

**BATH AND NORTH EAST SOMERSET - CORE STRATEGY EXAMINATION**

**Hearing: Spatial strategy, the housing requirement (in part), housing delivery (including the SHLAA) and the 5 year land supply.**

**TUESDAY 25 & WEDNESDAY 26 MARCH - INSPECTOR'S AGENDA**

*Hearing covers (so far as relevant and not addressed elsewhere) the following proposed changes:*

- November 2013 (CD10/CS1): CSAs 1, 2, 3 4, 5, 6; CSAs 7, 8 and 9 (not Green Belt site-specific matters); CSAs 12, 13, 14 (section 1, 2 and 3 only not Green Belt locations), CS18 (not Green Belt locations); CSA40, 41, 42 Rural Areas; CSA54.
- March 2013 (CD9/PC1): (In so far as still relevant and not superseded) SPCs:14 (numbers only), 15, 16, 17, 18, 20, 21, 22, 23 126, 128, 129, 130, 131, 132, 138, 136, 137, 140, 141, 143, 144.

*As I indicated in ID44, I have already heard (at the hearing on 10/11 December 2013) all those parties who made representations on the March 2013 consultation and who wanted to be heard who consider the Core Strategy unsound because identified need/overall housing provision included in the March 2013 changes is too low and that the supporting SHMA is inadequate. The present hearing is not an opportunity for those representors to repeat those arguments.*

**Part 1 Spatial strategy - housing and employment distribution between the spatial areas**

1.1 *If the Plan should deliver about 13,000 homes (as proposed by the Council), is the apportionment of these homes in CSA6 Table 1C justified?*

1.2 *To make this part of the hearing efficient and to avoid repeated comments from participants on each others cases, participants will have one main opportunity to explain why they think the apportionment is wrong/what it should be and one opportunity to comment after all participants have given their first explanation. The Council will have the opportunity to comment after each group of participants relating to a particular spatial area and at the end.*

1.3 *Where an alternative apportionment relies on the suitability of a particular site/location to accommodate more or less housing, that point should simply be flagged. The merits of the specific allocations proposed by the Council is for subsequent hearings.*

- Council to summarise its key points in justifying the spatial strategy.
- Participants whose primary concern is a greater or smaller share at:
  - Bath
  - Keynsham
  - Somer Valley
  - Rural Areas
  - Whitchurch
- All participants whose primary concern relates to the same spatial area to be heard together with the Council's response after each area.
- Participants to make any final comments in same order.
- Any final comments from the Council.

**WEDNESDAY 26 MARCH****Part 2 Housing requirement; housing delivery (including the SHLAA) and the 5 year land supply****2. Calculating the final housing requirement in the plan**

2.1 *These questions pick-up points originally intended for discussion towards the end of the hearing on 10/11 December, but postponed because of the implications of the consultation on the November 2013 proposed changes. Proposed change CSA6 makes only a small increase in the overall housing numbers compared with SPC14, but for the first time disaggregates the overall figures into separate market and affordable housing requirements, it is the justification for that paragraph and resulting implications for calculating the 5 year supply which are to be explored here, not the underlying components of the objective assessment of housing need.*

2.2 The Council has increased the housing requirement from its assessment of objective need/demand plus local plan backlog in order to deliver the additional affordable housing it has identified as needed.

- Is this the only way to ensure the delivery of the (Council's) identified affordable housing need?
- Did the Council explore increasing delivery by other means (e.g. 100% schemes)?
- Are there any prospects for delivery by other means?

*(Any discussion of the appropriate policy percentage to be sought from market housing should be addressed at the later hearing on affordable housing viability.)*

2.3 Given the Council's evidence in the SHMA, on what basis does the Council consider that this additional market-led housing will be delivered, given that it is more than its assessment of need/demand?

**3. The 5 year supply calculation**

3.1 Should the 5 year supply be calculated as the Council suggest (BNES/48, paragraph 39 and BNES/52, paragraph 3.34 onwards) on the basis of the Council's identified housing need plus local plan backlog or on the overall planned provision?

3.2 If incorporated into the adopted plan, would a disaggregated approach along the lines of CSA14 and CSA54 be workable to demonstrate whether or not the Council had a 5 year supply at any time and whether NPPF paragraph 49 should apply to a decision on an application?

3.3 What would happen in future decision making on planning applications if one element of the requirement has a 5 year supply and another does not?

3.4 The Council has included in its housing requirement the number of dwellings proposed in adopted Local Plan, but not delivered. Should delivering this backlog be spread out over the whole plan period or facilitated in a shorter period.

3.5 If the total housing provision currently proposed (around 13,000) was to be delivered evenly over the whole plan period would there still be a significant boost to the supply of housing as sought by the NPPF? Is a more sustained average level of provision preferable to peaks and troughs? (The Council calculate the

annual average in this scenario as 762 dwellings for the next 15 years - see BNES/52, Appendix 2 *Liverpool approach* Table 1).

#### **4. Housing delivery and the SHLAA**

*NPPF Footnote 11 states: sites with planning permission should be considered deliverable unless there is clear evidence that schemes will not be implemented within 5 years.*

4.1 The over-arching question for this topic is: if the Plan should be delivering about 13,000 homes, would the adoption of the Core Strategy establish a 5 year supply of housing on an on-going basis:

- On the basis of the Council's approach to calculating the supply (*unless following the discussion under 3 above I immediately conclude otherwise.*)
- On the basis that it should be calculated on the basis of the overall provision of around 13,000 as currently proposed, at an average of 762 dwellings per year?

4.2 Is the SHLAA's expectation of delivery in the different spatial areas justified? (*Explored in more detail below.*)

#### **Bath**

4.3 Is there now reasonable confidence that the constraints relating to the Windsor Road gas holder site will be overcome to enable delivery of Bath Riverside sites as shown in the SHLAA?

4.4 Is there now reasonable confidence that the Bath Flood Risk Management Project (CD9/FR2 and CD10/E14) will ensure that Bath Riverside sites can be delivered as shown in the SHLAA whilst meeting the requirements of national policy on flood risk?

4.5 Has there been any significant change in the capacity estimates or delivery timescale for the 3 former MOD sites?

4.6 Many of those objecting to the allocation of strategic sites in the Green Belt at Bath consider that such allocations would not be needed if densities on brownfield sites in Bath were increased. Is there any existing evidence that this is possible?

#### **Keynsham**

4.7 Is KE2 Somerdale likely to deliver as expected? Has the planning permission been issued/S106 signed?

#### **Somer Valley**

4.8 Are the employment sites identified in the SHLAA for housing, but not yet having planning permission, likely to be delivered? Is the former Focus DIY site in Midsomer Norton deliverable? (Concerns are raised on these matters in Rep 2564.)

**Simon Emerson**  
**Inspector**  
**March 2014**