

BATH AND NORTH EAST SOMERSET CORE STRATEGY EXAMINATION**Inspector's Note - 30 March 2012****National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites**

The NPPF was published by the Government on 27 March 2012. Technical Guidance was published at the same time, which includes further guidance in relation to flood risk, among other matters.

On 23 March 2012 the Government published Planning Policy for Traveller Sites.

All these will become Core Documents, but can be viewed here:

<http://www.communities.gov.uk/publications/planningandbuilding/nppf>

<http://www.communities.gov.uk/publications/planningandbuilding/nppftechnicalguidance>

<http://www.communities.gov.uk/publications/planningandbuilding/planningpolicytravellers>

Comments can be made on whether the NPPF or Policy for Travellers Sites materially change national policy compared with the policy they replace in so far as is relevant to the soundness of the Core Strategy and the main issues I have identified in this Examination.

Given the representations already made and the discussions at the hearings, I am particularly interested in the following:

- Whether the NPPF significantly changes national policy in relation to the approach to assessing the housing requirement in a Local Plan.
- Whether the new requirement for a 20% buffer in the 5 year land supply where there has been a record of persistent under delivery (NPPF, paragraph 47, 2nd bullet) should apply to Bath and North East Somerset (in the light of the evidence already submitted on past performance).
- Whether an allowance can and should be the made for windfalls in the 5 year supply (NPPF, paragraph 48) and whether any such allowance should also be included in the supply for years 6-15.
- Following on from the above, the Council needs to be clear whether it seeks any such allowance, what it should be and its justification. To assist my understanding of the matter, the Council should recalculate the figures for past small site windfalls (below the SHLAA threshold) which are set out in the SHLAA (CD4/H13 2.47-2.54) excluding all such development that was on residential gardens. Council to indicate whether there is accurate information to make this adjustment.

Evidence already submitted in support of representations (or the Council's case) should not be repeated. Appropriate cross references can be made to it.

When I have considered the responses to the NPPF I will decide how the Examination should proceed.

Simon Emerson
Inspector