

CD/PMP/MM3/7

**Bath & North East
Somerset Council**

Annex J

**Bath & North East Somerset
Placemaking Plan
Sustainability Appraisal Report
Addendum considering Main Modifications**

January 2017

1. Introduction

This Annex is an addendum to the Sustainability Appraisal (SA accompanying the B&NES Placemaking Plan). The Draft Placemaking Plan was submitted to the Secretary of State to be examined by an independent Planning Inspector in April 2016. The Examination hearings took place in September/October 2016. The Inspector has now written to the Council to confirm that the Examination can proceed to the consultation on the Main Modifications.

The Inspector is inviting comments on the Main Modifications to the Submitted Placemaking Plan. The Main Modifications are those which the Inspector considers are necessary to make the plan sound/and or legally compliant. The Main Modifications are proposed without prejudice to the Inspector's final conclusions on the Placemaking Plan which will be informed by all representations submitted in response to this consultation.

The schedule below lists the Main Modifications in Plan order so that they can be read alongside the Draft Placemaking Plan, comprising six volumes:

Volume 1 - District-wide	Volume 3 - Keynsham	Volume 5 - Rural Areas
Volume 2 - Bath	Volume 4 - Somer Valley	Volume 6 - Appendices

Please note that deletions to existing Placemaking Plan text are shown as ~~strike-through~~ and additional Placemaking Plan text is shown as underlined.

Each Modification to the submitted Placemaking Plan has a unique reference number as shown in the left-hand column of the schedule. This report includes tables which present the findings of the Sustainability Appraisal screening of the changes to the Submitted Placemaking Plan proposed by Bath and North East Somerset Council in 2013. The screening process has identified changes which are considered to make a difference to the Sustainability Appraisal (SA) of the Placemaking Plan (i.e. that the previous assessment of the Submitted Core Strategy requires amendment) and are therefore considered to be significant.

Where significant changes have been identified, Annex D (Placemaking Plan Policies) and G (Core Strategy Policies) of the Placemaking Plan SA report have been updated to amend the previous policy assessment matrix. The main SA Report has also been updated accordingly.

MM Ref.	Policy/Para	Main modification	SA Screening
VOLUME 1 - DISTRICT-WIDE STRATEGY & POLICIES			
MM1	Policy RA1, p.34	<p>POLICY RA1 - DEVELOPMENT IN THE VILLAGES MEETING THE LISTED CRITERIA</p> <p><i>Amend the Policy paragraph after criterion b:</i></p> <p><u>Residential development on previously developed sites falling within the scope of Policy ED2B adjoining and closely related to the housing development boundary will be acceptable if the requirements of Policy ED2B and other relevant policies are met.</u></p> <p>Residential development on sites outside the Green Belt adjoining the housing development boundary at these villages will <u>also</u> be acceptable if identified in an adopted Neighbourhood Plan.</p>	<p>Clarification and in order to ensure Policies RA1 and ED2B operate coherently and consistently.</p> <p>These changes need to be reflected in the SA.</p>
MM2	Policy RA2, p.34	<p>POLICY RA2 - DEVELOPMENT IN VILLAGES OUTSIDE THE GREEN BELT NOT MEETING POLICY RA1 CRITERIA</p> <p><i>Amend the Policy paragraph after criterion c:</i></p> <p><u>Limited residential development on previously developed sites falling within the scope of Policy ED2B adjoining and closely related to the Housing Development Boundary will be acceptable if the requirements of Policy ED2B and other relevant policies are met.</u></p> <p>Limited residential development on sites adjoining the housing development boundary at these villages will <u>also</u> be acceptable if identified in an adopted Neighbourhood Plan.</p>	<p>Clarification and in order to ensure Policies RA2 and ED2B operate coherently and consistently.</p> <p>Change needs to be reflected in the SA.</p>
MM3	Para 108, p.62	<p><i>First sentence:</i></p> <p>In order to support the delivery of Core Strategy Policy CP3, it is expected that major development, <u>excluding industrial B2 and B8 uses,</u> will provide <u>sufficient</u> renewable energy on-site <u>to reduce</u> anticipated (regulated) energy use <u>carbon dioxide emissions</u> in buildings by at least 10%.</p>	<p>The minor amendment proposed will ensure consistency with Policy SCR.1. Policy SCR.1 is subject to appraisal therefore it is not necessary to appraise this amendment. No implications for final SA.</p>
MM4	Para 112, p.63	<p>Designing solar arrays as a complementary part of a building can enable the PV arrays to complement the aesthetic of a building or development and need not compromise the character of protected areas such as the World Heritage Site and Conservation</p>	<p>As explained in the Statement of Common Ground with Historic England (CD/PMP/SCG1), this</p>

		Areas <u>provided proposals are consistent with Policy HE1</u> . When designing building-mounted solar arrays, consideration should be aesthetics and character in design choices in line with the Policy SCR2.	change does not relate to a policy, just cross references to Policy HE.1. The Plan is expected to be read as a whole. Therefore no implications for final SA.
	Para 117, p.64	Where ground mounted arrays are proposed in the Green Belt, reference will also need to be made to relevant Green Belt policies. <u>Policies for the historic environment and landscape will also apply to proposals for ground mounted arrays.</u>	As explained in the Statement of Common Ground with Historic England (CD/PMP/SCG1), this change cross references to historic environment and landscape policies. The Plan is expected to be read as a whole. Therefore no implications for final SA.
	Policy SCR3, p.64	<i>Insert a new final paragraph to read:</i> <u>In all cases proposals will be expected to be consistent with the relevant design, heritage and landscape policies.</u>	Amendment to Policy SCR3 to cross reference to historic environment and landscape policies. The Plan is expected to be read as a whole. Therefore no implications for final SA.
MM5	Para 130, p. 71	Policy CP4 applies to allocated sites within the “Bath Central”, “Bath Riverside” and “Keynsham High Street”; the “district heating priority areas” as shown in Diagram 5 and in more detail in the OS base maps within District Heating Opportunity Assessment Study- Part 5 (AECOM, 2010). The site allocations within Bath and Keynsham to which this policy applies include: Bath: <ul style="list-style-type: none"> • Walcot Street/Cattlemarket site • Central Riverside & Recreation Ground 	Deletion to reflect updated evidence. Policy CP4 still encourages the use of district heating within “Bath Central” area and continues to apply allocated within it. Therefore no implications for final SA.

		<ul style="list-style-type: none"> Manvers Street 	
MM6	Policy D.8, p.92	<p>POLICY D.8 - LIGHTING</p> <p>1. Proposals for artificial lighting will only be permitted where:</p> <ol style="list-style-type: none"> they would not give rise to an unacceptable level of illumination into the sky, open countryside, urban areas or villages; it can be demonstrated that additional lighting on site will have no detrimental impact on visual and residential amenity or local ecology; any adverse impact of lighting proposals in all new development, including light spill and energy use, is minimised through design or technological solutions (including the use of SMART lighting techniques) or by controlling the hours of use; safety is not compromised in low lit or dark public area. <p>2. Development will be expected to reduce or at best maintain existing light levels to protect or improve the darkness of rivers, watercourse or other ecological corridors in particular to protect or provide a functional dark route for European protected species. New internal lighting facilities with light spill to these features must be dimmable.</p> <p>3. Lighting in public areas should be designed to a suitable level of illumination in accordance with BS 5489-1 2013 and where appropriate, ensure consistency with Bath Lighting Strategy and guidance and where necessary the hours of operation will be controlled by the use of conditions.</p>	<p>Minor change to provide necessary clarification.</p> <p>No implications for final SA.</p>
MM7	New para 230A, p.98	<p><i>Add the following paragraph after para 230:</i></p> <p><u>In accordance with national planning guidance the Council will expect that <i>in all cases, land or site value should: reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge.</i> This confirms the principle set out in the NPPF that where safeguards are necessary to make a particular development acceptable in planning terms, and these safeguards cannot be secured, planning permission will not be granted for unacceptable development. In this context it is particularly important that developers ensure that the policy requirement to sustain and enhance the District’s historic environment is factored in land values and demonstrated in viability assessments.</u></p>	<p>This amendment ensures policy requirements responding to historic environment are considered in viability assessments.</p> <p>Policy HE1 will be re-appraised therefore this amendment to the supporting text is not considered necessary to be appraised separately.</p>

	Policy HE1, p.99	<p>POLICY HE1 - HISTORIC ENVIRONMENT</p> <p><i>Add the following paragraph to the end of Policy HE1:</i></p> <p><u>Where development viability assessments are required developers should demonstrate that the policy requirements, including to sustain and enhance the District's historic environment, have been considered and reflected in the land or site value.</u></p>	<p>This amendment ensures policy requirements responding to historic environment are considered in viability assessments.</p> <p>Change needs to be reflected in the SA.</p>
MM8	Policy NE2A, p.108	<p>POLICY NE2A - LANDSCAPES SETTING OF SETTLEMENTS</p> <p>Any development should seek to conserve and enhance the landscape setting of settlements and their landscape character, views and features. Development that would result in harm <u>adverse impact</u> to the landscape setting of settlements <u>that cannot be adequately mitigated</u> will not be permitted.</p>	<p>As explained in CD/PMP/002/7 in response to Inspector's issues, this amendment clarifies the intention of the policy which is to conserve and enhance the landscape setting of settlements. No significant implication to the appraisal.</p>
MM9	Policy NE2B, p.109	<p>POLICY NE2B - EXTENSION OF RESIDENTIAL CURTILAGES <u>GARDENS</u> IN THE COUNTRYSIDE</p> <p>Proposals to extend residential curtilages garden land will be permitted provided it can <u>be demonstrated that there are no adverse impacts on the setting of the site or property, residential amenity, local rural landscape character, key habitat features and/or ecological functions and that the proposed boundary treatment is sympathetic to the location and that there is no conflict with Green Belt policy.</u></p>	<p>As explained in CD/PMP/002/7 in response to Inspector's issues, this amendment clarifies the intention and operation of the policy and cross references with Green Belt Policy. The Plan is expected to be read as a whole. Therefore no implication on final SA.</p>
MM10	Policy GB3, p.126	<p>POLICY GB3 - EXTENSIONS AND ALTERATIONS TO BUILDINGS IN THE GREEN BELT</p> <ol style="list-style-type: none"> Proposals to extend a building in the Green Belt will only be permitted provided they would not i) represent a disproportionate addition over and above the size of the original building. or ii) Contribute to a deterioration in rural character as a result of the cumulative effect of building extensions. 	<p>This amendment ensures the Policy is consistent with national policy.</p> <p>Change needs to be reflected in the SA.</p>

<p>MM11</p>	<p>Para 373, p.146</p> <p>Para 374, p.146</p> <p>Para 375, p.146</p>	<p>National pPolicy supports the principle of self-build. Councils have a duty to understand <u>the demand/need for self-build housing</u> maintain a self-build register and to 'have regard' to the register in carrying out planning and other functions. Councils also have a <u>duty to grant planning permission in their administrative areas for enough serviced plots of land to meet the demand for self-build and custom housebuilding. Further regulations are anticipated to fully implement the legislation on self-build. All references to self-build in the policy and supporting text mean self-build and custom housebuilding as defined by Section 9 of the Housing and Planning Act 2016.</u></p> <p>The Council <u>keeps a self-build register and supports the principle of self-build provision as part of development sites and also as part of rural exceptions-sites for affordable housing and/or community land trust mechanisms. The Placemaking Plan provides the opportunity to develop therefore includes a policy to encourage self-build. ,although national policy inhibits a policy which require self-build accommodation. There is now a workable planning definition of self-build housing (introduced via the Government's Community Infrastructure Levy Exemption/Relief mechanism and the Custom & Self Build Act 2015).</u></p> <p>The Council has signed up to the Local Self Build Register (August, 2014) which will assist in gathering evidence of demand/need for self-build housing in the district <u>delivery of self-build units will be monitored against the demand for self-build plots as demonstrated by the self-build register. In the context of actual delivery and once further regulations are issued by government the Council will consider preparing a supplementary planning document to clarify implementation of the policy. There is also an opportunity to further address self-build provision through the review of the Plan.</u></p>	<p>To provide clarification and to ensure consistency with legislation.</p> <p>No implications for final SA.</p>
<p>MM12</p>	<p>New para 409A, p.159</p>	<p><u>LCR3 (5) Land at Silver Street (Midsomer Norton) is safeguarded for Norton Hill School, following the approval by the Education Funding Agency for primary school provision managed by Norton Hill School. This new primary school (630 places) will serve Midsomer Norton and surrounding areas. The safeguarded land could facilitate Norton Hill School to make more efficient use of their existing site for example by relocating playing pitches to the land at Silver Street to facilitate provision of the primary school. However, should a primary school be implemented and opened elsewhere to meet the</u></p>	<p>The amendments provide clarification to the operation of Policy LCR3.</p> <p>No implication to final SA.</p>

		<u>needs of primary education of Midsomer Norton and surrounding areas the safeguarded land will no longer be needed.</u>	
MM13	Policy LCR7C, p.171	<p>POLICY LCR7C - COMMERCIAL RIDING ESTABLISHMENTS</p> <p>Proposals for commercial riding establishments will be permitted provided the site is well related to an existing bridleway network and there is:</p> <ol style="list-style-type: none"> 1 adequate land within the curtilage of the site to allow for the proper care of the horses 2 adequate site supervision without the need for erection of residential accommodation 3 adequate provision for the storage and disposal of animal waste 4 no detriment to visual amenity resulting from the impact of jumps, fences and other equipment 5 no unacceptable adverse impact on ground and soil erosion both on and off site 6 no adverse impact upon other recreational uses in the locality, and 7 no adverse impact on key ecological functions or key habitat integrity <p>New buildings <u>will</u> only <u>be</u> permitted where clauses 1) – 7) are met, <u>and</u> the scale, siting and design have no adverse impact on landscape character.</p> <p>In the case of development in the Green Belt, proposals should <u>be consistent with national Green Belt policy</u> not have a materially greater impact than the present use on the openness of the Green Belt or would conflict with the purposes of including land within the Green Belt.</p>	<p>Minor grammatical amendment and clarification.</p> <p>No implications for final SA.</p>
MM14	Policy NE3, clauses 3c & 3d, p.112	<p>POLICY NE3 - SITES, SPECIES AND HABITATS</p> <ol style="list-style-type: none"> c. for <u>UK</u> Priority Species and <u>UK Priority</u> Habitats, where the importance of the development and its need for that particular location is sufficient to override the value of the species or habitat; d. for locally important species <u>and habitats</u>, where the importance of the development and its need for that particular location is sufficient to override the value of the species or habitat; 	<p>Amendments to Policy NE3 made for the purposes of clarification.</p> <p>No implications for final SA.</p>

MM15	Para 271, p.113	<p>National planning policy requires that components of the local ecological networks are identified and mapped. This should include the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them. Bath & North East Somerset's Ecological Networks comprises:</p> <ul style="list-style-type: none"> - The Cotswolds Nature Improvement Area (NIA) - Strategic Nature Areas (SNAs) - Horseshoe Bat Foraging Corridor (Draft) - Protected Wildlife sites (Special Protection Areas, Special Areas of Conservation; Sites of Special Scientific Interest, Sites of Nature Conservation Interest, Local Nature Reserves) - UK Priority Habitats including conservation buffers/ restoration zones - Flood Zone 2 - <u>Local BAP Habitat (Post Industrial Sites)</u> 	<p>Amendment to para 271 to include reference to the Local BAP Post Industrial Sites (see CD/PMP/DM29). See also proposed amendment to the Ecological Network (Policy NE5) as shown on the Policies Map (see Annex 1, p.12).</p> <p>This will also result in consequential factual changes to Diagrams 4 and 5 in Volume 3 - Keynsham and Diagrams 6 and 7 in Volume 4 - Somer Valley to be treated as minor changes made to the Placemaking Plan before it is adopted.</p> <p>No implications for final SA.</p>
MM16	Policy PCS2, p.129	<p>POLICY PCS2 - NOISE AND VIBRATION</p> <p>1 Development will only be permitted where it does not cause to unacceptable increases in levels of noise and/or vibration that would have an <u>significant</u> adverse effect on health and quality of life, the natural or built environment or general amenity unless this can be minimised or mitigated to an acceptable level.</p>	<p>In order to align Policy PCS2 more fully with national policy. Policy still requires adverse effect to be minimised or mitigated to an acceptable level, therefore there is no significant implication to final SA.</p>
MM17	Para 494, p.184	<p>Accounting for just over one third of total supply these locations <u>the Strategic and Other Primary Industrial Estates</u> are considered to be the most important concentrations of industrial land supply in the District. There are very strong economic reasons to retain them and they are afforded the highest level of protection in the Plan.</p> <p><i>Para 494 proposed to be split with the second part renumbered as para 494a:</i></p> <p>Un-named estates, smaller industrial clusters and standalone premises are subject to</p>	<p>Clarification provided.</p> <p>No implication to final SA.</p>

		Policy ED2.B (unless allocated for another use in the site allocations section). They are still subject to protection, to guard against the wholesale and unsustainable redevelopment of industrial land supply to other higher value uses, but to a lesser degree.	
MM18	Policy CR4 p.207	<p>POLICY CR4 - DISPERSED LOCAL SHOPS</p> <p>Outside the centres defined in Core Strategy Policy CP12 and on the Policies Map, proposals for development of appropriately located small-scale local shops (less than 280sqm gross floorspace which provide for local needs) within a settlement with a defined Housing Development Boundary will be supported.</p> <p>Proposals over 280sqm gross floorspace will be considered against Policy CR1 and Policy CR2.</p> <p><u>Proposals for a change of use of an existing small-scale local shop must be supported by a viability assessment to demonstrate that the unit is not capable of continuing in retail use.</u></p>	The amendment seeks to protect existing small scale local shops. Change needs to be reflected in the SA.
MM19	Para 582, p.210	<p>The B&NES highway network remains heavily trafficked highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs to minimise the adverse effect of traffic, and to enable environmental improvement to be made to existing centres. The Council will continue to safeguard routes for the Whitchurch bypass and Temple Cloud/Clutton bypass and recognises the need for studies to assess the Saltford bypass and an A46/A36 link. <u>The Council remains concerned with the impact of through traffic, particularly HGVs, on the WHS. This is compounded by the incomplete nature of the Trunk Road Network to the east of the city. The Council will work with neighbouring authorities, including Wiltshire Council, to address the problem of through traffic in Bath, particularly traffic that currently uses the A36-A46 route through the city and continue to press Highways England and Transport Ministers to take steps for solutions to be identified and funded in the next Road Investment Strategy to be published in 2020. The Council will also review the A4 corridor and, in particular, consider how best to improve the environment within Saltford and improve journey times and reliability between Bristol and Bath. This will include the options for</u></p>	<p>These amendments to the supporting text for Transport Policies provide a factual update giving clarity on the status of transport schemes and the means by which work will be taken forward.</p> <p>No implication to the SA.</p>

		<u>a bypass of the village.</u>	
MM20	Para 622, p.218	The Council proposes to expand the provision of Park and Ride facilities to serve serving Bath as part of a wider strategy promoting sustainable means of transport and reducing the impact of vehicles in the city and in particular its historic core. In addition to the proposed East of Bath Park and Ride site, initial investigations suggest that the existing Park and Ride sites at Newbridge, Odd Down and Lansdown are likely to need further expansion to ensure the transport network can accommodate the Enhanced Park & Ride provision will help to remove a variety of vehicular trips from the city arising from both existing pressures and those associated with growth generated by the Enterprise Area. , beyond <u>In addition to the Park & Ride enhancements improvements already implemented through the Bath Transport Package the existing Park and Ride sites at Newbridge, Odd Down and Lansdown are likely to need further expansion and a new Park & Ride site to the East of Bath provided to improve access from that side of the city. The locations of these expansions are indicated on the Bath Spatial Strategy diagram.</u>	Clarification provided. These amendments to the supporting text for Policy ST6 provide a factual update giving clarity on status of transport schemes and provision of Park & Ride facilities. Policy ST6 will be re-appraised therefore this amendment to the supporting text is not considered necessary to be appraised separately.
	Para 623, p.218	The Council has a long established policy to develop a new Park and Ride facility to the east of Bath to improve access from that side of the city, and to further reduce traffic into the centre. An independent review of potential sites for a Park and Ride sites facility was carried out in 2013. The Council has also consulted with the public to help identify the most appropriate location. No final decision has been made on a preferred site. The general area under consideration is indicated on the Bath Spatial Strategy diagram for reference. In addition the strategy diagram also indicates the locations for the future expansion of existing Park & Ride sites.	
	Para 624, p.218	The Council has consulted with the public to help identify the most appropriate location (September/October 2015). No final decision has been made on which is the preferred site. The general area under consideration is indicated on the Bath Spatial Strategy diagram for reference.	
	Para 625 (to	Policy ST6 will be used to assess Park and Ride schemes, <u>both extensions to existing</u>	

<p>be renumbered 624), p.218</p>	<p><u>Park & Ride sites and a new facility to the East of Bath. The need for and benefits of extending existing sites and developing a new facility will need to be weighed against the harm to environmental assets and, where relevant, the Green Belt. It is proposed that the following criteria in Policy ST6 guide the all Park and Ride site development of the East of Bath Park and Ride site to ensure a consistency of approach. In the absence of any firm proposals and in the event that a Park and Ride scheme may come forward within the Plan period, a</u> All proposals should be thoroughly evaluated before approval to ensure that the most sustainable locations are selected, and that all relevant impacts are properly assessed. <u>In particular, any proposal will be expected to be informed by an assessment of impact on the Outstanding Universal Value of the World Heritage Site and its Setting. This process should be undertaken by using the ICOMOS ‘Guidance on Heritage Impact Assets for Cultural World Heritage Properties’ and Historic England’s Good Practice Advice ‘The Setting of Heritage Assets’ and applying the Council’s Bath World Heritage Site Setting SPD. Any proposals for development within the Green Belt will have to comply with national Green Belt policy. The NPPF states that local transport infrastructure which can demonstrate a requirement for a Green Belt location is not inappropriate in the Green Belt, provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. Any proposal affecting the AONBs will need to take into account advice in the NPPF.</u></p>	
<p>Policy ST6, p.218</p>	<p>POLICY ST6 - PARK AND RIDE Development of new or expansion of existing Park and Ride sites will be permitted provided: a) that there is no unacceptable impact on environmental assets and amenity including the World Heritage Site and its setting, the Cotswolds AONB and Natura 2000 sites (SACs/SPA), <u>clear and convincing justification is provided for any harm to the World Heritage Site or significance of other designated heritage asset, with the degree of public benefit weighed against the level of harm;</u> and b) <u>that proposals within the Cotswolds AONB accord with national policy for determining planning applications for major development within an AONB;</u> and c) <u>that proposals affecting European sites meet the provisions of Policy NE3; and</u></p>	<p>Clarification and to ensure the policy accords more closely with the NPPF and other relevant Placemaking Plan policies. Change needs to be reflected in the SA.</p>

		<p>b) d) that there is no unacceptable impact on <u>the</u> surrounding road network and its capacity to safely accommodate potential traffic generation; and</p> <p>e) e) provision is made for the needs of those with impaired mobility and for the safety and security of all users; and</p> <p>d) f) in the case of Park and Ride development in the Green Belt, it can as necessary be demonstrated that there are not any more suitable or more sustainable alternative sites outside the <u>is a requirement for a Green Belt location and it preserves the openness of the Green Belt and</u> does not conflict with the purposes of including land in it.</p> <p>Applicants will also be required to demonstrate that the scheme complies with all other relevant national and local planning policies that affect the site and its location.</p>	
MM21	Policy ST7, p.220	<p>POLICY ST7 - TRANSPORT REQUIREMENTS FOR MANAGING DEVELOPMENT</p> <p>1 Development will be permitted providing the following provisions are met:</p> <p>a. highway safety is not prejudiced;</p> <p>b. safe and convenient access to and within the site for pedestrians, cyclists and those with a mobility impairment is provided or enhanced;</p> <p>c. suitable vehicular access;</p> <p>d. no introduction of traffic of excessive volume, size or weight onto an unsuitable road system or into an environmentally sensitive area;</p> <p>e. no traffic mitigation measures are required that would harm the historic or natural environment;</p> <p>f. provision made for any improvements to the transport system required to render the development proposal acceptable;</p> <p>g. secure and accessible cycle storage facilities.</p> <p>2 In the case of new development proposals, facilities for charging plug-in and other ultra-low emission vehicles will be sought where practicable.</p> <p>3 Transport assessments/ statements</p> <p>Planning applications for developments that generate significant levels of movement</p>	<p>Clarify operation of policy to confirm parking standards can be applied flexibility when specific circumstances are demonstrated.</p> <p>Change needs to be reflected in the SA.</p>

		<p>should be accompanied by a transport assessment or transport statement in accordance with National Planning Policy Framework and Planning Practice Guidance. Schemes will be expected to be tested through the Council's transport modelling, as necessary.</p> <p>4 Parking:</p> <p>a. An appropriate level of on-site servicing and vehicle parking and cycle parking should be provided in accordance with the parking standards as set out in Schedule 2 - Parking Standards and in Schedule 1 - Parking for Disabled people.</p> <p>b. There should be no increase in on-street parking in the vicinity of the site which would affect highway safety and/or residential amenity.</p> <p><u>c. To ensure that parking standards are applied using a flexible approach, departures from the prescribed minimum and maximum parking standards are able to be sought where specific circumstances can be demonstrated. Any reduction in minimum residential parking standards will require the completion of an accessibility assessment which will form the basis for any discount from the prescribed standard.</u></p>	
MM22	Para 639, p.222	<p>For B1 uses in the City Centre the parking standard is 1 space 400 sq metres. For all other non- residential development uses, the parking standard will be zero provision within the City Centre Zone exclusive of any operational requirements such as servicing/ maintenance/loading, and accessible parking specifically for Blue Badge Holders, where some provision may be required. Any departure <u>above the prescribed parking standards for B1 uses will need to be fully justified including reasoning why greater use of more sustainable transport solutions is not a suitable alternative.</u> or reduction in parking standards from the prescribed standards will need to be fully justified by an accessibility assessment and car parking management strategy. The accessibility assessment is discussed in more detail below.</p>	Clarification of operation of policy in terms of departures from maximum parking standards. This is modification of supporting text for Policy ST7 which is subject to further appraisal. Therefore it is not necessary to appraise separately.
	Para 642A, p.222	<p>Any departure <u>above the prescribed parking standards will need to be fully justified including reasoning why greater use of more sustainable transport solutions is not a suitable alternative.</u> or reduction in parking spaces from the prescribed standards will need to be fully justified by an accessibility assessment and car parking management strategy. The accessibility assessment is discussed in more detail in a later section. Any</p>	

		car parking management strategy will need to include reference to offsite impacts, and existing/proposed residents' parking zones. All significant residential developments that consist of 10 or more dwellings in the City Centre Zone will require a parking assessment	
	Para 645, p.222	The standards strike a balance between allowing proportionate and complementary parking provision in new developments, whilst at the same time not discouraging businesses from locating or expanding in Bath, or potentially transferring unmet parking demand onto residential streets. Any departure <u>above the prescribed parking standards will need to be fully justified including reasoning why greater use of more sustainable transport solutions is not a suitable alternative.</u> or Furthermore a significant reduction in <u>proposed parking spaces</u> from the prescribed <u>maximum</u> standards will need to be fully justified by an accessibility assessment and car parking management strategy. The accessibility assessment is discussed in more detail in a later section. This is to ensure that proposed parking is not reduced to the extent that it could lead to unmet parking demand being transferred onto nearby streets.	
	Para 655, p.223	The prescribed parking standards need to be considered in a sensitive and flexible way that reflects local circumstances. An accessibility assessment will be developed to assess the acceptability of potential departures from the prescribed <u>minimum residential and non-residential parking standards and significant reductions to the maximum non-residential parking standards</u> as set out in Schedule 2. This will help inform the implementation of Policy ST7.	
VOLUME 2 – BATH			
MM23	Strategic Issues, Para 9, p.3	The strategy for the city must sustain and refine the critical contribution of tourism to the economy. This means protecting and enhancing the characteristics that make the city special, providing a high quality public realm and ensuring that an appropriate level and range of visitor accommodation is maintained. <u>The Bath Hotel Futures Study 2015 updates the evidence underpinning the Core Strategy and suggests a need for an increased level of visitor accommodation. It is the Council's intention to review hotel requirements as part of the Local Plan review.</u>	This amendment clarifies background evidence to Policy No implication to final SA.

MM24	Para 17, p.4	The development of the University of Bath and Bath Spa University requires strategic policy direction in order to secure the future of each institution, and to ensure that the student population does not continue to drive the student lettings market to the detriment of the normal private housing stock and existing communities. The recently revised growth aspirations of both the University of Bath and Bath Spa University is putting significant pressure on the city's housing stock for conversion to HMO's (Houses in Multiple Occupation), and the demand for purpose built student housing is competing with the Council's priorities of delivering housing and employment.	This amendment to the supporting text reflects the modification to Policy B5. The implication to the SA is considered as part of Policy B5 appraisal.
	Para 22, p.4	Whilst there are significant development opportunities within the city, there is not enough land in the city to meet the land use demands that have been identified by the evidence. This is because Bath is a small city with relatively few development sites. The unmet need is not considered to represent exceptional circumstances for developing in the Green Belt and in any case is not viewed as overriding the great weight that needs to be afforded to the significance of heritage assets, not least the World Heritage Site. The Council has therefore had to prioritise land uses for the limited land available. It has agreed that it will plan to meet its housing numbers and employment floorspace in full; will strive towards meeting the projected <u>projected in evidence supporting the Core Strategy;</u> and will accept that there is a shortfall in meeting the retail capacity identified for the whole plan period. The aspirations of the Universities are unlikely to be realised under this approach, but the Council will seek to enable their continued success as far as possible, so long as it does not put at risk the achievement of the plan priority land uses.	This amendment to the supporting text reflects the modification to Policy B5. The implication to the SA is considered as part of Policy B5 appraisal.
MM24	Policy B1, 8 (a), p.10	8. Tourism, Culture and Sport a: Manage the provision of around 1,000 new hotel bedrooms between 2011 & 2029 <u>500-750 new hotel bedrooms</u> to widen the accommodation offer for the city, increase overnight stays and the competitiveness of the Bath as a visitor and business destination.	The Bath Hotel Futures Study 2015 updates the evidence underpinning the Core Strategy and suggests a need for an increased level of visitor accommodation. It is the Council's intention to review hotel requirements as part of the Local Plan review. Therefore the Core

			Strategy text was reinstated addressing the Inspector's concern. Change needs to be reflected in the SA.
MM25	New para 40a, p.14	<u>In accordance with national planning guidance the Council will expect that <i>in all cases, land or site value should: reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge.</i> This confirms the principle set out in the NPPF that where safeguards are necessary to make a particular development acceptable in planning terms, and these safeguards cannot be secured, planning permission will not be granted for unacceptable development. In this context it is particularly important that developers ensure that the policy requirement to sustain and enhance the District's historic environment is factored in land values and demonstrated in viability assessments (see Policy HE1).</u>	This amendment to the supporting text reflects the change made for Policy HE1. The implication to the SA is considered as part of Policy HE1 appraisal.
MM26	Para 44, p. 15	As set out in the 'Strategic Issues' above, there is not enough land in the city to meet its objectively assessed needs as identified by the evidence. The Council has therefore had to prioritise land uses for the limited land available. It has agreed that it will plan to meet its housing numbers and employment floorspace in full; will strive towards meeting as well as the projected <u>projected growth in hotel demand in evidence supporting the Core Strategy;</u> and will accept that there is a shortfall in meeting the retail capacity currently identified for the whole plan period. The aspirations of the Universities are unlikely to be realised under this approach, but the Council will seek to enable their continued success as far as possible, so long as it does not put at risk the achievement of the plan priority land uses.	This amendment to the supporting text reflects the modification to Policy B5. The implication to the SA is considered as part of Policy B5 appraisal.
MM27	Policy B2, 4 (d) – Hotel Bedrooms, p.36	4. Scope and Scale of Change: d: Manage the delivery provision of around 500–750–1,000 new <u>hotel bedrooms between 2011 & 2029</u> to widen the accommodation offer for the city, increase overnight stays and the competitiveness of the Bath as a visitor and business destination.	The Bath Hotel Futures Study 2015 updates the evidence underpinning the Core Strategy and suggests a need for an increased level of visitor accommodation. It is the Council's intention to review hotel

			requirements as part of the Local Plan review. Therefore the Core Strategy text was reinstated addressing the Inspector's concern. Change needs to be reflected in the SA.
MM28	Para 114, p.39	<p>Located on a key route into and out of the city centre, the Cornmarket, the Cattlemarket site, and at some point in the future, the Hilton Hotel, provide significant opportunities to remodel the fabric of this area, providing a more engaging experience that seamlessly integrates the whole of Walcot Street into the city centre, river and street frontage and their key features are as follows:</p> <ul style="list-style-type: none"> • Cornmarket: The two storey former Cornmarket Building is Grade II listed, and is a Building at Risk due to its poor structural condition. It is also vacant. See list description here. • Cattlemarket: This former cattlemarket has been used for decades as a surface level car park, and it continues to hold a market use on part of the site every Saturday. It is a complex and diverse site with river frontage, and historic vaults underneath a significant portion of the site which are used by bats, including species linked to the Bath and Bradford on Avon Bat SAC. The archaeology in this area is significant, and there are likely to be contamination and structural issues associated with redevelopment proposals. The site sits at a key ecological node, and is a key section of a dark habitat corridor. • Hilton Hotel: Despite being a very successful hotel, this is a building of poor aesthetic quality with a negative relationship to its context. Its redevelopment has been an aspiration for a considerable time, but its economic value as a successful hotel has worked against the viability of any proposed schemes. However, future opportunities for redevelopment or remodelling will in principle be supported, and proposals could extend further south to include all or part of the existing library. <p><u>The Council would support in principle a deliverable scheme that enables the redevelopment of the Hilton Hotel building and adjoining sites as this would have the potential to deliver increased retail and hotel floorspace, and replace the Hilton Hotel building. The Council's support is subject to an appropriate response to the character of the area, including as appropriate, the development requirements and design</u></p>	Change to reflect issues discussed at the hearings to ensure Policy SB1 approach does not prejudice a deliverable scheme for the wider site. Policy SB1 is subject to further appraisal therefore it is not necessary to appraise these amendments separately.

		<u>principles as set out below and compliance with other relevant development management policies.</u>	
	Policy SB1 (8), p.41	8) <u>Demonstrably</u> explore opportunities to facilitate the redevelopment or remodelling of the adjacent Hilton hotel <u>site building as well as and adjoining sites, which could in principle extend to include the Podium development</u>), within a comprehensive redevelopment proposal. Should this be achieved then the retention of <u>the existing number of</u> hotel bedspaces <u>as a minimum</u> and additional retail floorspace within the wider site <u>and as part of a mixed use scheme, will be supported required.</u> The other Development Requirements and Design Principles here would also apply. <u>Where there is evidence to robustly demonstrate that an appropriate form of mixed use redevelopment of the wider site (incorporating the Hilton Hotel and potentially the Podium) is deliverable</u> Proposals that prejudice the eventual redevelopment of the Hilton Hotel and adjoining sites <u>redevelopment of the wider site will be refused.</u>	Change to reflect issues discussed at the hearings to ensure Policy SB1 approach does not prejudice a deliverable scheme for the wider site. Change needs to be reflected in the SA.
MM29	Diagrams 5, p.43	<u>Change solid blue line to hatched blue line: 'Potential Pedestrian Link'.</u> <u>INCLUDE DIAGRAM IN APPX</u>	Clarification only. No implication for the SA.
MM30	Policy SB2, p. 44	Riverside East (The Rec, including Bath Rugby Club ...) 2. The design will respond appropriately and creatively to its sensitive context within the World Heritage Site, including the importance of open views for example from Grand Parade, Orange Grove and Terrace Walk to the hillsides beyond, and the iconic view from North Parade Bridge to Pulteney Bridge and Weir. <u>The range of views is to be agreed through the Development Brief and Landscape and Visual Impact Assessment process.</u> 4. The safety and convenience of vehicular access to and from the Rec will be improved.' 5. 'Ensuring landscape, tree planting and public realm enhancements along the river corridor contribute positively <u>to</u> its character, and that development alongside the riverside provides a positive relationship to it.'	For clarity and to avoid confusion No significant sustainability implication to final SA.
MM31	Title, p.107	BATH'S UNIVERSITIES AND PRIVATE COLLEGES	

Para 221

Delete Submitted Placemaking Plan Paras 221 -253 and Diagrams 19 & 20.

~~This is one of the most high profile issues affecting Bath. As part of the Placemaking Plan process the Council has reviewed and updated Section 2F of the adopted Core Strategy (2014), which, has already become out of date in respect of the evidence base on the growth aspirations of the Universities, as presented by the Universities, and if achieved the consequent demand for accommodation and the potential impacts thereof. Whilst the headlines of the strategic planning framework within which the Universities need to operate remains the same (i.e. the Article 4 Direction on HMOs which is flexible in its application via the SPD; Policy B5 on the management of further higher education related space in certain key areas of the city; and on-campus capacity e.g. for the University of Bath on the land that was removed from Green Belt in 2007) it is less likely to enable the full delivery of growth aspirations. The cumulative growth aspirations of the Universities and the related implications for student accommodation have increased since the adoption of the Core Strategy. That needs acknowledgment in revisions to the Plan. New private educational institutions e.g. language schools have also signalled a desire to increase their presence in the city. These contribute to the spatial footprint of the education sector are often a precursor to University enrolment for international students.~~

Para 222

Previous Strategic Assumptions

~~At the time of the preparation, examination and adoption of the Core Strategy in 2013/14 the combined published growth forecasts/corporate plans of both institutions were somewhat 'cooler' than the growth rates achieved prior to 2011. The needs related primarily to the growth of the University of Bath. The evidence for Bath Spa University was that it would remain the same size and would thus not generate any further pressures for student accommodation. The extent of the challenge was a need for around another 2,400 bedspaces, most likely needed by September 2020.~~

Para 223

~~In these circumstances the student accommodation needs generated could be met alongside the city's other objectively assessed development requirements and priorities (via a combination of mainly on-campus development, supplemented by some additional off-campus development) and without the need for the already high~~

This amendment to the supporting text reflects the modification to Policy B5 and re-instates Core Strategy text (which has already been subject to SA). The implication to the SA is considered as part of Policy B5 appraisal.

	proportion of student HMOs to increase.
Para 224	The significance of attempting to hold 2011 levels of student HMOs as a high watermark is because Bath (the city being the logical unit of analysis, not B&NES as a District) has the highest concentration of fulltime HE students (HESA data), after Oxford. Moreover, unlike Oxford, it does not have the dedicated student residences of a long established college system, and the multiple Oxford Brookes campus locations are less constrained than either Claverton Down or Newton Park. Student HMOs as a proportion of the dwelling stock are therefore very high, more so than in Oxford.
Para 225	It was recognised that to achieve an actual contraction in the baseline student HMO market (to redress past expansion) would require significant amounts of scarce and valuable land within the city to be developed for post first year student accommodation. In order for the vision for Bath to be realised it was clear that such land would be needed for the delivery of 7,000 additional 'normal' dwellings and other commercial uses, not least office space to provide employment opportunities for population growth.
Para 226	Updated Strategic Assumptions Only aspirations to the beginning of September 2020 have been provided in evidence from each University. That is not unreasonable as few institutions plan corporately based on the full timeframes of a Development Plan, but it is quite possible that both institutions will aspire to further growth beyond 2020, if aspirations to that point, or thereabouts are achieved. This is not an exact science and the purpose of the analysis below is to illustrate that there is a clear issue for the city of a considerable scale, rather than to precisely identify potential future needs. Institutions may modify their aspirations, plans or initiatives at any time. Further, the numbers to 2020 present enough of a challenge without speculating to 2029, although for comprehensiveness the conclusion of a long range projection of historic trends is presented as part of the data below.
Para 227	Summarising a snapshot of the combined position set out in the Student Numbers and Accommodation Study (2015) is difficult as there are discrepancies between publically available HESA data (which is presented in a consistent format) and the data provided

by the Universities during the preparation of the Plan. Further Bath Spa's plan evidence is set out in the form of FTEs rather than actual students. It is desirable that both institutions provide current and forecasting data in a consistent HESA format, and explain in detail how actual total registered students by mode of study are discounted to achieve a demand figure.

Base demand and aspirations for growth

- Data provided by the University of Bath (UoB) in July 2015 in a HESA format shows that it aspires to grow from around 14,000 registered students in 2011/12 to around 19,300 in 2020/21. The forecast growth is very much set to be oriented towards full time study, which generates the greatest need for further study bedrooms. At the start of the plan period around 79% of students were full time yet 73.5% of total registered students were judged by the University to be in accommodation need in the city (deductions being made for a number of reasons including all part time students, and full time students on sandwich courses etc.). The baseline ratio is forecast to rise to 77.8% by 2020 (as the share of part time students falls). Therefore, the need is currently for around 10,300 bed spaces and this could rise to around 15,000 (if the aspiration is fully achieved).
- The aspiration is therefore for 5,300 more students and this would equate to a need for 4,700 more bed spaces to 2020/21 • Data provided by Bath Spa University (BSU) between March and July 2015 is in a different format to that presented by the UoB and lacks clarity in respect of future changes in actual students, their mode of study and accommodation needs arising.
- In its representations at Options stage it stated that it aspired to grow from 6,632 FTEs (full time equivalents) in 2014/15 to 10,500 FTEs in 2020/21. This was broken down by year group but not mode of study. In response to the Council's request to back date FTEs figures to 2011/12 the University provided a figure of 6,060. Total aspired to FTE change for the current decade is therefore around 4,500. Clearly there is scope for a high proportion of this figure to be new full time students.

- ~~HESA data from 2009/10 to 2013/14 (latest available) on actual numbers and mode of study (which is more useful to assess and forecast housing needs) shows full time enrolment being quite steady at around 6,000 but that part time enrolment has contracted sharply from 3,000 to 1,200. In 2013/14 the ratio was about 83/17. The increase in the full time share of students to this level has also been a feature of change at the University of Bath. If that is to be a new 'norm' then 83% of the increase in FTEs might be full timers (3,835) and the residual 675 FTEs would be made up of something more than that in terms of actual students (say double i.e. 1,350)~~
- ~~If that is so and if aspirations are achieved then full time registrations could increase from 6,000 in 2011/12 to around 9,835 and part time to 2,550. Total enrolment would therefore be around 12,385 (79% full time and thus less than 83% but of the same order of magnitude). 2011 total enrolment was 8,555 (HESA).~~
- ~~Using full time students as a proxy for students in need of accommodation (by proxy it means that some full time students won't contribute to needs e.g. they live at home or outside Bath but some part time students will contribute to need e.g. an undergraduate staying on in an HMO to do a postgraduate graduate course), the need could increase by around 3,895.~~
- ~~BSU signalled to the Council in December 2015 that part of its aspiration (Bath Spa Global programme) was potentially going to be scaled back. Being a generator of full time students, that would have a notable effect on the net change in accommodation demand between 2011/12 and 2020/21. The Council would welcome further data from the University in HESA format related to this aspiration as stated in March/ July 2015 and in respect of any changes to that aspiration.~~

Para 228

Combined Picture of base demand and aspirations

On the basis of the representations

received at Options Stage (Jan July 2015) it is prudent for the Development Plan to assume in total that: 1 aspired to enrolment would see numbers increase from

Para 229

~~around 22,500 to around 31,700 (+9,200) to 2020/21 2 accommodation needs would increase from 16,300 to 24,800 (+8,500) 3 that these figures are only to 2020/21 and that if they are not achieved by then, that they may be achieved later in the Plan period. If they are achieved then further growth may be aspired to later in the plan period.~~

Supply Side

~~At December 2015, the Council has taken into account dedicated new supply (on and off campus) that has been built since 2011, is under construction or is permitted, and estimated additional capacity of not more than 1,000 within specific areas currently shown for accommodation development in the UoB masterplan (2014 update). Exclusive use developments yield around 3,000 bed spaces (1,700 to UoB and 1,300 to BSU). A further 944 bedspaces that are built, under construction or permitted are currently or potentially available to any student. However, of these 944 bedrooms, 375 are permitted in outline within BWR on part of a BMW/Mini car showroom site that is no longer available. There is some scope to explore an alternative location elsewhere within the BMW site but at present the 375 cannot be seen as commitment as the permission will not be implemented. The 'other commitments' figure is therefore more robustly viewed as being 569 and it is assumed that each institution students claim a half share. Future property deals on these extra sites could change that assumption. This boosts total commitments and master planned on-campus areas to 3,569 (1,985 UoB and 1,585 for BSU) This leaves a residual need of around 4,900 bedrooms (around 2,700 for UoB and 2,300 for BSU) in relation to 2020/21 aspirations. That is equivalent to a need for:~~

- ~~● around 1,225 HMOs to September 2020, or if that is to be avoided~~

~~around 11 more city centre type Green Park House developments (461 beds in 13,500m². i.e. 148,500 sq.m. overall) or,~~

- ~~● around 15 more out-of-centre type Twerton Mill Developments (327 beds on 8,700m². i.e. 130,000m². overall)~~
- ~~● that is an opportunity cost of around 1,700-1950 normal apartments or 60,000 sq.~~

	<p>m of office space and 900–1,150 apartments, and the affordable housing component which could be secured within that.</p>
Para 230	<p>These numbers would of course increase significantly if the trajectory of aspiration to 2021 was achieved and continued to 2029. As an illustration, for the UoB alone, if the long term annual rate of growth of around 4% is projected forward, it would increase needs by a further 5,500 bedspaces (1,375 HMOs or a further 12 Green Park House Developments)</p>
Para 231	<p>Policy Update</p> <p>The Council still seeks to enable, as far as possible, the continued success of The UoB and BSU and the contribution they make to the city’s identity, profile and employment base, and their a wider contribution to the UK skilled workforce and GVA. The provision of student accommodation is a high priority for the Universities and the Council also understands that each institution aspires to invest in and spread its academic and administrative estate in order to continue to provide high standards, in what is becoming an increasingly competitive higher education market. The Council is also aware of the Government’s Higher Education Green Paper (November 2015)</p>
Para 232	<p>However, in terms of town planning locally, their development requirements and aspirations form part of a whole suite of demands on a highly constrained city, which is a relatively small as a host for two universities and which has a limited land supply for meeting all development needs in full. Thus, difficult choices need to be made and the completion of the review of the Development Plan has highlighted such matters and site specific and detailed topic based policies have come under the spotlight. For example elsewhere in this Plan the Council has determined that it cannot meet the need for identified longer term retailing capacity without impacting on other objectives that it is has prioritised.</p>
Para 233	<p>The development of new academic space and student accommodation are clearly matters that require policy direction in the Local Plan at a strategic and site specific level. The Council is mindful that the growth in student numbers has not been accompanied by sufficient on campus study bedrooms but that the associated expansion of the student lettings market (which the PPG allows as part of the solution</p>

~~to student housing issues) has diminished the 'normal' housing stock of the city, cancelling out, in part, gross additions to the stock. Whilst a student HMO sector is a common feature of University towns, its current size in relation to Bath is already a cause for concern and the idea of it increasing further exacerbates this concern for interest groups including residents associations and those seeking to secure a house to rent or buy. The issues relate to the retention of mixed neighbourhoods in the city and also the maintenance of the conventional stock of residential properties from a strategic perspective~~

Para 234

~~Some stakeholders have requested a dedicated student accommodation strategy to inform planning policy. In the Council's view the reality for Bath is that the approach to this issue cannot stand alone outside of an overall integrated suite of planning policies for the whole city that considers and balances all uses and all issues. The approach to higher education and student accommodation can only make sense against the background of the full spatial planning context and its drivers. The Council cannot direct the Universities not to aspire to grow. It can only look to achieve the full scope of all needs /requirements/ aspirations affecting the city and seek to meet them in a sustainable way within its unique collection of environmental constraints. In a place such as Bath that may also involve a scheme of prioritisation of uses. The choices that are made affecting this issue are intimately interlinked with the choices that are made for others. The statutory Development Plan and the plan-making process is the place to set out and test policies affecting this issue and this is what the Plan does.~~

Para 235

~~Should any interested party view the approach as unsound then detailed modifications will need to be suggested to the examining Planning Inspector.~~

Para 236

~~The implication of the Plans policies and associated tools such as the Article 4 Direction (and accompanying SPD) is that aspirations may not necessarily turn into outcomes unless, for example the UoB begins to utilise its non green belt estate for follow on accommodation and that one or both institutions supplement what has already been secured in the city, with limited further windfall potential sites and solutions elsewhere. However, the effect of the Plan will be to contain to a significant degree the~~

level of further in-city sites.

Para 237

The Council has considered additional measures/policies such as refusing teaching space when dedicated accommodation supply is generating a need for more than a certain number of HMO bedrooms. Such an approach is in place in Oxford, but it is not considered to be a tool to be deployed yet in Bath as new teaching space is not only about enabling growth but improving existing conditions, there is not an equivalent B5 policy in Oxford, and both Oxford Universities have more land ownership options. Such a mechanism will though remain an option for future plan reviews.

Para 238

In presenting the following analysis it is crucial to understand that the District's housing requirement of 13,000 and the quantum that is to be delivered at Bath (7,000) relates to non student dwellings only. Whilst the PPG states that student housing can count towards a housing requirement, that is only logically the case, as recognised by the Core Strategy Inspector, when that requirement itself includes a component of student housing (as a bed space equivalent). In B&NES that is not the case. Student housing needs are a separate component of specialist demand in the form of bedspaces and on the evidence above are clearly volatile – hence why they are assessed separately.

Para 239

~~In-City Student Accommodation Blocks~~

~~Whilst the PPG also states that student accommodation can be counted based on the amount of housing that is released, this only holds true if the Universities are not growing and not using that new accommodation to achieve that growth. Where this is the case, new accommodation to enable more recruitment can simply 'fan the flames' of the HMO housing market by generating ever increasing demands for follow-on accommodation (i.e. more demand for HMOs or further accommodation blocks). Whilst short term boosts to supply recently achieved by BSU can have a short term positive effect, in the longer term once fully occupied with first years they will create further downstream demands. Neither University has historically had an eye to investing in land for follow-on demands. It is clear from BSU representations on the Options document that the space it has secured is to enable the growth in first year intake.~~

Para 240

~~There will always be an opportunity cost of allowing student accommodation blocks with the city. Up to a point this cost is manageable as it will not impact upon the achievement of the city's overall development programme as set out in Policy B1 of the Core Strategy. However, beyond a certain point, the opportunity cost of developing too much land in the city for student accommodation or teaching space becomes harmful to the realisation of objectives for housing, affordable housing and employment space. Whilst a number of in-city private sector accommodation projects have been permitted since 2011, this was prior to the adoption of Core Strategy Policy B5, when its 'controls' were not in place. However, having regard to monitoring data those developments have not put at risk the objectives to which B5 relates — but they increase the scarcity value of the land that is left to achieve those objectives.~~

Para 241

~~The risk identified is not helped by the fact that student accommodation is currently one of the most the most lucrative forms of real estate investment and is therefore often the most commercially attractive option to landowners. There is a risk that without a suitable planning policy framework, this sector will squeeze out the achievement of other requirements and that change in Bath will become focused too much on housing a transitory learning population (not all of which will go on to use their skills in the city, sub-region or even within the UK economy) than housing a more permanent and working population and achieving employment space and affordable housing outcomes. Further even if a new accommodation block did measurably (as opposed to in theory) release some HMOs back to the stock this would not be a release of affordable housing, and the affordable housing that could have been provided on the student accommodation site will have been forgone.~~

Para 242

~~In the Council's analysis there is not the land within the city ('city' does not include on-campus land) to enable the aspirations of the Universities (even if these were curtailed somewhat) without significant negative effects on other priorities — hence the approach set out in Policy B5 of the Core Strategy. This is not a blanket moratorium on further student accommodation blocks within parts of the city to which it relates, but these will be limited to windfall sites that are not identified for other uses in the HELAA or allocated in the site allocations section of the plan. The site allocations section of the~~

~~Plan identifies a number of sites that will change during the plan period within and outside Policy B5. None of the site allocations policies identify student accommodation as part of the land use mix – and where windfall sites do become available other interested parties as well as the Universities. The LPA cannot control who within the same planning use class secures the land. Due to the scale of the development challenge the Council has earmarked much of the land that is available / developable for specific uses. The scope for windfall potential is limited.~~

Para 243

~~This policy framework of prioritising the achievement of targets for other land uses in key areas of the city will implicitly result in significant containment effects in respect of student accommodation blocks. It will likely direct even more attention to the further growth in student HMO market as a source of supply and to on-campus options. However, that too is constrained.~~

Para 244

Houses in Multiple Occupation

~~Relative to other places the proportion of the housing stock that has already been converted to student Houses in Multiple Occupation (HMOs) is very high, higher even than in Oxford. The proliferation of HMOs in Victorian terraces in the Oldfield Park/ Westmoreland area is the most visible consequence of the mismatch between the growth in students and dedicated on-campus and off-campus accommodation development.~~

Para 245

~~In July 2013 in recognition of this proliferation an Article 4 Direction was made to require a planning application for the change of use of a C3 dwelling to a C4 HMO in Bath. An accompanying SPD currently applies a 25% threshold for streets/ neighbourhoods in the city, after which permission will be refused. The existing concentration of HMOs in the Oldfield Park area has now reached that threshold (in many cases the threshold was already significantly breached prior to the Article 4 Direction being made). Variations to the SPD can be made outside the full plan-making process to loosen or tighten the application of the Article 4 Direction in a targeted or city-wide way. However, the Council is aware that HMOs play a role beyond housing students and is mindful of this role. Whilst there are HMOs in other parts of the city it is not clear whether landlords can/will increase their portfolios at the rate required to~~

~~enable the Universities aspirations to be met. It seems unlikely that the unprecedented rate of increase that the Universities would require would take place given that the hotspot (Oldfield Park area) has no further headroom for growth and when it would require the market to colonise areas with housing type profiles and asking prices that are very different to the Oldfield Park area. Some further HMOs can though be expected to be permitted. There have been 78 more HMOs permitted in the 29 months from July 2013 (32 per annum). That is far below the rate that would enable HMOs to exclusively meet the Universities residual needs relating to their aspirations to 2020. The conversion of a C3 dwelling to a (Class 'N' Council tax exempt) C4 HMO is to be counted as a loss of a C3 dwelling housing in respect of monitoring net additional housing supply for the plan period and in respect of 5 year housing land supply, and these losses will require corrective action at plan review if the 7,000 net dwellings target for the city is at risk. The SPD can be varied to manage the extent of change and the risk of that happening.~~

Para 246

~~A significant increase in student HMOs in Bath to 2020/21 or beyond would put the achievement of 7,000 net additional dwellings at risk and put considerable pressure on 5 year housing land supply for the District. The Council would not view it as sustainable to make corrective action for a further 1,200 HMOs. It does not see any options for corrective action on the edge of Bath, not solely for Green Belt reasons but in respect of the significance of the World Heritage Site by virtue of impacts on its setting. Further, making corrective action for that level of development further afield is significantly less sustainable than retaining that supply within the city itself. The situation will be monitored and the SPD for the Article 4 Direction reviewed and amended as deemed necessary.~~

Para 247

~~**On-campus Development**~~

~~Whilst it might be supposed that on-campus land would/should be the first /preferred planning policy option for follow on accommodation space, it has in reality been the last. This is not sustainable for the city as a whole. Each campus has different constraints that affect the provision of follow on space.~~

Para 248

~~Site allocations polices have been made for the UoB campus at Claverton Down~~

	<p>(including the Sulis Club) and for BSU campus Newton Park (but not including Sion Hill for which generic development management policies will be used to manage change). The Bubo's and BSU's work in preparing and consulting on estate and campus masterplans demonstrates the value of proceeding on a strategic basis and has provided part of the evidence base to inform planning policy for future development.</p>
<p>Para 249</p>	<p>The UoB has the scope to utilise land that was removed from the Green Belt in 2007, together with land within the core parts of the campus to enable it to achieve its aspirations for growth (in terms both of student accommodation and academic space). In respect of student accommodation, beyond that which has been identified in the masterplan, the site allocations policy enables significant change, but it is for the University itself to determine the balance it wants to achieve between non green belt playing pitch provision and aspired to growth, and the rate of growth.</p>
<p>Para 250</p>	<p>BSU has less control over its future in respect of securing net additional student accommodation at Newton Park for the reasons set out in the site allocations policy. Further net additions to accommodation supply (to that built since 2011) is unlikely although older stock can be replaced within the confines of NPPF:89. Whilst BSU has secured much of the purpose built housing that developers have had permitted in the city, this will not fully accommodate the growth envisaged for all year groups. No site specific deliverable solutions to enable further increases in housing supply specifically for BSU can be identified in the Development Plan at this time. Any proposals would be dealt with on their merits via generic development management policies in association with Policy B5 (if the site is within the affected area). Other (new) campus locations that do not have an opportunity cost for the city may be needed either within or outside B&NES.</p>
<p>Para 251</p>	<p>No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will need to consider such circumstances, on their merits, at the time they are presented</p>
<p>Para 252</p>	<p>Summary</p>

	<p>The approach of the Local Plan is to enable the realisation of a sustainable balance between the aspirations of each university, private colleges, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting. The city currently over performs as a host to higher education yet under performs in relation to employment space and conventional housing. These are the Plans priority land uses for the key areas of the city where most change will take place</p>
Para 253	<p>The overall strategy of the Development Plan is to enable the universities and private colleges to fulfil their ambitions, as far as possible, without those ambitions having a negative impact on the realisation of the Council's wider strategic planning requirements for the city, nor an unacceptable impact on the University campuses or their environs, or on the existing normal housing stock of the city. Whilst a number of in city accommodation blocks have been permitted since 2011, the residual supply of land to 2029 dictates that further supply must be controlled in specific parts of the city where necessary, otherwise the housing, affordable housing and economic strategies will not be deliverable. This also applies to teaching space.</p>
Para 253	<p>Bath is a compact city and there a few places that can be regarded as unsuitable in transport terms in respect of windfall student accommodation beyond the Enterprise Area and Central Area (albeit these are the most sustainable areas and opportunity further afield would be limited in number and scale). There will be some further increase in HMOs within the city, and as a consequence of this, if the target of 7,000 dwellings for the city is put at risk, compensatory housing provision would be needed at full Plan Review (2019/20) based on actual recorded changes in the stock of HMOs. The SPD accompanying the Article 4 Direction can be used to manage the growth of HMOs.</p>
Para 2.36	<p>Reinstate the adopted Core Strategy paras 2.36 to 2.41.</p> <p><u>The Council seeks to enable the continued success of The University of Bath and Bath Spa University and the contribution they make to the city's identity and profile.</u></p>
Para 2.37	<p><u>The development of new academic space and student accommodation are matters that require policy direction in the Core Strategy. The Council is mindful that the growth in student numbers during the last decade has not been accompanied by sufficient on-</u></p>

campus study bedrooms and that the associated expansion of the student lettings market has diminished the 'normal' housing stock of the city. This is particularly significant given the relatively small size of Bath as a host city for two universities. The proliferation of Houses in Multiple Occupation (HMOs) in the Oldfield Park/Westmoreland area is the most visible consequence of the mismatch between the growth in students and on-campus development.

Para 2.38

The Council also understands that each institution needs to invest in its academic estate in order to continue to provide high standards. The approach of the Core Strategy is to enable the realisation of a better balance between the aspirations of each university, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting. The University of Bath's and Bath Spa University's work in preparing and consulting on estate and campus masterplans demonstrates the value of proceeding on a strategic basis and provides a framework for future development. The Information Paper on student numbers and accommodation considers the issues in more detail, provides a full assessment of the evidence that has led to the following policy approach and its likely impact.

Para 2.39

It is anticipated that this policy will enable the delivery of new on-campus study bedrooms to 2020/21 at a rate which broadly matches the growth of the student population. Based on estimated forecasts of growth, it will enable a modest increase in the student population (compared to rates experienced since 1997), enable all first years to be offered a place in managed accommodation, and potentially lead to a small contraction of the student lettings market - subject to accommodation preferences. To achieve a more significant contraction in the student lettings market would require significant amounts of valuable land within the city to be developed for student accommodation. In order for the vision for Bath to be realised this land will be needed for 'normal' housing and other commercial uses.

Para 2.40

It is envisaged that this approach could mean that 2012/13 levels of HMOs will represent the high water mark within the city. The Council has declared an Article 4 direction in relation to HMOs to manage the student lettings market in the southwest part of the city and elsewhere. The Council cannot apply HMO powers retrospectively.

Para 2.41	<p><u>Growth beyond 2020 will require additional on and off campus capacity to be identified. No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will need to consider such circumstances, on their merits, at the time they are presented.</u></p>	
Para 2.41A	<p>After Core Strategy paras 2.41 add the text below.</p> <p><u>At the time of preparation of the Placemaking Plan, the Council received updated growth plans from both Universities. They are summarised in the separate Information Paper: Student Numbers and Accommodation requirements in Bath Update (May 2016). New private educational institutions e.g. language schools have also signalled a desire to increase their presence in the city.</u></p>	
Para 2.41B	<p><u>The issues relating to the revised growth aspirations of both universities and private colleges and the resultant additional pressures on the housing market are considered to be strategic matters that will be assessed and responded to as part of the wider housing requirement through the future Local Plan review.</u></p>	
Policy B5, p.118	<p>POLICY B5 - STRATEGIC POLICY FOR <u>BATH'S</u> UNIVERSITIES, PRIVATE COLLEGES AND THEIR IMPACTS</p> <p>Overall Approach</p> <p>Planning decisions should enable, as far as possible, the aspirations of the University of Bath and Bath Spa University to be met, within the context of environmental sustainability and the need to deliver the full spectrum of other development requirements for the city, in the city.</p> <p>University of Bath – Claverton Down Campus</p> <p><u>With regards to the</u> The development and expansion of the University of Bath the strategy seeks, in accordance with saved Local Plan Policy GDS.1/B11 the development of about 2,000 study bedrooms and 45,000 sq.m. of academic space at the Claverton campus site allocations</p>	<p>The issues relating to the revised growth aspirations of the two universities and additional pressures on the housing market are considered to be strategic matters for future plan review.</p> <p>Reinstates the previously deleted University of Bath quantum of development that is anticipated to be delivered within the plan period.</p> <p>Reference to Bath Spa University is deleted as it is superseded by Policy</p>

		<p>Bath Spa University – Newton Park Campus</p> <p>Within the context of a strategic framework for the University’s entire estate the strategy seeks the redevelopment and intensification of the Newton Park campus to provide additional study bedrooms and academic space. Through the Placemaking Plan the Council will be reviewing whether the Campus should continue to be designated as a MEDS and, if so, its boundary.</p> <p>Proposals should accord with the NPPF, paragraph 89 and future local planning policy in the Placemaking Plan and seek to optimise opportunities for educational use and student accommodation within the current boundary of the campus or boundary of the MEDS if so defined in the Placemaking Plan before seeking to justify very special circumstances for development beyond them or a change to the development boundaries. In all circumstances regard should be had to the sites environmental capacity, the significance of heritage assets and the optimum development of the campus in this regard.</p> <p>Off Campus Student Accommodation and Teaching Space</p> <p>Proposals for off-campus student accommodation (whether in the form, C2, C4 or sui generis residential units) or teaching space will be refused within the Central Area, and the Enterprise Area <u>and on MoD land</u> where this would adversely affect the realisation of <u>other aspects</u> of the vision and spatial strategy <u>for the city</u> in relation to for delivering housing, and economic development (in respect of office, industrial, retail and hotel space).</p> <p>Housing Market Impacts</p> <p>Between 2011 and full Plan review the number of C3 dwellings permitted to convert to (Class ‘N’ Council tax exempt) C4 Houses in Multiple Occupation will be monitored and compensatory provision will be made if the achievement for 7,000 net additional dwellings for the city is at risk.</p>	<p>SB20. (These changes were included in the submission Plan)</p> <p>These changes need to be reflected in the SA.</p>
<p>MM32</p>	<p>Para 267, p.122</p>	<p>Policy SB19 <u>provides a clear steer for the development of the campus by identifying zones within which development can take place.</u> is designed to be largely self sufficient in enabling planning applications to be determined. It does not require a comprehensive supporting master plan to show where all individual future</p>	<p>Clarification in response to issues raised at the Examination hearings.</p>

	267A, p.122	<p>development projects can take place. The Development Framework plan of Policy SB19 <u>It also provides clear criteria for consideration of specific development schemes within different parts of the campus provides a clear steer for and supporting development framework will provide a sufficient steer for that purpose. However, The undeveloped land within the AONB (to the north of the Avenue) is a special case and here applications for development, at least an outline application setting out a plan and for the integration of this area will need to be preceded and informed by a detailed assessment to consider and articulate how development of this area will be integrated in to the main body of the University campus, and to ensure impacts on the wider AONB are understood and to establish how the impacts will be moderated. how effects on the AONB will be moderated, will be need to be permitted before individual projects can be determined.</u></p> <p><u>The amount of development previously assessed in the preparation of the 2007 B&NES Local Plan is set out in Policy B5. Whilst some of this has been delivered, it is not necessarily a cap on the quantum of development that could be achieved on campus. The Council is aware that the University has aspirations for development beyond these figures, however if this is to be pursued, then the University will need to undertake a comprehensive study that explores how and whether any additional development could be taken forward within the planning policy framework as set out in Policy SB19. It would need to respond to the environmental context of the whole campus, and how the enhancement of its environmental assets will be achieved. This process would need thorough stakeholder engagement and be informed by a robust evidence base. It could then inform the future planning policy position of the campus at plan review stage.</u></p>	These amendments to the supporting text reflect the change made to Policy SB19. The implication to the SA is considered as part of Policy SB19 re-appraisal.
	Policy SB19, p. 119	<p>POLICY SB19 - UNIVERSITY OF BATH AT CLAVERTON DOWN</p> <p>Sulis Club</p> <p>.....</p> <p>2. Purple Zones (hatched) – largely sport related development, pitches, tennis courts and a car park within the Cotswolds AONB where university related development is also acceptable in principle, but where, to the north of the Avenue at least an outline</p>	These modifications need to be reflected in the SA.

~~planning application will first need to be approved to establish a comprehensive programme for change. In order to effectively manage development within the AONB and to ensure impact on the wider AONB is comprehensively considered, it will be necessary for the University to undertake a full and detailed assessment preceding planning applications that:~~

- ~~• establishing the acceptable form and quantity of development; and~~
- ~~• setting out how any negative AONB and SAC impacts will be moderated sets out the effect on the AONB and SAC and how any negative impacts will be moderated; and~~
- ~~• describes how development will be integrated into the core of the campus, and its green infrastructure network.) before detailed applications for specific projects are determined.~~

~~The study is required to cover the whole of the Purple Zone (hatched), and its production should be guided by the latest version of the Cotswold AONB Management Plan where relevant. The study will need to demonstrably inform subsequent planning applications for development within this area.~~

~~.....~~

~~General Development Principles~~

~~g) In all circumstances As part of a campus wide strategy and to implement its Travel Plan all development proposals should enable sustainable transport choices to be made including bus use travelling to and from the campus/estate and pedestrian and cyclist circulation to, from and within the campus/estate. This includes retaining but not increasing an operational level of car parking of not more than 2,200 spaces so as not to harm the patronage of sustainable transport modes, their viability, or cause additional car trips to and from the campus.~~

MM33	Diagrams 2 and 3, p.10-11	<i>Remove the Paulton House site from the Primary Industrial Estate. See maps at Annex 1, pp.8-9.</i>	Factual Correction No implication to the SA.
MM34	Policy SV1, p.13	POLICY SV1 - SOMER VALLEY SPATIAL STRATEGY 4. Housing Enable around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John within the housing development boundary. <u>Residential development on previously developed sites falling within the scope of Policy ED2B adjoining and closely related to the housing development boundary will be acceptable if the requirements of Policy ED2B and other relevant policies are met.</u> Residential development on sites outside the Housing Development Boundary will <u>also</u> be acceptable only if identified in an adopted Neighbourhood Plan. This will include affordable housing, providing more choices of housing to meet the needs of the local communities. (Policies RA1 and RA2 are applicable to the other settlements in Somer Valley.)	Clarification and in order to ensure Policies SV1 and ED2B operate coherently and consistently. These changes need to be reflected in the SA.
MM35	New para 80A	<u>LCR3 (5) Land at Silver Street (Midsomer Norton) is safeguarded for Norton Hill School, following the approval by the Education Funding Agency for primary school provision managed by Norton Hill School. This new primary school (630 places) will serve Midsomer Norton and surrounding areas. The safeguarded land could facilitate Norton Hill School to make more efficient use of their existing site for example by relocating playing pitches to the land at Silver Street to facilitate provision of the primary school. However, should a primary school be implemented and opened elsewhere to meet the needs of primary education of Midsomer Norton and surrounding areas the safeguarded land will no longer be needed.</u>	Modification to address Inspector's concerns raised during the Hearings relating to Policy LCR3(5). The amendments provide clarification in the operation of Policy LCR3. No implication to final SA.
MM36	Policy SSV4 Former Welton Manufacturing Site	POLICY SSV4 - FORMER WELTON MANUFACTURING SITE Amend criterion 3 (other criteria to remain unchanged): 3. Enhance the Conservation Area and its setting including the retention and reuse of the former brewery building, <u>with a strong presumption in favour of its physical preservation, subject to robust economic viability testing measured against the</u>	This modification needs to be reflected in the SA.

		<u>value of the whole development allocation, and taking full account of the heritage value and wider possible uses of the former brewery building.</u>	
VOLUME 5 - RURAL AREAS			
MM37	Policy SR5, point 2, p.27	POLICY SR5 - PINKERS FARM <i>Delete point 2 as this was superseded by point 3 and should have been deleted. Renumber the remaining principles.</i>	Correct error No implication on final SA.
MM38	Policy SR14 (map), p.45	POLICY SR14 - WHEELERS MANUFACTURING BLOCK WORKS Amend site allocation boundary shown on map for site SR14 so that it excludes residential properties immediately to the south of the allocation.	Factual change No implication on final SA.
MM39	Policy SR15, principle 7, p.47	POLICY SR15 - LAND TO THE EAST OF ST MARY'S PRIMARY SCHOOL 7. The strong eastern landscape buffer to the eastern edge should be retained and the existing hedgerows and trees improved to create a strong countryside edge. <u>7. A strong landscape buffer to the eastern edge of the development should be created with trees and hedgerows to create a strong countryside edge.</u>	Correction No implication on final SA.
MM40	Policy SR2, Point 7, p.53	7. Development of any kind including gardens and garden boundaries should be kept at least 15m away from the centre line of the eastern and southern boundaries. <u>7. The paddock should be kept as open space.</u>	Clarification No implication on final SA.
VOLUME 6 - APPENDICES			
MM41	Policy SV1 Housing Development Boundaries, p.62	<i>Amend the HDB for Paulton to correctly include the area that has planning permission for residential development at the Former Paulton Printing factory site.</i>	Factual change reflecting principle of HDBs set out in CD/PMP/DM20 No implication on final SA.
MM42	Policy SV1, HDB for Somerset	<i>Amend the housing development boundary shown for the Somer Valley so that it includes the site allocated at Former St Nicholas Primary School in Radstock (site SSV20).</i>	Clarification No implication on final SA.

	Valley (p.66)		
MM43	Policy RA1, HDB for West Harptree, (p. 68)	<i>Amend the Housing Development Boundary for West Harptree so that it includes the site allocated at Leacroft, Bristol Road (SR2)</i>	Clarification No implication on final SA.
MM44	Policy LCR5 (Policies Map revision) p.72	<i>Amend Policies Map showing protected recreational open space (Policy LCR5) – to correct the error relating to land at Manor Road, Saltford (exclude land that is not part of Saltford Golf Course). See map at Annex 1, p.10.</i>	Correct mapping error. No implication on final SA.
MM45	Policy LCR6A, Local Green Spaces in Bath (p.85)	<i>Amend map by removing the allotments at Combe Down proposed to be designated as Local Green Space</i>	Clarification and error correction. Allotments remain protected under Policy LCR8. No implication on final SA.
MM46	Policy NE2A (Policies Map revision) p.87	<i>Policies Map showing Landscape Setting of Settlements (Policy NE2A) to be updated to be consistent with the online version which is the correct map. See map at Annex 1, p.11.</i>	Correct mapping error. No implication on final SA.
MM47	Policy NE5 (Policies Map revision) p.88	<i>Policies Map showing Ecological Network (Policy NE5) to be updated to show changes to Local BAP Habitat (Post Industrial Sites) and B&NES BAP Post Industrial Sites See map at Annex 1, p.12.</i>	Correct mapping error (see CD/PMP/DM29). No implication on final SA.
MM48	Policy RA2,	<i>Add map showing amendment to the Housing Development Boundary for Compton</i>	Correct omission in submission Plan.

	New map for Compton Martin HDB	<i>Martin so that it includes the site allocated at The Former Orchard (SR17)</i>	No implication on final SA.
MM49	Policy RA2, New map for East Harptree HDB	<i>Add map showing amendment to the Housing Development Boundary for East Harptree so that it includes the site allocated at Pinkers Farm (SR5)</i>	Correct omission in submission Plan. No implication on final SA.
MM50	Policy RA1, New map for Timsbury HDB	<i>Add map showing amendment to the Housing Development Boundary for Timsbury so that it includes the site allocated at Wheelers Manufacturing Block Works (SR14) and Land to east of St Mary's Primary School (site SR15).</i>	Correct omission in submission Plan. No implication on final SA.

