

CORE STRATEGY ADOPTION: TOP 10 FREQUENTLY ASKED QUESTIONS

The Council has now received the Inspector's Report. The Inspector has found the Core Strategy sound subject to some main modifications.

The Inspector's Report and his recommended main modifications are available to view on the Council's website at the link below and at the Council's main offices and all public libraries.

<http://www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/core-strategy-examination>

The Inspector's Report, main modifications and adoption of the Core Strategy will be considered by Full Council at its meeting on 10th July. The Council Report will be made publicly available on the Council's website at:

<http://www.bathnes.gov.uk/corestrategy>

In the lead up to the Full Council meeting the Council is aware that a number of questions have been raised regarding the Core Strategy and this document sets out a brief answer to the top 10 Frequently Asked Questions that are not addressed by the Council Report.

1. Do the required exceptional circumstances exist to justify removing land from the Green Belt for development?

Government policy set out in the National Planning Policy framework (NPPF) states that once established Green Belt boundaries should only be altered in 'exceptional circumstances'. The Council initially sought to deliver the housing needs without using Green Belt sites but this proved unsuccessful. The Council undertook significant evidence based work in considering whether exceptional circumstances existed to warrant removing land from the Green Belt for development at 5 sites:

- Land at Odd Down, Bath
- Land at Weston, Bath
- Land at SW Keynsham
- Land at East Keynsham
- Land at Whitchurch

The exceptional circumstances considered by the Council to justify a change to the Green Belt boundary at these sites is summarised in BNES/51 – which can be found here:

[http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/Examination/bnes51 -
response to id40.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/Examination/bnes51-_response_to_id40.pdf)

Following discussion at the Examination hearings and consideration of evidence and comments raised the Inspector has concluded that exceptional circumstances exist to change the Green Belt boundary at 4 of the 5 sites listed above. This is based on a careful assessment and comparison of the different locations in the District. The

Bath & North East Somerset Council
Core Strategy Adoption: Top 10 Frequently Asked Questions

Inspector concluded that exceptional circumstances for removing land from the Green Belt do not exist at Weston, principally because the benefit of providing housing in this location does not outweigh the harm caused to the Green Belt, Cotswolds Area of Outstanding Natural Beauty and World Heritage Site setting.

2. Has full consideration been given to brownfield sites (including the use of vacant space above shops) before considering the release of Green Belt sites?

Through the process of preparing the Core Strategy the Council has considered the contribution brownfield sites of various types can make towards meeting the housing requirement. The Strategic Housing Land Availability Assessment (SHLAA) sets out conclusions of the Council's assessment of the capacity of suitable and available brownfield sites. This includes major brownfield sites within Bath and the towns such as Bath Western Riverside, the MoD sites and Somerdale in Keynsham.

In addition the SHLAA sets out an assumed contribution from small brownfield windfall sites (which includes the use of vacant space above shops and bringing empty homes back into use). The contribution is based on analysis of past delivery and future potential within the context of changes to national policy (e.g. discouraging garden development for housing).

The Inspector has confirmed that the Council's proposed contribution of housing from brownfield sites including windfall sites is realistic and deliverable.

The overall housing requirement of around 13,000 homes cannot be met solely from brownfield sites.

3. Can development densities on brownfield sites and existing commitments be increased to reduce the amount of land to be released from the Green Belt for development?

The density of development assumed by the Council on brownfield sites is influenced by the location of the site and its surrounding context. Development densities also need to reflect the need for a range of different types of housing to be provided, including family housing, as well as flats/apartments. The assumed development densities also need to be justified as being realistic and deliverable. The Inspector has considered the assumptions made in SHLAA and confirmed they are robust. Therefore, there is no scope to increase density assumptions.

A range of development densities have therefore been assumed across different sites e.g. Bath Western Riverside (principally flatted development) will be developed at densities of more than 100 dwellings per hectare, whereas the MoD sites in more suburban locations are assumed to be developed at 35-40 dwellings per hectare reflecting the delivery of family housing, as well as flats. This is at the higher end of what is deliverable and what is needed to ensure an acceptable living environment

for future residents. The Council's density assumptions for each development site are evident from the SHLAA

Development density and capacity on existing commitments reflect the current extant planning permission. This can only be amended if a revised application is submitted by the landowner/developer.

4. Can the Council hold back the release of Green Belt sites until after brownfield sites have been developed?

No. In addition to setting how the overall housing requirement of around 13,000 homes will be delivered government policy set out in the NPPF requires that the Council identifies a rolling 5 year supply of available housing land (plus a 20% buffer to provide for flexibility). The 5 year land supply needs to be justified as being deliverable.

The 5 year supply of housing land from the adoption of the Core Strategy (covering the period 2014-2019) needs to include a contribution from the Green Belt sites. This is because the brownfield sites are unable to deliver sufficient housing quickly enough due to either housing completion rates or the fact that sites will take some time to come forward for development (e.g. to reflect the process of the land owner/developer submitting a planning application and the application being determined by the Council and planning permission being granted).

5. Can a greater proportion of affordable housing be delivered on development sites to reduce or avoid the need to release land from the Green Belt for development?

The NPPF makes it clear that the requirement of developers to provide a proportion of affordable housing on a development site should not undermine the delivery of housing because of financial implications. Therefore, the proportion of affordable housing delivered on development sites reflects viability evidence undertaken by the Council. This evidence supports the Council's Core Strategy policy requiring the proportion of affordable housing provided is 30% in some parts of the District and 40% in other areas. The Inspector has concluded that the viability evidence is robust and justifies the policy approach. Therefore, it is not possible to assume an increased proportion of affordable housing will be delivered on development sites.

6. Why can't the Council deliver the affordable housing required on land it owns?

The Council owns various plots of land across the District. Some of this land is suitable for development and not all of it is in locations that are suitable for affordable housing development. In addition land (including that in Council ownership) is also needed to help meet other objectives of the Plan and to provide for other uses. For example the Council owns land within and close to Bath city centre which is in a suitable location for affordable housing provision. However, this

land is in a prime location and in short supply to provide commercial/office space which is needed to facilitate economic growth. Therefore the Council is proposing mixed uses on these sites which includes some housing along with other uses but increasing the housing elements will have negative economic consequences

7. How and when will development start to be delivered on sites to be removed from the Green Belt?

Development of the sites removed from the Green Belt will need to be developed in accordance with the Placemaking Principles set out in the relevant Core Strategy policy. These principles address a range of issues e.g. minimising and mitigating environmental impacts, vehicular and pedestrian/cycle access arrangements etc. The Placemaking Principles also require that a Masterplan is prepared for each site through public consultation. Therefore, there is an opportunity for the community to be involved in drawing up the Masterplan which will set out in more detail the form and type of development to be delivered. The Masterplan will inform and/or be prepared in parallel with a planning application. In terms of the 5 year housing land supply referred to above it is assumed that housing will start to be delivered on the sites removed from the Green Belt during 2017/18.

8. If all villages were allowed incremental growth, would this obviate the need for loss of Green Belt?

The Core Strategy already allows for some limited growth within many villages across the District. It is assumed that small windfall sites (each with a capacity of less than 10 homes) will continue to come forward within villages. In addition the Core Strategy requires that sites are identified to provide for around 50 dwellings at the larger, more sustainable villages and for around 10-15 dwellings at the smaller villages outside the Green Belt. For those villages within and 'washed over' by the Green Belt national policy limits development to infill sites only. In addition to this sites can come forward for affordable housing and local communities can identify additional houses through a neighbourhood Plan if desired.

Therefore, the Core Strategy already allows for incremental growth of villages. Additional development over and above that outlined above would not represent a sustainable solution to provide for the housing required; in particular it would result in significant travel, primarily by car, to work and to use services/facilities. The Inspector has agreed the Council's approach to development in the rural areas is justified and sound. Even with this increased level of housing coming forward in rural areas, the Green Belt locations are need to meet housing requirements

9. Has the Government recently stated that there is no requirement to remove land from the Green Belt for new housing?

Through recent Ministerial Statements the government has re-iterated the importance of Green Belts and re-affirmed national policy that land should be

Bath & North East Somerset Council
Core Strategy Adoption: Top 10 Frequently Asked Questions

removed from the Green Belt for housing only in exceptional circumstances. The government has also stated that this is a choice for local authorities to make. However, national policy makes it clear that the objectively assessed need for housing should be met in full and in the most sustainable way. Within B&NES the Council has undertaken much work and tested various alternatives in arriving at the strategy of removing some land from the Green Belt to provide for housing. This has included assessing the degree of harm to the Green Belt. As set out above the Inspector is of the view that exceptional circumstances exist that justify removing land from the Green Belt at four sites for housing development i.e. at Odd Down, East Keynsham, South West Keynsham and Whitchurch and that these allocations are needed to make the Plan sound.

In light of the Inspector's conclusions, the four Green Belt sites are vulnerable to development even if the Core Strategy is not adopted (see also question 10 below).

10. What happens if the Council does or does not adopt the Core Strategy?

The Council is considering the adoption of the Core Strategy at its meeting on 10th July. If the Council adopts the Core Strategy it would become part of the Development Plan and carry full weight in the determination of planning applications. Planning applications must be considered in accordance with the Development Plan unless material considerations indicate otherwise. This is the case in relation to the date on which the decision notice is issued. Therefore, for those planning applications already submitted or still awaiting the issuing of the decision notice they will need to be determined in the accordance with the adopted Core Strategy.

If the Council does not adopt the Core Strategy it will remain vulnerable to aggressive planning applications and have limited control over what housing development comes forward and where. Whilst initially this may result in additional housing being developed on land outside the Green Belt, sites within the Green Belt would also be vulnerable given the Inspector's conclusions in relation to the sites proposed through the Core Strategy process and because the preparation of an up to date Local Plan to provide for the housing required would be a long way off (see below). Furthermore, the Council would be unable to continue preparing and adopt a Community Infrastructure Levy (CIL) Charging Schedule. Given government changes to scale back planning obligations this would result in significantly reduced income to pay for the provision of necessary infrastructure.

In the event of not adopting the Core Strategy the Council would need to withdraw it and begin preparation of a new style Local Plan. This work would need to be done in conjunction with adjoining authorities as part of a wider review of West of England plans. It would be a number of years before a new Local Plan could be put in place.