



**Bath & North East Somerset Representation Reference 106/5
Core Strategy Examination**

Respondent

Pro Planning

**Issue 1: Planned Provision for Jobs and Homes and Flexibility
Q 2.2 2.11 2.15**

December 2011

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ISSUE 1: Is the planned district-wide scale of provision for jobs and homes justified and is there sufficient flexibility to reflect uncertainties of forecasting and changing circumstances?

1. This statement, which elaborates representations dated 26 January 2011, primarily relates to Somer Valley. The responses to questions under Issue 1 are addressed in a separate statement on Issue 2 Sub Matter: Somer Valley.

Overarching Questions

2.2 If the requirements of the draft NPPF in relation to planning for housing were to become national policy before the close of the Examination, would planned provision meet those requirements (in particular paragraphs 13, 14 – first bullet, and 20-30)?

2. As elaborated in the statement on Somer Valley the answer to this question is that it would not. Draft NPPF paragraph 13 seeks a “positive planning system” which must “operate to encourage growth and not act as an impediment”. In fact the whole of Policy SV1 is a series of conflicting constraints and criteria each of which is individually an impediment to development, but taken together create such conflict and confusion as to render many potential housing sites undeliverable.

The Spatial/Practical Implications

2.11 What is the Core Strategy’s intention in relation to the future pattern of commuting?...Are these statements consistent with each other and how do they relate to the explanation about commuting in TP9 (paragraph 6.20-6.28) which appears to focus on the planned increase in housing/jobs and not any changes to existing patterns.”

3. Given that this statement primarily relates to Somer Valley, the focus is primarily on the Radstock/Peasedown St John/Bath corridor. The points raised under Issue 2 Sub Matter: Somer Valley of relevance to this overarching question are as follows.
 - The approach of only allowing housing in tandem with employment development in Somer Valley contravenes draft Government policy and renders the plan inherently inconsistent.

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- The plan seeks a reduction in industrial floor space, whilst in the same policy safeguarding all business floor space.
 - The largest allocated employment site in BANES has to date been Bath Business Park at Peasedown St John. It has recently and continues to provide a range of valuable job opportunities of benefit to the residents of Radstock.
 - The A367 corridor already has good public transport and is earmarked for further improvement. There is therefore no reason why housing should not be provided at Radstock in association with employment provision at Peasedown St John. It is a sustainable relationship.
 - The different house prices in Radstock compared with Bath and the obligation to meet all housing needs, support the strategy of encouraging housing development at Radstock which is not unreasonably constrained by employment and other requirements.

Flexibility and Review

2.15 What flexibility exists within strategy if the Council's assessment of growth/job creation or delivery are not borne out?

4. Again focusing on the Somer Valley allocations, by the current drafting of the relevant policies, if the Core Strategy fails to deliver new employment development and job creation in Radstock and Midsomer Norton, the consequence would in effect be to restrict housing development, possibly even to a lower level than that currently proposed to be allocated through the Core Strategy, which would render the Core Strategy unsound and in conflict with national policy.
5. In the more detailed statement on Somer Valley the implications for the lack of policy provision to give flexibility to review the Housing Development Boundary at the Placemaking Plan stage has a number of adverse consequences.
 - It unacceptably reduces flexibility within the Core Strategy policy,

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- unduly restricts subsequent site specific evaluations to identify the most sustainable housing and employment sites, particularly to address PPG 25 sequential test obligations, and,
 - precludes the ability to address anomalies between the Conservation Area boundary in Radstock and the Housing Development Boundary.