. However in light of the objective of economic led revitalisation, it is important that the additional housing this does not significantly worsen the balance between homes and jobs and the out-commuting problems and the council may therefore seek to ensure an economic benefit from new housing.

POLICY SV1 Somer Valley Spatial Strategy
1. - 3. *[no further change]*
4. Housing
a: ~~Review the HDBs to~~ Enable around ~~2,400~~ 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John. This will include affordable housing, providing more choices of housing to meet the needs of the local communities. (Policies RA1 and RA2 are applicable to the other settlements in Somer Valley.)
5. - 8. *[no further change]*

Table 9 Monitoring of Strategic Objectives

Strategic Objective	Policy	Indicator	Target
5. Meet housing needs	**DW1** District-wide spatial strategy	• ~~Net additional dwelling completions (market housing and affordable housing) for B&NES annually and total since 2006~~ • ~~Housing delivery trajectory (updated annually)~~ • total housing stock by tenure and type • housing permissions granted by tenure and type • housing permissions developed by tenure and type • housing delivery trajectory showing completions and forecast completions • % affordable housing secured on qualifying sites	**Deliver** ~~5,437 market homes and 3,290 affordable homes by 2029~~ ~~Calculation of housing land supply (expressed in years)~~ ~~The five year housing land supply position after 2015/2016 will be used as a strong indication of the achievability of housing delivery to the end of the plan period in accordance with the Core Strategy.~~ <u>Around 13,000 homes, comprising 9,710 market homes and 3,290 affordable homes 2011-2029.</u> <u>40% or 30% affordable housing secured on large sites depending on</u>

Strategic Objective	Policy	Indicator	Target
			geographic location 20% or 10% affordable housing secured on small sites depending on geographic location
	Place based spatial strategies B1, KE1, SV1, RA1&2	• ~~Annual residential dwelling completions by place~~ As above but broken down for (Bath, Keynsham, Somer Valley &rural areas)	Deliver housing as set out in Table 1B
		• *[no further change]*	*[no further change]*
	CP10 Housing mix	• *[no further change]*	
	~~**CP9** Affordable Housing~~ ~~**RA4** Rural exception sites~~	• ~~Number of new affordable homes completed annually since 2006~~ • ~~Percentage of affordable homes completed on sites meeting the large site and small site thresholds~~ • ~~Number of rural exceptions site delivered~~	~~3.110 affordable homes completed by 2029~~ ~~Large sites:~~ ~~40% in Area 1 and 30% in Area 2~~ ~~Small sites:~~ ~~20% in Area 1 and 15% in Area 2~~
	CP11 Gypsies, travellers travelling showpeople	• *[no further change]*	*[no further change]*

POTENTIAL CHANGES TO POLICY KE3A AND CONCEPT DIAGRAM

Proposed changes to Policy KE3A

Land adjoining East Keynsham Site Allocation

Policy KE3A

Preamble *[no further change]*

Placemaking Principles 1 to 5, 8, 10 to 11, 13 to 22 *[no further change]*

6. Development should incorporate an element of traditional materials, including natural lias limestone, in key locations to be determined through the masterplan.

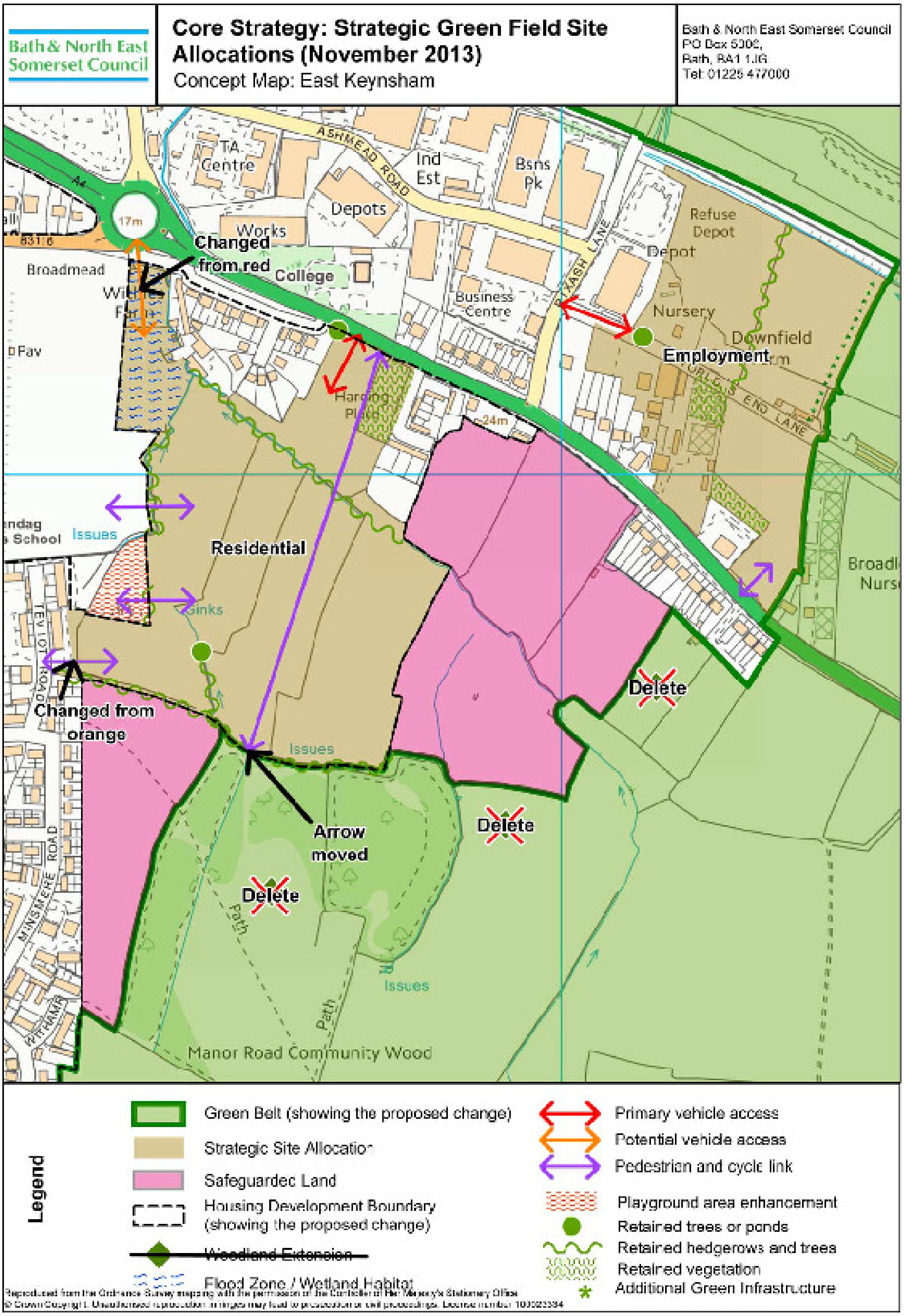
7. Incorporation of green infrastructure, including: (a) on-site provision of well integrated allotments and play provision; (b) ~~and~~ off-site ecological enhancements within ~~to formal and natural green space, including the provision of woodland and copse planting as an extension to~~ Manor Road Community Woodland; and (c) new planting, as an extension to Manor Road Community Woodland, to provide an appropriate edge to development. New planting should maximise native species woodland edge habitat and provide for public access.

9. Utilise the green corridors through the development to provide new shared pedestrian and cycle routes. The general alignment of ~~E~~existing public rights of way should be retained, enhanced and connected with these new routes. Public space and footpaths should incorporate species-rich verges and grassland habitat.

12. Direct highway access from the residential site to be formed to the A4. Pedestrian and cycle access ~~and~~ to be formed to the Chandag estate and to other points as shown on the concept diagram ~~allowing a through bus route~~. The layout should be pedestrian and cycle dominant. A ‘shared space’ ethos for streets and spaces should prevail throughout the site. Connections to existing bus stops should be enhanced, with new stops provided within the site.

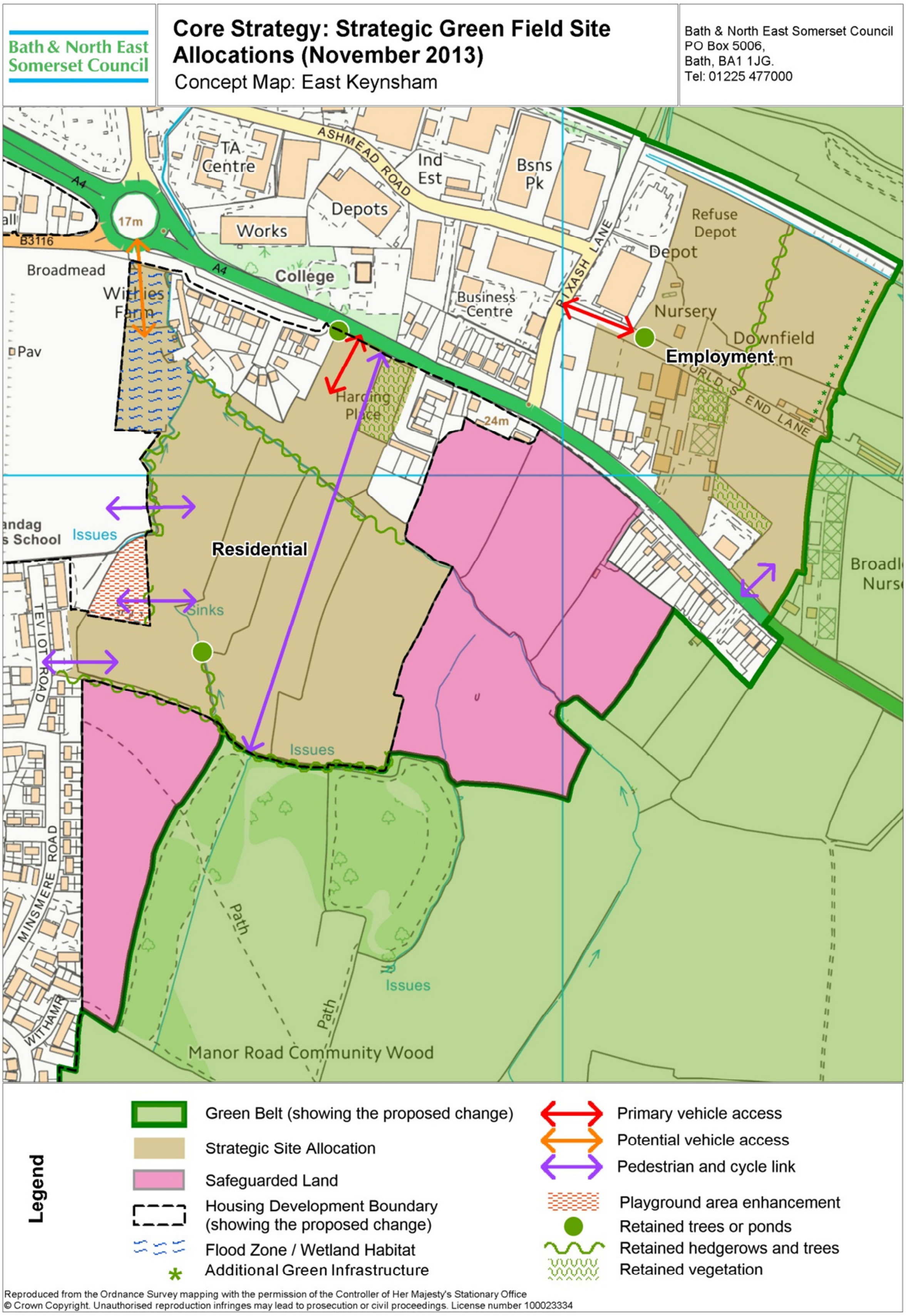
CONCEPT DIAGRAM RELATING TO POLICY KE3A - LAND ADJOINING EAST KEYNSHAM

Proposed changes indicated



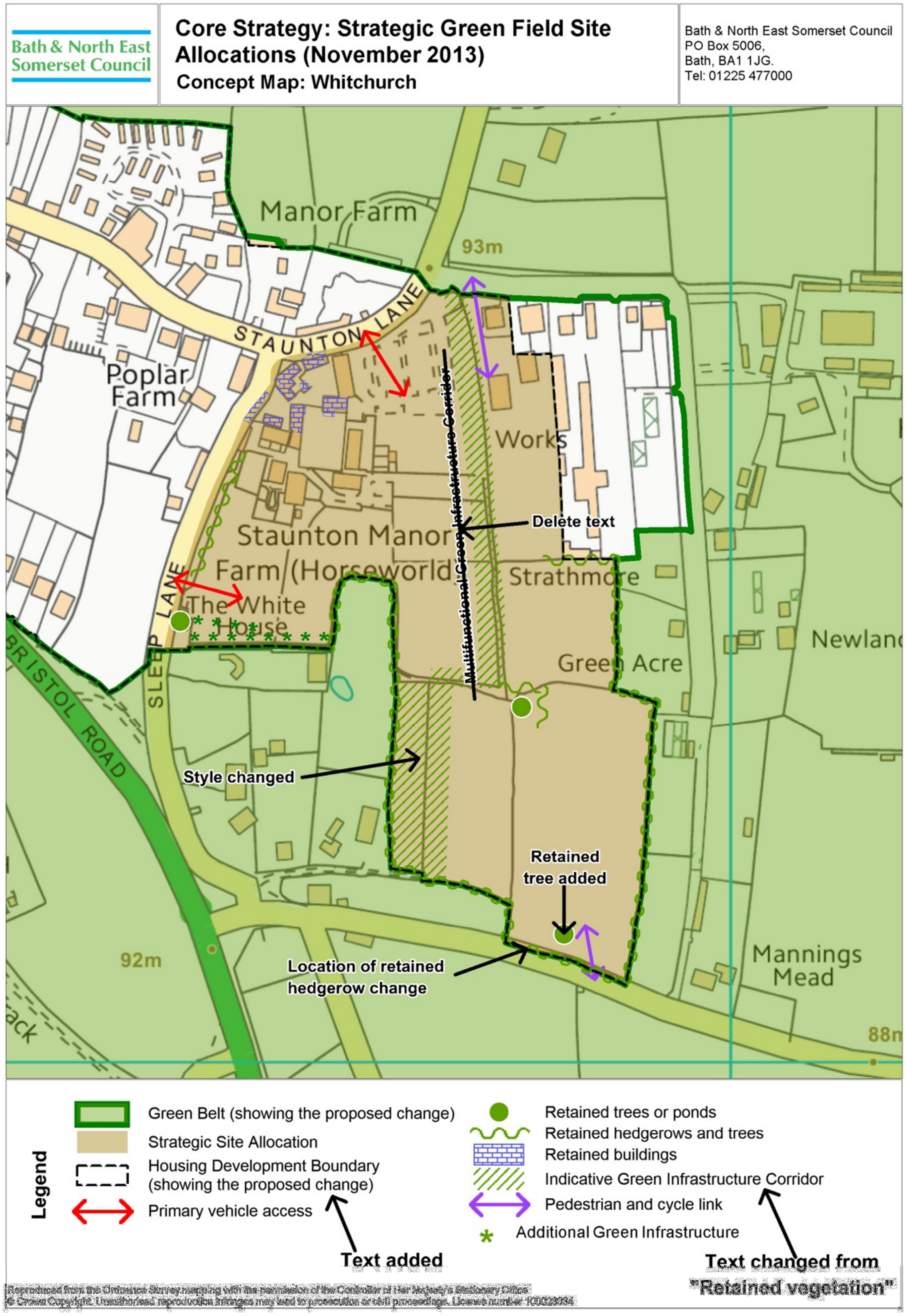
CONCEPT DIAGRAM RELATING TO POLICY KE3A - LAND ADJOINING EAST KEYNSHAM

Proposed changes incorporated



CONCEPT DIAGRAM RELATING TO POLICY RA5 - LAND AT WHITCHURCH

Proposed changes indicated



CONCEPT DIAGRAM RELATING TO POLICY RA5 - LAND AT WHITCHURCH

Proposed changes incorporated