

Bath and North East Somerset

# **Core Strategy Topic Paper 1**

## **Preparation Process**

May 2011

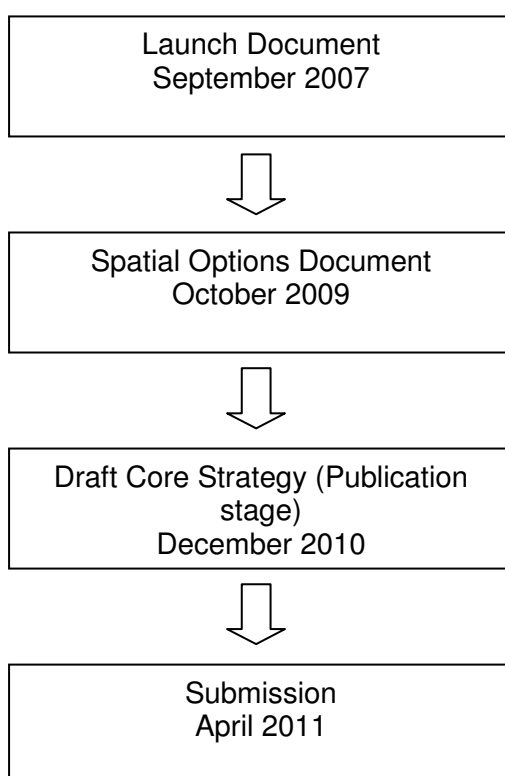


Bath and North East Somerset  
Local Development Framework

## TOPIC PAPER 1: CORE STRATEGY PREPARATION PROCESS

### 1.0 INTRODUCTION

- 1.1 This Topic Paper briefly outlines the stages in the preparation of the Core Strategy. It describes how the evidence base, various appraisals (including Sustainability Appraisal) and consultation have informed each stage of the Core Strategy preparation.
- 1.2 The timeline of the Core Strategy preparation process is summarised in the diagram below:



### 2.0 CORE STRATEGY LAUNCH DOCUMENT (CD 5/3)

- 2.1 The Launch Document was published for consultation for 12 weeks on 25<sup>th</sup> September 2007. Its purpose was to publicly launch the Core Strategy and stimulate discussion about how Bath & North East Somerset should develop over the period to 2026. The document outlined a spatial portrait of the District and proffered major issues and challenges facing the District and its constituent parts/places. The Launch Document did not set out firm policy options.

## **Evidence Base and Other Strategies**

- 2.2 The Launch Document drew on a range of evidence (see emerging core document list available as Annex 2 to the submission letter). Particular evidence that that informed the Launch Document included:
- Council Business Plans for Bath (CD4/E13) and the wider B&NES area (CD4/E14)
  - Joint Local Transport Plan 2 (CD4/T4), Greater Bristol Strategic Transport Study and Bath Transportation Package (CD4/T1 )
  - Bath and Rural Areas landscape character appraisals (CD4/UDL18, 18A &18B & CD4/UDL14)
  - Green Spaces Strategy (CD4/ENV3)
  - Destination Management Plan (CD4/RCS1 ) and Cultural Strategy (CD4/RCS2)
  - Housing need and affordability assessment (CD4/H2)
- 2.3 The Core Strategy also has a close relationship with and draws from a number of other strategies and in particular it is the spatial expression of the Sustainable Community Strategy. The Launch Document closely reflected the aspirations of the Community Strategy (SCS) at the time ('The Community Strategy for Bath & North East Somerset 2004 and Beyond - CD4/O7) for the District to be sustainable; inclusive; and distinctive. The key areas for improvement set out in the Community Strategy were also mirrored in the key issues identified. In 2005/06 the Council also prepared long term economic visions for the future prosperity of the District's key urban centres ('Future for Bath' (CD4/O3a), 'Future for Keynsham' (CD4/O3b) and 'Future for the Somer Valley' (CD4/O3c). These Futures Visions also reflected the SCS and were used to inform the Launch Document. The Futures Visions were tested through the preparation of and consultation on the Core Strategy (see also sections below).
- 2.4 At the time of its preparation the Launch Document also responded to the emerging draft Regional Spatial Strategy for the South West (RSS) (published by the South West Regional Assembly in July 2006) (CD3/4).

## **Appraisals**

- 2.5 A series of appraisals has been carried out throughout the preparation of the Core Strategy to inform development of the strategy at each stage. This was an iterative process which was integral to highlighting issues and opportunities to inform the emerging Core Strategy. The process of Sustainability Appraisal commenced ahead of the launch document and was carried out in collaboration with Environ (consultants). The Habitats Regulation Assessment, Health Impact Assessment and Equalities Impact Assessment were initiated following the launch document stage as policy options were being developed.

These appraisals were completed by a range of Council's officers in collaboration with the Primary Care Trust ( PCT).

- 2.6 The [Final Sustainability Appraisal scoping report](#) (December 2007) (CD4/A1) was published alongside the launch document. This scoping report examined the sustainability issues of relevance to the area and used these to produce a sustainability appraisal framework against which to appraise the plan. The scoping report was prepared by Council officers with Environ UK Ltd consultants acting as a 'critical friend'. The framework of SA objectives to be used for appraising DPDs in the LDF, including the Core Strategy, was subject to consultation to ensure that it addressed the key sustainability issues in the District.
- 2.7 The Habitats Regulation Assessment was not required at the launch stage as the document did not set out firm policy options.
- 2.8 A formal Health Impact Assessment was not undertaken at this stage again because the document did not set out firm policy options. Work on building knowledge in the planning policy team commenced however, and relationships with the PCT were established.
- 2.9 The Equalities Impact Assessment was also not completed at this stage as the document did not include draft policies. At this time, the planning policy team received initial training on completing equalities impact assessments from the Council's equalities team.

### **Consultation**

- 2.10 The launch consultation took place between 25<sup>th</sup> September and 17<sup>th</sup> December 2007. This involved a range of consultation events, displays, workshops, presentations and distribution of materials. This was in line with the Council's Statement of Community Involvement which details the types of activities that will take place during each stage of development plan document preparation. In response to this consultation 3,029 comments were received from 327 respondents. The full range of activities undertaken and issues raised by respondents are explained in full in the **Regulation 30 (1) (d) statement** (CD5/8).

### **3.0 SPATIAL OPTIONS DOCUMENT (CD5/4)**

- 3.1 The Spatial Options document was published in October 2009 for consultation. It presented spatial options to address the key issues and challenges facing Bath & North East Somerset and deliver the Council's Vision and Objectives for the District and the places within it. The document also identified the Council's preferred option.

## Evidence Base and Other Strategies

3.2 In developing the Core Strategy and presenting spatial options a range of further studies were undertaken. Key evidence that informed the spatial options document (additional to that available at the Launch document stage) included:

- Business Growth & Employment Land Study (CD4/E1)
- 2008 Retail Strategy (CD4/R1)
- Strategic Housing Market Assessment (CD4/H11)
- Gypsy and Traveller Accommodation Assessment (CD4/H10)
- Renewable Energy Research and Planning (CD4/S7)
- Strategic Flood Risk Assessment (levels 1 and 2) (CD4/FR6-FR12)
- World Heritage Site Setting Study (CD6/O1)
- Various assessments in relation to urban extension options including the CABE Urban Extensions Workshop report

*(This evidence is included in the emerging core documents list.)*

3.3 Following consultation on the Launch document and in parallel with the preparation of the Spatial Options document the Sustainable Community Strategy (SCS) was reviewed (the reviewed SCS 2009-2026 was published in September 2009). This enabled the Core Strategy to be prepared alongside the review of the SCS. The Options document identified and sought to deliver spatial objectives broadly reflecting the themes/drivers for change identified in the SCS. The SCS 2009-2026 (see CD4/O4) can be found at:

<http://www.bathnes.gov.uk/communityandliving/LocalStrategicPartnership/communitystrategy/Pages/default.aspx>. The Futures Visions developed by the

Council also continued to inform and be tested through the Spatial Options document (principally the options outlined for the strategy for Bath, Keynsham and the Somer Valley).

3.4 At this stage the Council proposed the allocation of **Strategic Sites** covering key development locations as promoted in PPS12 paras 4.6-7. These were subsequently dropped in response to advice from PINS and the HCA and the site detail to be included only on a broad locational basis with greater detail to be included in the Placemaking Plan

3.5 The Spatial Options document was based on and generally conformed with the draft RSS for the South West (letter confirming this received from South West Councils – see CD3/18). The Secretary of State's Proposed Changes to draft RSS had been published in July 2008. However, the Council objected to both the RSS level of growth and elements of its spatial strategy (see Council Report on Response to the Secretary of State's Proposed Changes to RSS – CD3/9). The Spatial Options document was consistent with this position in

aligning itself with the draft RSS. (See also Topic Paper 2 on the Overall Strategy).

### ***Appraisals***

- 3.6 [The interim SA report](#) (CD4/A5-A6) was published for consultation in September 2009 alongside the Spatial Options document. The interim SA report examined the sustainability effects of the Spatial Options document and provided recommendations to inform the development the Submission Draft of the Core Strategy.
- 3.7 Production of the interim SA report was an iterative process allowing for changes to be reflected in the Options document. Moving from a 'critical friend' role, Environ undertook this stage of the assessment in collaboration with Council officers. In mid 2008 and as the Spatial Options document was being produced, informal feedback was provided by Environ to the Council on the emerging options particularly focusing on the appropriateness of the vision and objectives for the plan as a whole and each sub area. In late 2008 this was followed up with additional advice and feedback from Environ to help the Council to develop the Spatial Options. During this period, and prior to the appraisal of options, Environ also undertook a review of the SA Objectives Framework. The review identified a number of areas for improvement and the SA Framework was updated accordingly.
- 3.8 The [Habitats Regulations Assessment](#) of the Options document (see CD4/A9) was completed by the Council's ecologist strategically screening for likely significant effect. An audit of relevant sites was presented using the 13 Natura 2000 sites identified for the West of England Partnership HRA. Development options and policy areas in the Core Strategy were then considered in terms of likely significant effect on the identified sites.
- 3.9 This approach aimed to identify issues and details that needed to be addressed prior to the production of the Draft Core Strategy (Publication Document) and to identify opportunities for plan amendment and modification to ensure no adverse effects upon the integrity of any European Site. The approach was discussed and agreed informally with Natural England.
- 3.10 The [Health Impact Assessment](#) (HIA) of the Spatial Options document (see CD4/A8) was completed during the summer of 2009 (and report published alongside the Spatial Options document). This was completed by the PCT with input from Council officers. This resulted in recommendations that were taken forward in the Spatial Options document and revisited in the development of the Draft Core Strategy.
- 3.11 The HIA emerged from several pieces of work involving Council officers and the PCT. In September 2008 and March 2009 workshops were held that aimed to highlight spatial planning and health issues and to introduce initial health

impact assessment of the emerging options. This involved the PCT, the WHO Collaborating Centre for Healthy Cities and Urban Policies at the University of the West of England, Planning Policy officers and officers representing services across the Council and Local Strategic Partnership.

- 3.12 The [Equalities Impact Assessment \(EQIA\)](#) of the emerging Spatial Options was completed in September 2009 (see CD4/A7). The assessment considered all corporate equality strands and resulted in the addition of an assessment strand that was considered particularly pertinent; socio-economic inequality. An action plan was produced which informed the Spatial Options document and the production of the Draft Core Strategy.

### **Consultation**

- 3.13 The consultation on the spatial options document took place between 19<sup>th</sup> October and 11<sup>th</sup> December 2009, with the period for receipt of comments extended to 15<sup>th</sup> Jan 2010. During the consultation period a significant range of events were held and material produced which engaged a variety of stakeholders. 3,270 comments were received from 204 respondents. Key issues raised included significant level of community and statutory consultee objection to urban extensions to Bath and south east Bristol. Full information can be found in the Regulation 30 (1)(d) consultation report (CD5/8).

## **4.0 DRAFT CORE STRATEGY (CD5/5)**

- 4.1 The Draft Core Strategy was published for consultation in December 2010. As the pre-submission draft it articulates the updated spatial Vision and Objectives for the District and established the locational strategy and strategic policy framework for delivering development and change within the District.

### **Evidence Base and Other Strategies**

- 4.2 Following the well publicised concerns over the RSS and the recent economic recession the Council reviewed its evidence base in order to ensure that the Core Strategy is based on up-to-date evidence, particularly taking into account the implications of the 2008-9 recession. Key additional evidence that informed the draft Core Strategy included:
- Future Housing Growth Requirements to 2026 report (CD4/H1)
  - Business Growth & Employment Land Study update (CD4/E2)
  - Economic Strategy (CD4/E8) and Local Economic Assessment (CD4/E7)
  - Smart Growth Study (CD4/E10)
  - Single Conversation: West of England Delivery & Infrastructure Plan (CD4/4)
  - Infrastructure Delivery Programme (CD4/1)
  - Strategic Housing Land Availability Assessment (CD4/H6-H7)

- Affordable Housing viability study (CD4/H9)
  - District Heating Opportunity Assessment (CD4/S1-S4), Renewable Energy and Planning Research update (CD4/S8), Landscape Sensitivity Analysis for Wind Energy Development (CD4/S6)
  - Flood Risk Management Strategy (CD4/FR2-FR5)
  - Bath Building Height Strategy (CD4/UDL2-L5), Public Realm and Movement Strategy (CD4/UDL13) and World Heritage Site Management Plan (CD4/UDL17)
  - Economic Regeneration Delivery Plans (CD4/E3-E6)
- 4.3 A comprehensive list of evidence used to inform the draft Core Strategy is included in the emerging core document list.
- 4.4 The draft Core Strategy continues to closely reflect the SCS and the spatial objectives are directly related to the SCS Drivers for Change. The draft Core Strategy is not based on planning for the level of growth set out in draft RSS but on more recent evidence of growth and the results of public consultation. The spatial strategy adopted in the draft Core Strategy remains broadly aligned with the draft RSS focus on strategically significant urban areas but it does not include urban extensions. Topic Paper 2 on the Overall Strategy provides more detail.

### **Appraisals**

- 4.5 The [Sustainability Appraisal Report](#) and a supporting non-technical study (see CD4/A10-A12) were published for public consultation alongside the Draft Core Strategy. The SA report outlines the significant effects of the preferred options and the reasonable alternatives considered as part of the issues and options assessment. The transition from the level of growth in the Spatial Options to that in the Draft Core Strategy was informed by both evidence (see above) and the SA process. The SA report outlines the reasons for the strategy chosen and the measures envisaged to prevent, reduce and as fully as possible offset any significant effects of implementing the plan. The SA of the options document had appraised two options that both included urban extensions and that planned for the same level of growth. To address the change in strategy, the final SA report includes a comparison of the strategy with and without urban extensions.
- 4.6 The [Habitats Regulation Assessment](#) of the Draft Core Strategy (see CD4/A16) was informed by the results of the initial assessment (at options stage). Following on from the Options Document, changes to the Core Strategy had evolved, resulting in lower overall levels of development. The original recommendations to help prevent significant impacts to European Sites have been addressed where still relevant and the final publication document has been amended to address all the issues raised including the residual issues identified through the last stages of the HRA process. The final



HRA did not progress to appropriate assessment because it was concluded the Council's Ecologist in discussion with Natural England that the Core Strategy is not likely to have a significant effect upon any European site within or adjacent to the District.

- 4.7 The [Health Impact Assessment](#) (CD4/A14) was carried out by BANES PCT and this built on the assessment undertaken at the options stage with the aim of embedding health considerations in the process. The report can be viewed at the above link, and includes an analysis of how the recommendations have been taken into account in the Draft Core Strategy.
- 4.8 As at the Options stage of the document, the [Equalities Impact Assessment](#) (CD4/A15) was completed by planning policy officers with critical friend support from a working group of Council officers. An action plan was produced which resulted in several changes to the Draft Core Strategy. It also provided recommendations to consider in future LDF document preparation.

### **Consultation**

- 4.9 Consultation on the Draft Core Strategy took place between 16<sup>th</sup> December 2010 and 3<sup>rd</sup> February 2011. In line with the regulations, this was a formal stage in the process where respondents could only comment on the document in terms of its legal compliance and soundness. 2,750 comments were received from 820 respondents. The key issues raised during the consultation included significant level of community support for the strategy not planning for urban extensions. Further information is set out in schedules 1-4 which include all the responses and key issues raised through the consultation. In addition the Regulation 30 (1) (e) consultation statement includes information on the activities undertaken and the key issues raised (see CD5/9).

## **5.0 SUBMISSION CORE STRATEGY**

- 5.1 The issues raised in representations on the draft Core Strategy have been considered by the Council and a number of non-material changes to the draft Core Strategy are proposed. These changes are set out in a schedule of Proposed Changes (CD5/6) that is submitted alongside the draft Core Strategy. For information purposes the Council has also submitted a version of the draft Core Strategy that incorporates the proposed changes (CD5/7).
- 5.2 The proposed changes have been subject to Sustainability Appraisal. Environ have assessed the sustainability implications of the proposed changes and the Sustainability Appraisal Report (for the draft Core Strategy) has been updated accordingly (see CD4/A13 for updated Sustainability Appraisal Report).

5.3 The timeline outlined above shows that Core Strategy preparation has not fully accorded with the milestones set out in the Council's Local Development Scheme (CD5/11). There has been a delay in the latter stages of the Core Strategy by about four months, linked to the need to revise the evidence in light of uncertainty over the RSS. However, the Local Development Scheme is being reviewed with an update scheduled for June 2011. A copy of the revised milestones for the Core Strategy and other Development Plan Documents will be supplied to the Inspector.