



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

**RESPONSE TO CD6/E2.2 -  
SCHEDULE OF ROLLING CHANGES TO THE  
DRAFT CORE STRATEGY FOR  
CONSIDERATION BY THE INSPECTOR  
FEBRUARY 2012**

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## Comments of CD6/E2.2

### CD6/E2.2 Ref 2 para 1.26

1.1 Pegasus Planning Group objects to the proposed change even though this increases the number of dwellings by 500 dwellings during the plan period. There remains a significant shortfall (approximately 5,700 dwellings) in the provision of dwellings compared with the ONS household projections. The Council's approach is that the Core Strategy's policies will result in a scale of housing provision that is well below reasonable assessments of future housing requirements, which Pegasus Planning Group have addressed in Hearing Statements in response to Issue 1 and its appendices.

### Ref 3 para 1.31

1.2 Pegasus Planning Group object to the additional sentence, as the review of the Green Belt should be undertaken in the Core Strategy. A review of the Green Belt and settlement boundaries should not be constrained in the ways suggested in BNES 9 and BNES 29.

### Ref 4 para 1.33

1.3 Although this amendment proposes an increase from 550 dwellings to 575 dwellings per annum, this is insufficient when compared to what is required by the latest household projections i.e. 16,750 dwellings gives an annual requirement of 836 dwellings. The adopted Local Plan has an annual requirement of 457 dwellings. This has only be exceeded in four years out of the 15 years of the Local Plan period, as a result of the Local Plan relying on brownfield sites which are inherently more difficult to bring forward even in different economic circumstances. The Core Strategy proposes 575 dwellings which is not a significant increase on the adopted Local Plan. Pegasus Planning Group objects to this "minor" increase. The Hearing Statement and Appendices to Issue 1 set out in detail what is considered to be the appropriate housing requirement for BANES.

Ref Policy DW1 clause 2

- 1.4 Pegasus Planning Group object to the marginal increase in the number of dwellings in Policy DW1 clause 2 for reasons already set out in Hearing Statement to Issue 1. It is noted that the amount of affordable housing is reduced by 400 dwellings. The Council's approach will exacerbate the shortfall in housing land supply and increase the need for affordable housing.

Ref 9 Policy DW1 last para only

- 1.5 Pegasus Planning Group objects to the Proposed Change to Policy DW1. Although BNES 24 states that the Council is committed to undertaking a timely review of the Core Strategy in conjunction with other West of England Authorities we are not aware of the timescale or the mechanism that will ensure when this review takes place. Furthermore the fact that a review will need to be undertaken in the context of the "Duty to Co-operate" this could take some time as all the local authorities will need to work together and would not result in an early review of the Core Strategy. Pegasus Planning Group remains concerned that whatever is set out (even in Policy) will ensure that the Council adhere to any timetable. There is no indication as to what will happen if the Council do not comply with the Policy.

- 1.6 The following points should be incorporated into a revised Policy DW1 addition:
- A review of the Core Strategy within 5 years
  - A proper comprehensive review of the Green Belt boundaries within BANES area
  - A full re-evaluation of housing needs using nationally valid statistics and projections for both housing and employment growth;
  - An undertaking to incorporate with the review the "duty to co-operate" not only with the other authorities within the West of England Partnership area but also the adjoining authorities to the South and East i.e. Mendip District Council and Wiltshire Council.
  - Monitoring of the BANES growth strategy for homes and employment in the wider sub-regional context.

Ref 22 para 2.22 Ministry of Defence land

- 1.7 Given that the Council are relying on the Ministry of Defence land it is not clear to what extent the area will be developed for residential, as whilst reference is made to SHLAA indicating that these sites can deliver well in excess of 1,000 new homes, it is

also indicated that the Placemaking Plan will consider the overall capacity in more detail and the scope for business space.

Ref 45 para 6.63

- 1.8 This approach is not justified by a detailed analysis of the impacts on Green Belt purposes of specific sites, or by an analysis of the housing needs of the settlements. It implies a maximum of site that could be considered for detailed changes in Green Belt boundaries.
- 1.9 It is important to distinguish strategic changes to the general extent of the Green Belt and detailed changes in Green Belt boundaries. The Core Strategy needs to consider both:
- a) to propose changes in the general extent of the Green Belt and
  - b) to provide a clear policy framework for subsidiary development plan documents, such as the proposed Placemaking Plan and Neighbourhood Plans, to make detailed changes.
- 1.10 Both kinds of change can make a contribution to strategic housing requirements as well as serving local housing needs.

Ref 46 para 6.64

- 1.11 Pegasus Planning Group objects to review of inset boundaries through the Placemaking Plan. Exceptional circumstances should only be considered through a comprehensive review of the Green Belt. The studies to date do not amount to a Green Belt Review as they don't look at the pros and cons of sites, only broad areas.

Ref 53 para 7.05

- 1.12 Pegasus Planning Group considers that the approach to monitoring is deferring the decisions about meeting development requirements in BANES until five years time. There is no policy requirement on the Council to undertake a Review. The overall changes to Policy anticipated by the additional wording to Policy DW1 may provide some strengthening in the need for a review of the overall document, but it does not address the issue - what action can be taken against the Council if it fails to comply

with its own policy requirements. The key concern is how a timetable for the review can be ensured.

- 1.13 Pegasus Planning Group have objected to the Core Strategy, the shortage of housing provision in the Core Strategy means that the strategy is fundamentally unsound without a proper review of the Green Belt to investigate opportunities to meet strategic and local housing needs. Postponing addressing the issues to an early review will not address the unsoundness of the Core Strategy.