

Bath and North East Somerset Core Strategy Examination**Inspector's Note – Progression of the Examination 2014**

1. This note covers 3 inter-related matters:

- The intention to progress the Examination to further hearings following the hearings on the SHMA/housing requirement;
- The dates for the commencement of the further hearings and an indicative timetable;
- A request for Statements of Common Ground between the Council and the owners/developers of the Green Belt land proposed for allocation in the November 2013 amendments.

2. Progression of the Examination

2.1 Following the hearing on the SHMA/housing requirements on 10/11 December 2013 I have decided that it is appropriate for the Examination to continue with further hearings as soon as practical, so as to complete the Examination of all the extant Council changes published during 2013.

2.2 I am not intending to publish any detailed interim conclusions on the SHMA/housing requirement other than these brief comments here which are sufficient to provide a context for the further hearings. I cannot come to any firm conclusions at present as I have yet to consider (and hear) any representations made in response to the November 2013 consultation on proposed changes, such as CSA14 which refer to the housing requirement and its make-up. Those representations may well include new parties to those who previously made representations and who participated in the hearing on 10/11 December 2013.

2.3 I have, however, heard all those existing parties who wanted to be heard who consider the plan unsound because identified need/overall housing provision included in the March 2013 changes are too low and that the supporting SHMA is inadequate. I have not identified any fundamental problem as a result of the hearing on 10/11 December which I need to bring to the Council's attention at this stage and which would require a delay to the further hearings. I have not been persuaded that overall housing provision in the plan needs to be greater than the *around 13,000 homes* as now proposed by the Council (eg in proposed change CSA14 to policy DW1 2c - Schedule of Amendments, November 2013 CD10/CS/1).

2.4 To make effective use of the forthcoming hearings and to avoid the repetition of arguments already heard seeking an increase in overall housing provision above that now proposed by the Council, the discussion at the hearings should proceed on the assumption that the total supply of housing of *around 13,000 homes* is either about right or should be lower (if, for example, the exception in NPPF paragraph 14 is met). Representations have been made arguing the latter, but have not yet been heard. In relation to the Strategic Housing Land Availability Assessment generally and the allocated sites, my focus will be whether the headline housing requirement that the Council is now proposing can be delivered in a manner which is sound.

3. Commencement of the further hearings

3.1 The hearings will recommence on **Tuesday 25th March** and will extend over 3 weeks. I will not be able to provide a detailed programme of hearings/topics until 28 February after I have reviewed the representations on the November 213

consultation. My intention is that at least the following topics will be covered in this order.

1st week (25 March onwards) Hearings on at least:

Spatial strategy (housing/employment distribution);
Housing delivery, including 5 year supply calculation and all SHLAA matters (other than the individual Green Belt sites)
Proposed plan review - timing and consequences.

2nd week (1 April onwards):

Green belt allocations (changed order from suggestion earlier in the year).
Tuesday: Odd Down – a full day likely
Wednesday: Weston - half day (AM); PM for any other Bath or overrun
Thursday: Keynsham – a full day likely
Friday (AM) - any Keynsham overrun.

3rd week (8 April onwards):

Tuesday: Whitchurch - half day (AM); PM for any overrun.

Wednesday/Thursday
Any remaining matters requiring a hearing, subject to my further consideration.

(No sitting on Friday 11 April as I have another work commitment.)

3.2 My intention is that a more detailed hearing programme would be issued by Friday 28th February. Some discrete remaining matters may be slotted into the end of the 1st week if there appears to be time. By 28th February, I would also issue any questions I had that needed to be clarified in pre-hearing statements. The subsequent deadline for any such statements would be 7 March 2014. However, I am not intending to issue generic pre-hearing questions for further statements for all hearings as I already have a large volume of evidence and detailed representations on most matters and further generic questions are likely to result in repetition of points, which would be unhelpful. I will issue agendas in advance of the hearings to focus the discussion.

4. Statements of Common Ground (SCG) on proposed Green Belt allocations

4.1 The hearings in March/April 2014 will need to address much detailed and controversial material, particularly in relation to some of the Council's proposed allocations. To make effective use of the hearings, I request that the Council and the various owners/developers/promoters of the Green Belt sites proposed for allocation in the November 2013 Amendments should prepare a SCG relating to the delivery and environmental impact of those allocations. These SCG are essential for my effective preparation for the hearings. The deadline for the submission of the SCG is noon **Friday 14th February** so as to inform my resumed preparation from mid February.

4.2 The SCG should include (but are not limited to):

- 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 evidence from landowner/developers included in the Core Documents or submitted with representations on the November consultation.

4.3 The SCG should make clear which parts of respective evidence documents on different environmental/highway and other matters are agreed and where there is disagreement briefly the main reason for that disagreement. Disagreement on essentially factual matters, such as whether development would be visible from specific viewpoints, should be capable of resolution.

4.4 If there is some outstanding "technical" matter that might yet be resolved between the parties after the deadline, please do not delay submission of the SCG on other matters whilst waiting for that to be resolved. I will accept a supplementary SCG on any outstanding matter if it is subsequently *agreed*.

4.5 These SCG 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. Whilst SCG between the Council and promoters regarding their suggested enlarged or alternative proposals would be welcome these should be separate from the SCG on the allocations and not delay or complicate completion of those.

Simon Emerson
Inspector
2 January 2014