

BATH AND NORTH EAST SOMERSET - CORE STRATEGY EXAMINATION

AGENDA - ISSUE 2: SPATIAL STRATEGY AND DELIVERY

**Day 2 (After completion of discussion on Issue 1)
The SHLAA and flood risk sequential test**

The agenda broadly follows the structure of the questions set out in ID7 focussing on matters I want to explore further.

Assumptions made in the SHLAA:

1. The SHLAA assumes that all sites (large and small) with extant planning permission will be delivered. Is this reasonable?
2. Does the SHLAA make realistic assumptions about the delivery/developability of sites without planning permission? (BWR and MOD sites in Bath will be discussed under the Bath Spatial Area.)
3. Should small site windfalls after 2022 be treated as a contribution to supply or as an element of additional flexibility to the SHLAA sites?
4. Is the Council's figure for future windfalls reasonable? (400-560 over 4 years - SHLAA May 2011, 2.53 CD4/H13). Should past rates be discounted because of the changes to PPS3 in June 2010?

Five year housing supply:

5. On the basis of the SHLAA figures and the Council's planned provision of 11,000 dwellings most parties accept that there is (just) a 5 year supply provided that the shortfall in delivery since 2006 is annualised over the whole remaining plan period. Is the latter assumption reasonable or should the shortfall since 2006 be recovered over a shorter period?
6. If the requirement of the draft NPPF in relation to housing supply of 5 years plus 20% (paragraph 109) were to become national policy before the close of the Examination, and such provision could not be demonstrated, what would be the implications for the Core Strategy?

Flood Risk Sequential Test

7. Has the Sequential test been appropriately addressed for the 1,000 plus dwellings without planning permission proposed on sites at Bath Riverside which are, in part, in Flood Zone 3?
8. Should any contingency allowance be made in case the detailed application of the Exception test, where required, cannot be met for relevant dwellings at Bath Riverside?

**Simon Emerson
Inspector 10 January 2012**