

Council Response to Inspector's Note regarding Core Strategy Final Inspector's Report (ref. ID/16)**1. Introduction**

- 1.1 The Inspector has requested that the Council confirm how the site allocations proposed in the Placemaking Plan align with the evidence underpinning the Core Strategy in terms of the contribution of site allocations to meeting the overall housing requirement and expected timing of delivery in relation to the five year housing land supply.
- 1.2 The Council's response is based on the housing supply trajectories relevant at that time, namely the March 2014 trajectory, which was the latest version of the trajectory updated during the Core Strategy Examination and referred to in the Inspector's Final Report, and the September 2016 trajectory, which is the latest and updated version submitted to the Placemaking Plan Examination as CD/PMP/S5/1.
- 1.3 Based on these trajectories (at 2014 and 2016) two tables are attached outlining the anticipated housing supply from sites allocated in the Draft Placemaking Plan and for completeness also the sites allocated in the Adopted Core Strategy. The housing contribution from allocated sites is broken down by policy area; whether the sites have planning permission at the time of the trajectory; and on an annual basis for the remainder of the plan period.

2. Housing contribution from Allocated Sites

- 2.1 At the time of the Core Strategy Examination the housing supply trajectory showed a total supply of around 13,160 dwellings for the plan period (2011-2029) against a plan requirement of around 13,000 dwellings. The September 2016 trajectory identifies a total supply of around 12,690 dwellings.
- 2.2 The attached tables show that in both 2014 and 2016 allocated sites make a significant and broadly similar contribution towards meeting the overall housing requirement. More than 50% of the total requirement is anticipated to be delivered on sites allocated in the Placemaking Plan and Core Strategy.
- 2.3 Whilst overall housing supply has decreased by around 470 the contribution from allocated sites across the District as a whole has decreased by a lesser amount of around 140 dwellings for the plan period. With regard to sites allocated in the Draft Placemaking Plan there remains significant alignment with the evidence underpinning the Core Strategy.
- 2.4 During the remainder of the plan period (2016-2029) the Placemaking Plan allocations were anticipated to deliver 5,453 dwellings at the time of the Core Strategy Examination and in the latest trajectory this remains at a similar level of 5,415 dwellings. Within this overall alignment there are some differences which can be summarised as follows:

- Contribution from allocated sites in Bath has decreased by around 100 dwellings. This is primarily due to the housing contribution from Bath Western Riverside (site SB8) falling significantly for reasons outlined at the Examination hearings and reflecting the evidenced and deliverable intentions of the principal developer (Crest). This reduction in supply from Western Riverside has been partly offset by a greater contribution from some of the other allocated sites e.g. Bath Press (SB9), MoD Warminster Road (SB12) and South Quays (SB5)
- Similar (slightly greater) contribution from allocated sites in Keynsham in the 2016 trajectory, primarily reflecting the increased capacity at Somerdale (site KE2a) with the granting of full/reserved matters planning permissions since 2014
- Marginally reduced contribution from allocated sites in the Somer Valley reflecting an assumed lower dwelling capacity on the Welton Manufacturing Site (SSV4) and the fact that the Bath College Somer Valley Campus site (SSV18) is no longer intended to include a residential element
- Increased contribution from allocations in the rural areas reflecting that the sites proposed to be allocated in the Placemaking Plan were not previously identified in the housing supply trajectory at the time of the Core Strategy Examination

3. Expected Timing of Delivery of Allocated Sites (Five Year Land Supply)

- 3.1 At the time of the Core Strategy Examination the Council's March 2014 housing supply trajectory showed a five year housing land supply for the 2016-2021 period of 6,049 dwellings. In the September 2016 trajectory this has decreased by around 300 dwellings to 5,726 dwellings. However, this level of supply still means that the Council is able to demonstrate a five year housing land supply, plus 20% buffer, against the Core Strategy housing requirement. The supply of 5,726 actually equates to a five year land supply plus a 35% buffer.
- 3.2 With regard to the dwellings contribution from allocated sites to five year housing land supply the 2014 and 2016 trajectories show alignment in relation to the anticipated timing of housing delivery. In 2014 the sites allocated in both the Placemaking Plan and the Core Strategy were anticipated to deliver 3,509 dwellings between 2016 and 2021, this figure remains the same (at 3,510) in the September 2016 trajectory. Within this figure the contribution from sites allocated in the Placemaking Plan has increased.
- 3.3 The attached tables show that at both the time of the issuing of the Core Strategy Inspector's Report and now the allocated sites contribute to five year housing land supply on an ongoing basis. In common with the overall supply position demonstrated by the 2016 trajectory the housing supply from the allocated sites decreases towards the end of the plan period. As set out at the Examination hearings the reduction in supply from allocated sites and the risk of overall supply shortfall only occurs significantly after the Core Strategy has been reviewed and supply issues addressed.

TABLE 1: SEPTEMBER 2016 TRAJECTORY (PLACEMAKING PLAN EXAMINATION): HOUSING SUPPLY FROM SITES ALLOCATED IN THE PLACEMAKING PLAN & CORE STRATEGY

Breakdown by year

	Total 2011-2029	Total 2016-2029	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29		
Allocated in PMP, no planning permission (Bath policy area)	1339	1339	0	0	69	177	0	191	281	120	126	75	75	125	100		
Allocated in PMP, no planning permission (Keynsham policy area)	48	48	0	0	0	0	0	48	0	0	0	0	0	0	0		
Allocated in PMP, no planning permission (Somerset Valley policy area)	118	118	0	18	0	0	50	50	0	0	0	0	0	0	0		
Allocated in PMP, no planning permission (Rural Areas policy area)	78	78	0	14	14	50	0	0	0	0	0	0	0	0	0		
Allocated in PMP, with planning permission (Bath policy area)	3492	2969	288	274	407	478	358	190	160	160	160	160	84	125	125		
Allocated in PMP, with planning permission (Keynsham policy area)	768	695	74	248	60	60	59	65	65	64	0	0	0	0	0		
Allocated in PMP, with planning permission (Somerset Valley policy area)	81	81	0	0	30	51	0	0	0	0	0	0	0	0	0		
Allocated in PMP, with planning permission (Rural Areas policy area)	87	87	0	0	38	32	17	0	0	0	0	0	0	0	0		
All allocated sites in PMP (Bath policy area)	4831	4308	288	274	476	655	358	381	441	280	286	235	159	250	225		
All allocated sites in PMP (Keynsham policy area)	816	743	74	248	60	60	59	113	65	64	0	0	0	0	0		
All allocated sites in PMP (Somerset Valley policy area)	199	199	0	18	30	51	50	50	0	0	0	0	0	0	0		
All allocated sites in PMP (Rural Areas policy area)	165	165	0	14	52	82	17	0	0	0	0	0	0	0	0		
Total supply from Allocated Sites in Placemaking Plan	6011	5415	362	554	618	848	484	544	506	344	286	235	159	250	225		
5 Year supply from Allocated Sites in Placemaking Plan			2016-21 = 2866					2021-26 = 1915					2026-29 = 634				
Allocated in CS, no planning permission (Bath policy area)	300	300	0	0	0	50	50	50	50	50	50	0	0	0	0		
Allocated in CS, no planning permission (Keynsham policy area)	370	370	0	0	20	100	100	50	50	50	0	0	0	0	0		
Allocated in CS, no planning permission (Whitchurch policy area)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Allocated in CS, with planning permission (Bath policy area)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Allocated in CS, with planning permission (Keynsham policy area)	100	100	0	24	50	26	0	0	0	0	0	0	0	0	0		
Allocated in CS, with planning permission (Whitchurch policy area)	224	224	0	24	100	100	0	0	0	0	0	0	0	0	0		
All allocated sites in PMP & CS (Bath policy area)	5131	4608	288	274	476	705	408	431	491	330	336	235	159	250	225		
All allocated sites in PMP & CS (Keynsham policy area)	1286	1213	74	272	130	186	159	163	115	114	0	0	0	0	0		
All allocated sites in PMP & CS (Somerset Valley policy area)	199	199	0	18	30	51	50	50	0	0	0	0	0	0	0		
All allocated sites in PMP & CS (Rural Areas policy area)	165	165	0	14	52	82	17	0	0	0	0	0	0	0	0		
All allocated sites in PMP & CS (Whitchurch policy area)	224	224	0	24	100	100	0	0	0	0	0	0	0	0	0		
Total supply from Allocated Sites in Placemaking Plan & Core Strategy	7005	6409	362	602	788	1124	634	644	606	444	336	235	159	250	225		
5 Year supply from Allocated Sites in Placemaking Plan & Core Strategy			2016-21 = 3510					2021-26 = 2265					2026-29 = 634				

TABLE 2: MARCH 2014 TRAJECTORY (CORE STRATEGY EXAMINATION): HOUSING SUPPLY FROM SITES ALLOCATED IN THE PLACEMAKING PLAN & CORE STRATEGY

	Total 2011-2029	Total 2016-2029
Allocated in PMP, no planning permission (Bath policy area)	2721	2651
Allocated in PMP, no planning permission (Keynsham policy area)	90	90
Allocated in PMP, no planning permission (Somerset Valley policy area)	282	244
Allocated in PMP, no planning permission (Rural Areas policy area)	28	28
Allocated in PMP, with planning permission (Bath policy area)	2301	1777
Allocated in PMP, with planning permission (Keynsham policy area)	700	630
Allocated in PMP, with planning permission (Somerset Valley policy area)	0	0
Allocated in PMP, with planning permission (Rural Areas policy area)	70	33
All allocated sites in PMP (Bath policy area)	5022	4428
All allocated sites in PMP (Keynsham policy area)	790	720
All allocated sites in PMP (Somerset Valley policy area)	282	244
All allocated sites in PMP (Rural Areas policy area)	98	61
Total supply from Allocated Sites in Placemaking Plan	6192	5453
5 Year supply from Allocated Sites in Placemaking Plan		
Allocated in CS, no planning permission (Bath policy area)	300	300
Allocated in CS, no planning permission (Keynsham policy area)	450	450
Allocated in CS, no planning permission (Whitchurch policy area)	200	200
All allocated sites in PMP & CS (Bath policy area)	5322	4728
All allocated sites in PMP & CS (Keynsham policy area)	1240	1170
All allocated sites in PMP & CS (Somerset Valley policy area)	282	244
All allocated sites in PMP & CS (Rural Areas policy area)	98	61
All allocated sites in PMP & CS (SE Bristol policy area)	200	200
Total supply from Allocated Sites in Placemaking Plan & Core Strategy	7142	6403
5 Year supply from Allocated Sites in Placemaking Plan & Core Strategy		

Breakdown by year

16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
240	280	240	135	250	490	451	295	215	27	28	0	0
30	30	30	0	0	0	0	0	0	0	0	0	0
90	70	70	14	0	0	0	0	0	0	0	0	0
0	0	14	14	0	0	0	0	0	0	0	0	0
162	231	174	121	121	121	121	121	121	121	121	121	121
83	77	40	30	50	50	50	50	50	50	50	50	0
0	0	0	0	0	0	0	0	0	0	0	0	0
33	0	0	0	0	0	0	0	0	0	0	0	0
402	511	414	256	371	611	572	416	336	148	149	121	121
113	107	70	30	50	50	50	50	50	50	50	50	0
90	70	70	14	0	0	0	0	0	0	0	0	0
33	0	14	14	0	0	0	0	0	0	0	0	0
638	688	568	314	421	661	622	466	386	198	199	171	121
2016-21 = 2629				2021-26 = 2333					2026-29 = 491			
50	50	50	50	50	50	0	0	0	0	0	0	0
90	110	110	70	50	20	0	0	0	0	0	0	0
50	50	50	50	0	0	0	0	0	0	0	0	0
452	561	464	306	421	661	572	416	336	148	149	121	121
203	217	180	100	100	70	50	50	50	50	50	50	0
90	70	70	14	0	0	0	0	0	0	0	0	0
33	0	14	14	0	0	0	0	0	0	0	0	0
50	50	50	50	0	0	0	0	0	0	0	0	0
828	898	778	484	521	731	622	466	386	198	199	171	121
2016-21 = 3509				2021-26 = 2403					2026-29 = 491			