

# **Bath and North East Somerset Core Strategy Soundness Tool Self Assessment**

**May 2011**



## BATH & NORTH EAST SOMERSET CORE STRATEGY SOUNDNESS TOOL SELF ASSESSMENT

Key question	Evidence provided
<b>Justified</b>	
<b>Participation</b>	
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p><b>Consultation statements:</b> Launch Consultation, Spatial Options consultation (Regulation 30, 1d) (CD5/8), Draft Core Strategy consultation (Regulation 30, 1e) (CD5/9)</p> <p>The consultation statements describe activities undertaken and materials used at key stages of the development of the document. These statements relate to how commitments in the <a href="#">Statement of Community Involvement</a> (CD5/13) have been met. The statements also include details of the Council's responses to the key issues arising.</p> <p><b>A high level of interest was demonstrated at each consultation stage:</b></p> <p><i>Draft Core Strategy consultation:</i> 2,750 comments were received from 820 respondents, of which 1,695 were expression of support (47%). More than 675 of the respondents were from members of the public.</p> <p><i>Spatial Options consultation:</i> A total of 3,270 comments were received on the Spatial Options document from a total of 204 respondents.</p> <p><i>Launch consultation:</i> 3,029 comments from 327 respondents.</p> <p>As well as these consultation periods <b>ongoing engagement</b> took place throughout the District with various stakeholders including meetings, workshops and briefing sessions. This involved adjoining authorities, Parish and Town Councils, Chew Valley Partnership, Somer Valley Partnership, English Heritage, Environment Agency, developers and landowners, Keynsham Interagency Forum, Keynsham Delivery Advisory Group, British Waterways, Bristol Water, Wessex Water, Bath Preservation Trust, Better Bath Forum, B&amp;NES Initiative, Strategic Growth Alliance.</p>
<b>Research/ fact finding</b>	
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source</p>	<p>The <a href="#">Evidence base</a> underpinning the Core Strategy is listed on the Council's website. In addition there are topic and information papers which support the Core Strategy. The Core document list includes a full list of the evidence base presented by topic area and the date of publication at section CD4.</p> <p>Submission Topic Paper 1 (CD6/S2) contains further explanation, however the following are of particular relevance:</p>

Key question	Evidence provided
<p>of the evidence?</p> <p>4. How up to date and convincing is it?</p>	<p>Conclusions of the Sustainability Appraisal Report (CD4/A13) of the Submission Core Strategy and its assessment of alternatives.</p> <p>The consultation reports identified at (1).</p> <p>Regulation 30(1)(d) Statement (Reg 25 participation/consultation) (CD5/8) section: 'Key issues arising from spatial options consultation' and analysis of comments'</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>See Submission Topic Paper 2 – Overall Strategy (CD6/S3).</p> <p>Also of particular relevance: Section 5.2 of the Sustainability Appraisal Report (CD4/A13) 'Assumptions made during the assessment'</p>
<b>Alternatives</b>	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these</p>	<p>The Draft Core Strategy (CD5/5) is consistent with the preferred Spatial Option (Option 2) in the <a href="#">Spatial Options Document</a> (CD5/4) although revised to reflect the post recession level of growth and therefore without the urban extensions. Submission Topic Paper 2 – Overall Strategy (CD6/S3) provides more information and further explanation.</p> <p>The Core document list provides a full list of the evidence base presented by topic area and date it was produced.</p> <p>Sustainability Appraisal report (CD4/A13) section 5.3 'The reasons for selecting alternatives' and Annex E: 'Appraisal of the Publication Core Strategy, Urban Extensions Commentary';</p> <p>Consultation statements from each stage of the process including analysis of responses to launch consultation and options consultation (hyperlinks under response to Question '1' above).</p> <p>Habitats Regulation Assessments completed on the <a href="#">Spatial Options Document HRA</a> (CD4/A9) and <a href="#">Draft Core Strategy HRA</a> (CD4/A16).</p> <p>Equalities Impact Assessments completed on the <a href="#">Spatial Options Document EQIA</a> (CD4/A7) and <a href="#">Draft Core Strategy EQIA</a> (CD4/A15) which include actions taken to improve the emerging document.</p>

Key question	Evidence provided
decisions were made?	<p data-bbox="421 172 2074 236">Health Impact Assessments completed on the <a href="#">Spatial Options Document HIA</a> (CD4/A8) and <a href="#">Draft Core Strategy HIA</a> (CD4/A14) which include the Council's response to improve the emerging document.</p> <p data-bbox="421 292 1823 323">The development of the Core Strategy is also explained through the following supporting information papers:</p> <p data-bbox="421 363 1294 395"><b>Information Papers for the Core Strategy Spatial Options stage</b></p> <p data-bbox="421 435 1305 467"><a href="#">World Heritage Site Setting Study - Information Paper</a> (CD6/O1)</p> <p data-bbox="421 507 2000 539"><a href="#">New neighbourhood in an urban extension to South / South West Bath - Information Paper (PDF - 840kb)</a> (CD6/02)</p> <p data-bbox="421 579 1473 611"><a href="#">South East Bristol Urban Extension- Key references (PDF - 161KB)</a> (CD6/03)</p> <p data-bbox="421 651 1272 683"><a href="#">Bath Central Area - Information Paper (PDF - 407kb)</a> (CD6/04)</p> <p data-bbox="421 722 1368 754"><a href="#">Settlement Classification - Information Paper (PDF - 1.1mb)</a> (CD6/05)</p> <p data-bbox="421 794 1843 826"><a href="#">Interim Sequential and Exception Tests for Strategic Sites - Information Paper (PDF - 2.71MB)</a> (CD6/06)</p> <p data-bbox="421 866 1597 898"><a href="#">Economic Development and Employment - Information Paper (PDF - 520kb)</a> (CD6/07)</p> <p data-bbox="421 938 1149 970"><b>Information Papers for the Draft Core Strategy stage</b></p> <p data-bbox="421 1018 1563 1050"><a href="#">Draft Core Strategy Information Paper - Student numbers and accommodation</a> (CD6/D1)</p> <p data-bbox="421 1098 1630 1129"><a href="#">Draft Core Strategy Information Paper - Flood Risk Sequential and Exceptions Test</a> (CD6/D2)</p> <p data-bbox="421 1185 1384 1217"><a href="#">Flood Risk Sequential and Exceptions Test Appendix B - Part 1</a> (CD6/D3)</p> <p data-bbox="421 1273 1373 1305"><a href="#">Flood Risk Sequential and Exceptions Test Appendix B - Part 2</a> (CD6/D4)</p> <p data-bbox="421 1361 1014 1393"><a href="#">Transport Modelling Technical Note</a> (CD6/D5)</p>

Key question	Evidence provided
	<p><b>Topic Papers for Submission stage</b></p> <p>Preparation Process (CD6/S2)  Overall Strategy (CD6/S3)  Climate change policies and a corporate approach to sustainability (CD6/S4)  Flood Risk Management (CD6/S5)  Affordable Housing (CD6/S6)  World Heritage Site and its setting (to follow)</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>The Sustainability Appraisal report (April 2011) is the culmination of several stages of appraisal as part of an iterative process, the relevant reports are listed below:</p> <p>Sustainability Appraisal Report (2010) (CD4/A13) (see also Annex E: ‘Appraisal of the Publication Core Strategy, Urban Extensions Commentary’)</p> <p><a href="#">Interim Sustainability Appraisal Report (December 2009)</a> (CD4/A5)</p> <p><a href="#">Sustainability Appraisal scoping report (December 2007)</a> (CD4/A1)</p> <p>The appendices to these documents include schedules of the Council’s response to issues raised and resultant changes made to the emerging document.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>The Council’s position in relation to this is set out in Submission Topic Paper 2 – Overall Strategy (CD6/S3).</p>

Effective	
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>Para 1.02 in the Draft Core Strategy (CD5/5) explains its relationship with the <a href="#">Sustainable Community Strategy</a> (CD4/04). The Key Strategic Issues discussed at 1.12 relate to the drivers for change identified by the SCS. These are the priority issues for the Council and the LSP. The Strategic objectives (1.14) include the relevant SCS driver. Table 3 (p24) details the objectives/SCS drivers in relation to the policy framework and mechanisms to support delivery including the relevant Local Plan or Draft Core Strategy policy against each objective. The Corporate Vision is reflected in the Core Strategy and the Futures work both informed, and was tested through, the Core Strategy.</p> <p>The issues and vision are expanded upon in each place based section: Strategic Issues for Bath (p.29) and Vision for Bath (p.32). Strategic Issues for Keynsham (p.61) and Vision for Keynsham (p.62). Strategic Issues for the Somer Valley (p.78) and Vision for the Somer Valley (p.79). Strategic Issues for the Rural Areas (p.93) and Vision for the Rural areas (p.94).</p> <p>The issues were discussed with communities through the Launch document (CD5/3) and subsequent stages of the Core Strategy</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>See Submission Topic Paper 2 – Overall Strategy (CD6/S2).</p>
<p>16. Does the development plan document contain clear objectives?</p>	<p>Section 1c of the Draft Core Strategy (CD5/5) contains the vision and strategic objectives (see also response to 13 and 14 above). Links are made to the <a href="#">Sustainable Community Strategy</a> (CD4/04) and its 'drivers for change'.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>The Strategic Objectives are presented alongside the relevant SCS drivers which are also identified under the Key Strategic Issues for the District. Some objectives are more overtly place specific through reference to places in the District whilst others refer to particular local issues such as managing student accommodation.</p> <p>The strategic issues are outlined in each section of the Draft Core Strategy (CD5/5) and addressed through the vision and policy framework for each area. The Core Policies respond to the issues and objectives identified for the District in section 1b/1c of the Draft Core Strategy.</p>
<p>19. Is it clear how the policies will meet the objectives?</p>	<p>Matrix of objectives against policies included at Draft Core Strategy (CD5/5) Table 3 (p24) – this includes relevant SCS drivers.</p>

20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	
21. Are there realistic timescales related to the objectives?	<p>The <a href="#">Infrastructure Delivery Programme</a> (CD4/L1)- outlines the key infrastructure requirements to deliver the Core Strategy. It also includes desired infrastructure items and sets the template for what is required in terms of funding and lead agencies.</p> <p>Indicators - Draft Core Strategy Monitoring Framework (Draft Core Strategy Section 7) (CD5/5).</p> <p>Where data is monitored annually, progress will be monitored against the 2026 or interim target.</p>
22. Are the policies internally consistent?	<p>Objectives are consistent with those of the SCS and the links are drawn out in the first chapter of the Draft Core Strategy (CD5/5) (as referred at 13/14 above).</p> <p>The Core Strategy is consistent with and informed by other Council strategies including: Sustainable Community Strategy (CD4/04), Futures for Bath, Keynsham and Somer Valley, Council’s Economic Strategy (CD4), Public Realm and Movement Strategy (CD4/UDL13), World Heritage Site Management Plan (CD4/UDL17).</p> <p>The Council has sought to ensure that the policy framework is internally consistent eg the requirements for affordable housing and sustainable construction have been tested against viability so as not to deter new housing development. The renewable energy target has been set at a level to limit harm the natural environment.</p> <p>Ongoing involvement of council officers from other services has ensured a consistent corporate approach.</p>
23. Does the development plan document contain material which: <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<p><a href="#">The Local Development Scheme</a> (CD5/11) outlines the scope of the Core Strategy and that of other DPDs. The Core Strategy focuses on strategic level policies and accords with its intended ‘role and content’ as identified in the LDS and in PPS12 (CD2/11).</p> <p>The LDS describes how the Core Strategy will be complemented by the Placemaking plan regarding site detail. In addition the policy framework in the Core Strategy sets out how the saved Plan policies are being progressively replaced. The Core Strategy does not duplicate national policy although regard has been had to the forthcoming National Planning Framework which will simplify national policy.</p>
24. Does the development plan document explain how its key	Monitoring section of Draft Core Strategy (CD5/5) is presented against the objective to which it relates.

<p>policy objectives will be achieved?</p>	<p>Table 3 (p24) details each policy and the mechanisms supporting its delivery. In addition each place based section includes a delivery section.</p> <ul style="list-style-type: none"> <li>• <a href="#">The Infrastructure Delivery Programme</a> (CD4/L1) outlines the key infrastructure requirements to deliver the Core Strategy it also includes desired infrastructure items and sets the template for what is required in terms of funding and lead agencies. Timeframes are established for key infrastructure items.</li> </ul>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>The Core Policies are supportive of the strategy and objectives. Table 3 Draft Core Strategy (CD5/5) page 24) outlines the policy framework and mechanisms to support delivery.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p><a href="#">Infrastructure Delivery Programme</a> (CD4/L1) and Draft Core Strategy (CD5/5) Policy CP13 on Infrastructure Provision.</p> <p>A key infrastructure table is included in each section of the Draft Core Strategy (CD5/5).</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>See response to 24 above.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p><a href="#">Infrastructure Delivery Programme</a> (CD4/L1)</p> <p>A key infrastructure table is included in each section of the Draft Core Strategy (CD5/5).</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>As at 26, 27 and 28 above.</p> <p>Monitoring Framework in Draft Core Strategy and <a href="#">Infrastructure Delivery Programme</a> (CD4/L1).</p> <p>Draft Core Strategy (CD5/5) - Section on delivery (table 3, p24). Each Core Policy has a section on delivery in the policy box. Area based policies contain a section on delivery at the end of each place based chapter.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p>	<p>The Core Strategy sets out the spatial implications of development and the <a href="#">Evidence base</a> demonstrates the range of plans and strategies considered including those from external bodies. The Council has worked with a range of other service providers in preparing the Core Strategy especially regarding</p>



<p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>Infrastructure provision.</p> <p>The Core Strategy includes links to other Council strategies: Sustainable Community Strategy, Futures for Bath, Keynsham and Somer Valley, Council’s Economic Strategy, Public Realm and Movement Strategy, World Heritage Site Management plan. It reflects the ambitions of other strategies and plans for example Town and Parish Plans and Futures visions.</p> <p>Account has been taken of funding and plans of other organisations and service providers which are often based on short term timescales. With a time frame to 2026 the Core Strategy frames the longer term direction and this should influence other organisations and service providers in their future planning.</p> <p>Topic Paper 2 (CD6/S3) sets out more comments on how the Core Strategy is a spatial plan.</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council’s views about the matter?</p>	<p>See responses to questions 34-36.</p>
<p><b>Flexible</b></p>	
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>See Submission Topic Paper 2 – Overall Strategy (CD6/S3).</p> <p>Para 1.36 of the Draft Core Strategy (CD5/5) ‘ contingency’ also provides information. Contingencies to infrastructure requirements are identified in the <a href="#">Infrastructure Delivery Programme</a> (CD4/L1).</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?</p>	<p>Draft Core Strategy (CD5/5) Section 7 – Monitoring and Review which includes indicators.</p> <p>See para 1.36 of the Draft Core Strategy (CD5/5) regarding contingency.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	

<b>Monitoring</b>	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	Monitoring Framework in the Draft Core Strategy (CD5/5) gives detail of indicators and targets. The Annual Monitoring Report will continue to monitor the relevant targets and Planning Policy will collate the necessary input of other service areas to feed into this where appropriate.  No housing site allocations included.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	
39. Are suitable targets and indicators present (by when, how and by whom)?	

<b>National policy</b>	
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification?	The Council considers that the Draft Core Strategy (CD5/5) is consistent with national policy.
42. Does the development plan document contain policies that do not add anything to existing national guidance? 43. If so, why have they been included?	Reference to national policy in the Core Strategy policies is to ensure that the provisions of national policy are fully considered and implemented e.g. CP8 Green Belt (PPG2).  The Core Strategy does not duplicate national policy although regard has been had to the forthcoming National Planning Framework which will simplify national policy.