

Bath & North East Somerset Placemaking Plan**COUNCIL'S RESPONSE TO ID/3: MATTER 2 – OVERALL APPROACH*****Matter 2 - Overall Approach******Issue 2 – whether the overall requirements of the adopted CS would be achieved through the Placemaking Plan******Q1. Would the Placemaking Plan meet the overall housing requirement of about 13,000 dwellings?***

1. The Placemaking Plan, through the site allocations and the development management policy framework, seeks to facilitate the delivery of the housing requirement established by the Core Strategy. Within this context the Inspector has advised in her guidance note (ID/2) that the housing requirement is not to be discussed at and falls outside the scope of the Placemaking Plan Examination.
2. The Core Strategy requires that between 2011 & 2029 provision is made for around 13,000 homes. The 13,000 figure is not a cap. However, it should be noted that the Core Strategy Inspector in his report (para 78) explains what this means i.e. whilst the policy frame seeks to enable the delivery of 13,000 dwellings by 2029, it should not prevent development on otherwise policy compliant sites e.g. PDL windfalls. The requirement for around 13,000 also entails a significant increase over the Objectively Assessed Need (OAN) in order to fully meet the affordable housing requirement. The background to this policy is the Core Strategy Inspector's report (CD/PMP/G26).
3. The apportionment of the housing requirement between sub-areas within B&NES is derived from and based on the spatial strategy (CD/PMP/G6). On the basis of this strategy all areas except Bath are shown to be on target through the Council's published 2016 housing land supply trajectory (CD/PMP/S4). In Bath, a minor shortfall has recently emerged.
4. As stated above the figure of around 13,000 dgs is significantly inflated above OAN – the OAN is 10,122 but nearly 3,000 additional market houses are planned for to facilitate the provision of affordable housing. Further, it is a round figure, the actual statistical requirement relating to the OAN inflated to provide affordable housing is 12,936.

5. The Council’s latest Housing Land Supply Trajectory (CD/PMP/S4) shows identified deliverable supply of 12,651 units ie a possible shortfall of 285 dgs.

6. The supply position set against the Core Strategy requirement is outlined in Table 1 below. Given that the housing requirement is significantly inflated to provide affordable housing (AH) it is relevant to look at any shortfall against this figure. As shown in Table 1 the shortfall in AH units is 82 units (around 4 months of supply). In the absence of any windfall sites delivering solely or mainly affordable housing (e.g. exception sites) around another 200-250 dwellings overall would be needed to deliver this at a policy compliant proportion of 30%-40%. In effect the 200-250 figure represents the relevant shortfall. Even taken against the around 13,000 figure only a marginal shortfall of around 350 units (less than 3% or less than 6 month supply) is currently shown.

Table 1: Summary of Core Strategy Requirement & Identified Supply

	Objectively Assessed Needs	Core Strategy Requirements	Delivery	Shortfall
Market Housing	6,832	9,646	9,443	203
Affordable Housing	3,290	3,290	3,208	82
Total Housing	10,122	12,936	12,651	Total shortfall 285

7. In assessing supply from large sites significant analysis of delivery informed by commercial/market input (particularly through discussions with agents representing developers taking forward sites) has been undertaken. Anticipated delivery programmes have been informed by the build out of schemes within B&NES. Importantly the marginal shortfall in identified supply at April 2016 must be seen in the context of a number of conservatisms that have been applied:
 - a. Estimated supply from some identified sites is conservative e.g. R/O 89-123 Englishcombe Lane (HELAA ref. Odn3) capacity estimated at 40 whereas pre-app discussions indicate 70 is achievable; Roseberry Place (HELAA ref. Wes 4&5) capacity estimate is 175 and discussions on reserved matters application now indicate 200 dwellings is

achievable. The capacity allocated site at Odd Down in Bath (HELAA ref. E14) is 300 dgs but this is not a cap. The Council took a very cautious approach on this location and it is likely that a scheme with a higher capacity, 100 to 150 additional dgs, could come forward which still accords with the Core Strategy development requirements.

- b. HMOs – an allowance for the loss of 15 dwellings per annum is included in the Housing Trajectory. This is to reflect loss of housing to student accommodation based on past trends. The record shows that 96 HMOs were permitted since 2013, of which 53 are non-student and 43 are student HMOs. In theory non-student HMOs increase the number of households that can be accommodated in the housing stock. This means that 53 dwellings (the annual average of about 17 dwellings) helped to increase the number of households that can be accommodated in the housing stock. ie 17 HMOs per annum x 3= 51 households per annum. (as one HMO provides 4 households creating 3 new households) = 51 x 13 years = 663 households.

	Permissions	Non-student	Council tax exempt
13/14*	18	10	8
14/15	37	17	20
15/16	41	26	15
Total	96	53	43 (45 % of total)

*HMO SPD and Article 4 came into effect on the 1st July.

- c. No allowance has been included for large windfall sites other than those where there is currently identified interest e.g. through a pre-application advice request. Past experience shows over the plan period as a whole other large windfalls will come forward. The policy framework allows for this as stated in para 1.2 above. Work currently underway on the West of England Joint Spatial Plan indicates that it is reasonable to expect up to an extra 300 dgs to come forward in Bath on such sites. Up to 100 of these dwellings could come forward before 2029.
- d. The allowance for small windfalls discounts past rates of delivery by 20% to reflect past role of residential garden redevelopment. The definition of previously developed land was amended in 2010 to exclude private residential gardens and the NPPF (para 48) confirmed that no allowance should be made for housing supply from this source. Analysis shows that since the build out of any remaining

permissions there is no discernible decrease in small windfall delivery by 20%

Table 2: Estimated supply effect of conservatisms

Conservatism	Estimated supply effect 2016-2029
a. Identified sites	100 -150
b. HMOs	663
c. Large windfalls	100-300
d. Small windfalls	342
TOTAL	1,205

8. Table 2 shows that the estimated total supply effect of the conservatism above could be around 1,200 dgs. If these are taken into account this increases overall supply from around 12,651 to well over 13,500.
9. In any event even if there is a marginal shortfall in supply such a shortfall only relates to the end of the plan period and a process of reviewing the Core Strategy has been established to address the situation (see below).
10. The supply trajectory (CD/PMP/S4) demonstrates that the Council has a 5 year housing land supply (as required by NPPF, para 47). The Council accepted at the Core Strategy Examination that 5 year land supply should be calculated against housing requirement of around 13,000 (as opposed to the significantly lower OAN) and that any shortfall in supply resulting from progress against that requirement should be corrected in the following 5 years rather than the Plan period as a whole (i.e. the commonly termed 'Sedgefield Approach'). The Council has also accepted that it is an authority to which the requirement for a 20% buffer applies given past under delivery. Within this context the supply trajectory shows the Council has a 5 year supply plus a 30% buffer.
11. Therefore, any marginal shortfall in overall supply is not a short term issue and as shown by the trajectory clearly relates to the end of the Plan period. Within this context the Council considers that the most appropriate mechanism for addressing any such shortfall is through the review of the Plan as any problems caused would not be until later in the plan period, by which time the review to which the Council is committed will have been completed

and new allocations made. It is not appropriate or proportionate to delay adoption of the Placemaking Plan (see Written Ministerial Statement below).

12. Paragraphs 7.05 to 7.05f of the Adopted Core Strategy (CD/PMP/G6) indicate the Council's commitment to reviewing the Core Strategy about every 5 years. If monitoring indicates there is no reasonable prospect of delivery of around 13,000 homes by 2029 changes to the Core Strategy will be made to rectify this situation. Review is also needed to ensure flexibility so that housing delivery responds to changing circumstances, including the implications of economic performance and growth rates. Review may require a change in spatial strategy and will entail a review of the plan period.
13. In accordance with the Duty to Co-operate and sound strategic planning the Core Strategy review will be co-ordinated with those of the adjoining authorities in the West of England (i.e. Bristol, North Somerset and South Gloucestershire). Work on the Bristol Housing Market Area (HMA) SHMA shows that there continues to be two separate HMAs covering Bristol & Bath. As set out in the Adopted Core Strategy B&NES will continue to work closely with the adjoining authorities to consider the most appropriate proposals for accommodating housing needs within the Bristol HMA. This process is being taken forward through the preparation of a West of England Joint Spatial Plan (JSP) covering the four authorities and the plan period 2016 to 2036. The B&NES Core Strategy review is being co-ordinated with and will generally conform with the strategic context set by the JSP.
14. In May 2016 Council agreed that the review of Bath HMA SHMA should be accelerated (see CD/PMP/G28), thereby bringing forward the full review of the Core Strategy from 2019 to be undertaken alongside the preparation of the West of England Joint Spatial Plan. This means that both the JSP and the B&NES Core Strategy review will now consider and plan for meeting the housing needs of both the Wider Bristol and Bath HMAs from 2016 to 2036. The scope and programme for the JSP and Core Strategy review was agreed by Council in May 2016 (CD/PMP/G28) and is set out in the Council's Local Development Scheme (CD/PMP/G19). Good progress has and continues to be made on preparation of the JSP. An issues & options consultation took place in late 2015/early 2016 and a draft plan consultation, under regulation 18, is on track to take place during autumn of this year.
15. Addressing any shortfall in supply that may arise towards the end of the plan period through the Core Strategy review will enable the most appropriate solution to come forward through a carefully considered and evidence based

process of plan making (considering both Green Belt and non-Green Belt options) within the context of an agreed sub-regional strategy addressing the needs of the wider Bristol and Bath HMAs.

16. The Government's Planning Practice Guidance (Paragraph: 027 Reference ID: 3-027-20140306) states that "Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15." Allied to this through the Written Ministerial statement (dated 21/07/2016) the government has made it clear that commitment to an early review of the Plan may be an appropriate mechanism to ensuring a sound plan is not unnecessarily delayed. It states:

"We recognise that those councils who produce a Local Plan have committed considerable resources, as have others contributing to its development. They should be able to rely on Planning Inspectors to support them in the examination process. I have made it clear to the Planning Inspectorate that this support must be provided. In particular, Inspectors should be highlighting significant issues at an early enough a stage to give councils a full opportunity to respond. As we have made clear in planning guidance a commitment to an early review of a Local Plan may be appropriate as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan's soundness or legal competence as a whole. The Planning Advisory Service has published a note on where Local Plans have been found sound, subject to early review, which local authorities should consider."

Ref: <http://www.parliament.uk/documents/commons-vote-office/July%202015/21%20July/8-Communities-and-Local-Government-Local-Plans.pdf>

17. The Council considers that the Placemaking Plan in conjunction with the Core Strategy significantly increases the supply of housing, consistent with the NPPF; and that the Placemaking Plan is fundamentally sound and legally compliant in all other aspects. As set out above it is entirely appropriate for any marginal long term shortfall in supply to be dealt with through the Core Strategy review, a mechanism which was put in place by the Core Strategy Inspector.

Q2. Is the strategy for determining Housing Development Boundaries positively prepared, justified and consistent with national policy?

18. Housing Development Boundaries (HDBs) are defined in order to identify and delineate those parts of settlements within which residential development will be acceptable in principle, subject to meeting the requirements of other policies in the Plan. As set out in CD/PMP/DM20 they are defined so as to allow for windfall sites to come forward within the policy framework of the Local Plan, reflecting the different roles and character of each settlement consistent with the NPPF (paragraph 17, Core Planning Principles). Where more significant residential development is required on the edge of settlements the most appropriate sites have been allocated through the Placemaking Plan and the HDB reviewed so that it encompasses the site.
19. HDBs have therefore served effectively to provide clarity and certainty to all those involved in the development process
20. HDBs are defined having regard to delivering housing but also the need to protect the character of settlements, avoid development in areas that would cause harm and maintain other uses (e.g. employment uses, recreational facilities etc) that are important for the vitality, viability and sustainability of settlements. This is consistent with the objectives of the NPPF (e.g. see paragraph 28). With regard to settlements excluded from the Green Belt HDBs are defined tightly around the settlement and generally coterminous with the Green Belt inset boundary so as control inappropriate development (again consistent with national policy).
21. Their definition enables delivery of the appropriate levels of housing development as required by the Core Strategy and in accordance with the spatial strategy. The Housing Land Supply Trajectory (CD/PMP/S3) shows that the required amounts of housing will be delivered in those parts of the District where HDBs are defined. HDBs are an important tool in ensuring housing provision is directed to appropriate locations/sites through plan making. Consistent with the NPPF Core Planning Principles (paragraph 17) the Council has empowered local communities in this plan-led approach by involving them in the process of reviewing the HDBs. The HDBs defined will be kept under review in order to ensure future housing delivery continues to be secured in the most sustainable and appropriate locations. This will be undertaken in conjunction with local communities as part of the Core Strategy review, work on which will be commencing later this year (see paragraph 1.8 above).

Q3. Would the Placemaking Plan secure the delivery of sufficient land to accommodate 10,300 new jobs?

22. The Core Strategy outlines a requirement to plan for around 10,150 additional jobs (net) between 2011 and 2029. For reasons of sustainability the spatial strategy is to focus most of this job growth at Bath and then Keynsham and the Somer Valley (principally the towns of Midsomer Norton and Radstock), with only limited job growth being directed towards the rural areas.
23. Table 4 below shows that there has already been significant job growth during the first five years of the plan period. Oxford Economics 2015 workplace projections indicate that B&NES has experienced net jobs growth of over 6,700 jobs in the period 2011 – 2016 as outlined in CD/PMP/G31. Analysis of relevant data sets including APS Resident jobs, APS Workplace jobs and BRES Workplace Employees in Employment suggest that there has been good jobs growth across the district up to 2016.

Table 4: Creation of Jobs in B&NES 2011-2016

Place/Area	2011-2016 Net Additional Jobs OE 2015 estimate	Core Strategy 2011-2029
Bath	5,200	6,950
Keynsham	300	1,600
Somer Valley	600	900
Rural Areas	600	700
B&NES District	6,700	10,150

24. The Placemaking Plan, through its site allocations and Development Management policy framework will facilitate continued provision of job growth in accordance with the Core Strategy (see also statements on matters relating to individual places).
25. Within Bath most of the additional jobs are projected to come forward in office based sectors and allocations are made, primarily within city centre/edge of centre locations, capable of delivering significant amounts of new office floorspace (in line with the net additional figure of 40,000 sq. metres set out in Policy B1). These allocations (as well as those in other part

of the District) have been viability tested (CD/PMP/S2) showing that the proposed land use mix and the plan's policy requirements can be viably delivered. Evidence provided through the Bath Office Market Review (CD/PMP/DM23) also shows that there is significant demand for good quality office space in central locations which is currently constrained by the lack of new well located grade A space.

26. At Bath the Core Strategy plans for a contraction in the demand for industrial floorspace, whilst seeking to sustain a multi-faceted economic base by retaining some industrial premises within the city, primarily focussed in the Newbridge Riverside area. Growth in industrial type floorspace is planned for in other parts of the District and delivery facilitated by the Placemaking Plan (see below).
27. At Keynsham job growth is being principally provided for via the allocation at Somerdale, which includes significant office floorspace and other job generating uses (and now has the benefit of outline and reserved matters planning permissions) and the removal of land from the Green Belt and allocation for employment uses to the east of Keynsham through the Core Strategy (Policy KE3A). This allocation provides primarily for industrial type uses (in part allowing for displacement from parts of the river corridor in Bath, as well as enhancing the economic base and addressing the future requirements of Keynsham). Located between Bristol & Bath and with good communication links Keynsham is more attractive for industrial users as evidenced in the Industrial Market Review (see CD/PMP/DM18).
28. The site has also been the subject of specific viability testing which shows it can be viably delivered (Report on Masterplanning the site prepared by BNP Paribas will be published and supplied to the Inspector by the end of August 2016). The designation of Bristol, Bath and Somer Valley Enterprise Zone (EZ) recently confirmed by DCLG includes land allocated at Keynsham and this will also assist in bringing forward economic development (see paragraph 3.7 below).
29. In the Somer Valley job growth is being primarily focussed within industrial sectors, supplemented by some additional office jobs within the town centres and associated with industrial businesses. The Placemaking Plan facilitates this provision through a significant allocation at Old Mills (on the edge of Midsomer Norton but within Paulton Parish) and the policy framework that protects existing industrial uses and supports additional provision within identified strategic and other primary industrial estates. These will act as the

main focus for job growth in the Somer Valley and their strategic importance is confirmed through the Industrial Market Review (CD/PMP/DM18). The Somer Valley is part of the recently designated EZ and the locations/sites within it are based on land allocated in the Placemaking Plan and referenced in the policy framework. EZ designation will help facilitate business investment and delivery of job growth during and beyond the plan period.

30. Within the rural areas the policy framework supports the provision of small scale employment opportunities appropriate to the character of villages (e.g. through Policies RA1, RA2, RE1, RE3 and RE6). There is a number of existing industrial estates/business premises where Policy ED.2B protects existing space and is supportive of additional provision of employment space. This will include previously developed sites in the Green Belt, where in conjunction with national policy (NPPF, paragraph 89) some limited additional provision is facilitated through redevelopment and limited infill. With the exception of the Wheelers Block Works in Timsbury (site SR14) no specific allocations for employment uses are made in the rural areas.

Q4. How have opportunities for prioritising new development on brownfield land been secured and considered in allocating sites?

31. Both the NPPF (including through the Core Planning Principles in paragraph 17) and the Adopted Core Strategy through objectives 1 and 2 encourage the effective use of previously developed land in helping to meet housing and economic development needs. The Placemaking Plan has been prepared in this context and helps to achieve these objectives. Through the process of allocating sites in the Placemaking Plan opportunities to prioritise new development on brownfield land have been considered and, where demonstrably deliverable, secured. Through the HELAA and work undertaken with communities, represented by town and parish councils, brownfield opportunities have been identified as the first priority and assessed. However, the objective of prioritising brownfield opportunities has been balanced against the need to ensure allocated sites are deliverable and that a 5 year land supply is secured both at the current time and on a continuous basis through the Plan period.
32. This process has resulted in brownfield sites accounting for around 74% of the allocations across the District as a whole. The proportion varies by area/place and this outlined in table 5 below. Within the urban areas of Bath, Keynsham and the Somer Valley the proportion is higher given the greater prevalence of identifiable opportunities. Within the rural areas most of the allocated sites are greenfield reflecting the smaller size of settlements and

their built form. However, the level of overall development directed towards the rural areas is limited and as such this has a limited effect on achieving the overall Core Strategy objective.

Table 5: Proportion of allocations in the Placemaking Plan on brownfield land

Place	Total number of allocations	Number on brownfield land	Proportion on brownfield land
Bath	20	19	95%
Keynsham	2	2	100%
Somer Valley	10	7	70%
Rural area	7	1	14%
B&NES	39	29	74%