

BANES PLACEMAKING PLAN EXAMINATION

RESPONSE TO INSPECTORS MATTERS AND ISSUES (ID/3 – REV 1)

MATTER 1 PROCEDURAL REQUIREMENTS

ON BEHALF OF RADSTOCK LLP (PARTICIPANT ID: 6414)

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | **F** 01454 618074 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

1. MATTER 1 – Procedural requirements

Issue: Whether policies contained in the Placemaking Plan would meet the housing requirements for the Somer Valley of 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasdoem St John

d) Has the Plan been subject to adequate Sustainability Appraisal?

- 1.1 As currently the presented the proposed Development Plan, as a whole, does not enable the minimum housing requirement of the Core Strategy to be delivered. Our observations in respect of Issue 2 present this case in more detail.
- 1.2 The Sustainability Appraisal of the Placemaking Plan and the reappraisal of the Core Strategy changes do not acknowledge this new reality. Therefore there is no assessment of the effects of a housing deficit in respect of the social pillar of sustainability.
- 1.3 The Development Plan now falls short of enabling its objectives in respect of housing. The Council partially acknowledges this in its evidence base, yet the extent of the shortfall is greater than is stated (as set out on our response to Issues 2). The shortfall is not acknowledged in the Sustainability Appraisal Report and it cannot therefore cannot be said to have informed the submission PMP in this respect.
- 1.4 Proposed additional text to the CS set out in paragraph 17-22 of Volume 2 of the BANES Plan (see Q1:i) sets out the intention *to plan to meet housing numbers and employment floorspace in full*, yet in practice the Plan does not enable this and the SA report to does recognise this.

g) Has the Council submitted robust evidence to demonstrate that it has met the duty to cooperate?

- 1.5 It is the Council's evidence that all 13,000 homes can no longer be delivered within BANES. It is our evidence that the shortfall is greater than set out. The Council should have rectified the issue internally within BANES (which it has not done). It must therefore be relying on the plan-making section of paragraph 14 of the NPPF, arguing that the harm of modification would significantly and demonstrably outweigh the benefits (the tilted balance). In such circumstances it should have looked to neighbouring authorities to attempt to rectify this issue before continuing with the examination. We see no evidence of this either. The Council must choose

between modifying the Plan to achieve an internal solution or if it argues that the tilted balance is met, show that it has sought out of district solutions. In reality the tilted balance cannot be met in a strategic sense across BANES and the Council must now move to propose modifications to the PMP.