

REP/067/001

From: [REDACTED]
Sent: 20 November 2013 13:37
To: chris.banks@zen.co.uk
Cc: [REDACTED]
Subject: Bath & North East Somerset Core (B&NES) Strategy

From: Trevor John, [REDACTED]

I have previously commented on the excessive number of homes being put forward in the Core Strategy and would like the following comments passed to the Inspector in advance of the meetings in December about the housing requirement and the SHMA. I do not plan to appear at the hearings.

The most up to date figures from B&NES for the housing requirement are set out in the table below (supplied by B&NES). Column 5, headed "Total plan target" is the SHMA figure but it is then adjusted because the latest SHLAA suggests a supply of only 2,935 affordable homes, giving a shortfall of 355 homes against the SHMA figure (last column).

	SHMA over 20 years	SHMA over 18 years	LP Backlog	Total plan target	Pre Nov 13 SHLAA Supply (less proposed Green Belt sites)	Difference
Total	8400	7560	1167	8727	11856	+2859
Market	5200	4680	757	5437	8921	+3834
Affordable	3200	2880	410	3290	2935	-355

The table below is B&NES suggested allocation of Green Belt sites to make up this shortfall and the column headed "Aff" is based on 40% or 35% for the various sites.

Green Belt Allocations to make good the difference re affordable housing

	Market	Aff	Total
Bath, Weston	90	60	150
Bath Odd, Down	180	120	300
Keynsham East	175	75	250
Keynsham South	140	60	200
Whitchurch	140	60	200
Total	725	375	1100

This suggests that the Green belt sites can produce 375 affordable homes, to exceed the SHMA target by 20 homes.

Pre Nov 13 SHLAA Supply (plus Green Belt)*	Difference vs total plan target
12956	+4229
9646	+4209
3310	+20

However, what is glaringly obvious is that this results in 9,646 market homes, against a SHMA target of 5,437 homes, an excess of 4,209 homes (as B&NES admit). In effect, landowners/developers are being "bribed" with planning permissions for market homes, 725 of which will be in the Green Belt, to persuade them to supply 355 affordable homes.

In the case of all of the Green Belt sites, this is completely contrary to paragraph 80 of the NPPF, which says:

"Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

Using these Green Belt sites simply to achieve 355 affordable homes is encouraging sprawl, not safeguarding the countryside, not preserving the setting of Bath and not encouraging the development of

brownfield sites.

The Odd Down/South Stoke plateau is nearly all AONB land and paragraph 116 of the NPPF says:

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

Building on this land to provide 120 affordable homes (and probably far fewer, because a large number of affordable homes could go on the Odd Down FC site, which is not Green Belt/AONB) is arguably not “exceptional circumstances” and not a “national consideration” but more certainly, B&NES have not adequately considered “the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way” or the “detrimental effect on the environment and the landscape”.

B&NES must be asked to find other ways to provide these affordable homes, such as:

- Requiring land owners to accept higher affordable percentages than 35 to 40%. Bath market homes, and the land concerned, are so expensive that the profit on them should make this perfectly feasible.
- Increasing the low densities that are proposed for the brownfield sites in Bath.
- Finding land to provide 100% affordable developments. For example, I am sure that many settlements in B&NES would volunteer land for such developments to enable young people to continue living in the village etc concerned.
- Using some of B&NES own vast property portfolio to supply suitable sites.
- Encouraging the use of the large number of empty flats that exist above shops in Bath.
- Approaching neighbouring towns that have good rail travel links into Bath (such as Bradford on Avon, Westbury, Melksham etc) to see if they can help with sites.

To make sure that this is achieved, the SHMA target should remain 8,727 homes.