

Core Strategy Review
2016 - 2036

Schedule of Comments on the
Commencement Document

Received between 7th November
and 19th December 2016

Core Strategy Review Commencement Consultation

Schedule of comments received

Core Strategy Review Commencement Consultation: Schedule of Comments Received

ID: 49 / 1 Name: Organisation: Clutton Parish Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Clutton Parish Council discussed the review at their November Parish Council meeting and asked me to make the following comment:

While the review talks about "infrastructure", it completely omits any mention of broadband infrastructure. In our view, this needs to be seen as a key supporting service to business in the area, including home-working, and can have a mitigating effect on traffic and transport, therefore it should be included

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 50 / 1 Name: Organisation: Saltford Parish Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Saltford Parish Council agrees with the recent comment by the Leader of B&NES Council at a public meeting in Saltford on 1st December 2016 that there was not any housing development planned for Saltford and supports his opposition to the use of any of Saltford's important green belt land for housing development.

Further Information available within the original representation: No

ID: 50 / 1 Name: Ms Tricia Golinski Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

No

Comments on the proposed programme for the preparation of the Core Strategy review

No

Specific observations on the Core Strategy review

"Saltford Parish Council agrees with the recent comment by the Leader of B&NES Council at a public meeting in Saltford on 1st December 2016 that there was not any housing development planned for Saltford and supports his opposition to the use of any of Saltford's important green belt land for housing development."

Further Information available within the original representation: No

ID: 73 / 1 Name: James Addicott Organisation: Newton St Loe Conservation Group

Agent:

Comments on the proposed scope and content of the Core Strategy Review

We note with concern that there is no inclusion of a Food Security plan for the region in the scope of the current review. We would emphasise the need to address this particular aspect of planning given the projected issues and challenges

surrounding peak oil, climate change, biodiversity loss, and demographics (ie increased population).

We therefore ask that BANES includes a Food Security and Sustainability Plan in its scoping within the JSP and Core Strategy review, and with emphasis on a sustainable, self sufficiency model including scoping the food footprint for the region, ecological and environmental aspects, and synergy with Bristol and other regional planning around sustainable food security.

Comments on the proposed programme for the preparation of the Core Strategy review

We note there is no stakeholder or community engagement process evident in the timeline of the plans, though we imagine it is implicit. However, we would prefer and request that this is transparently located in the schedule at the start of the process so that local people will be more empowered to participate in the process, and all concerned parties can be prepared for and engage within the given timelines.

Specific observations on the Core Strategy review

We are conscious that housing quotas established during the last Core Strategy were premised on the need to help homeless people off the housing list in BANES. We would like evidence of how the current plan (2010 – 2016) has achieved this, not least given that CURO housing at Foxhill appears to start in the region of £350K+ as the lowest end of their for sale range. It is hard to imagine that these levels of costs are 'affordable' or enable those on low incomes, and therefore most likely to be without their own homes, to establish a foot on the housing ladder. We want to be sure that any failing to reach the agreed targets in the last strategy are accounted for and not repeated in the future strategy. See ref: <https://www.thebureauinvestigates.com/2016/11/27/uk-housing-crisis-house-prices>

We demand more transparency about this aspect of the plan and the methodology for scoping the number of houses and levels of housing required, also the target markets, and especially where affordable housing quotas are currently not met, or have not achieved their specified goal. This is important because to increase housing numbers at the higher end of the market in BANES will simply act to push up the overall costs of housing for ordinary people. Given that job opportunities in Bath remain principally in the tourist and retail sector eg minimum wage, a general rise in the cost of housing will continue to widen the gap between salaries and housing opportunities in this region. See ref <https://www.theguardian.com/uk-news/2015/sep/02/housing-market-gulf-salaries-house-prices>

Further Information available within the original representation: No

ID: 93 / 1 Name: Jacqui Ashman

Organisation: Highways England

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Highways England is keen to ensure that policy takes account of the need for transport and land use planning to be closely integrated. In this respect, your attention is drawn to DfT Circular 02/2013 which sets out how Highways England will engage with the planning system to deliver sustainable development.

The scope and content of the Core Strategy review are clear and appropriate and we are content that through the links with the West of England Joint Spatial Plan and Joint Transport Strategy matters of a strategic nature will be robustly considered and taken forward.

Comments on the proposed programme for the preparation of the Core Strategy review

The programme is ambitious but we believe it to be deliverable. We are pleased to note that the intention is to wait for the Inspector's report on the West of England Joint Spatial Plan before submitting the revised Core Strategy for examination. This gives an opportunity for any changes proposed by the Inspector to be addressed in the submitted Core Strategy.

Specific observations on the Core Strategy review

Highways England encourages early engagement on any proposals which could have an impact on the SRN. Please contact me if I can be of further assistance

Further Information available within the original representation: No

ID: 95 / 1 Name:

Organisation: The Coal Authority

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Thank you for consulting The Coal Authority on the above document.

Having reviewed the document, I confirm that we have no specific comments to make at this stage. We would welcome the Core Strategy Review and the effective 'merger' with the Placemaking Plan to form an overall Local Plan.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales.

Bath and North East Somerset Council clearly understand our planning objectives having added the minerals section to the existing Core Strategy to address our previous concerns. We would look for the Core Strategy Review to continue to set out the overall strategic picture towards mineral safeguarding.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 114 / 1 Name:

Organisation: Society of Merchant Venturers

Agent: 278

Savills

Comments on the proposed scope and content of the Core Strategy Review

Savills is instructed by the Society of Merchant Venturers (SMV) to submit representations in response to the Bath and North East Somerset ('the Council') Core Strategy Review 2016 - 2039: Commencement Document Consultation, herein after referred to as the 'Commencement Document'. This representation is made in the context of our client's substantial land interest to the south/south-east of Keynsham and we have attached a land ownership plan which illustrates the extent of that interest.

National Planning Policy Context

The National Planning Policy Framework (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 14 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.

Paragraph 47 of the NPPF seeks to "boost significantly the supply of housing". The NPPF outlines that Local Planning Authorities (LPAs) should ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. The Framework, at paragraph 52, confirms that the supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements or extensions to existing villages and towns.

Bath and North East Somerset Core Strategy Review 2016 - 2039: Commencement Document

The following section provides the SMV's response to the Commencement Document on the proposed content, scope and programme for the Council's Core Strategy Review.

Housing Need

In conjunction with these representations, we have provided a response to the West of England Joint Spatial Strategy (JSP): Towards the Emerging Joint Spatial Strategy Consultation. It is acknowledged in the Commencement Document that the JSP will establish the overall housing requirements for the area and the context for the Core Strategy Review (paragraph 9).

The supporting evidence for the JSP recommends a joint housing requirement of up to 105,000 new homes over the JSP plan period. However, it is clear from a review of the housing requirement for the West of England that the Objectively Assessed Need (OAN) has been suppressed – indeed three alternative assessments prepared by: Barton Willmore, Business West and the OAN based upon the methodology prescribed by the Local Plan Expert Group, indicate that the housing requirement for the West of England area falls within the range 130,000 – 150,000 dwellings.

Accordingly, there is clearly a greater requirement to release additional land (including Green Belt land) to meet the housing requirements of the West of England/Bath and North East Somerset in the most sustainable locations, including at Keynsham – either via strategic locations (more than 500 houses) identified in the JSP and/or non-strategic sites in the Core Strategy Review.

Indeed, whilst we are proposing an extensive urban extension to the south-east of Keynsham in the JSP, we have also previously promoted a potential development of only part of the land at Uplands Farm – comprising some 250 dwellings together with a neighbourhood centre providing local services and facilities for the development and which could serve a wider area improving sustainability locally – see enclosed Indicative Concept Map.

Housing Strategy for non-strategic growth

With regards to non-strategic sites, the draft JSP states that the three unitary authorities - including Bath and North East Somerset Council - will need to deliver approximately 1,000 new dwellings each over the plan period identified through individual Local Plans (Source: paragraph 46 of the West of England JSP: Towards the Emerging Joint Spatial Strategy Consultation Document). However, as explained above, the overall housing requirement could substantially increase and therefore it would be inappropriate to determine a housing strategy for development within the Council's Core Strategy Review before the final housing requirements have been established in the JSP.

Notwithstanding the above, it is clear that large scale extensions to the most sustainable settlements – including Keynsham – are the most appropriate locations at which to direct a significant proportion of the non-strategic housing growth in accordance with paragraph 52 of the NPPF. Extensions to the most sustainable settlements – such as Keynsham - can be of a scale that ensures that the most efficient use of existing or proposed infrastructure can be made. The scale of such development can provide additional benefits in providing the resources, land or otherwise, commensurate with the need generated. They can, in other words, become sustainable extensions to make existing settlements more sustainable.

The SMV respectfully reserves the right to comment further on the quantum of development directed to the settlements in the Council's Core Strategy Review as the evidence base of housing need is advanced in the JSP.

Local Green Belt Review

We support the Council's commitment to undertake a local Green Belt Assessment/Review as part of the supporting evidence base for the Core Strategy Review – indeed it is unlikely that the majority of the housing development needs of the area will be met through development within existing urban areas. Accordingly, it will be necessary to review the Green Belt boundaries at the most sustainable settlements, including at Keynsham. Indeed from the Strategic Green Belt Assessment it is clear that the west of Keynsham makes a major contribution to preventing merger of settlements (i.e. Bristol, Keynsham and Bath). In the corollary, growth to the south and east of Keynsham will not have the same substantial impact on that purpose of the Green Belt between Bath and Bristol as to the west of Keynsham.

We trust the above comments clearly set out the SMV's position at this stage. The SMV would welcome early discussions with the Council to discuss the opportunity of delivering development to the south-east of Keynsham.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 118 / 1 Name: J Tinworth

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Referring to your letter of 7th November, 2016 I would comment that:

Under the Core Strategy adopted in July 2014, the Inspector had made it clear that housing development along the A4 (from The Globe Inn to the Bath boundary) should not be allowed. If it was allowed that would be the equivalent to "ribbon development" (i.e. continuous development linking Bristol, Keynsham, Salford and Bath). It was considered most important that this "green" entrance into our World Heritage City must be protected. This policy must continue.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 120 / 1 Name: William Gaskell

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

I want to build and operate a small modular nuclear reactor in BANES and a skyscraper to accommodate the workers who move to the city in security without developing the green belt. Perhaps by integrating small wire energy solutions to any new build housing developments in law, this would leave the grid to support transport infrastructure and a hydrogen economy that would add an additional layer of energy security to the economy. My proposed solution is problem solving by communicating from first principles: making sure stakeholders profit from the development and the players are all kept happy.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 154 / 1 Name: Jane Hennell

Organisation: The Canal & River Trust

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Thank you for your consultation on the Core Strategy Review commencement document. The Canal & River Trust have considered the content of the document and have no comments to make in this case.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 170 / 1 Name: Organisation: Robert Hitchins Limited
Agent: 19 Pegasus Group

Comments on the proposed scope and content of the Core Strategy Review

Pegasus Group has been instructed by Robert Hitchins Limited to respond to the Core Strategy Review Commencement Consultation.

The review of the Core Strategy is welcomed and particularly the opportunity to formalise the relationship between the Core Strategy and the Placemaking Plan into one Local Plan. I note that it is the intention not to review the site allocations and detailed development management policies contained in the Placemaking Plan, as they will have only recently been adopted; however, if any are affected by the emerging policies or changes in national policy these will need to be reviewed.

The Core Strategy review is being prepared alongside the West of England Joint Spatial Plan which will provide the new strategic planning context for B&NES to 2036. Consequently, the timetable is dependent on the progress of the JSP. Whilst the JSP will establish the overall housing requirement and the broad distribution of housing and employment, including the identification of strategic development locations and strategic infrastructure, it will be for the Core Strategy to identify and allocate non-strategic sites.

Although there are allocations in the adopted Core Strategy and the Placemaking Plan, additional development opportunities will need to be identified and allocated for the plan period to 2036 in accordance with the overall housing requirement established for B&NES. Pegasus have submitted representations in response to the West of England Towards the Emerging Spatial Strategy Document and consider that the housing requirement should be higher than currently proposed and that in order to meet housing needs a broad portfolio of sites should be complimented with smaller non-strategic sites so as to ensure housing delivery is maximised and that the Plan is positively prepared, justified and effective.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

In this context we are promoting land off Stockwood Lane, Whitchurch which can make a contribution to meeting the housing needs in the plan period. The site has previously been promoted in response to the Call for Sites for the Housing and Economic Land Availability Assessment in January 2015, which was undertaken by each of the four authorities as part of the evidence base for the development of the West of England Joint Strategic Planning Strategy).

We have previously engaged in the Core Strategy and promoted land off Stockwood Lane, Whitchurch. It is now recognised through the emerging West of England JSP that the housing needs across the wider Bristol HMA have significantly increased and as a result there is need for green belt releases around Whitchurch to accommodate 3,500 homes. This is to be welcomed and will necessitate the release of land off Stockwood Lane through the Core Strategy review as a non-strategic site, whilst still maintaining a green gap between Whitchurch and Bristol or as part of wider allocation.

Pegasus on behalf of Robert Hitchins Limited look forward to engaging in the review of the Core Strategy; in the meantime, if you require any further information or we can be of assistance in any way please do not hesitate to call me on the above number.

Further Information available within the original representation: No

ID: 184 / 1 Name: Organisation: Persimmon Homes Severn Valley
Agent:

Comments on the proposed scope and content of the Core Strategy Review

1 Persimmon Homes Severn Valley (PHSV) support the intention to review the Core Strategy in parallel with the JSP.

2 The Commencement Document suggests that it will be necessary to allocate as appropriate any strategic sites

required. However, it should be recognised that strategic sites will be formally allocated in the JSP and the role of the Core Strategy Review will be to set out detailed requirements for each site and also allocate non-strategic sites.

3 The Commencement Document says the Core Strategy will need to establish a strategy for the allocation of non strategic sites. That is clearly necessary. It is important that sufficient sites are allocated to meet housing needs and that the identified housing requirement derived from the JSP is not treated as a target or a minimum. It is clear from Ministerial Statements that the emerging Government Housing White Paper is likely to place increasing emphasis on delivery of sufficient housing numbers in order to meet the policy of significantly boosting housing supply.

4 The Commencement Document also says that because the Core Strategy and Place-making Plan are recently adopted it will only be necessary to review policies if there are changes in legislation. Notwithstanding the short period the Place-making Plan has been in operation, we also think it is necessary to review all policies in both documents in light of practice so far.

5 We note that it is intended to review the expansion objectives of the universities and if so Policy B5 would also need to be revisited (paragraph 10). We would also support a review of Policy CP3, Renewable Energy Targets, in the light of practice so far. Finally we support the publication of a Sustainability Appraisal Scoping Report.

Comments on the proposed programme for the preparation of the Core Strategy review

1 PHSV support the programme which sets out the preparation of the review one step behind the emerging JSP. It is particularly important that this relationship between the two plans does not slip in order to ensure the detailed requirements of strategic allocations are identified as early as possible.

2 We hope both plans do indeed follow the programme set out, but we fear there will be delays. We consider the emerging housing figures in the JSP do not meet a Full Objectively Assessed Need. Unless the proposed overall housing numbers in the Consultation Draft of the JSP are substantially increased, there is likely to be a long drawn out examination process, as was experienced at the Gloucester, Cheltenham, Tewkesbury JCS. Whilst there are currently no figures for each authority and concerns relate to the overall West of England figure, even if the figures for Bath and North East Somerset do not require substantial amendment, delays are likely to occur due to issues in the other local authority areas.

Specific observations on the Core Strategy review

1 We think it is necessary to update the Spatial Vision and Strategic Objectives of the adopted Core Strategy in order to reflect the more ambitious economic and housing growth aspirations set out in the Local Enterprise Partnership Strategic Economic Plan which will need to be reflected in the emerging JSP.

2 The emerging JSP proposals will also have an impact on the distribution of development in Bath and North East Somerset and as a result will require review of the spatial distribution of housing. We note that at present the distribution is Bath 54%, Keynsham 17%, Somer Valley 20%, rural areas 9% and Whitchurch green belt 1%. The JSP changes priorities for housing development from the Somer Valley to Keynsham. It identifies Keynsham as a strategic development location for up to 1,100 dwellings, whereas Somer Valley is identified as a strategic employment location with no specific housing allocation, because it is one of the least sustainable locations in the sub region for accommodating strategic housing growth. In addition the JSP says there is already a substantial imbalance in the number of workers who reside in the town and the employment available and this will be exacerbated in the light of existing residential commitments. It has also proved difficult to attract new employment to the area and jobs have been eroded over the years. The conclusion is that strategic new housing growth will inevitably lead to substantial out commuting which will be difficult and costly to mitigate. This means the emphasis in Somer Valley is to facilitate employment generation to help mitigate this in the new enterprise zone.

3 Therefore, given the recognised constraints in Bath and in accordance with the settlement hierarchy, a greater percentage of housing should be allocated in Keynsham and the existing strategy and proportion of housing for the southern part of the district including the Somer Valley needs to be reconsidered.

4 We also consider it would be appropriate to review the growth strategy for the rural areas.

5 Finally, in respect of the Neighbourhood Development Plans, we note the reference in the Commencement Document to the relationship with existing Neighbourhood Development Plans, but there is also need to consider how emerging

and new Neighbourhood Development Plans are to be prepared in timing terms in relation to the Core Strategy Review. As with the relationship between the JSP and the Core Strategy Review we would suggest that any new Neighbourhood Development Plans could be prepared one step behind the Core Strategy Review to avoid wasted and duplicated work.

I would be grateful if you could take the above comments into account in progressing the Core Strategy Review and keep Persimmon Homes Severn Valley updated on its progress.

Further Information available within the original representation: No

ID: 197 / 1 Name: Nigel Bray

Organisation: Railfuture Severnside

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Railfuture welcomes the intention in the Commencement Document (paras. 17 and 18) to consult and engage with neighbouring authorities on cross-boundary strategic issues. This is important because much of the infrastructure required for the Core Strategy extends well beyond the boundaries of B&NES, eg the Great Western main railway line. Also, a high proportion of people working in Bath live in West and North Wiltshire.

The section on Relationship with other Plans is highly relevant, particularly regarding the West of England Joint Transport Study and Joint Spatial Plan. We believe that the feedback from the Consultation into the Joint Transport Study and the JSP should be used to update the B&NES Core Strategy.

We would like Network Rail and Train Operating Companies to be regarded as stakeholders for future Consultations into the Core Strategy if they are not already so.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 224 / 1 Name: Ms Caroline Kay

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

YES see uploaded document

Comments on the proposed programme for the preparation of the Core Strategy review

YES see uploaded document

Specific observations on the Core Strategy review

YES see uploaded document

Further Information available within the original representation: No

ID: 224 / 1 Name:

Organisation: Bath Preservation Trust

Agent:

Comments on the proposed scope and content of the Core Strategy Review

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National Planning Policy Context

The National Planning Policy Framework (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 14 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.

Paragraph 47 of the NPPF seeks to “boost significantly the supply of housing”. The NPPF outlines that Local Planning Authorities (LPAs) should ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. The Framework, at paragraph 52, confirms that the supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements or extensions to existing villages and towns.

Bath and North East Somerset Core Strategy Review 2016 - 2039: Commencement Document

The following section provides the SMV’s response to the Commencement Document on the proposed content, scope and programme for the Council’s Core Strategy Review.

Housing Need

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Accordingly, there is clearly a greater requirement to release additional land (including Green Belt land) to meet the housing requirements of the West of England/Bath and North East Somerset in the most sustainable locations, including at Keynsham – either via strategic locations (more than 500 houses) identified in the JSP and/or non-strategic sites in the Core Strategy Review.

Indeed, whilst we are proposing an extensive urban extension to the south-east of Keynsham in the JSP, we have also previously promoted a potential development of only part of the land at Uplands Farm – comprising some 250 dwellings together with a neighbourhood centre providing local services and facilities for the development and which could serve a wider area improving sustainability locally – see enclosed Indicative Concept Map.

Housing Strategy for non-strategic growth

With regards to non-strategic sites, the draft JSP states that the three unitary authorities - including Bath and North East Somerset Council - will need to deliver approximately 1,000 new dwellings each over the plan period identified through individual Local Plans (Source: paragraph 46 of the West of England JSP: Towards the Emerging Joint Spatial Strategy Consultation Document). However, as explained above, the overall housing requirement could substantially increase and therefore it would be inappropriate to determine a housing strategy for development within the Council’s Core Strategy Review before the final housing requirements have been established in the JSP.

Notwithstanding the above, it is clear that large scale extensions to the most sustainable settlements – including Keynsham – are the most appropriate locations at which to direct a significant proportion of the non-strategic housing growth in accordance with paragraph 52 of the NPPF. Extensions to the most sustainable settlements – such as Keynsham - can be of a scale that ensures that the most efficient use of existing or proposed infrastructure can be made. The scale of such development can provide additional benefits in providing the resources, land or otherwise,

commensurate with the need generated. They can, in other words, become sustainable extensions to make existing settlements more sustainable.

The SMV respectfully reserves the right to comment further on the quantum of development directed to the settlements in the Council's Core Strategy Review as the evidence base of housing need is advanced in the JSP.

Local Green Belt Review

We support the Council's commitment to undertake a local Green Belt Assessment/Review as part of the supporting evidence base for the Core Strategy Review – indeed it is unlikely that the majority of the housing development needs of the area will be met through development within existing urban areas. Accordingly, it will be necessary to review the Green Belt boundaries at the most sustainable settlements, including at Keynsham. Indeed from the Strategic Green Belt Assessment it is clear that the west of Keynsham makes a major contribution to preventing merger of settlements (i.e. Bristol, Keynsham and Bath). In the corollary, growth to the south and east of Keynsham will not have the same substantial impact on that purpose of the Green Belt between Bath and Bristol as to the west of Keynsham.

We trust the above comments clearly set out the SMV's position at this stage. The SMV would welcome early discussions with the Council to discuss the opportunity of delivering development to the south-east of Keynsham.

Comments on the proposed programme for the preparation of the Core Strategy review

Error in the printed programme

11. First of all the programme as printed on page 6 of the commencement document has a printing error with two years being wrongly attributed. However assuming the programme is intended to ally to that of the JSP, our questions about programming are as follows:

Materiality of emerging plan

12. Assuming the Placemaking Plan can be adopted as sound in (say) mid 2017, will the B&NES Local Plan be the determinant of planning applications and crucially appeals in the interim period until end 2018 before the adoption of the JSP and reviewed Core Strategy? In particular, will the housing requirement in the emerging JSP be a material consideration for speculative planning applications in the area or will the existing Local Plan be defensible?

Bath HMA and duty to cooperate

13. Given the agreement at the previous Core Strategy hearings (and the implicit acceptance in the emerging JSP) that Bath HMA is a separate HMA from greater Bristol, we think it would be judicious for the programme to include explicitly a timetable and openness about the process underlying the duty to cooperate, particularly in relation to West Wiltshire. The existing Local Plan and JSP documents together with the B&NES SHLAA recognise the very real environmental constraints upon Bath and therefore if the housing requirement were to increase considerably for Bath HMA during the JSP process it is almost inevitable that B&NES might have to look to Wiltshire to share part of its housing requirement (particularly in relation to affordable housing). We have argued elsewhere that B&NES should work harder to achieve its own desired policy outcomes in relation to affordable housing on individual sites. However the duty to cooperate should be openly timetabled and a consultation process delineated.

Specific observations on the Core Strategy review

14. In addition to student housing and viability, there are Bath-specific issues which materially affect the ability of the local authority to deal with housing need. These are holiday lets, Airbnb-style party lettings, and the promotion of new homes to second homers or non-resident investors (an explicit advertising strategy of Crest Nicholson in relation to Western Riverside).

Party houses/Airbnb

15. The Federation of Bath Residents' Associations (FOBRA) estimates that 500 bedspaces in central Bath are let out as whole house holiday/party lets from houses of 10+beds or more alone. We note that the City of Westminster has recently introduced a licensing system for Air B&B lettings which prevents whole house lettings for more than 90 days a year, together with a mandatory fine of £20,000. While the details of such a system may not be a matter for the Core Strategy, we believe that a specific policy on holiday lettings should be included, partly to discourage the purchase of new-build properties for this purpose. At the very least the number of bed spaces offered in this way should be researched as part of the evidence base when reviewing the provision of hotel bed spaces in policy B1, and a policy framework introduced to make clear whether the Council actively encourages or discourages this usage through planning policy.

Second homes

16. The recent case in St Ives <http://www.planningresource.co.uk/article/1415206/highcourt-backs-st-ives-neighbourhood-plan-second-homes-ban> whereby a ban on second homes was upheld in the High Court would also be worth examination by B&NES. In a city where land availability is highly restricted and housing need is high it would make sense for planning policy to set some determinants about the potential ownership models for new build housing developments. This might also depress land values which is usually the key driver for claims of viability problems.

Further Information available within the original representation: No

ID: 236 / 1 Name: Organisation: North Somerset Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Core Strategy Review as a title

We understand the reasoning for calling the document the Core Strategy Review is for consistency as the public and members are familiar with this terminology. However, in the longer terms this could be misleading for a number of reasons:

- The Core Strategy previously set the strategic context in terms of housing numbers - that is now the role of the JSP.
- The timeframe covered by the document is beyond the original Core Strategy so calling it Core Strategy could be confusing.
- NPPF refers to Local Plans.
- Paragraph 9 of the Commencement Document states that the CS review provides the opportunity to combine the two DPD's (Core Strategy and Placemaking Plan) into one DPD – a Local Plan.

In terms of moving forward to a new plan period it may be more helpful for the document to be called BANES Local Plan 2016-2036.

Comments on the proposed programme for the preparation of the Core Strategy review

Timetable

The dates in the diagram on page 6 are wrong as it states 2017 on the fourth and fifth sections on the timeline, where I think it should say 2018.

The dates in the Commencement document don't match those in the LDS. The Commencement document timetables the hearings for Winter 2018 and the LDS timetables the hearings for June 2018.

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 262 / 1 Name: Mr Justin Milward

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

"It is important that the existing 'Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape' policies are robustly reviewed. Whilst the current Core Strategy contains good policies supporting woodland creation for green infrastructure (eg policies B1 and CP7), it does not provide adequate protection for ancient woodland and ancient trees. We would therefore like to see trees and woods highlighted as a critical element of the new Core Strategy with a specific dedicated Trees & Woodland Policy supporting their protection, enhancement and further creation, backed up by a commitment to develop a Trees and Woodland Strategy Supplementary Planning Document. Please see our website for guidance on this - <https://www.woodlandtrust.org.uk/publications/2016/07/tree-strategies/>. We believe that having a comprehensive up-to-date Trees & Woodland Strategy in place is absolutely key to Local Authorities being able to maximise the wide benefits that trees and woods can deliver for local communities."

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 270 / 1 Name:

Organisation: Blue Cedar Homes

Agent: 36 D2 Planning

Comments on the proposed scope and content of the Core Strategy Review

Under Paragraph 181 of the NPPF, Local Authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their local plans are submitted for examination.

The Core Strategy review would need to cooperate with its neighbouring authorities to ensure that all housing and other needs are addressed. There are a number of neighbouring authorities to the B&NES and they are all at varying stages of their Plan making process. Under Paragraphs 17, 157 and 178 of the NPPF neighbouring authorities should work jointly together and co-operate to address planning issues which cross administrative boundaries or on matters that are larger than local issues.

The proposed scope of the Core Strategy review states that it is being undertaken in the context of the JSP and that 'there has been and continues to be significant joint working and co-operation in preparing the JSP'. The Objectors' have made representations to the JSP consultation and we believe that the overall housing provision in the JSP is too low and should be increased by at least 15,000 dwellings to ensure that the OAN for market and affordable housing is met. Accordingly, we believe that the JSP should deliver up to 120,000 net additional new homes in the period up to 2036.

Clearly the Core Strategy review will have to address the JSP revised housing requirement and it is likely that this will result in additional housing site being required in B&NES. A significant part of the JSP is to ensure that future housing needs are met but the plan seeks to do this by identifying a number of strategic sites. In such circumstances, and a suitable strategy to identify other sources of housing land to meet identified development needs, we believe that a series of non-strategic sites should also be identified within both the Core Strategy review and the JSP rather than leave their identification to preparation of a later plan which will take a number of years to prepare. This will ensure that housing needs are met in a shorter timescale

Paragraph 21 of the Commencement Document states that there will be a 'review of the expansion objectives of the Universities and the relationship between student accommodation and overall housing requirement' However, it is noted with regards to student accommodation that no account has been taken in the housing provision of any potential uplift on student partners during the JSP period. The various universities in the JSP area have plans to expand and increase student numbers. Accordingly, if the FOAN is to be calculated then the future student population must also be factored into the FOAN.

Furthermore, the South Somerset Strategic Market Assessment (SHMA) has just been published which shows a significant increase in housing needs in the area covering the local authorities Mendip, Sedgemoor, South Somerset and Taunton Deane. Mendip is one of B&NES's neighbouring authorities and the SHMA has identified a Full Objectively Assessed Housing Need of 12,948 dwellings 2014-2039 which will require Mendip to deliver additional housing. It is not yet known whether B&NES would be expected to accept any unmet housing needs of Mendip; however under the Duty

to Co-Operate B&NEs would be expected to provide robust evidence to demonstrate that meeting the needs of Mendip would be inconsistent with the policies set out in the NPPF, for example policies on Green Belt, or other environmental constraints.

This will have to be taken in to account in order to ensure the Core Strategy review can fulfil the Duty to Co-Operate.

Comments on the proposed programme for the preparation of the Core Strategy review

The proposed programme for the Core Strategy review is set out on Page 6 of the document. This demonstrates how the Core Strategy review would relate to the preparation of the JSP. The only comment we would make with regards to the programme is that the planned programme for the JSP appears to be overly optimistic given the level of interest that this plan will attract from local residents, Officers and Councillors.

A similar 'joint' plan currently going through the system is the Gloucester, Cheltenham and Tewksbury Joint Core Strategy (JCS). The timetable for this Plan was as follows:-

- Issues and Key Questions Public Consultation November 2009 - February 2010
- JCS Part 1 Public Consultation June - August 2010
- Preferred Option Public Consultation December 2011 - February 2012
- Draft Joint Core Strategy Public Consultation October-December 2013
- Pre-Submission Publication June - August 2014
- Submission to the Planning Inspectorate November 2014

As part of the Examination in Public of the JCS, there has been three stages of hearings between May 2015 and April 2016. The Inspector in her Interim Report of 26th May 2016 stated:-

"The Examination of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) has proved to be complex and controversial and has attracted considerable public participation and suggestions for amendments throughout."

The JCS is still not adopted. The JCS authorities are currently in the process of considering the modifications necessary to the JCS following the Inspectors report and this decision will require agreement across all three JCS Authorities.

It is considered the above example demonstrates how complex a process the JSP will be. There will need to be agreement to the JSP by all 4 of the Councils it covers: - B&NES, Bristol City, North Somerset and South Gloucestershire. This will undoubtedly be a timely and challenging process.

Therefore, in view of the above, the current programme for the JSP which only allows just over 2 years from draft proposals to an adopted Plan is unrealistic. Clearly, if there is a delay with the JSP programme, this will have a knock on effect on the preparation and programme of the Core Strategy review.

Specific observations on the Core Strategy review

In our response to Question 1, we believe that a series of non-strategic sites should be identified within both the Core Strategy review and the JSP rather than leave their identification to preparation of a later plan which will take a number of years to prepare. This will ensure that housing needs are met in a shorter timescale.

Blue Cedar Homes Limited control land off Church Lane, East Harptree, which they believe is ideally placed to help accommodate part of the future housing need for the area (see attached plan).

We believe that the objector's site is suitable for residential development for the following reasons: -

- i. The site is available and deliverable being in the control of a retirement homes developer.
- ii. The site lies within the defined housing development limits of East Harptree in the adopted Local Plan. Such policies are permissive towards residential development in such areas.

A full Landscape and Visual Impact Assessment (LVIA) was prepared to support a planning application on the site. The viewpoints within that assessment were agreed with the Council in advance. No criticism was made of the methodology taken in the production of the LVIA and in a number of respects the Council references the findings of the LVIA in the Delegated Report to support its rationale for not objecting to the proposals on the grounds of AONB impacts.

It is noted in the LVIA that the Landscape and Visual Impact Assessment deals with the separate but interlinked issues of: -

- Landscape Character: The effects of the development upon discrete character areas and/or character types

comprising features possessing a particular quality of merit; and

- Visual Context: The effects of the development on views from visual receptors and upon the amenity value of the views.

The Council had no objection in respect of visual impacts arising from the development, the refusal relates to the character and appearance of the appeal site and its contributions to the character of the settlement.

The LVIA concluded that minor, adverse landscape effects would occur in respect of the public right of way crossing the site. This is because the development would cause permanent alteration to the context of a key feature in the landscape. However, the changed context is not uncharacteristic of the surrounding landscape and is not considered to be a significant issue.

The Council's officers agreed with the conclusion that there would be negligible impacts on the AONB. The officers also agreed that from public viewpoints, approaching the settlement, the development would be contained within the confines of the existing settlement and would be seen in the context of the existing buildings in the village. Clearly the Council's objection relates to localized impact on the character and views associated with the site.

The site is not specifically designated as an important open space, reference is made to a general policy within the adopted Local Plan but this may apply to any area of open land within the District. The Council has not undertaken a criterion based assessment of the appeal site to determine what contribution the site makes to the settlement. The reference to the NPPF Local Green Space designation in the delegated report is not relevant as no such designation is currently being progressed by the Council.

In terms of the landscape character, the Council seeks to expand the site's role within the settlement and suggest, without any specific analysis, that the site defines the rural character of East Harptree. This is not the case, it is an undeveloped and open area of remnant field with no physical connection with the wider countryside. The location of the site, its containment within the settlement and proximity to Ashwood means that it does not have a distinctly rural character or exert an influence over the wider settlement.

In fact East Harptree is considered to be rural in character following new development at Ashwood which illustrates development within the village does not undermine the character.

The rural character of the site is defined by its immediate landscape context which is described in the LVIA section 3.

In terms of the contribution the site makes to the character of the settlement, reliance is placed on views from Church Lane. Interestingly the Council's officers erroneously describe important views from Church Lane (across the site) towards the Chew Valley Reservoirs and suggest they will be lost as a result of the development. In fact there is only one viewpoint from within the site (on the public right of way) which allows views out towards the reservoirs. Such views will not be lost as a result of the development.

Views of the site are extremely limited and localized. From Church Lane the development will be visible from 100m of the land with development always seen in the context of the existing development. No views out of the settlement will be lost. There are no other views identified by the Council as being affected and in need of consideration in the planning balance.

In the context that the NPPF supports sustainable development it is important that those issues which are weighted against the scheme must be significant and demonstrably outweigh the planning balance. In respect of the landscape and visual balance, the site does not have a significant role in defining the character of the settlement. Only one view is noted as being important in contributing to the character of the settlement and this is not lost by the proposed development.

There are no landscape objections to the allocation of the site.

There are no technical objections to the development of the site, access can be achieved to the requisite standards. The site lies within Flood Zone 1 where residential development is acceptable. Adequate provision can be made for surface water and foul drainage.

There are no ecological objections to the development of the site. A Phase 1 Habitat Survey has been carried out. It

demonstrates that any development could make adequate ecological mitigation to compensate for any habitat lost through tree and hedgerow removal.

In view of the above, the site is not only suitable but also available and deliverable within the Plan period and should be allocated for residential development

Further Information available within the original representation: Yes

ID: 274 / 1 Name:

Organisation: Sport England

Agent:

Comments on the proposed scope and content of the Core Strategy Review

In response to all three questions above, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport. The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. As such, Sport England wishes to see local planning policies that seek to protect, enhance and provide for sports facilities based on robust and up-to-date assessments of need in accordance with paragraphs 73 and 74 of the NPPF.

Sound policy can only be developed in the context of objectively assessed needs, in turn used to inform the development of a strategy for sport and recreation. Policies which protect, enhance and provide for sports facilities should reflect this work, and be the basis for consistent application through development management. Sport England is not overly prescriptive on the precise form and wording of policies, but advises that a stronger plan will result from attention to taking a clearly justified and positive approach to planning for sport. In this way, planning authorities will be able to demonstrate that their plan has been positively prepared (based on objectively assessed needs in accordance with paragraph 73 of the NPPF), is consistent with national policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a local plan or other policy document could be considered 'unsound'.

For more information on how to forward planning for sport please see: Sport England's Planning for Sport Forward Planning Guidance - <http://www.sportengland.org/media/351266/planning-for-sport-forward-planning-guide-july-2014-.pdf>

Evidence Base

For the local plan area, the evidence base for sport and recreation is currently incomplete and not adopted.

The Playing Pitch Strategy remains 'emerging' after slow progress. It needs to be completed and signed off by the Steering Group and adopted by the Council.

We are also working with the Council on the production of a Built (sports) Facilities Strategy. It will need to address displaced user requirements. This work is currently 'draft'. The emerging work is not ANOG compliant, it has followed guidance published by Sport England <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>. We would strongly recommend that B&NES use ANOG next time (by June 2018) in order to produce a LA wide assessment and develop a subsequent area wide strategy from.

The completion of this evidence base work is imperative to meet local community and recreational needs and future needs to underpin Local Plan policy and inform new provision to be secured by planning obligations and the Community Infrastructure Levy.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Active Design

Sport England along with Public Health England have recently launched our revised guidance 'Active Design' which we

consider has considerable synergy the Plan. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to www.sportengland.org/activedesign. Sport England believes that being active should be an intrinsic part of everyone's life pattern.

- The guidance is aimed at planners, urban designers, developers and health professionals.
- The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives.
- The guidance builds on the original Active Designs objectives of Improving Accessibility, Enhancing Amenity and Increasing Awareness (the '3A's'), and sets out the Ten Principles of Active Design.
- Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles.
- The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments.
- The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

The developer's checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign

Sport England would encourage development in Bath and NE Somerset be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.

MODEL POLICY FOR ACTIVE DESIGN

A suggested model policy for Local Plans and Neighbourhood Plans is set out below:

- Supporting Text to the Policy is included within the Active Design guidance.

Further Information available within the original representation: Yes

ID: 279 / 1 Name: Rohan Torkildsen

Organisation: Historic England

Agent:

Comments on the proposed scope and content of the Core Strategy Review

I have scanned the document and note the focussed scope of the review which is heedful of the parallel sub regional planning underway. Effective transport planning will need to be carefully managed.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 281 / 1 Name: Charles Routh

Organisation: Natural England

Agent:

Comments on the proposed scope and content of the Core Strategy Review

There are two areas which where it may be appropriate to modify the scope of the review, or otherwise ensure these matters are considered.

1. As part of our engagement with the local planning authorities involved with the JSP, we are working to develop a strategic approach to ensuring development enhances rather than diminishes the natural capital of the area. Whilst the place-making plan has a number of policy hooks for this, we think it would be valuable to review how this work might be fully embedded into the Local Plan.

2. Secondly (and potentially related to the point above), as set out in Planning Practice Guidance, you should be

monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). It would be helpful to clarify whether this is happening, and if not how this might be addressed as part of the review. We note that the placemaking plan says: "The monitoring framework will be added to in the future as the range and number of indicators will increase as additional policies are prepared and adopted in other Local Development Documents."

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 301 / 1 Name: Organisation: South West Harp Planning Consortium
Agent: 43 Tetlow King

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

The above comments are intended to be constructive. We would like to be consulted on further stages of the Core Strategy Review and other publications by Bath and North East Somerset Council, by email only to consultation@tetlow-king.co.uk. Please ensure that the South West HARP Planning Consortium is retained on the LDF database, with Tetlow King Planning listed as their agents.

Further Information available within the original representation: No

ID: 304 / 1 Name: Organisation: University of Bath
Agent: 44 Mark Rose Define

Comments on the proposed scope and content of the Core Strategy Review

I write on behalf of my client the University of Bath in respect of the above consultation. The University very much welcome the Council's decision to prepare the Core Strategy Review as there is an urgent need to establish an appropriate strategic planning policy context that facilitates the further sustainable growth and development of the University.

Question 1 : Proposed Scope and Content of the Core Strategy Review

The Council's current development spatial strategy as set out in the PlaceMaking Plan is to seek to direct all University related development to the campus, and actively resist development elsewhere in the City. The soundness of that approach was discussed at the examination and the Inspector's final conclusions are awaited. However, Mrs Sheratt did set out some "Interim Findings" in relation to the proposed changes to the Core Strategy policies; highlighting that as the PMP was not intended to be a (partial) review of the Core Strategy, then only very limited changes could be made in order to maintain consistency between the two documents when read together. Notably in terms of the University, she acknowledged (para 20) that the future development needs of the Universities have changed, and concluded (para 23) that the Council should reconsider its approach to the changing circumstances in a future review of the Core Strategy.

The University, which employs over 3,000 people and has circa 16,000 students, is a major driver of social opportunity and economic growth in the City and District, and in that context the extant Core Strategy, notably Policies B1 and B5, seek to provide policy support for its continued growth and development. However, the specific terms of Policy B5 are now substantially out of date. It refers to the provision of additional teaching and research space and student bed spaces on the campus, but as the discussions at the recent PMP Examination highlighted, the development figures presented in the policy were first identified nearly 15 years ago, and only ever sought to provide for the development required in the period to 2020. Of great concern to the University is the very limited "headroom" left in relation to academic and research related development.

The Council's proposed modifications to the PMP as currently drafted acknowledge that these figures are not considered by the Council to be a "cap" to development subject to a further masterplanning study of the campus. That recognition is welcomed by the University as there are significant projects that must be brought forward prior to the likely adoption of the Core Strategy Review at the end of 2018.

However, whilst the PMP included the preparation of a Development Framework for the campus (embedded into Policy SB19), there was no attempt to reconcile the University's longer term development needs with the capacity of the campus to accommodate further development. Despite that, it is apparent that the capacity of the campus is relatively limited, significantly constrained, and ultimately finite. In that context the University consistently expressed the view through the Examination of the PMP, that priority should be given to academic and research development on the campus, and that student bed space accommodation should be provided elsewhere in the city. The University maintain that position.

Notwithstanding that, however, the Council's current strategy to confine all University related development to the campus is clearly not sustainable in the long term. Inevitably, it will hinder the University's ability to respond to the Government's Higher Education policy and priorities, ensure its long term sustainability, and maintain its national and internationally recognised standing. It will also limit its wider social and economic development role within the City and District, in terms of support for company formation and business growth, the provision of a skilled workforce, and as the second largest employer in the city.

It is essential therefore, that the Core Strategy Review proactively addresses these issues as a priority. However, the Core Strategy Review Commencement Document makes very little reference to University related issues. In the section that sets out the scope of the Core Strategy Review, Matter (e) refers to the university expansion objectives and the implications for the housing market; and the schedule of the evidence base required only refers to student accommodation requirements. There is no reference at all the University's other development requirements or addressing the related campus capacity issues that were highlighted through the PMP Examination process. Indeed, it is of significant concern that Policy B5 is not included under paragraph 10 as a key policy that needs to be reviewed in this process.

Furthermore, the Commencement Document suggests that the PMP will be rolled into with the Core Strategy Review without substantial change in order to provide a single Local Plan. That suggests that despite the acute capacity issues at the Campus, the Council do not expect that Policy SB19, which includes the Sulis Club as part of the Green Belt, will need to be reconsidered. There is, however, no policy framework in the PMP guiding development needs once the capacity of the campus has been developed out.

It is clear that the Council has retained a very narrow focus of what the key University related planning issues are (i.e. the impact on the local housing market even though it is understood that the student residence requirements form part of the overall OAN identified in the latest SHMA dated June 2016). That cannot remain the case through the Core Strategy Review. The review must consider what the University's academic, research and ancillary development and related infrastructure requirements are across the plan period, and what the relative capacity of the campus and wider city to accommodate those development requirements is. A sustainable strategy to ensure that the identified development needs are provided for is required, and that will need to be realised through changes to both Core Strategy Policy B5 and PMP Policy SB19.

In that regard, given the limited and finite development capacity at the Campus, the University is currently exploring the case for the Sulis Club site to be taken out of the Green Belt to help satisfy its expansion needs. The University's plans are yet to be developed and will flow out of the Masterplanning Study of the campus and is now being undertaken in light of the change to the PMP following its Examination (as referred to above). The role of the Sulis Club in providing additional capacity to meet the University' identified development needs and its current Green Belt designation will clearly be a key matters for the Core Strategy Review.

The Council should also be aware that the University have had discussions with Wessex Water in relation to their plans for their adjoining land, and the University sees such a development as complementing its objectives for the Sulis Club. That is particularly as the University's potential employees report that the supply of housing locally is inadequate and expensive. Indeed, the provision of sufficient housing in the city, supported by an appropriate transport network, should also be addressed as a priority in the Core Strategy Review. The University have also made submissions to thee West of England Joint Spatial Plan in that regard.

Comments on the proposed programme for the preparation of the Core Strategy review

The matters highlighted above are critical to the University's on-going operations and long term strategic planning, and therefore, the University would like to see the Core Strategy Review progress with momentum to adoption.

The Core Strategy Review should play a critical role in supporting the University's continued success through the provision of a positive planning policy context that facilitates its sustainable growth and development in the long term to the benefit of the City and wider area. However, to do so it must address the key matters highlighted above. The University would, therefore, very much welcome an open discussion with the Council in respect of the development of the Core Strategy policies in that regard.

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 322 / 1 Name:

Organisation: Bath Spa University

Agent: 281

CBRE

Comments on the proposed scope and content of the Core Strategy Review

CBRE is instructed on behalf of Bath Spa University ('BSU') to submit representations to the Bath & North East Somerset ('B&NES') Core Strategy Review Commencement Document. This document is available for comment alongside the Joint Spatial Plan ('JSP') prepared by the four West of England Planning Authorities (Bristol, North Somerset, South Gloucestershire and B&NES). These representations are submitted alongside those submitted by BSU to the JSP, a copy of which has been appended to this letter.

BACKGROUND Current Context

BSU is a key stakeholder in Bath and the region, making a positive contribution both economically and socially to the city. BSU welcomes the opportunity to work proactively with B&NES at an early stage of the plan making and review process to establish a comprehensive approach to BSU's estate strategy and space requirements in light of the competing land interests within the city. This is in line with paragraph 155 of the NPPF which states that, "a wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agree priorities for the sustainable development of the area."

BSU has engaged with B&NES on their general estate strategy and most recently on the production of the Placemaking Plan, to ensure the University's growth aspirations are considered alongside other competing growth aspirations and land uses in the city. Following the Placemaking Plan Examination, the Inspector concluded in her Interim Report that the needs of the Universities (BSU and the University of Bath) cannot be considered in isolation of the wider housing requirement for B&NES, and therefore suggested that B&NES reconsider the approach to the changing circumstances of the Universities, deferring considerations of how those requirements should or should not be addressed to the forthcoming review (paragraph 23 of the Inspector's Interim Report). Once published, BSU will engage further with B&NES on the Main Modifications to the Placemaking Plan.

The current Commencement Document provides the opportune moment to engage with B&NES on BSU's changing circumstances to ensure they are recognised in the emerging framework and in accordance with the instructions of the Inspector to the Placemaking Plan.

Bath Spa University

BSU is a leading University in the South West, recognised for its teaching and research excellence. It offers a range of pre-degree, undergraduate and postgraduate degree programmes, focused primarily on arts and humanities subjects. In 2015, BSU celebrated 10 years since gaining full university status, with its history in the city dating back over 160 years.

The University currently has a core of c. 7,750 students within Bath and its surrounding areas, across its five areas of study. Supporting this academic base are 770 full time equivalent employees (FTE) in teaching and supporting functions.

For the 2015/16 academic year alone, employee numbers have increased by c.50 FTEs. The University also has strong links and partnerships with surrounding businesses, communities and schools. In addition to providing a highly skilled workforce, it is a source of entrepreneurialism and indirect benefits through its multiplier effects.

The University's main campus at Newton Park provides over two thirds of the University's estate. This is the main campus for undergraduate courses. It is located within the Green Belt on land leased from the Duchy of Cornwall and is set around a Grade I Listed Country House set in Capability Brown designed landscaped gardens. The University has recently undertaken significant investment in the site consistent with a comprehensive Masterplan for the campus. This has been delivered in two phases; Phase 1 (10/04747/FUL) provided c. 8,500 sqm of new academic space and Phase 2 (12/02141/EFUL) delivered 561 bed spaces to the south of the campus. This Masterplan was developed between, inter alia, BSU, B&NES, English Heritage and the Duchy of Cornwall. The University also has two small campuses, one at Sion Hill and one at Corsham Court in addition to operating from a number of smaller sites for specific purposes. The University has also recently acquired the Herman Miller Building in Locksbrook Road as the new location for the School of Art and Design. Alongside this academic floorspace, the University provides 1,376 places for student accommodation which are University owned, with an additional 888 bed spaces from external providers.

From a national perspective, the Higher Education sector continues to change, with the lifting of the undergraduate student admission 'cap' from 2015, allowing universities to admit as many Home and EU students as they wish. BSU aspires to grow its current home, EU and international students from the c.7,750 to c.10,800 by 2020 with targeted and sensible investment. This represents between a 4% and 10% growth rate per year. This growth will probably only be achieved if BSU is able to acquire additional academic teaching space and be able to offer student housing to all first year students.

The market remains volatile while the impacts of several factors unfold such as increased competition, Brexit and continued and increasing limitations on international recruitment. Despite these impacts, BSU remains confident it will continue to remain attractive into the future. While it is very difficult to predict long term growth, BSU believes that beyond 2020 the growth in student numbers could be c. 1,200 by 2030 and a further 1,000 by 2040 to reach a population approaching 13,000 at that time. To ensure consistency, BSU would like to work with B&NES to make sure that the figures which form the Student Numbers and Accommodation Requirements in Bath evidence base document are up to date and correct in light of current recruitment trends.

To accommodate the growth aspirations of BSU, additional academic floorspace and student bedspaces need to be provided. It should be noted that BSU prefers to accommodate its growth through purpose built student accommodation either on-campus or off-campus to ensure better quality and management for the benefit of its students and the surrounding communities. In addition, approximately 44% of students; live with their parents, own their own home or rent outside of the city. Competing universities are increasingly concerned for health, safety and welfare of students and are moving towards the provision of student accommodation for three years' study rather than the traditional first year of study only – an aim impossible to meet on BSU's current estate holdings. Providing more accommodation in turn will also reduce the pressure on market housing and HMOs.

Assuming that 56% of students (circa 5,900 students of the above 10,800) will continue to require accommodation, some 3,645 bed spaces will be required in 2020-2021 (assuming BSU's provision of 2,264 does not increase). Of the 3,645, c. 1,100 will be to accommodate the growth in student numbers, the balance reflecting the existing shortfall. This total need will increase further if the percentage of students requiring accommodation were to increase to between 60-70%¹. In consultation with students, it is understood that this may be likely. Planning to meet these needs in a managed way through the development plan process is BSU's preferred approach.

In summary, in the short term (2016-2021) BSU requires 3,645 bed spaces but taking account of recent acquisitions, and dependent on current plans does not need additional academic floorspace in the short term. However, in the long term to 2040, BSU could require between 12,000 and 15,000 sqm of academic floorspace, which could increase further if current planned acquisitions do not come forward.

Medium and long term growth is difficult to forecast; however it is expected that the University will grow by a further 21% cumulatively; 10% to 2030 and a further 10% to 2040. There is also the possibility that external student accommodation providers may not continue to provide accommodation beyond 2030 which will put further pressure on the University to deliver their own accommodation. Furthermore, should the demand increase to 60%, by 2040 the

shortfall in bedspaces could be as high as 6,400.

The Core Strategy Review provides the ideal opportunity to ensure that the evidence base is correct and assurance that the short/medium and long term aspirations of BSU will be fully considered. This is given the context that future University growth at Newton Park is restrained under the existing policy framework and leasehold arrangements, meaning the University will need to look for alternative sites to meet these needs.

REPRESENTATIONS Scope of representations

In light of the above context and growth requirements, BSU wishes to comment on the proposed scope and content of the Core Strategy Review, responding to questions 1, 2 and 3 that are posed by B&NES in the Commencement Document.

Approach of the Core Strategy Review Commencement Document to accommodating University growth

Paragraph 10 of the Core Strategy Review Commencement Document states that the review process will result in a range of adopted Core Strategy policies being revised and new policies being included. In light of the Inspector's Interim Statement on the Placemaking Plan on the need to defer consideration of the universities until the plan review, we consider that Policy B5 (Bath's Universities) should be included in the policies that will need to be updated through the Core Strategy Review to ensure that the policy reflects the updated growth aspirations of BSU and the University of Bath. Policy B5 currently restricts growth outside of the campus limits. This is unnecessarily restrictive in the context of the above need as the existing campus at Newton Park is unable to meet future growth aspirations that are necessary to facilitate the University's continued contribution to the economy of Bath. In addition, the fragmented estate beyond Newton Park is proving to be impractical for a modern expanding university.

The Commencement Document also sets out that a review of the expansion objectives of the Universities and the relationship between student accommodation requirements/supply and the overall housing requirement will be undertaken. In the context of the Inspector's Interim Statement, requiring the changing circumstances to be considered as part of the Local Plan Review, we are supportive of this approach to reviewing the needs of the universities in the context of the wider housing requirement. The draft Strategic Housing Market Assessment, published for the B&NES Special Cabinet Meeting in October 2016 sets out how the Objectively Assessed Need (OAN) for Housing has been calculated for the West of England Housing Area. This explicitly considers particular types of housing need such as the need for housing for the elderly, but it is not clear if OAN considers student need. With regards to student housing need, Paragraph 38 of Planning Practice Guidance (PPG) states that:
 "student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting"

Paragraph 21 of the PPG states that:

"Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus ... Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation. Plan makers should engage with universities and other higher educational establishments to better understand their student accommodation requirements."

The existing planning policy framework was produced on the assumption that the University of Bath would experience either 1% or 3% growth for part of the period, with BSU assuming no future growth in overall students. The growth requirement for BSU has changed and it is important that these needs be considered holistically alongside other uses and housing requirements as part of the current plan process. Without fully considering the need of the Universities alongside the needs of the population and other growth objectives, the Core Strategy Review is unlikely to meet the 'positively prepared' test set out at Paragraph 182 of the National Planning Policy Framework ('NPPF') or address the comments of the Inspector to the Placemaking Plan that student housing needs should be considered as part of the Core Strategy Review.

Long term growth

It is clear from the Placemaking Plan Examination Hearings that there are a number of competing land uses within Bath and that these have to be delivered within a city constrained by both heritage and environmental factors.

The JSP prepared by the West of England Planning Authorities, requires 105,200 dwellings to be delivered in the region up until 2036 of which 12,800 are identified as B&NES requirement. The Core Strategy Review will be prepared in the context of the NPPF, where sustainable development is seen as the golden thread running through plan-making. In plan-making, the focus of sustainable development means that local authorities should positively seek opportunities to meet the development needs of their area unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole. Sustainable development has three dimensions; economic, social and environmental. Part of the scope for the Core Strategy Review is establishing a strategy for identifying any other sources of housing/employment land supply not identified in the JSP to meet identified development needs. The JSP notes that 'due to significant environmental constraints, there is no scope to further expand Bath outwards' and that 'it is not possible to sustainably accommodate the identified growth needs entirely outside the Green Belt'.

We believe that the Core Strategy Review should consider other sustainable methods of achieving housing need whilst accommodating the Universities aspirations for growth within both a constrained environment and within the plan period; given that this growth will result in physical need in the latter stages of the plan's lifespan. To address the issues that could face B&NES, the University has committed to rethinking the conventional campus approach and would welcome early engagement with B&NES to discuss the idea of a new community on the edge of Bath within the land ownership of the Duchy of Cornwall. This community would provide a mix of uses, including housing for students and residents alongside commercial floorspace to promote economic growth within the city. This concept will help to reduce the pressure on delivering accommodation in the centre of the City and alleviate the pressure on the change of existing dwellings to HMOs. It will also help to address the concerns of many residents who are worried about the high concentration of students that has occurred in some areas of the city.

The concept is still in development and BSU would welcome discussions and engagement with B&NES to bring it forward as a solution to Bath's competing land interests as well as a way to accommodate the University's growth aspirations.

SUMMARY

BSU is seeking to ensure that the needs of the University with regards to academic floorspace and student accommodation are considered holistically in the context of other competing land uses as the strategic policy framework is reviewed. The University looks forward to working collaboratively with B&NES and the Duchy of Cornwall in providing a solution to this issue. However, in the first instance it is important to ensure that the evidence base is correct and B&NES is fully aware of BSU's potential growth.

I trust that these representations are helpful in the context of the Core Strategy Review Commencement Document and that they will be considered during the Local Plan Review Process. We look forward to working with B&NES to establish the best way forward.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: Yes

ID: 384 / 1 Name:

Organisation: Wiltshire Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

The only potential omission is in relation to the criteria listed in paragraph 17 of the consultation document. It is worth

highlighting that it may not be just site allocations and infrastructure that can have cross boundary implications. For example, measures to address "Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape" (para 15), such as BANES previous proposal to restrict non-local HGVs from using the A36 through Bath because of air quality issues, can also have cross boundary implications. Therefore, in para 17, either bullet point e) needs to be amended or a separate bullet point added to reflect the fact that some policy decisions/measures (in addition to those generated by the HRA process e.g. air quality action planning, noise planning, etc) can also have cross boundary implications which should be subject to consideration under the duty to co-operate.

Comments on the proposed programme for the preparation of the Core Strategy review

The timetable for the review of the Core Strategy, with submission being timed to take place after the Inspector's report on the WoE JSP, seems sensible (although it is assumed that the timings for the JSP hearings and receipt of Inspector's report are to take place in mid-autumn 2018 rather than 2017?). This will allow any relevant modifications to the JSP to be taken into account in the Core Strategy submission documents.

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 828 / 1 Name:

Organisation: Deeley Freed Estates

Agent: 304

Cushman and Wakefield

Comments on the proposed scope and content of the Core Strategy Review

DFE, through its associated companies, are active in the B&NES area and currently involved in several high-profile projects in the City of Bath. This includes the firm's current mixed-use development at Sawclose and the planned regeneration of the Roseberry Place site, within the Bath City Riverside Enterprise Area, that will commence in early-2017.

DFE welcomes the opportunity to comment at this early stage in the Core Strategy Review process and it is hoped that the firm's general comments are helpful.

Overall, DFE consider that the Commencement Document provides a clear basis for understanding the intended content, scope and programme for the Core Strategy Review. The document is commended on this basis.

In terms of the intended scope of the Core Strategy Review, this is broadly as DFE would expect, particularly having regard to dovetailing the emerging strategic planning context to be set out in the Joint Spatial Plan being prepared by the West of England authorities.

Comments on the proposed programme for the preparation of the Core Strategy review

In terms of the indicated process and programme for undertaking the Core Strategy Review, DFE considers that this is sound.

Specific observations on the Core Strategy review

DFE wish to make the following general comments on the overall approach to the review of the Core Strategy:

In establishing a strategy for accommodating housing and employment needs (including affordable housing and specialist forms of housing such as student accommodation), it will be important for the Council's approach, and individual policies, to exhibit sufficient flexibility. This is especially so in the City of Bath where there is an acknowledged shortage of development land and changing demands for its use over time. Policies, including formal site allocations, need to be responsive to these changes and not be overly prescriptive in terms of the range and quanta of development required at particular sites or within specific policy areas. This will give landowners, developers, and investors the opportunity to react to prevailing market opportunities and demands with resulting social and economic benefits being realised. It will allow sites to come forward promptly and reduce the potential for stalling due to lack of viability or market interest. For example:

- Student Accommodation: the economic benefits of supporting the accommodation needs and growth of the City's two universities should not be overlooked in the emerging development strategy. Furthermore, the provision of new

purpose-built student accommodation reduces the pressure on established residential areas that have suffered from the negative effects of high numbers of HMOs. Student accommodation development often represents a suitable and sustainable redevelopment option in cases where mainstream housing and traditional employment uses are unattractive or unviable. The Council's approach to student accommodation should offer greater flexibility to allow prevailing demands to be met;

- Affordable Housing: new approaches to housing delivery, particularly the growing popularity of build-to-rent, mean that the Council's approach to affordable housing needs to be responsive to different housing models and associated viability considerations (eg. lower immediate returns on investment with rental models); and

- Employment: the B&NES economy benefits from a wide range of employment-generating uses falling outside the 'B' Use Classes. This includes jobs relating to specialist forms of housing, retail and leisure developments. As the B&NES economy continues to evolve, it will be important to ensure that policies can be applied flexibly to accommodate non-B Class employment activities and other uses with economic benefits. In line with prevailing national planning advice, traditional employment sites should only be safeguarded where there is significant and compelling evidence to justify protection of the land for B-Class uses.

DFE encourages the Council to adopt a flexible development strategy going forward, where policies provide the basis for delivering sustainable development in changing market conditions and demands.

Further Information available within the original representation: No

ID: 1338 / 1 Name: Organisation: Midsomer Norton Town Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

From the Midsomer Norton Town Council perspective, we would seek assurance that the acceptance of the housing/employment imbalance locally will not be reversed in any housing review. This is already based on comments made in the emerging PMP and in relation to the rationale behind the selected JSP housing allocation sites. We trust, however, that we will not be excluded from infrastructure and transport need assessment and regeneration investment expected within the adopted Core Strategy 2014.

Agree with general approach

Comments on the proposed programme for the preparation of the Core Strategy review

Support the joining-up with the emerging Joint Spatial Plan and Transport Plans and the Placemaking Plan.

Specific observations on the Core Strategy review

We trust that the promised support from B&NES Council in para 21 will be forthcoming should an update of the Parish's NDP - on which there has already been significant work by volunteers – be required as part of the new local plan process.

The Town Council has welcomed close liaison with Officers on the PMP and would seek to be actively involved in the early stages of the review.

Further Information available within the original representation: No

ID: 1415 / 1 Name: Ms Tanya West Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

The Parish Council is happy with the proposed scope and content of the Core Strategy Review.

Comments on the proposed programme for the preparation of the Core Strategy review

The programme works well alongside the West of England Joint Spatial Plan timings.

Specific observations on the Core Strategy review

The review should focus only on those sections of the Core Strategy which require reviewing not the entire document.

Further Information available within the original representation: No

ID: 1525 / 1 Name:

Organisation: South Stoke Parish Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

South Stoke Parish Council feel strongly that apart from any limited infill, that might be possible under Green Belt Policy (Reinforced by the publication of the NPPF), Bath and its largely Green Belt/AONB Setting has reached its maximum capacity for new dwellings.

Any further major development would be extremely damaging to the openness of the Green Belt and to the important AONB countryside setting of the City. In addition current and possible future infrastructure systems are very limited.

Comments on the proposed programme for the preparation of the Core Strategy review

South Stoke Parish Council has little to contribute at this time, about the review process but is very concerned that it should be able to be involved in every part of the forthcoming procedure.

Specific observations on the Core Strategy review

South Stoke Parish Council are particularly concerned that this review should take into account the positive effect that Towns in West Wiltshire and Mendip (Somerset) could and should have on the provision of affordable housing to serve the growing demand created by Bath's developing economy. The 'Duty to Co-operate' with neighbouring Authorities should be re-emphasised.

Further Information available within the original representation: No

ID: 1555 / 1 Name: Mrs Sue Heatheman

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Stowey Sutton Parish Council broadly supports the scope of the review.

Comments on the proposed programme for the preparation of the Core Strategy review

"As an area with an adopted neighbourhood plan we would expect to be consulted at an early stage on issues which could potentially conflict with the revised Core Strategy, with frequent opportunities to feed residents views into the emerging Core Strategy review document. We would expect time to be allowed within the Core Strategy review programme for areas with adopted Neighbourhood Plans to begin their own review process to ensure continuing compatibility with the Core Strategy."

Specific observations on the Core Strategy review

"We are particularly concerned about Core Strategy policy RA1 and would wish to be involved in the review of this policy. We wish to highlight the existing issues for our settlement with transport, sustainability, employment and inadequate infrastructure and the importance of cross referencing the West of England joint spatial plan on these issues."

Further Information available within the original representation: No

ID: 2429 / 1 Name: Mr Nicolas Stubbs

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

"Our site at Queen Charlton Quarry has the benefit of an implemented consent in the Green Belt (reference 13/04126/MINW et seq) for the management of food waste and the generation of electricity and is ideally placed for intensification of both without requiring the impairment of anywhere else in the Green Belt, Cotswold and Mendip AONBs, Bath WHS, Chew Valley Lake Special Protection Area, water source protection and land vulnerable to flooding. Our facility will make a considerable contribution to reducing greenhouse gas emissions and will greatly assist the Council in delivering the renewable energy commitments in the Adopted Core Strategy and therefore our site should now be identified as having been allocated in the revised Core Strategy and the Joint Waste Core Strategy. We would

like it to be noted that we wish to be consulted on the infrastructure delivery in respect of waste management and renewable energy production."

Further Information available within the original representation: No

ID: 2919 / 1 Name: Dr David Martin

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

"It is not clear why and how the Council can develop a specific strategy for identifying land supply for housing and employment. A vital part of the review should be to assess the impact of the two universities on the city, in respect of student accommodation and housing needs, transport infrastructure and the opportunity cost of loss of HMO Council Tax, and the revenue from other development sites that could be used for housing rather than student blocks in the city."

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 3095 / 1 Name:

Organisation: CPRE

Agent:

Comments on the proposed scope and content of the Core Strategy Review

We have considered the potential scope of the review and have the following comments.

1. It is important that the review of the Core Strategy results in a definitive statement of the role of Neighbourhood Plans in the planning process.
2. The Core Strategy should include a review of the duty to co-operate with neighbouring authorities, particularly Bristol. We believe that the primary duty of the authority is to take account of the views of its own local citizens on potential developments in housing and roads rather than those of other authorities.
3. The Core Strategy review should include in its scope how detailed transport plans for any proposed developments will be made taking account of the effect on congestion and pollution locally and within neighbouring authorities. It should review how it can be ensured that developments are only approved subject to guaranteed funding for improvements needed in this area and other types of infrastructure including fast broadband communication

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 3332 / 1 Name: K Stammers

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

With regard to Core Strategy Review most residents realise the need for additional housing, however, the outstanding issue for me, local residents and other A4 road users is the poor access to and from the site for up to 700 cars (that's a lot of cars) and the impact this will have on the already crawling A4 Bath Road!! Can you imagine the additional A4 traffic

when schoolchildren need dropping off and collecting from the proposed primary school? How will this affect an already choked main road? I am guessing none of the councillors live near to the A4 proposals?

There is one traffic issue that can only get worse with more traffic, the entrance to Snapdragons Nursery. This small junction is very dangerous in rush hour traffic and there has been no consideration of this in BANES revised A4 Road Layout.

The access to Snapdragons Nursery must be improved or made impossible for a right turn into the Nursery when travelling from Saltford. There is currently a simple road sign implying Snapdragon traffic to go around the Broadmead roundabout that some Parents just ignore and enter the oncoming right hand turn lane used by Bath road residents. This is a head-on accident waiting to happen!

Since the opening of Snapdragons nursery in 2012 there have been many incidents where parents approaching from Saltford decide the quickest most direct route to the Nursery is by entering the right turn filter lane instead of driving around the Broadmead roundabout as intended. The speed limit is 40mph in both directions so there is a possible impact speed of 80mph! That right hand filter lane should be treated as a one-way road meaning NO ENTRY!

With the increase of traffic proposed Core Strategy will cause, I urge the council to assess and improve the road access for parents using the Nursery entrance.

These are points to address:

- 1.The Nursery entrance is too narrow and vehicles approaching from the roundabout cannot make the left turn manoeuvre when another vehicle is exiting, this causes traffic to brake sharply or swerve around the vehicles. This sudden swerve is particularly dangerous when a resident is taking the right turn filter lane or motorbikes are filtering through traffic.
- 2.On exit from the Nursery some vehicles make a right hand turn and edge out their car into the busy traffic until someone lets them out. If there is a gap in the traffic from the Saltford direction the exiting vehicle will fly out to make the turn right manoeuvre. This is so dangerous when the speedy right turn is not seen by traffic entering the filter lane.
- 3.All roads adjoining Keynsham Broadmead roundabout have a speed limit of 30mph except for the busiest stretch of Bath Road currently set at 40mph? With the increase of traffic using this Nursery junction and residents attempting to cross the road for shopping at Waitrose or using the A4 Bus stop to Bath, would it not be prudent to reduce the speed limit along this dangerous stretch of road?
- 4.Make it physically impossible for traffic from Saltford direction to enter or cross the Right Hand filter lane. If the speed limit was reduced to 30mph, maybe a mini roundabout would solve the problem?

I held a meeting with BANES representatives (June 2015) but they have ignored this issue. I was initially upbeat and positive that something would be improved but after the council meeting I realised that lack of money is the priority above common sense improvements! I hope it doesn't take someone to be seriously injured or killed before changes are made.

I am worried that if BANES can't or won't sort out this simple problem what chances do we have of them sorting out all the other A4 road issues due to be exposed by the Core Strategy?

Further Information available within the original representation: Yes

ID: 3494 / 1 Name: Mr Andrew Wait

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

"Whilst recognising that we need a better transportation structure and more housing. I consider that not enough attention was given, once again, to an integrated transportation policy. The whole approach is far too piecemeal with cycle lanes not linking with other forms of transport and bus, rail, cycle and road networks being essentially being separated from one another. The whole difficulty with housing is that it should be affordable and near to places of

employment, building on the outskirts of towns and cities simply creates transportation problems and isolation. We need to build communities in the centres of our towns and cities to make the best use of our limited space."

Comments on the proposed programme for the preparation of the Core Strategy review

I attended the UWE event and I see precious little evidence that any notice was taken of the observations made at that event. There seems little point in consulting if opinions and issues raised are largely ignored.

Specific observations on the Core Strategy review

"I am strongly opposed to the building of a Saltford by Pass. It will achieve very little. We know from the Atkins study of 2006 that very little benefit can be achieved from such a road which is strategically irrelevant. Most road users will continue to take the direct route through Saltford which as somebody who uses that route several times a week I know is very rarely significantly congested. Building this road will create more congestion as at least one end of it will be a single carriageway road which will create a ""bottle neck"".The green belt gap between Keynsham and Saltford is a valuable community space and should be protected. Currently, a beautiful community forest has been developed over twenty years or so and it is highly valued by the residents of this area and beyond. Many folk had trees dedicated to loved ones and to see these trees go under the bulldozers will be very distressing. In every neighbourhood plan from both Saltford and Keynsham over the last 35 years that I know of has demanded the independence of the two communities. This gap would be lost with the inevitable housing infill needed to pay for such an expensive road.Alternative transport links are very good with the express X39 bus and the enhanced future rail network creating ample opportunities to get the commuters out of their cars.Finally, if there is money for a new dual carriageway, it would be far better continuing the Bristol Ring Road clockwise from Hick Gate, this together with the new Long Ashton road will produce a fast route around the south side of Bristol, far better than a random by-pass linking to nothing in particular."

Further Information available within the original representation: No

ID: 3636 / 1 Name: Mr Roger Stephenson

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

"I object to the West of England Joint Spatial Plan and Joint Transport Plan proposal for housing development in Whitchurch Village.The A37 corridor is the most congested and dangerous access to Bristol and any increase in traffic would cost more lives and injury until the ring road and A37 traffic are made safe. Any increase in development in S Bristol should follow, not precede suitable road infrastructure.I object to the proposed expansion of housing in Whitchurch Village because of the inadequate road provision."

Further Information available within the original representation: No

ID: 4335 / 1 Name: Mr Neil Fountain

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

No

Comments on the proposed programme for the preparation of the Core Strategy review

No

Specific observations on the Core Strategy review

Having read the WofE document, which proposes the significant take-up of green belt land for housing development in this area, without clearly demonstrating that exceptional circumstances are proven, I believe that BANES should ensure in its review that the protection of the green belt is of over-riding importance along with the necessity to improve infrastructure to meet current never mind future needs.

Further Information available within the original representation: No

ID: 4362 / 1 Name: Judith Chubb-Whittle

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Homelessness is increasing; any homelessness is unacceptable. The affordability of rents and open market prices cripple residents/ would-be residents potential to have stable housing. More financially vulnerable persons need to be housed close to needed social infrastructure of schools, doctors, shops, transport etc. Lack of stable housing creates 'burdens' on mental & physical health services and causes social unrest and increases discrimination.

Personally, I find the idea of building estates on Greenfield land and particularly in the Green Belt rather than on Brown Land unacceptable. I understand that Brownfield sites cost developers more to develop but such sites tend to be better located for the future residents. Developers are adept at 'wriggling' out of premise that it is socially desirable to reutilise brownfield land before greenfield land. Viability of utilising brownfield sites could be improved by building low-rise types rather than individual houses. All development should include green spaces with good natural surveillance as per European models identified 'Life Between Buildings: Using Public Space' by Jan Gehl.

I do not feel that there is a need to re-examine the Green Belt. The Green Belt was hard won and once the 'green lungs' of an expanding Bath or Bristol are lost through sprawl that is final. However, should the Green belt be reviewed then a firm compensation of lost GB land should remain as an expand BELT of Green Belt land circumnavigating towns & cities across the JSP area. I feel that Green Corridors, instead of keeping a 'belt', will be open to being 'nibbled at' by developers & their well-funded legal representatives. Local authorities are more financially restricted to fight such challenges. I appreciate that land/villages being incorporated into a new Green Belt could be equally contentious where landowners & developers currently have Options but the Green Belt is an important social principle that should remain a fundamental planning policy & practice.

To whom it may concern,

Re; Submission to question 3

The building of large estates of affordable housing is in my view unacceptable because there is evidence that such estates end up a social mess where there is insufficient infrastructure and structured backup. Without easy access to good quality nursery & schooling children fail to develop to their full potential. Evidence has shown a mix of tenures and 'housing products' can help the people change the estates and their social outcomes [TCPA & RTP].

Affordability is the key issue. Local housing is extremely expensive relative to much of the rest of the country. Improvement in transport infrastructure can prove a dual edged sword with commuters to the London & the south-east finding cheaper accommodation in the southwest thus raising demand for housing and pushing up prices. We need to look at reducing delivery time and cost of units as a matter of urgency.

Demand in any case is rising because private landlords are now exiting the market amongst other things.

Off-site fabrication offers a way we can address the issue. There are plenty of designs about e.g.

<http://www.bdonline.co.uk/three-prefabricated-solutions-to-the-housing-crisis/5080430.article>

There is a distinct skills shortage that is not being addressed as a matter of urgency. Many tradesmen / technicians are retiring or leaving the industry. Massive national infrastructure schemes ranging from nuclear power stations to railways that will soak up present capacity for tradesmen. Prefabrication could help to alleviate this problem.

The principle of CPO I agree with but there has to be a safeguard to prevent a developer putting forward a property without getting owners' consent then refusing to buy it. The owner has a CPO and the developers can then adjust later

applications of his own.

Planning policy must address the banking of land & where options or permissions have been granted landowners & developers must be made to 'deliver' within the life of the Local Plan or sooner.

I feel that under no circumstances should housing or industrial development be allowed on Grade 1 agricultural land thus taking land out of agricultural or horticultural production.

Grade 1 land cannot be 'remade', it is a finite and vital resource. We need to be able to feed our people and be able to export accordingly. Land base industries face a great deal of uncertainty through Brexit. Uncertainties in terms of land, commodity & production prices etc. If farming fortunes take a downturn and if land prices decrease landowners may seek to maximise their financial situations through selling land. There may alternatively be an increase in land banking, which I believe is undesirable for the wider community, whilst people need homes.

As a policy local authorities within the WoE JSP should not grant options or permissions on grade 1 agricultural/horticultural land.

Further Information available within the original representation: No

ID: 4393 / 1 Name: Michael Mcloughlin

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Bath seems to have become the residence of the STUDENTS, which in theory is to be embraced?

But in fact has become Gridlocked between the hours of 7.30am /10am 330pm/530pm to the tradesmen of Bath.

The never ending buildings with not enough parking is laughable Bike sheds are not the answer.

Planners whom I stress are not elected seem to pass any thing, while elected councilors who represent the residents are bypassed.

I am glad I am old enough to have seen the best of Bath. And I leave you faceless people to destroy what your predecessors pre 1960 to ruin.

Knowing you do not want this sort of comment, feel free to bin this

Further Information available within the original representation: No

ID: 4402 / 1 Name:

Organisation: Bristol City Council

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Thank you for providing Bristol City Council with the opportunity to comment on the Core Strategy Review Commencement Document.

I can confirm that the council have no comments to make at this stage.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 4434 / 1 Name:

Organisation: Network Rail

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Thank you for providing us with the opportunity to give our comments on the BathNES Core Strategy Review.

At this stage, we have no comments as such on the scope of the review, but given the review will include that of housing numbers and sites, Network Rail would request that it is included in future consultation comment requests on this review as we have various locations which we are looking to promote for inclusion for housing purposes.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 4532 / 1 Name:

Organisation: Silverwood Partnership

Agent: 36

D2 Planning

Comments on the proposed scope and content of the Core Strategy Review

Under Paragraph 181 of the NPPF, Local Authorities are expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their local plans are submitted for examination.

The Core Strategy review would need to cooperate with its neighbouring authorities to ensure that all housing and other needs are addressed. There are a number of neighbouring authorities to the B&NES and they are all at varying stages of their Plan making process. Under Paragraphs 17, 157 and 178 of the NPPF neighbouring authorities should work jointly together and co-operate to address planning issues which cross administrative boundaries or on matters that are larger than local issues.

The proposed scope of the Core Strategy review states that it is being undertaken in the context of the JSP and that 'there has been and continues to be significant joint working and co-operation in preparing the JSP'. The Objectors' have made representations to the JSP consultation and we believe that the overall housing provision in the JSP is too low and should be increased by at least 15,000 dwellings to ensure that the OAN for market and affordable housing is met. Accordingly, we believe that the JSP should deliver up to 120,000 net additional new homes in the period up to 2036.

Clearly the Core Strategy review will have to address the JSP revised housing requirement and it is likely that this will result in additional housing site being required in B&NES. A significant part of the JSP is to ensure that future housing needs are met but the plan seeks to do this by identifying a number of strategic sites. In such circumstances, and a suitable strategy to identify other sources of housing land to meet identified development needs, we believe that a series of non-strategic sites should also be identified within both the Core Strategy review and the JSP rather than leave their identification to preparation of a later plan which will take a number of years to prepare. This will ensure that housing needs are met in a shorter timescale

Paragraph 21 of the Commencement Document states that there will be a 'review of the expansion objectives of the Universities and the relationship between student accommodation and overall housing requirement' However, it is noted with regards to student accommodation that no account has been taken in the housing provision of any potential uplift on student partners during the JSP period. The various universities in the JSP area have plans to expand and increase student numbers. Accordingly, if the FOAN is to be calculated then the future student population must also be factored into the FOAN.

Furthermore, the South Somerset Strategic Market Assessment (SHMA) has just been published which shows a significant increase in housing needs in the area covering the local authorities Mendip, Sedgemoor, South Somerset and Taunton Deane. Mendip is one of B&NES's neighbouring authorities and the SHMA has identified a Full Objectively Assessed Housing Need of 12,948 dwellings 2014-2039 which will require Mendip to deliver additional housing. It is not yet known whether B&NES would be expected to accept any unmet housing needs of Mendip; however under the Duty

to Co-Operate B&NEs would be expected to provide robust evidence to demonstrate that meeting the needs of Mendip would be inconsistent with the policies set out in the NPPF, for example policies on Green Belt, or other environmental constraints.

This will have to be taken in to account in order to ensure the Core Strategy review can fulfil the Duty to Co-Operate.

Comments on the proposed programme for the preparation of the Core Strategy review

The proposed programme for the Core Strategy review is set out on Page 6 of the document. This demonstrates how the Core Strategy review would relate to the preparation of the JSP. The only comment we would make with regards to the programme is that the planned programme for the JSP appears to be overly optimistic given the level of interest that this plan will attract from local residents, Officers and Councillors.

A similar 'joint' plan currently going through the system is the Gloucester, Cheltenham and Tewksbury Joint Core Strategy (JCS). The timetable for this Plan was as follows:-

- Issues and Key Questions Public Consultation November 2009 - February 2010
- JCS Part 1 Public Consultation June - August 2010
- Preferred Option Public Consultation December 2011 - February 2012
- Draft Joint Core Strategy Public Consultation October-December 2013
- Pre-Submission Publication June - August 2014
- Submission to the Planning Inspectorate November 2014

As part of the Examination in Public of the JCS, there has been three stages of hearings between May 2015 and April 2016. The Inspector in her Interim Report of 26th May 2016 stated:-

"The Examination of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) has proved to be complex and controversial and has attracted considerable public participation and suggestions for amendments throughout."

The JCS is still not adopted. The JCS authorities are currently in the process of considering the modifications necessary to the JCS following the Inspectors report and this decision will require agreement across all three JCS Authorities.

It is considered the above example demonstrates how complex a process the JSP will be. There will need to be agreement to the JSP by all 4 of the Councils it covers: - B&NES, Bristol City, North Somerset and South Gloucestershire. This will undoubtedly be a timely and challenging process.

Therefore, in view of the above, the current programme for the JSP which only allows just over 2 years from draft proposals to an adopted Plan is unrealistic. Clearly, if there is a delay with the JSP programme, this will have a knock on effect on the preparation and programme of the Core Strategy review.

Specific observations on the Core Strategy review

In our response to Question 1, we believe that a series of non-strategic sites should be identified within both the Core Strategy review and the JSP rather than leave their identification to preparation of a later plan which will take a number of years to prepare. This will ensure that housing needs are met in a shorter timescale.

The Silverwood Partnership control some 3.8 hectares of land North of Kilmersdon Road, Manor Farm, Haydon which they believe is ideally placed to help accommodate part of the future housing need for the area (see attached plan). The Council's SHLAA (2013) identifies the site (RAD 31c) as having potential to deliver a yield of about 100 dwellings. The site was rated as being 'moderate/high' suitability for development. It states:

"In respect of the smaller area only (RAD 31c), development would have a low to moderate impact on landscape character. Whilst it would be seen from a distance, it would relate well to the rest of Haydon village on the ridge top."

The site is located adjacent to the development boundary relating to Haydon. The site is suitable for development and can be delivered immediately after planning permission is granted. The objectors have carried out all the necessary technical and environmental surveys. There are no access constraints and the site can be adequately drained. There are no issues on the grounds of archaeology and the SSSI can be adequately protected. Furthermore, there are no issues of ecological importance on the site. In all there are no constraints to residential development coming forward on the site. It is a sustainable, suitable and deliverable site.

A Planning Application for the development of the site for up to 100 dwellings has already been considered by the Local Planning Authority. The reasons for refusal can be overcome and there are no technical objections to the development of the site for residential development. The site could deliver up to 100 dwellings and all of these would be delivered

within 5 years following the granting of planning permission.
The site is therefore available, suitable and can be developed in a short timescale.
Accordingly we believe that land North of Kilmersdon Road, Haydon should be identified for residential development, as a non-strategic site.

Further Information available within the original representation: Yes

ID: 4600 / 1 Name: Mrs Margaret Williams Organisation:
Agent: 28 Mr Mel Clinton Nash Partnership

Comments on the proposed scope and content of the Core Strategy Review

"Under 9. reference should be made to maintenance of a 5 year deliverable housing supply over the plan period. Under 10. the policy area 'District housing supply & economic development', should also include reference to the overarching spatial strategy, including the extent of the Green Belt. Under 12. it would be helpful to include evidence on school capacity. It is appreciated that this may be covered under the Infrastructure Delivery Plan heading. In addition to the Rural Facilities Audit there also needs to be evidence on urban facilities in order to inform the Sustainability Appraisal and choice of preferred spatial strategy."

Comments on the proposed programme for the preparation of the Core Strategy review

"There appear to be errors in the programme, with the wrong year given in a number of places. The programme has slipped compared to that set out in the LDS. It would seem that adoption is now likely in Spring 2018, provided there is not significant delay. It would be helpful to show the target adoption date,"

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 4604 / 1 Name: Organisation: Barratt Homes
Agent: 305 Pegasus Group

Comments on the proposed scope and content of the Core Strategy Review

EXTRACT

This submission is made by Barratt Homes, Bristol in response to the emerging West of England Joint Spatial Plan and the accompanying evidence base. Barratt Homes, Bristol has land interests on the western side of Keynsham of around 9 hectares. The representations in this submission are supported by a promotional document for the Lays Farm and the two documents should be read as a composite representation.

3. THE LAYS FARM LOCATION

3.1 We have presented the credentials of the Lays Farm location in the promotional document that accompanies these representations. This considers:

- the sustainability of the location;
- the environmental factors affecting the location;
- the realistic housing potential/capacity of the area in relation to the environmental effects of development;
- the deliverability of the location, absolutely and relative to other strategic locations;
- the acceptable green belt effects of development given that exceptional circumstances exist for removing land from the green belt;

3.2 We do not repeat the content of the promotional document here but based thereon we set out below an evaluation of the Lays Farm location against the 'four strategic priorities' of the plan and their 'spatial implications for the spatial strategy', thus assessing the location on the terms of the JSP itself. Logically these priorities and spatial implication must also flow into the BANES Local Plan Review to ensure consistency. We note that Table 2 of the 'Towards the Emerging Spatial Strategy' document states that West and South West Keynsham "does not perform well in the sustainability appraisal. It would be difficult and costly to mitigate the negative impacts of development in this location".

3.3 Firstly, we do not agree that both of these areas can be joined together for assessment purposes. A more refined analysis is required as there are important differences between areas to highlight. Secondly, in terms of the big picture, the performance of locations around Keynsham must be conditioned by the high performance of Keynsham as a whole

as a strategic place within the West of England and within BANES. Consequently, the periphery of Keynsham must perform better than the periphery of places that are as a whole less sustainable e.g. Churchill in North Somerset. Thirdly, it is inconsistent to say that this general part of Keynsham is not very sustainable when it has been repeatedly identified for Green Belt release in past Local Plans as set out in the promotional document. Barratt is concerned that this blunt and inaccurate assessment will unduly affect the BANES LP Review. A more refined Assessment is needed.

Strategic Priorities of the JSP

Economic: To identify and meet the need for housing and accommodate the economic growth objectives of the LEP Strategic Economic Plan

The objectively assessed need for housing is presented as 105,000 but can be regarded as being at least 124,000. The Lays Farm location offers the potential to deliver around 180 homes across a range of house types and to enable an increase in the workforce that is required to deliver the aspirations of the LEP Strategic Economic Plan.

It is well connected to the centre of Keynsham (a bus stop adjoins the site) and from there to both of the primary urban and employment centres of Bath and Bristol.

Social: To ensure that the JSP benefits all sections of our communities

Lays Farm can provide a policy compliant level of affordable and starter homes in a location well connected by public transport choices.

Environment: To protect and enhance the sub-region's diverse and high quality environment and ensuring resilience including thorough protection against flood risk

The Lays Farm site is not a high quality environment and the proposed developable area, master planned as set out in the promotional document would have negligible landscape and visual effects.

Infrastructure: To ensure a spatial strategy where new development is properly aligned with infrastructure Keynsham is highly sustainable relative to the other potential growth locations in BANES.

The Lays Farm site will maximise the housing delivery effectiveness of the Keynsham Transport Strategy and the West of England Transport vision, thus improving the cost-benefit assessment of proposed improvements.

The KE4 site will deliver a new bus service, the viability of which will benefit from increased patronage at Lays Farm.

In recent comments made by the LHA on the KE4 site that funding from CIL will be sufficient to mitigate the potential developments impacts. This availability of CIL funding for strategic transport schemes has resulted in no highway objections to those schemes, although permission is yet to be granted.

3.4 In relation to the 'spatial implications for the spatial strategy' the Lays Farm Location performs as follows:

Spatial implications for the spatial strategy

Economic rebalancing to help address inequality, improve accessibility to jobs, support economic growth, and address unsustainable commuting patterns by aligning jobs and homes.

The Lays Farm location would help to boost the renewal of Keynsham following the closure of Somerdale. Population growth will secure the future of the high street to enable it to continue to offer a 'market town' level of services.

The JSP recognises that there are unsustainable travel patterns in operation in the WoE and Keynsham one of the prime locations within which to address this issue and where movements can be mitigated effectively and at lower cost.

Sufficient land should be identified to meet the needs to development including:

- Deliver the housing needed at a range of sustainable locations
- Facilitate economic growth of both existing employment centres such as the Enterprise Zones and Enterprise Areas and in new locations which will most successfully deliver the appropriate scale and type of jobs and contribution to the West of England economy.
- Recognise the need for affordable housing delivery in accessible locations close to employment centres and other services and close to where the need arises.

Barratt, Bristol agrees that a range of sustainable locations are required. It also asserts that the most sustainable places should be selected, that sustainable sites at those places should be maximised and that the range of locations selected should be sufficient to enable the housing requirement to be achieved and in a frontloaded manner as demanded by 5-year supply calculations.

Bath will struggle to meet its own needs after 2029 and therefore the next most sustainable locations should be selected for development to feed provide workers for the Bath Enterprise area.

82% of completions in Bristol have been apartments and a significant number of schemes in South Gloucestershire and in Bath are apartments. The plan should set a specific target for the number of 'houses' that need to be built so as to ensure a suitable housing mix.

The Lays Farm location enables 'houses' to be built linking to sustainable travel routes to the Temple Quay and Bath Enterprise Area and other employment centres, e.g. Brislington and Keynsham.

The housing requirement will only deliver around half of the assessed affordable housing need and should be boosted further. Needs should be met where they are generated and on sites with public transport options.

Retention of the overall function of the Bristol & Bath Green Belt as set out in the NPPF.

The term overall function is not used in the NPPF.

The 'fundamental purpose' is permanent openness to prevent urban sprawl but plan-makers have determined that there are exceptional circumstances for removing land from the Green Belt. Therefore, the overall function as it has been termed is not to be retained absolutely.

Plan-makers need to be more precise about 'overall function', and how this relates to the NPPFs lexicon

'Overall function' could be interpreted as avoiding the merging of major urban areas with surrounding towns. However, growth towards towns is not 'merging'.

As set out in the promotional document the performance of the Green Belt at Lays Farm demands close attention and can be distinguished from land to the south and to the north. As set out in section 8 of this representation the Stage 2 Green Belt assessment is too blunt and needs further refining in respect of non-strategic growth options.

The environmental quality of the West of England is maintained and enhanced by:

- Planning positively to ensure that development encourages and does not restrict the benefits the natural environment can provide.
- Ensuring no net loss to biodiversity and enhancing ecosystem service provision
- Developing a more resilient environment to help tackle the challenges of future climate change

Development at the Lays Farm location would not offend the environmental quality of the West of England.

A suitable developable area can be defined and planned with structural landscaping to mitigate any wider visual effects within Stockwood Vale.

The term 'developing a more resilient environment' is imprecisely defined.

Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality public transport links.

The focus of new transport infrastructure should address both existing challenges and create capacity for sustainable growth.

As set out in the promotional document, Keynsham as a place and the Lays Farm as a site, both absolutely and in relative terms, are locations that would enable sustainable travel choices to be maximised, linking to current and planned infrastructure investment.

Barratt Bristol agree that a new infrastructure should play a dual role to maximise the benefits of investment.

3.5 This section should be read in conjunction with the Lays Farm promotional document. It is clear that the JSP assessment of the West of Keynsham (in respect of Green Belt and sustainability is not refined enough to inform the BANES Local Plan review in respect of non-strategic growth and to identify better performing smaller and sustainable developable areas.

3.6 Given that the Sustainability Appraisal of West Keynsham is not robust in the light of the planning history of the area it is inconsistent for the JSP consultation document to raise the potential for non-strategic growth at NW Saltford but not at SW Keynsham. Further, NW Saltford has greater Green Belt impacts than SW Keynsham.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: Yes

ID: 4630 / 1 Name: Organisation: The British Archaeological Trust
Agent:

Comments on the proposed scope and content of the Core Strategy Review

Thank you for consulting RESCUE: The British Archaeological Trust on the above document.

We have no comments to make at this consultation stage but would be grateful if you should, please, keep RESCUE informed and consulted upon at later stages of the Core Strategy.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 4788 / 1 Name: Organisation: Stratland Hicks Gate Ltd

Agent: 305 Pegasus Group

Comments on the proposed scope and content of the Core Strategy Review

EXTRACT

This submission is made by Stratland Hicks Gate Ltd in response to the emerging West of England Joint Spatial Plan and the accompanying evidence base. Stratland Hicks Gate Ltd has land interests in the Hicks Gate area totalling 44 acres. The representations in this submission are supported by a promotional document for the Hicks Gate Strategic location and the two documents should be read as a composite representation.

EXTRACT

1.1 This submission is made by Stratland Hicks Gate Ltd in response to the emerging West of England Joint Spatial Plan and the accompanying evidence base. Stratland Hicks Gate Ltd has land interests in the Hicks Gate area totalling 44 acres. The representations in this submission are supported by a promotional document for the Hicks Gate Strategic location and the two documents should be read as a composite representation.

3.1 We have presented the credentials of the Hicks Gate Location in the promotional document that accompanies these representations. This considers:

- the sustainability of the location;
- the environmental factors affecting the location;
- the realistic housing potential/capacity of the area in relation to the environmental effects of development;
- the deliverability of the location, absolutely and relative to other strategic locations;
- the acceptable Green Belt effects of development given that exceptional circumstances exist for removing land from the Green Belt;
- the critical role of land to the south of the Hicks Gate roundabout in delivering the West of England Transport Vision and the road link to enable the full potential of the Whitchurch strategic location.

3.2 We do not repeat the content of the promotional document here but based thereon we set out below an evaluation of the Hicks Gate location against the 'four strategic priorities' of the Plan and their 'spatial implications for the spatial strategy', thus assessing the location on the terms of the JSP itself. We note that Table 2 of the 'Towards the Emerging Spatial Strategy' document states that Hicks Gate would be effective in helping to deliver the Plan's strategic priorities.

Strategic Priorities of the JSP

Economic: To identify and meet the need for housing and accommodate the economic growth objectives of the LEP Strategic Economic Plan

The objectively assessed need for housing is presented as 105,000 but can be regarded as being at least 124,000. The Hicks Gate location offers the potential to deliver 1,700 homes across a range of house types and to enable an increase in the workforce that is required to deliver the aspirations of the LEP Strategic Economic Plan.

It is well connected to both of the primary urban and employment centres of Bath and Bristol.

Social: To ensure that the JSP benefits all sections of our communities

The Hicks Gate location can provide a high number of affordable and starter homes in a location well connected by public transport choices.

The Hicks Gate location forms part of south Bristol and would therefore contribute to the regeneration agenda for this part of the city.

Environment: To protect and enhance the sub-region's diverse and high quality environment and ensuring resilience including thorough protection against flood risk

The Hicks Gate location is not a high quality environment. It is a discordant urban fringe landscape.

There is an area of flood risk associated with Scotland Bottom but this would be master Planned as part of the nature conservation network.

Infrastructure: To ensure a spatial strategy where new development is properly aligned with infrastructureThe Hicks Gate location is highly sustainable relative to the other potential strategic growth locations. No new strategic highway is needed to enable the location itself to be developed. It is on an express bus route to Bristol and Bath and this is targeted for a further upgrade in the Transport Vision. Hicks Gate is a site that can be delivered early in the Plan period.

Land in this location has a critical role in relation to the provision of a new link between the A4 and the A37 at Whitchurch. This link is needed to unlock the proposed development potential of Whitchurch.

3.3In relation to the 'spatial implications for the spatial strategy' the Hicks Gate Location performs as follows:

Spatial implication of the spatial strategy

Economic rebalancing to help address inequality, improve accessibility to jobs, support economic growth, and address unsustainable commuting patterns by aligning jobs and homes.

The Hicks Gate location would help to boost the future of south Bristol, injecting investment, people, workers and expenditure into this part of the city.

The JSP recognises that there are unsustainable travel patterns in operation in the WoE and the Hicks Gate location is one of the prime locations within which to address this issue and where movements can be mitigated effectively and at lower cost.

Sufficient land should be identified to meet the needs to development including:

- Deliver the housing needed at a range of sustainable locations
- Facilitate economic growth of both existing employment centres such as the Enterprise Zones and Enterprise Areas and in new locations which will most successfully deliver the appropriate scale and type of jobs and contribution to the West of England economy.
- Recognise the need for affordable housing delivery in accessible locations close to employment centres and other services and close to where the need arises.

Stratland Hicks Gate Ltd agrees that a range of sustainable locations are required. It also asserts that the most sustainable locations should be selected and that the range of locations selected should be sufficient to enable the housing requirement to be achieved and in a frontloaded manner as demanded by 5-year supply calculations.

82% of completions in Bristol have been apartments and a significant number of schemes in South Gloucestershire and in Bath are apartments. The Plan should set a specific target for the number of 'houses' that need to be built so as to ensure a suitable housing mix. Having regard to the emerging spatial strategy very few houses will be built within or very close to Bristol, particularly in respect of the south of the city.

The Hicks Gate location enables 'houses' to be built linking to sustainable travel routes to the Temple Quay and Bath Enterprise Areas and other employment centres, e.g. Brislington and Keynsham.

The housing requirement will only deliver around half of assessed affordable housing need and should be boosted further. Needs should be met where they are generated and on sites with excellent public transport frequency.

The Bristol SHMA does not breakdown the affordable need into smaller areas, thus it is not possible for the Plan to know the extent to which it is meeting needs where they arise. This requires attention. The Hicks gate location can provide affordable 'houses' for the south of Bristol

Retention of the overall function of the Bristol & Bath Green Belt as set out in the NPPF.

The term overall function is not used in the NPPF.

The 'fundamental purpose' is permanent openness to prevent urban sprawl but Plan-makers have determined that there are exceptional circumstances for removing land from the Green Belt. Therefore, the overall function as it has been termed is not to be retained absolutely.

Plan-makers need to be more precise about 'overall function', and how this relates to the NPPFs lexicon and the JSP.

'Overall function' could be interpreted as avoiding the merging of major urban areas with surrounding towns. However, growth towards towns is not 'merging'.

At a meeting of BANES Council in September 2011 the Head of Planning at BANES recommended that the Hicks Gate location be identified as contingency site in respect of the first iteration of the Core Strategy. The report states that "by keeping development back from the ridge-line the highest landscape impact can be significantly avoided. This could also maintain the principle of the Green Belt gap".

This suggest that BANES was content that the overall function of the Green Belt in this location could be retained if the Hicks Gate location was identified for development.

The environmental quality of the West of England is maintained and enhanced by:

- Planning positively to ensure that development encourages and does not restrict the benefits the natural environment can provide.
- Ensuring no net loss to biodiversity and enhancing ecosystem service provision
- Developing a more resilient environment to help tackle the challenges of future climate change

Development at the Hicks Gate location would not offend the environmental quality of the West of England.

The term 'developing a more resilient environment' is imprecisely defined.

Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality public transport links.

The focus of new transport infrastructure should address both existing challenges and create capacity for sustainable growth.

As set out in the promotional document, the Hicks gate location, both absolutely and in relative terms, are locationsthat would enable sustainable travel choices to be maximised, linking to current and Planned infrastructure investment.

Stratland Hicks Gate Ltd Land has a vital role to play in connecting the A4 and A4174 to the A37 at Whitchurch.

3.4 This section should be read in conjunction with the Hicks Gate promotional document. It is clear from the JSP own evaluation of the site that it is a suitable, and highly performing location for strategic development.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: Yes

ID: 4797 / 1 Name: Organisation: Westmark (Bath) Ltd

Agent: 277

Savills

Comments on the proposed scope and content of the Core Strategy Review

4. Scope and content of the Core Strategy Review

We have a number of comments on the proposed scope of the Core Strategy Review.

Firstly, it is noted that the consultation document makes a number of references to the emerging JSP and the need to plan for additional strategic sites to accommodate development planned at the regional level. It is clear that the emerging JSP has a mandate to deliver a 'step change' in housing delivery with 105,000 new homes currently planned in the JSP, although it is widely considered that this figure will need to increase. However, there is a danger that there will be too great a focus on the delivery of normal housing and not enough emphasis on delivering student accommodation to meet the growing demand.

Whilst the JSP will be important in setting the strategic context for the delivery of housing, the Council must plan properly for the whole need, including the growing student for students through off-campus purpose built accommodation.

We strongly consider that that Council must review its approach to the provision of student accommodation in Bath to address the current imbalance in supply and demand. The Council's existing policies, particularly policy B5 in the Core Strategy and Placemaking Plan, are excessively restrictive towards the delivery of student accommodation and weighted too in favour of the provision of normal residential dwellings in central areas.

The Core Strategy currently excludes student accommodation within the assessment of the Council's housing land supply. However, it is clear that the national The NPPG allows local authorities to count student housing towards their overall housing requirement:

"All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting". (Paragraph 038).

It is strongly considered, that given the existing shortfall and overwhelming need for student accommodation in Bath, that the Council should be counting student housing towards the housing land supply.

Whilst we understand that there is a limited number of available sites within Bath to accommodate all of the existing need, we disagree that residential development should be prioritised within the central area over student accommodation. In our view, it is far better to locate student accommodation within the city close to the university and range of services and facilities, along with the main transport interchange. There is an opportunity, through the Core Strategy Review to identify new development opportunities outside of the central area for normal residential dwellings, including through strategic extensions and development at the main towns and villages, including Keynsham, Radstock and the Somer Valley. However, it would clearly be inappropriate to look at locations outside of the city for student accommodation.

It is therefore recommended that the Council's policies on the delivery of student accommodation, specifically policy B5, which sets a blanket restriction on student accommodation within the central Area, the Enterprise Area and on MoD land, is reviewed. It appears, from the Inspector's findings on the Placemaking Plan, as was the case with the adopted

Core Strategy, that the Council has not been asked to address the issues surrounding the overwhelming student need, and instead implies that this issue can be pushed back and dealt with at a later stage. The issue over how to address the imbalance between student supply and demand is now critical and must be dealt with through this Core Strategy Review rather than continually avoided.

It is noted that in paragraph 4 of the consultation document, it is stated that “through the Core Strategy review additional development opportunities will be identified and allocated”. Whilst we welcome the Core Strategy Review incorporating both strategic policies and allocations within one document, it is however concerning that later in the document, in paragraph 9, in relation to existing allocations, it is stated that “it is not proposed that these will be reviewed” through the Core Strategy Review.

We strongly contest this approach, and consider that a Core Strategy Review must identify and re-evaluate development opportunities, both new and existing. If it is intended that the Core Strategy Review will set the overarching strategic policies and land allocations for the next 20 years, it is critical that the proposed allocations are viable and deliverable.

As set out earlier within the representations, we have continued to state that the land at Upper Bristol Road / Windsor Bridge Road, Bath is not viable for residential-led development, and instead there should be an allowance for student accommodation within any allocation for the site to ensure that the site can be progressed and contribute to the city’s development pipeline. Paragraph 173 of the NPPF is very clear that careful attention should be paid to viability and costs in plan-making and that “sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.

The landowner has undertaken a significant amount of work on viability and found that a residential-led scheme would not be viable. This work must be taken into account as part of the preparation of the draft Plan.

If the Core Strategy Review does not take this opportunity to review existing allocations alongside new development opportunities, to ensure that existing allocations are still deliverable, this will raise significant question marks over the soundness of the emerging Core Strategy and whether the strategic objectives can be met. We strongly recommend that the Council reviews existing allocations alongside up to date evidence as part of the preparation of the Core Strategy Review and does not simply focus on new development opportunities.

Paragraph 9 (e) of the consultation document proposes a review of “the expansion objectives of the Universities and the relationship between student accommodation requirements/supply and the overall housing requirement”. We support this review and consider that such a review is critical to addressing the imbalance between student supply and demand in the city. Only by assessing the capacity and realistic delivery of student accommodation on the two main campuses will the Council be in a position to understand and plan for the off-campus need. However, it is important that this approach suggested by the Council does not simply focus on the capacity of the campuses as the focus for student accommodation, but that there is a recognition of the clear need to plan for off-campus student accommodation in sustainable locations. It is also important that this work is underpinned by up to date evidence through an update to the Council’s Student Needs Assessment.

Moving onto paragraph 10, we are concerned that the policies suggested to be reviewed includes only a limited number of policies. Of greatest concern, is the absence of policy B5 within those policies listed under ‘spatial strategy’.

For the reasons set out within these representations, we have significant concerns over the approach set out within the consultation document which appears to suggest that some of the key policies, including policy B5 which will set the future provision of student accommodation in Bath, will not be reviewed despite the need to plan for growth in light of new evidence which will no doubt be prepared.

In relation to the preparation of the evidence base which will inform the Core Strategy Review, we agree broadly with the evidence set out in paragraph 12. The need for an up to date assessment of ‘Student Accommodation Requirements and Supply’ will be critical to addressing the current imbalance between student supply and demand and we welcome this being listed as a requirement. We do however urge the Council to utilise this new evidence on student need and properly plan for the need rather than simply ignore the results in order to prioritise other objectives, as has been the case to date through the adopted Core Strategy and emerging Placemaking Plan.

Furthermore, the Strategic Housing Market Assessment should include an assessment of the existing and future housing needs, including the needs of students, in order to inform the preparation of the Core Strategy Review.

Overall, we continue to be concerned with the Council's approach to the strategic policies and allocations, particularly the lack of recognition that the overwhelming need for student accommodation is being overlooked. In our view the Council should be giving equal weighting to student and residential development through the strategic policies and reviewing existing and new land allocations accordingly

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

1. Introduction

These representations have been prepared by Savills on behalf of Westmark (Bath) Ltd who have an interest in land at Upper Bristol Road / Windsor Bridge Road, Bath identified on the enclosed plan (Appendix 1).

The site is currently allocated for development, identified on the Local Plan Proposals Maps as falling within a General Development Site (Policy GDS.1) for mixed use development. In addition, the emerging Placemaking Plan proposes to allocate the site, under Policy SB8, for residential-led development, but specifically excludes student accommodation as a potential future use. The site is also referred to within the Draft Placemaking Plan as 'land within the North Bank'.

Representations have been submitted promoting the site throughout the Placemaking Plan process, particularly to the consultations on both the Options Document in January 2015, and the Pre-Submission Draft in February 2016, as well as attendance at the examination hearings sessions themselves. Through this involvement in the Placemaking Plan process concerns were continually expressed over the Council's proposed allocation of the site for residential development whilst excluding student accommodation as a potential use.

In addition, a planning application (ref: 15/05688/FUL) for the provision of purpose built student accommodation on the site was refused in July 2016, primarily due to its conflict with Policy B5 of the adopted Core Strategy which requires that: Proposals for off-campus student accommodation will be refused within the Central Area, the Enterprise Area and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development.

Given the clear, overwhelming need for additional, purpose built student accommodation in Bath, it is considered that the Council must take the opportunity through the Core Strategy Review to fully assess the need for the plan period and seek to address the imbalance between supply and demand through a combination of amendments to the strategic policies and specific land allocations.

Despite the previous representations submitted, it is noted that the content of Placemaking Plan Policy SB8 has not changed and we therefore continue to object to the exclusion of student housing as a potential land use option on the land within the North Bank.

2. Overview of the Upper Bristol Road / Windsor Bridge Road Site

The Site

The land at Upper Bristol Road / Windsor Bridge Road has been in a poor, near derelict condition for a number of years. The site was a former gasworks which was purchased by UK & European Investments in 2005. Whilst the eastern part of the site has been occupied by two light industrial units, this covers a small percentage of the overall area of the site. The west side of the site has not been developed but does comprise previously developed land.

It should be noted that a proposal for residential development on the site was previously withdrawn at the planning appeal stage in 2006. The application comprised the demolition of existing buildings, contamination remediation works and redevelopment of the site for 171 residential apartments, 72 car parking spaces, associated landscaping and external works and creation of a new highway access off Upper Bristol Road (Ref.05/00097/EFUL).

Since this time only part of the site has been occupied, however the existing light industrial units are currently in a poor condition. Indeed, it is clear that the whole site is in a very poor condition, and will continue to fall into disrepair unless development, of a use which is viable and deliverable, takes place to bring the site back into use. Furthermore, intrusive ground investigations undertaken by Arup previously to inform the design of the previous development have shown that the ground has been impacted by the historical use of the site as a gas works. Subsequent detailed assessments have indicated that there is a potential risk posed to the adjacent River Avon, and that the development of the site will facilitate the reduction of this potential risk to acceptable levels.

More recently, a planning application (ref: 15/05688/FUL) was submitted for the redevelopment of the site for student accommodation with the following development description:

“Demolition of existing buildings and redevelopment to provide student accommodation (Sui Generis), comprising 394 bed spaces, ancillary facilities, 149sqm of ground floor flexible space (Class B1 and D1), new access to the river towpath, car and cycle parking provision and landscaping”.

The application was however refused on 29 July 2016, primarily for the following reason:

The development for off-campus student accommodation on the application site which falls within the Enterprise Area, is considered to reduce the housing numbers anticipated to come forward in the Bath Western Riverside area and as such would adversely affect the realisation of the spatial strategy for the city in relation to housing. The development is therefore considered to be contrary to policies B5 and B1 of the Core Strategy 2012.

Principle of Development

Whilst we have expressed our concerns over the Council’s continued desire to allocate the site for residential-led development, excluding student accommodation, we have shown long standing support for the allocation of the site for development in principle and welcome the Council’s conclusion that the site is suitable to accommodate a proportion of the city’s growth.

The site is approximately 1.5 km west of the city centre, and benefits from good transport and pedestrian links, therefore enabling any future residents the chance to easily reach a range of local services and facilities via sustainable travel modes.

The majority of the site is currently vacant and derelict, therefore providing a sustainable brownfield redevelopment opportunity.

Furthermore, the 2016 planning application was supported by a suite of technical assessments to demonstrate that the site is suitable and deliverable, and the application proposals were not refused on any technical grounds.

Viability

Paragraph 173 of the NPPF addresses viability and deliverability, stating that “pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.

The landowner has assessed the viability of residential development on the site, and has found that this would not be a viable and indeed deliverable use. To demonstrate this, detailed viability evidence has been provided through both the 2016 planning application and promotion of the site through the emerging Placemaking Plan. This viability work assessed different land use scenarios for the site, including a 100% student accommodation scheme, a student/residential mixed use scheme, and a 100% residential scheme.

The Assessment confirms that the proposed student scheme submitted with the 2016 planning application is a viable and wholly appropriate development option for the subject site. However, in comparison to a student scheme, the use of the site as a 100% residential development is unviable based on the same scheme, and a mixed use scheme also produces a negative land value. In particular, the mixed use scheme of residential and student accommodation, on a

relatively tight site, are not an ideal combination in terms of incompatibility issues.

There are a number of reasons for the negative land value for the 100% residential option, including the need to provide a percentage of affordable housing in line with adopted planning policy, parking requirements including the potential for an underground car park, contamination and the poor site access.

In all cases, there are abnormal costs involved with the excavation and remediation of the contaminated land on site which could see this value eroded further.

We have already expressed our fundamental concerns with the Council's high level Viability Assessment which was commissioned to support the emerging Placemaking Plan, specifically to test the financial viability of the sites being considered for allocation. In particular, we expressed our concerns through representations and attendance at the hearing sessions for the examination into the Placemaking Plan over a number of important assumptions that have been overlooked and must be considered to ensure the analysis reflects the reality on the ground.

In particular, it should be noted that the historical use of the land has resulted in the site being heavily contaminated. There are therefore significant abnormal costs and risks associated with the creation of an acceptable development platform as part of any development of the site. The Council's Viability Assessment did not accurately reflect this position, a matter which is critical to the exercise being undertaken. Indeed, the Council should be aware that the remediation costs are likely to be significant. We conservatively estimate that the additional costs to deal with the site amount to between £2m, assuming parking at grade, and £3m, assuming that a basement car park is provided.

Furthermore, any development on the site which includes the creation of a basement car park to accommodate an appropriate level of car parking will require a significantly higher level of remediation, cost and risk, due to the need to excavate into the contaminated ground.

In terms of build costs, we also expressed significant concerns over the build cost assumptions made within the Council's Viability Assessment. Based on specific cost information which has been prepared by Westmark's cost consultants to inform the 2016 planning application, this demonstrates that the Council's assumptions do not accurately reflect the correct build cost to be applied to a development of this site. Instead, such development costs would in reality be significantly higher than the assumed level in the Council's Viability Assessment. For example, the assumed development costs for the hypothetical scheme within the Viability Assessment equates to approximately £150 / sq ft. However, our cost plans, notwithstanding any contamination, have been based upon approximately £200 / sq ft. Applying the build costs of £200 / sq ft with a figure of £2m for contamination adds an additional £7.5m of costs to the analysis set out within the Council's Viability Assessment, resulting in a net residual value of approximately £2.328m, far below the Council's assumed figure.

It is also clear through the 2016 planning application, that officers at the Council will only support development on the site which comprises a majority of the materials as Bath stone. It has been made clear by officers that there is limited scope for achieving a lower quality finish in this important location, and therefore this clearly influences the build costs assumptions that need to be carefully considered as part of the viability testing.

Given the Council's previous evidence overlooked a number of key assumptions, it is strongly considered that the Core Strategy Review should be supported by robust viability evidence to support the allocation of sites for particular land uses, including the land at Upper Bristol Road / Windsor Bridge Road, to include the following:

- A proper reflection of the contamination and remediation costs for the site;
- Consideration of the impact of basement parking on build costs, and an acknowledgement that any parking to be provided would need to be provided at grade;
- Consideration of the Council's Design Codes, set out in the Bath Western Riverside SPD which prescribes a height limit of 3-5 stories across the site, and the resultant impact on net developable area which could be achieved;
- A true and accurate reflection of build costs, particularly the increased cost of provided the majority of a scheme in bath stone.

Deliverability

Student Scheme

Whilst the 2016 planning application, comprising approximately 394 student bed spaces, was refused in July 2016, the application was refused on the grounds of the principle of development and design, rather than any technical or deliverability considerations.

The submission of the planning application also demonstrates a commitment from Westmark (Bath) Ltd to pursue student accommodation as a deliverable use. Significant time and cost has already been invested in proposals for the site and these are driven by evidence on both student need / demand, and viability advice taking into account the significant costs likely to be involved in bringing the site forward for development.

Residential Scheme

Notwithstanding the significant viability concerns relating to a residential scheme, there are a number of deliverability issues, some of which have already been covered within the Council's SHLAA. These constraints include the need for junction / access improvements alongside a detailed assessment of vehicular trip generation. In addition, the SHLAA recommends that development on the site be designed to provide parking to a "substantially reduced standard".

Furthermore, specialist highways advice provided by Curtins confirms that any access from Upper Bristol Road should be avoided due to its close proximity to the signalised junction of Upper Bristol Road and Windsor Bridge Road. Vehicular access at this point is likely to result in a significant impact on the capacity of an already busy junction. Further to this, it is apparent that any traffic exiting/entering the site to/from the eastbound carriageway of Upper Bristol Road would need to cross two lanes of traffic, resulting in an increase to highway safety risk. In addition, any use of Midland Road would require improvements.

If parking is required, the only access to the scheme is from Midland Road, located to the rear of the site, which is neither desirable nor is it conducive to delivering a scheme which is on a par with values being achieved elsewhere. The access arrangements from Midland Road will affect achievable values. Furthermore, as already outlined, in order to meet required parking standards for a residential scheme this is likely to result in a significant area of the site being required for parking particularly as excavation to create a basement level parking will be compromised as a result of land contamination issues. The requirement for parking is therefore likely to significantly impact on the viability of a residential scheme. In addition, whilst it is unclear what housing mix has been assumed within the Council's Viability Assessment, such a residential scheme would need to provide for sufficient parking to meet the Council's required parking standards, including a requirement for visitor parking.

The proximity of the site to the adjacent waste recycling centre will only compound the potential parking problem. The recycling centre is expected to operate for a further 7/8 years and therefore would impact on the ability to access the site. A student scheme which proposes no on-site parking would address this issue.

It is strongly considered that, notwithstanding the viability concerns relating to a residential-led development, that student accommodation would be a more appropriate use for the site given that concerns over highways and parking could be alleviated. Whereas a residential development would be required to provide a specific level of on-site parking, student accommodation could be provided with limited or zero on-site parking, removing concerns over vehicular movements in and out of the site, impacts on the local highways network, and available space for on-site parking.

Furthermore, one of the reasons for refusal relating to the 2016 planning application was specifically over the height of the proposed riverside buildings and the need to reduce the overall height and massing. As a result, it is clear that in design terms, a residential scheme would also need to be limited in height which, as a result, would result in reduced unit numbers and reduced viability for such a scheme.

Indeed, some of the key benefits of the site in delivering student development over residential include:

- Would facilitate the redevelopment of a predominantly vacant brownfield site, bringing the site back into a viable re-use;
- Address the significant need for additional student bed spaces in Bath;
- Would assist with the reversal of existing HMO's back to non-student housing (based on the Council's assumption of 4

students per HMO, a student scheme on the site has the potential to release up to 101 HMO's back to normal residential development, contributing to the Council's housing land supply);

- Would reduce vehicle movements to/from the site in comparison to a 'normal' residential scheme which would require a significant number of vehicular parking spaces;
- Would generate a level of employment;
- Would enable significant landscape and environmental improvements to be made.

3. Need for Student Accommodation

We have expressed our views on the current supply and demand imbalance in Bath in respect of the provision of student accommodation through both evidence submitted in support of the 2016 planning application, and previous representations to the Placemaking Plan.

It is noted that the Core Strategy Review is not yet supported by up to date evidence on student need, but that such new evidence is to be prepared, as stated on page 4 of the Consultation Document.

As a result, to highlight our concerns, we have provided some observations within these representations on the Council's decision to continue to ignore the evidence available, both in the form of the Council's own evidence to support the emerging Placemaking Plan and evidence presented to them by participants at the recent examination hearing sessions.

We have already presented our own evidence as part of the 2016 planning application, which concludes that, as of September 2015, the supply of private purpose built student accommodation in Bath amounted to 5,991 bed spaces, which allows only 32% of the full time student population to access a bed space, with the remainder (68%) making alternative arrangements either in the private rented (HMO) sector, their own home or their parents' home. This demonstrates a need for good quality purpose built student accommodation in Bath. For context, by national standards, a 30.1% supply of students to available bed spaces is considered low. The 32% figure therefore falls into the same categorisation. In our view, even if it is assumed that all schemes in the current development pipeline are delivered, it would still leave approximately 59.4% of full time students unable to access university provided or private sector purpose built student accommodation. These students will therefore have to rely on the parental home, own home, HMO style accommodation or privately rented accommodation. This therefore puts increased pressure on the private sector rental markets as students will look to occupy the private sector housing stock due to lack of purpose built student accommodation in Bath.

The Council's latest evidence on student need is set out within the report 'Student Numbers and Accommodation Requirements in Bath' (May 2016). This report confirms the low level of current provision, stating in Table 12 that only 33.3% of full time students have access to a bed space.

In particular, it should be noted that the Council's May 2016 Report states that:

"under the original assumptions bedspace demand has increased by 1,083, the number of available bedspaces has increased by 797. This means that unmet need would have increased by around 286", ... based on the new assumptions set out in paragraph 2.7, the supply identified in Table 2a was able to cater for 31.4% of need in 2011 and 33.2% in 2015/16. Further, whereas bedspace demand has increased by 1,772, the number of University controlled bedspaces had increased by 967".

The Council's evidence does recognise that off-campus purpose built student accommodation would assist in addressing this ongoing problem, and that providing such purpose built blocks would reduce the pressure on additional HMO's and pressures on the wider housing market, with the Council's May 2016 Report confirming that "further in-city accommodation blocks would reduce the reliance on potentially unrealistic levels of HMO growth i.e. in addition to that which might come forward in line with recent trends. To support the Universities, more land in the city could be given over to dedicated accommodation blocks but in most cases there would be an unacceptable effect re Policy B5 of the Core Strategy - which only allows student accommodation if it would not harm the realisation of the objectives for other uses".

There is also a clear recognition within the May 2016 Report to the on campus restrictions, with the evidence stating that "In theory, The University of Bath may be able to do more to influence its aspirations to 2020/21 - given the nature

of and policies affecting its estate. But, it seems unlikely that it could deliver more than 1,000 new bedspaces on campus to this point”.

Whilst the May 2016 Report outlines the current problems and policy conflicts in seeking to provide for the growing student need in Bath it provides no solutions to inform the plan making process, and it is therefore no surprise that the key policies for the delivery of student accommodation in the Placemaking Plan are not proposed to be amended as a result.

There is a clear recognition that off-campus accommodation is necessary to assist in providing for the future growth in student numbers which cannot be accommodated on campus. However the Council’s current evidence simply states that providing off-campus student accommodation is likely to conflict with Policy B5 of the Core Strategy and therefore avoids addressing this very significant ongoing problem. There is therefore a need for the Council to update its evidence on student need as part of the Core Strategy Review and ensure that its conclusions are taken into account rather than dismissed in order to prioritise other objectives.

Furthermore, the Council’s adopted Core Strategy recognises that the growth of student numbers in the last decade has not been accompanied by sufficient on-campus study rooms and that this has led to an expansion of student lettings which has diminished the ‘normal’ housing stock of the City. Indeed, the proliferation of HMOs is recognised within paragraph 2.37 of the adopted Core Strategy, as the most visible consequence of the mismatch between the growth in student numbers and on-campus development.

This pressure that a lack of student accommodation provision has on the private sector rental market, will result in the displacement of other social demographics from obtaining housing through the private sector rental market in Bath.

Therefore, the provision of purpose built student accommodation will reduce the significant pressure on HMOs and the private sector rental market. HMOs often provide low quality and less secure accommodation which do not meet the needs or expectations of students. By increasing the number of purpose built student accommodation in Bath, it will ease the pressure on HMOs and allow this accommodation to be utilised by families. For example, large areas of HMOs develop in areas due to the lack of university or private sector provided student accommodation.

Overall, there is a clear identified need for off-campus purpose built student accommodation in Bath, and the land at Upper Bristol Road / Windsor Bridge Road provides an opportunity to deliver such accommodation on a highly sustainable site. The Council must take the opportunity available through the Core Strategy Review to address the current imbalance and review the prioritisation of land uses.

Further Information available within the original representation: Yes

ID: 4803 / 1 Name: Organisation: Waddleton Park Ltd

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Peter Brett Associates are pleased to submit comments on behalf of Waddeton Park Limited (WPL) in relation to the consultation on the proposed content, scope and programme for the Core Strategy Review 2018 – 2036.

WPL welcome the attempt at positive planning and recognition of the need to get started with the plan review to ensure that it is consistent with and prepared in parallel to the West of England Joint Spatial Plan (JSP). While we make comments on the content of the Core Strategy Review documentation, it is important to address the relationship between this and the JSP because it is essential that the combination of documents must establish an appropriate spatial strategy for the long term, integrating new and existing development with necessary infrastructure to deliver required and worthwhile development.

The Core Strategy Review is necessary because the Core Strategy is clearly out of date in many respects. A review was required by the previous Inspector and has been endorsed more recently by the Inspector examining the Placemaking Plan in her interim findings in November 2016 who agreed that strategic matters, such as a review of the wider housing requirements, should be considered through future plan reviews.

Scope and content

The scope of the plan is critical and it is essential that this can only be properly considered in relation to the JSP. While the draft JSP is currently being consulted on this has not been finalised and therefore it is critical that the process of preparing the Core Strategy Review provides for continuing flexibility in the scope and content of the plan and that it is able to fill in matters that need to be dealt with in a development plan, but which are not adequately dealt with in the JSP.

An important role for the JSP is to establish the amount of development, both for employment and all types of housing to be provided and it is essential that the Core Strategy Review takes on board these matters, reflects the most recent evidence and is up to date at any time. Consequently, it is essential for the Core Strategy Review to identify development opportunities and allocate strategic and non-strategic sites to meet the whole range of identified needs in full. The implications of the spatial strategy for policies and places needs to be examined and as a consequence it may be necessary to alter and update the policies that are emerging through the Placemaking plan.

In addition, a key role will be to set out the spatial strategy for the area as well as the role of settlements, such as Midsomer Norton. The Somer Valley is now an Enterprise Zone and there is clear intention to develop this area as a strategic employment location. The Council cannot guarantee that all new jobs here will be taken up by existing residents of the area. Indeed, while improving self-containment may be a laudable aim, it is not deliverable and would have implications for employment in other parts of the wider area, not just in the West of England. Job creation relies on an adequate labour supply which is influenced by the attractiveness of local housing and services that are provided. It is important that the Core Strategy Review is clearly based on robust evidence, and that the opportunity to provide improved services and adequate housing is not restricted by the JSP. There is a clear need for the Core Strategy Review to provide non-strategic housing in a range of locations specifically to meet local needs which inevitably emerge as a result of the changing population structure, as well as to ensure adequate affordable housing and to support the enterprise zone. Indeed, the plan must meet the needs of the Somer Valley for market and affordable housing, as well as for elderly and care accommodation as well as infrastructure requirement such as schools, and this will require the release of green field sites.

It is also critical for the plans in combination to deal properly with the issue of how any shortfall in the five year supply of housing land in the plan area as a whole, or in any part of the plan area is dealt with in other parts of the plan area.

Green Belt is a sensitive, ill understood and inadequately addressed issue in the West of England, as in most places, and raises particular issues over the respective roles of the 'strategic' and 'local' parts of the development plan being created. The JSP is currently flawed in not adequately changing the general extent of the Green Belt, removing strategic development sites and providing for 'safeguarded land' as well as establishing new boundaries. There is a clear requirement to use the Green Belt as the most sustainable location to meet future needs and this should be addressed properly by both the JSP and the Core Strategy Review.

In terms of policy content, it is essential to ensure that the policy position is up to date to enable planning applications to be determined properly. In the interests of efficient plan making the Core Strategy Review should include only what is necessary to implement the development strategy and to ensure policies are up to date. However, clarity is required about exactly what policies are included in which documents and the status of each.

We support the intention to review student numbers, expansion objectives, requirements and supply and to ensure this is properly included in the new plan.

In terms of the currently policies identified that may require revision as set out in paragraph 10 of the commencement document, this is not a full list and many are missing. It should be recognised that in addition to those policies listed it is also considered that the following policies may also need to be reviewed:

- B5 Strategic Policy for Bath's Universities;
- KE2 Town Centre/Somerdale Strategic Policy;
- SV2 Midsomer Norton Town Centre Strategic Policy;
- SV3 Radstock Town Centre Strategic Policy;
- RA5 Land at Whitchurch Strategic Site Allocation; and
- Core Policies: CP5, CP7, CP8, CP9, CP10, CP12, CP13.

Plan hierarchy and relationship

The relationship between the plans and the different tiers of plan making is very important and should be clarified. The document is confused on this point with no clear understanding of what plans will remain in place and what will provide the relevant and up to date development management and planning policies. Paragraph 4 of the commencement document currently states that paragraph 20 and 21 addresses the relationship with other plans. However, these paragraphs refer to the section above and then only considers neighbourhood plans. This circularity needs to be resolved and the relationship with the JSP and Placemaking plan should be explicitly set out.

Paragraph 9 appears to suggest that the opportunity will be taken to combine two DPDs into one, a Local Plan, yet the detailed development management policies will not be reviewed. It is presumed that the Core Strategy Review will result in one Local Plan and the logic should be that this has everything in it and that everything is reviewed as necessary to ensure it is consistent with the JSP and the emerging spatial strategy. In order to aid understanding of the process and relationships it would be helpful if the name of the Core Strategy Review/Local Plan could be clearly set out so at this early stage. Also clarification of exactly what Local Plans will eventually be in place for decision making purposes would be helpful.

The Core Strategy Review should also recognise the relationship that BANES has not only with the West of England but also with Mendip and Wiltshire. The Somerset SHMA has just been published which identifies significantly higher housing growth required to 2039 and this will have important duty to cooperate implications for the Council, which should be properly addressed.

We would be grateful if you could confirm receipt of these representations and ensure that we are informed of all the next stages in the progress of the Core Strategy Review.

Comments on the proposed programme for the preparation of the Core Strategy review

The Council is right to start the plan now and ensure that it is prepared in conjunction with and consecutively to the JSP, rather than waiting for the JSP to be made before getting the review underway. However, it is important that the timetable recognises that there may be changes required to the JSP and that this will need to be factored into the preparation of the Core Strategy Review. The approach should be one that fully reflects the JSP, taking forward positive planning for the area by complementing the JSP in scope and content rather than inhibiting its implementation. It is essential that the development plan is kept up to date and is a dynamic tool for implementing needed change. Consequently, it is crucial that the plan is not submitted until the Inspector has reported on the JSP and that there is time built into the programme to ensure that the Core Strategy Review can be updated and respond to any concerns or modifications that arise through the JSP process.

It is noted that the Core Strategy Review is commencing before the Placemaking Plan has been adopted. This is confusing and the status of all the relevant plans, the timescales they cover, and what will be superseded by what document is not clearly set out.

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 5016 / 1 Name: Mr Phil Harding

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

No.

Comments on the proposed programme for the preparation of the Core Strategy review

No.

Specific observations on the Core Strategy review

The public commitment on 1st December 2016 by the Leader of B&NES Council, Cllr Tim Warren, at the public meeting

in Saltford about a proposed bypass that there was not any housing development planned for Saltford is welcomed by Saltford Environment Group (SEG). SEG also supports Cllr Tim Warren's opposition stated at that meeting to the use of any of Saltford's Green Belt land for housing development. Cllr Tim Warren's statement is in line with the fact that there is no political mandate or permission from the residents of B&NES or Saltford to allow any loss of the Green Belt to development. The ruling Conservative administration at B&NES Council was elected in May 2015 on a manifesto to defend the Green Belt from development. The Core Strategy Review should not therefore propose, suggest or even hint at housing development on any parcel of Green Belt land in Saltford as that would be contrary to the declared land use planning policy of B&NES Council.

Further Information available within the original representation: No

ID: 5049 / 1 Name: Mr Sunin Crutchley

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

It is unclear whether the review will be looking again at the question of the Green Belt. We already lost one section of green belt between Keynsham and Saltford and there really should be no excuse for revisiting this. Otherwise there is a major risk of the two settlements merging into one, contrary to one of the key findings of the earlier review.

Comments on the proposed programme for the preparation of the Core Strategy review

No

Specific observations on the Core Strategy review

No

Further Information available within the original representation: No

ID: 5172 / 1 Name:

Organisation: Halsall Homes

Agent: 197

Colliers

Comments on the proposed scope and content of the Core Strategy Review

Overall, it is considered that the proposed scope and content of the Core Strategy Review, as a whole, does not demonstrate the requirements of a sound plan. The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' ", namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These representations highlight that the Plan should be positively prepared, justified, effective and consistent with National Policy by setting out the requirements and aligning the proposed scope with these requirements.

It is understood that the B&NES Core Strategy review is at a very early stage however, it is considered that the consultation document detailing a very brief strategy on how the objectives are going to be achieved. The primary purpose of the B&NES Core Strategy review is to identify and allocate sites to meet the housing and economic development requirements established through the JSP up to 2036. The focus of the B&NES Core Strategy review is to deliver the vision and objectives of the Joint Spatial Plan by identifying and allocating as appropriate any strategic sites required, as well as establishing a strategy for and allocating sites to provide non-strategic development. Whilst both the JSP and the B&NES Core Strategy review have been co-ordinated for public consultation, none of the more specific detail from the JSP has been used to inform the B&NES Core Strategy review commencement document.

At paragraphs 14, 47 and 159 the NPPF is very clear that authorities should positively seek to meet their objectively assessed needs when plan-making. The NPPF requires that finding the most sustainable locations for planned growth should be the starting point when seeking to allocate land through a Local Plan. The commencement document has not touched upon a strategy of where to focus the additional growth.

Additional land should be allocated to ensure flexibility of supply and sustainable locations should be considered to be first priority in selecting further sites for allocation. The Core Strategy Review needs to consider allocating strategic sites that will be deliverable, provide a mix of sites and locations that are attractive to wide cross sections of the housing market which can contribute to affordable housing and lifetime homes. The need to consider self-build, first time homes, intermediate homes and a full range of market homes is essential.

The land of Wellsway comprises 0.6 ha of developable brownfield land that is capable of accommodating 100% affordable housing scheme with up to 25 dwellings; this is reflected by its transitional urban location and density of the surrounding development (See Appendix 2 for an Site Layout Plan). This is subjected to the constraints analysis, any proposed technical solutions and open space provision. This would contribute immediately to the shortfall of housing in the five-year housing land supply. Previous issues relating to undersupply has been largely due to the complexities of seeking to deliver the bulk of housing on complex strategic sites requiring either significant preparatory infrastructure or complex remediation and the sale of a significant brownfield site.

At present Keynsham is considered as the most sustainable location for development outside of Bath. As a consequence, the need to provide sufficient land for development is significantly higher in locations such as Keynsham. The land at Broadleaze Nursery performs fewer purposes of why land should be included in the Green Belt than the land adjoining East Keynsham. As such, the land at Broadleaze Nursery should be considered appropriate as an allocation. The future development pattern for the area is being strongly influenced by the West of England Partnership's Joint Strategic Plan and as such, the requirement to deliver a greater volume of residential development, in particular 100% affordable development, is significant.

Comments on the proposed programme for the preparation of the Core Strategy review

It is acknowledged that the programme for the Core Strategy review has been set to relate to the preparation of the JSP. As the JSP will set the overall strategic context which the Core Strategy review will need to conform to, this is welcomed. Consultation is a key factor for any programme this also needs to be taken into consideration when planning the programme.

The matter of critical importance is that the Local Plan Review is not brought forward inconsistent with the general themes and broad locations that will become established via the West of England Partnerships emerging Joint Spatial Plan and Joint Transport Study.

To ensure this does not happen and the work undertaken for the Bath Local Plan Review is undermined the programme for drafting and consultation should be offset from the WEP JSP and JTS.

It is advised that whilst it is important not to delay the progress of the Review, it is brought forward so as to be found sound when at Examination. In order for the Inspector to be capable of finding the Review Sound it must be consistent with the JSP, or at very least the emerging strategy.

AS the programme is currently detailed, it does not allow flexibility to react to delays in the JSP, revisions of any policies within the JSP brought about through the consultation process.

We are mindful that the Placemaking Plan was assessed at Examination earlier this year and that the need to have a sound document that draws together those policies and those already within the current local plan should not be delayed. Part of the assessment of soundness is ensuring an adequate supply of development land and it is critical to ensure Bath and North East Somerset has a defensible plan. However, with careful monitoring of the progress of the JSP should enable this to work in tandem.

Our suggestion would be to add a further three months to the programme of the Bath Local Plan to ensure resilience and a timely adoption.

The programme should therefore read:
- Autumn 2016: Commence

- Autumn 2017: Draft Proposals
- Summer 2018: Publish Plan
- Winter 2018: Submit for Examination
- Spring 2019: Hearings

In allowing the additional few weeks to account for key indicators arising from the West of England Partnership the Bath Local Plan Review should be able to resource effective plan making by ensuring the evidence base and objectives are robust.

Specific observations on the Core Strategy review

The Core Strategy Review will formalise the relationship by combining two DPDs into one Document, effectively streamlining the policy position, which is welcomed. Paragraph 9 of the consultation document states 'Given that the site allocations and detailed Development Management Policies contained within the Placemaking Plan will only recently have been adopted it is not proposed that these will be reviewed, unless changes to legislation or national policy makes this necessary during the preparation process.' It is considered that a review of these allocations and policies may be necessary as there may be scope to address some of the housing and economic development requirements established through the JSP not considered before.

Where the JSP is seeking to direct development the Bath Local Plan Review should then ensure these locations are capable of providing the quantum of development proposed through the JSP.

The Review should also seek to allocate smaller sustainable development sites to ensure a flexibility of supply. The JSP will be dealing with sub-regional strategic issues and the Duty to Cooperate. This means that to ensure Bath has a suitable supply of housing land to meet its own justified needs the Review will need to focus on delivering other sites that are not identified in the JSP.

The Review should be capable of standing on its own two feet whereby sites that are not seeking to redress sub-regional and shared issues via the DTC, the plan will be capable of achieving an allocation without direct support from the JSP. Ensuring Bath and North East Somerset has a steady supply of planned development sites is essential and this relies on a flexible resource being provided. Additionally, to the land supply issues that have been prevalent in the sub-region, Bath also is restricted in affordability terms. It would be useful if the Affordable Housing Policy that is shaped through this review reflects the diverse nature of the district.

The City of Bath, and much of the authority area, is an expensive location to purchase property and there will be locations that can contribute better towards Affordable Housing than others. Using a variety of models to unlock affordable housing potential, including shared ownership, self-build and starter home initiatives, it would be positive to understand better how the Local Plan expects to meet its Affordable Housing Needs based on up to date location-specific evidence.

Location and Description of the Site

The proposed development site measures 0.6 hectares of developable land to accommodate approximately 25 dwellings, this figure is reflected by its transitional urban location and the density of surrounding development. The site is washed over with green belt designation and will require a green belt release or allocation to be brought forward for development. See Appendix 1 for a Site Location Plan.

The site is currently operational for most of the year as Broadleaze Nursery, selling Christmas trees through winter and then as a nursery throughout the spring and summer. The built form is typified by the extensive coverage of glasshouses and poly-tunnels synonymous with this type of use. Over 75% of the site has some built form. The development site in question does not have a specific landscape designation other than the Statutory Green Belt designation.

The site is located to the east and outside of, but adjacent to, the Keynsham settlement boundary. The site is within the administrative area of Bath and North East Somerset Council. The site can come forward and deliver a 100% affordable housing scheme for up to 25 dwellings.

A detailed flood map and modelled flood levels provided by the Environment Agency show that the site is located within Flood Zone 1.

Further Information available within the original representation: Yes

ID: 6346 / 1 Name: Organisation: Mactaggart and Mickel
 Agent: 205 Roche Associates

Comments on the proposed scope and content of the Core Strategy Review

In the Commencement Document (CD) it is stated (at paragraph 9) that the Core Strategy Review (CSR) provides the opportunity to formalise the relationship between the Core Strategy and the Placemaking Plan (PMP) by combining the two DPDs into one DPD (a Local Plan). However, it is not the intention to review the PMP since it will have only been recently adopted.

The difficulties of combining two DPDs that have been prepared at different times, are based on different evidence bases, and deal separately with strategic and non-strategic matters has been evidenced through the recent PMP Examination. The consequence is that the Inspector has found elements of the PMP that sought to update strategic provisions of the Core Strategy, to be beyond the locus of the PMP, and therefore should be removed from the Plan. In consequence, through its Schedule of Rolling Changes, the Council has rescinded large parts of the PMP, and is likely to be required to make further amendments once the Inspector's full report is published where changes have been made to Core Strategy policies, but not yet rescinded.

More importantly, throughout the Placemaking Plan Examination, the Council conceded that the PMP could not, and would not, meet the strategic requirements set out in the Core Strategy in a number of areas, but encouraged the Inspector to find the Plan be found sound since the Core Strategy would be subject to early review. Whilst, for reasons adduced at the PMP Examination, this is not accepted to be an appropriate way of proceeding, it would only be admissible if the intention was also to undertake an early review of the PMP which is parasitic upon the Core Strategy, and through which the accepted deficiencies of the PMP in its submitted form can be rectified.

Notwithstanding, and without prejudice to, the above, assuming that the PMP is adopted in accordance with the anticipated timetable, it is unlikely to have been only 'recently' adopted by the time the CSR progresses significantly. This is due in part to an error in the Plan Programmes set out on page 6 of the CD which anticipates 'Submission for Examination' of the Joint Spatial Plan in Spring 2018, and then reverts to mid 2017 for Hearings with adoption in Winter 2018. It is assumed that the anticipated date for Hearings is intended to be mid 2018, with the Examination Inspector's Report in Autumn 2018. Assuming that the PMP is adopted in Spring 2017 as currently anticipated, it will not have been 'recently' adopted by the time that the CSR is submitted for Examination since it will be mid 2018, not 2017 as indicated in the Plan Programmes.

Notwithstanding, and without prejudice to, the foregoing, the Plan Programmes is considered to be extremely optimistic given the scale and complexity of the issues, not least infrastructure delivery, with which the JSP must grapple, and with substantial growth allocations to make that are likely to be extremely politically contentious between the participant authorities. The difficulties of putting a single authority strategic plan in place, and consequential timetable slippage, will be well known to the Council. It is therefore extremely unlikely that it will proceed in accordance with the anticipated timetable. A more realistic, yet still optimistic, scenario is likely to be adoption in Winter 2020.

For all of the foregoing reasons it is considered that the CRS must comprise a full Local Plan review, incorporating the Core Strategy and PMP into a single document all of which is subject to simultaneous review with the output being the adoption of a composite and up-to-date Local Plan that makes proper provision to 'meet' full objectively assessed needs, and therefore remedies the accepted deficiencies of the current DPDs.

The scope of the CSR must therefore include all topic areas comprised in the current plan and be a full Local Plan Review resulting in a composite replacement Local Plan that will supersede both the Adopted Core Strategy and the emerging PMP. It must incorporate both strategic and non-strategic reviews of Green Belt boundaries to ensure that sufficient land in appropriate locations is available to meet objectively assessed and other needs, including the needs of the University and other institutions which, by the Council's own admission in the PMP, are currently unlikely to be met in full.

Comments on the proposed programme for the preparation of the Core Strategy review

For reasons set out above, the review programme is both optimistic and unrealistic, even allowing for correction of the typographical errors. Even on the most optimistic scenario, the Inspector's report on the JSP Examination is unlikely to

be received before Autumn 2019, meaning that the CSR will not be submitted until 2020. The programme should be adjusted accordingly.

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 6372 / 1 Name: Steve Osgood

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Please find below comments on certain sections of the revised Core Strategy / Placemaking, out for consultation prior to 18 December 2016.

1

Heritage

Because Bath's underlying economy relies substantially on its international tourist appeal, maintenance of the identified features of its World Heritage City status is a pre-requisite for any Core Strategy.

BNES appraisal in the light of UNESCO's Urban Landscape Initiative, has not been updated nor compared with like continental cities - (Spain has 37 such cities), and far too little attention has been given to or references made to a clear development conflicts,

b to the maintenance of existing fabric etc over the plan period per policy HE1 8b

The WHS Management Plan adopted by Council was an expensive exercise and its recommendations should be recognised and referred to in proposals for development or refusals.

2

Interests

A conflict of interests arises when the Council is both Owner/Developer of the site and Local Planning Authority.

Notwithstanding Councillor's protests of impartiality, this conflict can only be resolved by a contextual townscape proposal by a quite independent party. BNES has in the past issued planning consents following consultations and then changed the ground rules on plot ratio, use content etc without further consultation - Western Riverside is a case in point, Foxhill and Newark presenting similar situations.

3

Placemaking sites

Planning is a numbers discipline. Townscape is about quality of place. In a World Heritage City the latter absolutely must predominate in order to not prejudice OUV's, the possibility of Objections, Call-ins etc Placemaking sites appear to be opportunistic and 'estates driven' rather than strategic.

Council's planning briefs for emerging sites must remain fluid until an acceptable townscape and architectural solution is agreed (by the sort of non government 'board of designers' which is common to most heritage towns in the world) - a planning committee is not the same thing.

3

Bathwick Meadows

Neither the JSP nor Core Strategy appear to recognise the environmental significance of the Avon valley entering Bath from the east. This should be a strategic, designated green area stretching from 'golden valley' to Parade Gardens, via Sydney Gardens (Holburne) & Bath Rec, with defined restrictions on edge permissions and a 20 year programme for pedestrian use and consequential landscaping / hardscaping.

(refer environmental impact of recent linear parks in east London, Milton Keynes etc)

4

Eastern Park & Ride and A4/A3 connection

Proposals have not yet demonstrated compliance with policy ST3 1),2) & ,3) or a solution that would not be 'called in'. An acceptable environmental solution is overdue.

5

Bath Recreation Ground is a quite unsuitable location for a mass event stadium because

- social patterns in international tourism, in terrorism etc now mitigate against large assembly facilities in town centres
 - a professional single use facility mitigates against Council objectives for amateur recreation at the core of the city and its policies D1, e/f to policy D8/1 a&b
- the size of stadium proposed is a regional facility (ie not supportable by Bath's size) generating substantial inbound travel for events
- the consequent modal split of travel into the centre of Bath cannot be supported by available access and parking infrastructure without prejudice to other activities
- the open space of the subject site is a key feature of Bath's World Heritage City status

6

Western Riverside housing

With the increase in plot ratios and lowering of design standards from the originally approved scheme, BNES appears to have lost control of the environmental quality of what was perhaps the most promising housing site in the region, if not the country. Visitors to Bath will come for the Royal Crescent and Circle / not for Western Riverside which is a seriously lost opportunity from its original concept. This now requires a huge planting programme to ameliorate the present environment of mid 20cent slab blocks.

7

Foxhill

The current proposal appears to be stuck in the 1960's and presents a lost opportunity for Bath to show the way forward with a truly contemporary solution - much could be gained by visiting recent Dutch and German low but quite high density and liveable housing. The introduction of 6 storey slab blocks at the back of the site is truly erroneous.

I trust you will take these perhaps random comments in the spirit intended. Bath could be doing a lot better !

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 6410 / 1 Name: Organisation: Linden Homes Strategic Land

Agent: 19 Pegasus Group

Comments on the proposed scope and content of the Core Strategy Review

Pegasus Group has been instructed by Linden Limited (Linden Homes Strategic Land) to respond to the Core Strategy Review Commencement Consultation.

The review of the Core Strategy is welcomed and particularly the opportunity to formalise the relationship between the Core Strategy and the Placemaking Plan into one Local Plan. I note that it is the intention not to review the site allocations and detailed development management policies contained in the Placemaking Plan, as they will have only recently been adopted; however, if any are affected by the emerging policies or changes in national policy these will need to be reviewed.

The Core Strategy review is being prepared alongside the West of England Joint Spatial Plan which will provide the new strategic planning context for B&NES to 2036. Consequently, the timetable is dependent on the progress of the JSP. Whilst the JSP will establish the overall housing requirement and the broad distribution of housing and employment, including the identification of strategic development locations and strategic infrastructure, it will be for the Core Strategy to identify and allocate non-strategic sites.

Although there are allocations in the adopted Core Strategy and the Placemaking Plan, additional development opportunities will need to be identified and allocated for the plan period to 2036 in accordance with the overall housing requirement established for B&NES. Pegasus have submitted representations in response to the West of England Towards the Emerging Spatial Strategy Document and consider that the housing requirement should be higher than

currently proposed and that in order to meet housing needs a broad portfolio of sites should be complimented with smaller non-strategic sites so as to ensure housing delivery is maximised and that the Plan is positively prepared, justified and effective.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

In this context we are promoting land off Bath Old Road, Radstock which can make a contribution to meeting the housing needs in the plan period. The site has previously been promoted in response to the Call for Sites for the Housing and Economic Land Availability Assessment in January 2015, which was undertaken by each of the four authorities as part of the evidence base for the development of the West of England Joint Strategic Planning Strategy).

We have previously submitted a Sustainability Appraisal for land of Bath Old Road, Radstock in response to the West of England JSP Issues and Options Consultation in January 2016. Since then further work has taken place to refine the concept plan based on a more detailed Transport Assessment, as such a revised Concept Plan has been prepared and is included in the attached Development Framework document. A Socio Economic Assessment has also been prepared and is included with this submission.

Pegasus on behalf of Linden Limited look forward to engaging in the review of the Core Strategy; in the meantime, if you require any further information or we can be of assistance in any way please do not hesitate to call me on the above number.

Further Information available within the original representation: Yes

ID: 6442 / 1 Name: MD Gibb

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

UNFORTUNATELY THERE IS NO POINT IN PUTTING FORWARD MY "OPINION OR SAY" AS YOU STATE. I WROTE TO BATH V NE SOM STATING MY OPINION WITH REGARDS STUDENT ACCOMODATION IN BATH, WHICH I FELT AS A BATHONIAN OF 84 YEARS (AS WAS MY MOTHER) I HAD THE RIGHT TO DO. I RECEIVED NO REPLY!!!

Further Information available within the original representation: No

ID: 7115 / 1 Name:

Organisation: Bidwell Metals

Agent: 187 Mr Matthew Kendrick

Grass Roots Planning Ltd

Comments on the proposed scope and content of the Core Strategy Review

2.1 We have set out our concerns in connection with the policy approach to the Somer Valley in previous representations to the Core Strategy and PMP during February 2016; however, we are also aware that specific questions have been asked as part of this review process and this section sets out our responses to them in turn.

2.2 Our responses to the consultation questions are as follows:

2.3 BANES alongside Bristol, South Gloucestershire and North Somerset form the West of England Partnership which aims to jointly provide for new houses, land for employment and infrastructure over the next twenty years. In doing this the WoE Partnership is currently preparing a Joint Spatial Plan (JSP) which is currently being consulted on. As a result, the review of the CS will need to be informed by the JSP. It is expected that the JSP process will identify that the number of homes that need to be provided for in BANES will rise.

2.4 The JSP which, is currently being consulted on at the same time as the CS, states the following within paragraph 39: 'Evidence shows that due to significant environmental constraints there is no scope to further expand Bath outwards.'

2.5 This statement raises the question as to where development will be placed within BANES. The city of Bath has a number of environmental constraints which include the cities designation as a UNESCO World Heritage Site, large conservation area and the nearby Cotswolds AONB. These factors can be seen as a constraint on the council's ability to deliver large scale development. The CS highlights that the city of Bath alongside Keynsham and the Somer Valley are the main population centres. With a number of large scale developments already allocated at Keynsham (including emerging JSP allocations) and the constraints surrounding Bath it is clear that allocating development within the Somer Valley is going to be required to ensure the areas Objectively Assessed Housing Need (OAN) is provided for.

2.6 As we have set out in previous representations we consider that within the Somer Valley there needs to be greater flexibility provided as part of planning policy to introduce the flexibility that the NPPF requires to enable authorities to react to rapid change. Currently housing growth is restricted here. Housing affordability within BANES is deteriorating and given the constraints to developing at Bath alternative strategies are required.

2.7 Given the extensive development planned for at Keynsham and the emerging allocation of land at Whitchurch to provide an urban extension at Bristol, we consider that one of the only remaining options available to BANES is the provision of housing within the Somer Valley.

2.8 BANES have raised concern that there is insufficient employment in the Somer Valley to justify larger scale development here but we contend that such concerns are outweighed by the need to provide for the areas OAN. The justified alternative would be to provide for development here and strengthen the areas public transport links with Bath and Bristol, which could be achieved through planning contributions secured from new development.

2.9 As a result there needs to be a permissive policy in place such as to allow for the development of sites in sustainable locations on the edge of settlements. This would provide the flexibility required in order to meet changing circumstances as set out within paragraph 14 of the NPPF as well as ensuring a rolling five year housing land supply can be achieved and maintained as set out within paragraph 47 of the NPPF.

Comments on the proposed programme for the preparation of the Core Strategy review

As stated within question one, the review of the CS needs to be informed by the JSP. Meaning the time scale for the preparation of the revised CS needs to be realistic while also taking account of housing numbers which are to be set as part of the JSP. At this present time, we feel the current time frame presented to be too optimistic and would not be fully informed by the JSP.

Specific observations on the Core Strategy review

2.11 As mentioned the city of Bath's designation as a world heritage site and confirmation that the area will not be taking any large-scale growth has led to a need for greater flexibility. The main secondary population centre of Keynsham already has a large level of housing growth currently allocated to it. As a result, it is seen that there is a greater need for more housing to be placed within or close to large towns within the authority area. Development at Bath and Keynsham the Somer Valley can be seen as the most sustainable locations to accommodate growth where possible. As a result of the constraints on Bath and Keynsham the Somer Valley has to be considered to take more housing within the authority area. The concerns in respect to locational sustainability in this area could be dealt with through the provision of better public transport links delivered via developer contributions.

1.1 On behalf of Bidwell Metals Ltd Grass Roots Planning have been instructed to prepare and submit written representations to the Bath and North East Somerset (BANES) Core Strategy Review. Bidwell Metals currently own a metal recycling facility and connected transport depot on the northern edge of Clandown and Radstock respectively.

1.2 This statement sets out our position on the Core Strategy (CS) and the issues and options for consideration as part of the impending review. We also promote two Bidwell Metals sites as future allocation for housing.

1.3 The CS was found sound and then adopted 10th July 2014 and forms part one of the Bath & North East Somerset Local Plan with the PMP intended to form part two. The PMP is intended to be a document in its own right and will supersede certain elements of the CS in addition to help shape what development takes place and where up to the year 2029. We have previously submitted representations for both of these sites in regards to the Bath North East Somerset Draft Place Making Plan (PMP) which ran from December 2015 to February 2016. When considering the PMP and its relationship to the CS we have significant concerns in respect to the policies set out in the Somer Valley Chapter, which

aim to restrict the supply of housing growth and will not allow the flexibility to react to changing circumstances as required by paragraph 14 in respect to the overarching presumption in favour of sustainable development.

1.4 Both of the sites promoted within this statement have been submitted to BANES as planning applications in October 2016 with both sites contributing up to 76 dwellings (49 for Chapel Road, 27 at Bath Old Road) to the housing supply for the area. The applications are supported by technical studies undertaken to inform any mitigation measures that need to be considered with regards to highways, ecology, landscape, archaeology etc. but it is largely thought that there are no significant in principle constraints to the development of these sites. The homes proposed can be delivered within the next five years' subject to planning permission being granted early in 2016.

Further Information available within the original representation: Yes

ID: 7116 / 1 Name: Rosemary Naish Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Given the issues being addressed by the JSP, and therefore not in of this review the proposed scope & content is sensible.

Comments on the proposed programme for the preparation of the Core Strategy review

It is important that both the CS review & the JSP are in sync and this is reflected in the programme.

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 7248 / 1 Name: Mrs Marianne Streater Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

"There are 3500 houses planned for Whitchurch without any planned improvements to the infrastructure and amenities. We already have limited facilities and the traffic situation is already very stretched. Only recently the A37 had two fatalities, which should be taken into consideration. Whitchurch village is badly situated to take this amount of development, there are better areas that could support it but have surprisingly been over-looked. For example, Long Ashton already has a park and ride facility and up-coming metro-bus link that could be used, and is also closer to significant amounts of amenities and employment. Another example is Hicksgate, right beside the ring road, park and ride and close to employment. Also, other areas have been omitted for subjective reasons like ""they value their green-belt""....well so does Whitchurch village but this has been over-looked. Whitchurch village neighbourhood plan showed 98% of respondents wanted their green-belt retained and valued it highly. Why is one area omitted from development based on them valuing their green-belt and another isn't?! There is also plans to build a link road from Hicksgate to Whitchurch, however, this would not be necessary if the housing was placed at Hicksgate! Basically, if Whitchurch is to take this amount of development, there MUST be some realistic plans to improve the amenities and transport issues that we already have and the residents should have visibility of this before the development is agreed."

Further Information available within the original representation: No

ID: 7248 / 2 Name: Mrs Marianne Streater Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

"There are 3500 houses planned for Whitchurch without any planned improvements to the infrastructure and amenities. We already have limited facilities and the traffic situation is already very stretched. Only recently the A37 had two fatalities, which should be taken into consideration. Whitchurch village is badly situated to take this amount of development, there are better areas that could support it but have surprisingly been over-looked. For example, Long Ashton already has a park and ride facility and up-coming metro-bus link that could be used, and is also closer to significant amounts of amenities and employment. Another example is Hicksgate, right beside the ring road, park and ride and close to employment. Also, other areas have been omitted for subjective reasons like ""they value their green-belt""....well so does Whitchurch village but this has been over-looked. Whitchurch village neighbourhood plan showed 98% of respondents wanted their green-belt retained and valued it highly. Why is one area omitted from development based on them valuing their green-belt and another isn't?! There is also plans to build a link road from Hicksgate to Whitchurch, however, this would not be necessary if the housing was placed at Hicksgate! Basically, if Whitchurch is to take this amount of development, there MUST be some realistic plans to improve the amenities and transport issues that we already have and the residents should have visibility of this before the development is agreed."

Further Information available within the original representation: No

ID: 7249 / 1 Name: Mr Terry Walker

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

"I would like to see that brown field sites are used for development and green field sites are only used as a last result. Also any empty properties are renovated and brought up to date for use. We are losing good farm land at an alarming rate land that we and future generations will need for food production. Once this land is developed it is gone for good."

Further Information available within the original representation: No

ID: 7250 / 1 Name: Mrs Margaret Waring

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

"I have just spent half an hour trying to navigate this review but found the whole thing too complicated, too much jargon, too ambiguous to give me any straight forward answers to my curiosity. As a retired professional, I strongly feel that if you genuinely want feedback from the general public you need to seriously look at producing some more basic, factual information and leave the present data online for those with ' Council speak' experience! I know these comments are not appropriate to your question, but I do feel very strongly about this. People cannot comment on what they do not understand. PLEASE FORWARD AS APPROPRIATE."

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 7251 / 1 Name: Oldfield Park Residents Association (OPRA) Organisation:

Agent: 303 Mr Rob Mitchell

WYG Planning & Environment

Comments on the proposed scope and content of the Core Strategy Review

Please see accompanying letter

Comments on the proposed programme for the preparation of the Core Strategy review

Please see accompanying letter

Specific observations on the Core Strategy review

Please see accompanying letter

Further Information available within the original representation: No

ID: 7251 / 1 Name:

Organisation: Oldfield Park Residents Association

Agent: 303

WYG

Comments on the proposed scope and content of the Core Strategy Review

We write on behalf of the Oldfield Park Residents Association (OPRA) in respect of the Core Strategy Review 2016-2036 Commencement Document. We understand the Review is being undertaken alongside the West of England Joint Spatial Plan.

The Core Strategy Review Notice observes that “Local involvement in plan-making helps make a better and more relevant plan.” It is in this spirit that OPRA seeks to engage in the Review process from the outset.

OPRA notes that in respect of the Review preparation the Council is at the first stage of public consultation and, at this initial stage, is inviting views on the proposed content, scope and programme for the Review. OPRA note with interest further consultation is planned and gratefully requests it is notified in due course as the Review progresses and further consultation undertaken.

The Commencement Document details that the Council currently intends for the Review to be focussed on key elements of the plan, including, inter alia:

- addressing housing (including affordable housing) and employment development requirements to 2036;
- establishing a strategy for identifying any other sources of housing/ employment land supply (not identified in the planned Joint Spatial Plan);
- reviewing the expansion objectives of the Universities and the relationship between student accommodation requirements/supply and the overall housing requirement; and
- inclusion of new policies or amendments to existing policies.

Placemaking Plan

Following the conclusion of the Draft Placemaking Plan (PMP) Examination Hearing Sessions, OPRA note the Inspector’s Interim Findings (ID/17). These make clear the Core Strategy (CS) forms Part 1 of the Local Plan and the PMP is intended as Part 2. The PMP does not incorporate a partial review of the CS and is intended to be the “daughter document” to the CS – its purpose is “to give effect to the strategic policies within the CS...”

With respect to Policy B5 of the CS ‘Off Campus Student Accommodation’ the Inspector’s Interim Findings highlight the uncertainties with the assumptions on university growth which underpin this policy. The Inspector notes that future development needs of universities have now changed. The Inspector advises this strategic matter must be considered as part of the Core Strategy Review.

Houses in Multiple Occupation (HMOs), Oldfield Park

It is broadly recognised e.g. paragraph 2.37 of the CS that the demand for on campus student accommodation has not been sufficiently catered for. The resulting expansion of the student lettings market has diminished the 'normal' housing stock of the city. The CS acknowledges the consequent proliferation of HMOs is particularly marked in the Oldfield Park/Westmoreland area.

The Council’s SPD Houses in Multiple Occupation in Bath (2013) states that the combination of the Council’s Article 4 Direction and the SPD will “manage the future growth and distribution of HMOs across the City, with the aim of creating more balanced communities.” In determining planning applications the SPD requires special consideration of areas

above a 25% HMO density threshold be applied. However, whilst the SPD is a material consideration, it does not have Development Plan status.

Notwithstanding the SPD, the Council's most up to date evidence set out in 'Students Numbers and Accommodation Requirements in Bath' (dated May 2016) highlights, at Appendix 4, the concentration of HMOs in Oldfield Park – it shows in some areas concentration is as high as 47%. Despite this degree of imbalance HMO development proposals continue to be permitted in Oldfield Park, under delegated powers.

There is tacit acknowledgement at paragraph 2.37 of the CS of the "visible consequence" a "mismatch" in the supply shortfall of on-campus student development has caused in Oldfield Park/Westmoreland. Local residents are acutely affected by what OPRA considers to be a wholly disproportionate provision of HMOs in Oldfield Park. Such an over-concentration of student/HMO provision in Oldfield Park gives rise to highly significant effects which include, but are not limited to: noise, disturbance, anti-social behaviour, detrimental impact to townscape (through poor/mismanagement of property) and, crucially, the marked imbalance in the local community.

Despite the above, there is no explicit, strategic policy protection of Oldfield Park. It is OPRA's firm view that the existing level of policy protection provided by the Core Strategy e.g. Policy B5, as worded, is ineffective and inadequate in ensuring a "balanced community" in Oldfield Park.

Core Strategy Review

OPRA welcome the Council's intention to review the Universities expansion objectives and student accommodation requirements/supply. However it is OPRA's view that any review must more broadly encompass the demand and supply relationship of the Houses in Multiple Occupation (HMO) sector generally i.e. inclusive of non-student HMOs needs/supply, and with specific regard to the Oldfield Park ward. The review must include the effectiveness of Core Strategy policy in maintaining balanced communities.

As part of this, OPRA requests the scope of the CS Review includes a full and thorough review of:

- HMO Article 4 Direction – this authority wide direction likely discourages HMO provision in areas with very low HMO concentration;
- including otherwise highly sustainable areas well equipped to cater for future HMO needs – investigation of a refinement of the Direction is needed; and
- Policy B5 of the Core Strategy – The policy provides the Central Area explicit policy protection.

It is OPRA's view that Oldfield Park in particular warrants greater policy protection from purpose built student accommodation and HMOs (student/ non-student) given the effect an over concentration of HMOs has had on the balance of the local community. OPRA consider more effective policy intervention is required and new policy and/or amendments to existing CS policies are likely to be the most appropriate course of action. Full consideration of this should therefore be included in the CS Review.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Houses in Multiple Occupation in Bath SPD

OPRA also understand the Council intends to publicly consult on a review of the HMO in Bath SPD (planned for Spring 2017). OPRA acknowledge the SPD will be subject to its own review process and consultation; nevertheless given the relevance of this document to the matters raised above the timing of this review is considered opportune.

As you are aware the degree of existing local HMO provision over and above the 25% SPD threshold plays no role in development management decisions. With particular regard to the Oldfield Park ward OPRA consider the SPD threshold mechanism, in its current iteration, to be ineffective in ensuring a balanced community. OPRA welcomes the planned review and requests it is also kept updated of public consultation on this document in due course.

We trust the above is helpful as you progress towards CS Review Issues/Options consultation in Spring 2017.

Further Information available within the original representation: No

ID: 7252 / 1 Name: Mr Guy Lamb

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Although there is no housing development proposed for Saltford at present, I would like to remind the council that, as was seen in the 2013 Manor Road inquiry, there is vigorous opposition from Saltford residents to any large scale, unsustainable development on the greenbelt around Saltford. Any such development would harm the greenbelt, dilute Saltford as a cohesive community and transform it to a dormitory for Bristol and Bath.

Further Information available within the original representation: No

ID: 7253 / 1 Name:

Organisation: St William Homes LLP

Agent:

Comments on the proposed scope and content of the Core Strategy Review

SWH understands that the B&NES Core Strategy Review Commencement document is an initiation document setting out the proposed scope and programme for the preparation of the Bath & North East Somerset Core Strategy Review 2016-2036.

The proposed scope and content is supported; in particular the proposed approach to identify and allocate development opportunities, align the Core Strategy with the Joint Spatial Plan as well as the anticipated adopted Placemaking Plan is welcomed.

The intention to prepare and publish an evidence that is proportionate to the scope of the review including a Strategic Housing Market Assessment and a Housing and Economic Land Availability Assessment and incorporating a housing land supply delivery trajectory is in line with both the NPPF and NPPG and therefore supported.

Comments on the proposed programme for the preparation of the Core Strategy review

Timescales set out in paragraph 23 are supported.

Specific observations on the Core Strategy review

SWH does not have any other comments at this stage. We are fully committed to working with the Council and stakeholders to bring forward development of the site at Lower Bristol Road, Bath and on this basis we look forward to being actively involved in the Core Strategy process going forward.

St William trust that their comments will be duly considered.

St William Homes LLP (SWH) is pleased to provide written representations in response to a consultation on Bath & North East Somerset, Core Strategy Review Commencement Document – 2016.

SWH are a joint venture company formed by the Berkeley Group and National Grid Property Holdings (NGPH). The partnership has been established to lead regeneration of redundant gasholder sites across London and the south-east. The Berkeley Group brings substantial experience of redeveloping complex regeneration sites and has the ability to deliver a significant number of well-designed, high quality new homes through applying a landscape led approach.

In respect of this consultation, SWH has an interest in the National Grid owned site at Lower Bristol Road, Bath and these representations are made solely on behalf of St William, notwithstanding any representations made by other divisions of the Berkeley Group or National Grid.

The Site

The site comprises an irregular parcel of previously developed 'brownfield' land that wraps around the site of three (now demolished) large gas holders. The surrounding uses are mixed in character; there are various car dealerships which adjoin the site to the south and run along Lower Bristol Road. Beyond this on the southern side of Lower Bristol Road is

the former Bath Press site and other existing residential development. To the east of the appraisal site is recent and current development being completed by Crest Nicholson and to the West is the A3604 (Windsor Bridge Road).

The River Avon runs along the northern boundary of the appraisal site, consequently, there are areas at risk of flooding associated with this. Areas within Flood Zones 2 and 3 respectively.

The site is accessed from the A3604 Windsor Bridge Road and Oldfield Park rail station is approximately 500m to the south and is part of the Bath Western Riverside development area, as included in the related Bath Western Riverside SPD adopted 2008. The SPD allocates the site as a “residentially led, mixed-use site including community and local retail.”

There is an existing permission for the site as part of the wider regeneration area, application reference 06/01733/EOUT has permission for ‘Up to 2281 residential homes and apartments, up to 675 student bedrooms and associated communal areas, local shops, restaurants and other community services and facilities, a primary school, construction of new bridges, roads, footways and cycle ways, associated infrastructure and facilities, accommodation works and landscaping.’

Further Information available within the original representation: No

ID: 7254 / 1 Name: Organisation: Rentplus
Agent: 228 Tetlow King

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

We represent Rentplus, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people aspiring to own their own home but trapped by ineligibility for other affordable housing. Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the model’s compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council’s strategic planning team take into account this innovative, Government supported, model.

There are clear challenges to delivering sufficient affordable housing across Bath and North East Somerset to meet local housing needs, as emphasised in the adopted Core Strategy, Placemaking Plan and this Review. Many households across the District face a long wait to access appropriate housing as those in greatest need on the housing register are rightly prioritised, while open market housing and private rental accommodation is in many areas prohibitively expensive. Rentplus homes offer a new solution to this issue, enabling access to housing rented at an affordable level with the expectation that those householders will purchase in year 5, 10, 15 or 20, with a gifted deposit. This provides the security of an affordable rent, fixed at 80% of the open market rent or the Local Housing Allowance, allowing households to save towards a mortgage on the property without fear of rent rises, and maintenance of the property during the rental period.

This innovative tenure allows families to move to more appropriate homes, freeing up social rented or affordable rented properties for households in greater need. It also allows those families trapped in private rented sector accommodation, or still living with parents to gain independence and security of tenure. The delivery of Rentplus homes as part of a mixed tenure (or mixed use) scheme also has the potential to speed up overall delivery as the product does not require grant funding, and can be occupied speedily.

Partner Registered Providers already active in the District are also given the option of purchasing any Rentplus property that is not bought by an individual household within the 20 year period, giving the Registered Provider an opportunity to continue offering that property as any affordable housing tenure. The Council is invited to enter into a Memorandum of Understanding (MoU) with Rentplus, setting out joint aims to deliver high quality housing to local people in need. This provides a best endeavours commitment by Rentplus to replenish stock sold in the Borough on a one for one basis, allowing for a proportion of the affordable housing stock to be retained in the local area.

As noted above, the Government has recognised the benefits of this new tenure and is expected to incorporate this within the definition of affordable housing as set out in the NPPF. We are encouraging planning authorities to incorporate the tenure within Local Plans to help those in need out of inappropriate housing.

As noted in the adopted Core Strategy, there is a clear need to deliver significant numbers of affordable housing. This is increasingly difficult with cuts to grant funding and other economic factors impacting development. The inclusion of rent to buy within the reviewed Core Strategy would help alleviate the housing need across the District, much of which is currently trapped in private rented sector accommodation. This is recognised by national policy and case law to not meet the needs of households requiring affordable housing, in part due to lack of security of tenure and also a predominantly poor quality of accommodation.

It is important to note that the partner Registered Provider is given the option of purchasing any Rentplus property unsold within 20 years. This gives the Registered Provider an opportunity to purchase and continue offering that property as any affordable housing tenure that meets their needs. The Council is also invited as part of the delivery of Rentplus homes to enter into a Memorandum of Understanding (MoU), setting out joint aims to deliver high quality housing to local people in need. As currently encouraged by Policy CP9, the MoU also provides a best endeavours commitment for Rentplus to replenish the stock on a one for one basis, allowing for a proportion of the affordable housing stock to be retained in the local area.

Further Information available within the original representation: Yes

ID: 7255 / 1 Name: Adrian Betts and Kerry Irvine Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

No

Comments on the proposed programme for the preparation of the Core Strategy review

No

Specific observations on the Core Strategy review

We agree with the recent comment by the Leader of B&NES Council at a public meeting in Saltford on 1st December 2016 that there was not any housing development planned for Saltford and supports his opposition to the use of any of Saltford's important green belt land for housing development."

Further Information available within the original representation: Yes

ID: 7256 / 1 Name: Organisation: Millennium Developments

Agent: 288 Colliers

Comments on the proposed scope and content of the Core Strategy Review

Overall, it is considered that the proposed scope and content of the Core Strategy Review, as a whole, does not demonstrate the requirements of a sound plan. The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' ", namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. These representations highlight that the Plan should be positively prepared, justified, effective and consistent with National Policy by setting out the requirements and aligning the proposed scope with these

requirements.

It is understood that the B&NES Core Strategy review is at a very early stage however, it is considered that the consultation document detailing a very brief strategy on how the objectives are going to be achieved. The primary purpose of the B&NES Core Strategy review is to identify and allocate sites to meet the housing and economic development requirements established through the JSP up to 2036. The focus of the B&NES Core Strategy review is to deliver the vision and objectives of the Joint Spatial Plan by identifying and allocating as appropriate any strategic sites required, as well as establishing a strategy for and allocating sites to provide non-strategic development. Whilst both the JSP and the B&NES Core Strategy review have been co-ordinated for public consultation, none of the more specific detail from the JSP has been used to inform the B&NES Core Strategy review commencement document.

At paragraphs 14, 47 and 159 the NPPF is very clear that authorities should positively seek to meet their objectively assessed needs when plan-making. The prioritisation and maximisation of derelict, underused and undeveloped land within urban areas is supported as strategy for meeting a proportion of the JSP's requirements. The NPPF requires that finding the most sustainable locations for planned growth should be the starting point when seeking to allocate land through a Local Plan. The commencement document has not touched upon a strategy of where to focus the additional growth.

Additional land should be allocated to ensure flexibility of supply and sustainable locations should be considered to be first priority in selecting further sites for allocation. The Core Strategy Review needs to consider allocating strategic sites that will be deliverable, provide a mix of sites and locations that are attractive to wide cross sections of the housing market which can contribute to affordable housing and lifetime homes. The need to consider self-build, first time homes, intermediate homes and a full range of market homes is essential.

The land of Wellsway comprises 2.7 ha of undeveloped land within the City of Bath. The site is capable of accommodating approximately 42 dwellings at a density similar to that of the surrounding development (see Appendix 2). This would contribute immediately to the shortfall of housing in the five-year housing land supply. Previous issues relating to undersupply has been largely due to the complexities of seeking to deliver the bulk of housing on complex strategic sites requiring either significant preparatory infrastructure or complex remediation and the sale of a significant brownfield site. The prioritisation of undeveloped land within urban areas should be supported as a strategy for meeting the objectives of the JSP and the Core Strategy review and is integral to the soundness of the plan.

Comments on the proposed programme for the preparation of the Core Strategy review

It is acknowledged that the programme for the Core Strategy review has been set to relate to the preparation of the JSP. As the JSP will set the overall strategic context which the Core Strategy review will need to conform to, this is welcomed. Consultation is a key factor for any programme this also needs to be taken into consideration when planning the programme.

The matter of critical importance is that the Local Plan Review is not brought forward inconsistent with the general themes and broad locations that will become established via the West of England Partnerships emerging Joint Spatial Plan and Joint Transport Study.

To ensure this does not happen and the work undertaken for the Bath Local Plan Review is undermined the programme for drafting and consultation should be offset from the WEP JSP and JTS.

It is advised that whilst it is important not to delay the progress of the Review, it is brought forward so as to be found sound when at Examination.

In order for the Inspector to be capable of finding the Review Sound it must be consistent with the JSP, or at very least the emerging strategy.

AS the programme is currently detailed, it does not allow flexibility to react to delays in the JSP, revisions of any policies within the JSP brought about through the consultation process.

We are mindful that the Placemaking Plan was assessed at Examination earlier this year and that the need to have a sound document that draws together those policies and those already within the current local plan should not be delayed. Part of the assessment of soundness is ensuring an adequate supply of development land and it is critical to ensure Bath and North East Somerset has a defensible plan. However, with careful monitoring of the progress of the JSP should enable this to work in tandem.

Our suggestion would be to add a further three months to the programme of the Bath Local Plan to ensure resilience

and a timeous adoption.

The programme should therefore read:

- Autumn 2016: Commence
- Autumn 2017: Draft Proposals
- Summer 2018: Publish Plan
- Winter 2018: Submit for Examination
- Spring 2019: Hearings

In allowing the additional few weeks to account for key indicators arising from the West of England Partnership the Bath Local Plan Review should be able to resource effective plan making by ensuring the evidence base and objectives are robust.

Specific observations on the Core Strategy review

The Core Strategy Review will formalise the relationship by combining two DPDs into one Document, effectively streamlining the policy position, which is welcomed. Paragraph 9 of the consultation document states 'Given that the site allocations and detailed Development Management Policies contained within the Placemaking Plan will only recently have been adopted it is not proposed that these will be reviewed, unless changes to legislation or national policy makes this necessary during the preparation process.' It is considered that a review of these allocations and policies may be necessary as there may be scope to address some of the housing and economic development requirements established through the JSP not considered before.

Where the JSP is seeking to direct development the Bath Local Plan Review should then ensure these locations are capable of providing the quantum of development proposed through the JSP.

The Review should also seek to allocate smaller sustainable development sites to ensure a flexibility of supply. The JSP will be dealing with sub-regional strategic issues and the Duty to Cooperate. This means that to ensure Bath has a suitable supply of housing land to meet its own justified needs the Review will need to focus on delivering other sites that are not identified in the JSP.

The Review should be capable of standing on its own two feet whereby sites that are not seeking to redress sub-regional and shared issues via the DTC, the plan will be capable of achieving an allocation without direct support from the JSP. Locations that will support the specific objectives within Bath, for example, should be identified and land allocated in line with the Bath SHMA and ELR. Locations that can contribute to the vibrancy of Bath World Heritage Site and add value to Bath's economy should be able to be identified and brought forward on a smaller scale than that proposed in the JSP. Ensuring Bath and North East Somerset has a steady supply of planned development sites is essential and this relies on a flexible resource being provided. The Bath Local Plan Review should have a minimum site threshold for allocations appropriate to the scale and mix of its polarised character areas. For example, sites of ten and above for City of Bath and sites of 50 and above for locations outside of the City will ensure a steady and flexible supply of land. Additionally, to the land supply issues that have been prevalent in the sub-region, Bath also is restricted in affordability terms. It would be useful if the Affordable Housing Policy that is shaped through this review reflects the diverse nature of the district.

The City of Bath is an expensive location to purchase property and there will be locations that can contribute better towards Affordable Housing than others. Using a variety of models to unlock affordable housing potential, including shared ownership, self-build and starter home initiatives, it would be positive to understand better how the Local Plan expects to meet its Affordable Housing Needs based on up to date, location specific evidence.

Land at land at Wellsway, Odd Down, Bath comprises 2.7ha of greenfield land approximately 1-mile from the centre of Bath. The linear site borders Wellsway to the east, an arterial road which leads to the centre of Bath. The west of the site borders Odd Down Playing Fields and a number of residential properties lie on the northern and southern edges (see Appendix 1- Site Location Plan). The site is located within the City of Bath World Heritage Site and the Bath Conservation Area. There are two Grade II listed buildings in close proximity to the site; 172 Wellsway to the north, and 372 and 374 Wellsway with Retaining Wall, Railings and Steps to the south.

The site is accessed from Wellsway and slopes gently from north west to south east and also forms part of a site of Nature Conservation Interest. The site has excellent access links to the centre of Bath with a bus stop less than 20 metres away and Bath Spa railway station less than 1.5 miles away.

Further Information available within the original representation: No

ID: 7257 / 1 Name:

Organisation: NHS Property Services

Agent:

Comments on the proposed scope and content of the Core Strategy Review

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

When planning for new settlements, the Council should ensure that they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.

Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable

Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.

Restrictive policies, especially those which require substantial periods of marketing, could prevent or delay required investment in services and facilities. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.

An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing). Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 7258 / 1 Name: Leonard Sheen

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

I was surprised to discover that under the current strategy, only housing of more than 10 units count towards any target set for a parish.

This creates a difficulty for a small parish such as High Littleton where small developments (such as the successful Curo development of the former Co-op site - 9 units) are essential in order to maintain the character and setting of our rural

community.

I would therefore argue that the overall net increase in housing units is what should be measured against the target with no minimum number of units,

Further Information available within the original representation: No

ID: 7259 / 1 Name:

Organisation: Green & Faulkner

Agent: 193 Planning Potential

Comments on the proposed scope and content of the Core Strategy Review

On behalf of our clients (Green & Faulkner) we are pleased to see the intent to review the Core Strategy and have only a brief comment/query regarding the Scope and Evidence Base. It is unclear in the latter what is meant by "Local" Green Belt Assessment and it would appear likely, given the previously identified development needs, that the Green Belt boundary may need to be seriously reviewed in order to accommodate essential needs. The term "local" suggests a rather particular and, maybe, not comprehensive review or assessment which is not justified at this stage.

We trust, therefore, that the Green Belt Assessment will be comprehensive and take into account the fact that local people have ties to various locations where they may wish to spend their ongoing lives and trust that the review will look at all Green Belt areas and not, simply, promote one or two locations which may not be the most sustainable outcome for local residents. Those living in village areas also justify a focus on their local needs should these require expansion of the settlements.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Further Information available within the original representation: No

ID: 7260 / 1 Name:

Organisation: Barwood Land

Agent: 43 Savills

Comments on the proposed scope and content of the Core Strategy Review

We support the intention to use the CS Review as an opportunity to combine the CS and Placemaking Plan into a single 'Local Plan'. In line with paragraph 9, this should include a review of all policies in light of changes in national guidance or policy, or to reflect changes in best practice.

As set out at paragraph 7, the emerging JSP will establish the housing requirement for B&NES, allocate the broad locations for strategic development over the plan period and identify strategic infrastructure proposals.

In relation to strategic infrastructure, the commencement document specifically references transport, however in light of the requirement to plan across local authorities boundaries, we would also seek to ensure that the wider infrastructure requirements, for example education, health care etc., are also identified at a high-level as part of the JSP's evidence base. This will ensure that the JSP's allocation of sites is based upon a robust evidence base, and that a coordinated approach to infrastructure can be supported across the WoE. This is particularly pertinent in relation to South East Whitchurch given its proximity to Bristol.

The CS Review will formally allocate the sites at the Strategic Development Locations (SDL) identified within the JSP. The consultation document indicates that this allocation will include setting development and design principles, and infrastructure requirements for each site.

In light of the anticipated timelines for the JSP and the CS Review, the infrastructure necessary to support the developments, and the range of land interests across the SDLs, we would encourage the Council to provide allocation policies which set out mitigation and infrastructure requirements across the allocations.

Broad design parameters should be included within the CS Review which provide sufficient detail to remove the

requirement to subsequently undertake another masterplanning process across the allocations; which would add an additional delay to the delivery of the sites. This is particularly pertinent given the potential need for the SDLs to commence delivery in the medium term. The design parameters should however be flexible to ensure that detailed planning proposals can respond to opportunities and constraints which come forward as part of the collection of detailed assessments to underpin future planning applications.

The policies should also include sufficient detail in respect to infrastructure and mitigation requirements to enable applications to come forward on the allocations within a timely manner. This should ensure that should an application be submitted on only part of a strategic allocation, that there is sufficient evidence upon which to determine whether the proposals comply with the aspirations for the wider allocation, and that any infrastructure required for the wider allocation is secured.

In respect to the approach to affordable housing – the commencement document indicates that this will form part of the CS Review. Whilst it may be that the detailed development management policy in respect to affordable housing delivery will form part of this document, the JSP's evidence base will require a viability assessment to underpin the proposed SDLs.

Comments on the proposed programme for the preparation of the Core Strategy review

We support the timelines identified at p.6 of the document in respect to the relationship between the emerging JSP and the CS Review.

The decision to commence the CS Review now is encouraged, and the decision to publish draft proposals at the same time as the final JSP consultation in Summer 2017 is supported; as the Council's emerging evidence base for the CS will support the JSP process.

Specific observations on the Core Strategy review

We agree with the list of evidence base documents which will be drafted to support the CS Review. It is recognised that a number of these will only constitute local updates, following the drafting of strategic documents as part of the JSP evidence base.

In light of the timelines which the Council are seeking in respect to the emerging JSP and the CS Review, we would encourage the Council to produce drafts of these evidence base documents to support the draft plan consultation in Summer 2017. This will ensure that interested parties have sufficient opportunity to comment on the evidence base, and that the Council can respond appropriately to comments raised.

Barwood support the comprehensive development of the land at SE Bristol, and as such would welcome the opportunity to discuss the detailed allocation of the site with the Council following its identification as a preferred SDL within the JSP consultation document.

These representations have been prepared by Savills on behalf of Barwood Land, in response to the Bath and North East Somerset (B&NES) Core Strategy (CS) Review 2016-2036: Commencement Document (November 2016). Our client has the benefit of a Promotion Agreement with the landowners – the Horseworld Charity, on land at South East Whitchurch. A plan is enclosed which indicates the extent of our client's land interests.

These comments respond directly to the questions as set out in the consultation document. However, in so doing they expand on the content of the consultation document where appropriate to reference the wider planning context in respect to the emerging West of England (WoE) Joint Spatial Plan (JSP). It is noted that a parallel consultation is taking place in relation to the JSP, 'Towards the Emerging Spatial Strategy Document' (November 2016), and as such, we do not seek to repeat our submissions to that document.

It is however material to note that our client's land forms part of a broad location for development identified as a 'Strategic Development Location' (SDL) within the current consultation document under 'SE Bristol Whitchurch'. Our client's land is capable of accommodating a part of the major mixed-use new community set out in that consultation document for up to 3,500 new dwellings, and a range of supporting uses.

Further Information available within the original representation: Yes

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

I'm writing this email in response to the proposed redevelopment of homes in the Fox Hill area of Bath. I'm very pro-development in run-down areas that have potential for improvement, however looking at Bath I feel there are much better areas to be focussing on before getting to the stable brick builds. I live in Shaws Way in Twerton, an area with a large proportion of privately owned BISF homes (British Industry Steel Federation). BISF homes are all regulated pre-fabricated 3 bedroom houses placed mostly on large plots of land, they were built as I'm sure you know after the war as emergency accommodation. They were originally council owned and then a lot have now become privately owned. I own my home and have moved in last year, and looking around at local properties most look quite run down and have giant gardens that are being put to waste!! Some still have asbestos roofing, the side wooden pannels are being ripped off in storms and Most if not all have very poor insulation with thin walls (no brick) and waste energy, not contributing to Baths energy conservation plans I'm sure! If there were new builds built here that included driveways a large proportion of on road parked cars would be stopped, allowing buses to pass freely without trouble. The proposal I would like to put forward is for the council to at least consider our area for redevelopment (one 3 bed BISF home would be big enough for 2 new builds!) which I feel would make bath look better, be more energy efficient and contribute to the ongoing development of our beautiful city. I feel since they are prefabricated they would cost less to be demolished with a blank slate for new builds with better insulation to be put in their place. https://en.wikipedia.org/wiki/BISF_house

Further Information available within the original representation: No

ID: 7262 / 1 Name:

Organisation: Andrews Marquees

Agent: 219 PlanningSphere

Comments on the proposed scope and content of the Core Strategy Review

PlanningSphere act on behalf of, Andrews Marquees Ltd, who are the freehold owners of land at Oaklea, Sleep Lane, Whitchurch. We are instructed to comment on the Council's current round of consultation on its Core Strategy Review Commencement Document.

We note that the Core Strategy Review will allocate strategic sites at locations identified in the Joint Spatial Plan (JSP) and that in addition, other development opportunities will be identified and allocated building on those already identified in the Place Making Plan. The preparation of the Core Strategy Review and the JSP will therefore take place in parallel. Given that the Review is at an early stage, involvement at this time is clearly crucial in helping to influence and shape this review, hence our comments set out below.

It is the intention that the Place Making Plan, which we understand will be adopted shortly, will be combined with the Core Strategy Review to produce a Local Plan for Bath and North East Somerset. This appears to be a reasonable approach provided timetables for production of each of these documents are adhered to.

It is very likely that as a result of the JSP process and the Core Strategy Review additional housing land will need to be allocated to meet both five-year housing land supply and the overall target for housing delivery over the next 20 years. The interim Inspectors report into the Place Making Plan, at Paragraph 34 acknowledges that there is already a shortfall in the 2014 Core Strategy overall housing target - I acknowledge that the latest housing trajectory indicates an overall supply of some 12,690 dwellings, falling slightly short of the CS requirement of around 13,000 dwellings Given the ongoing pressing need for the identification of land for housing within Bath and North East Somerset, it is important that additional non-strategic sites are included and allocated as part of the Core Strategy Review process to ensure that the combined Local Plan has identified a sufficient supply of housing sites to meet housing need in the new Local Plan period (presumably 2016-2036).

Review of Green Belt Policies

In order to be able to demonstrate a sufficient supply of sustainable and deliverable sites, we consider that further Green Belt land in suitable locations should be released in order to meet the Council's Objectively Assessed Housing

Need for the 2016-2036 plan period. The NPPF is very clear that the correct mechanism for a review of Green Belt land is through the Local Plan process. We therefore welcome the commitment at paragraph 7 of the Consultation document to a strategic green belt review. However, whilst there are clear benefits in identifying strategic sites for Green Belt release, there needs to be a mechanism to enable the introduction of smaller sites at locations already identified as being suitable for Green Belt Release. This will enable the maintenance of a balanced portfolio of site sizes. We therefore also welcome the commitment to have new policies for the allocation of strategic and non-strategic sites at paragraph 10 in the Consultation document. We consider that these new policies should:

- Clearly recognise the necessity of the release of Green Belt land in sustainable locations
- Identify both a portfolio of strategic sites and smaller readily deliverable sites for release from the Green Belt that will enable a balanced approach to housing delivery.
- Identify sites in otherwise sustainable locations with good public transport links and surrounding infrastructure where landscape and other impacts can be limited.

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

Whitchurch has a number of existing services and facilities including a primary school, church, pub/restaurant and shops. There are regular bus services to the cities of Bath, Bristol and Wells as well as the wider area with links to mainline rail services. Bristol City Centre is approximately 8 km away and the City of Bath lies approximately 21 km west of Whitchurch. There is also a cycle path route that provides a traffic free route part way into Bristol City Centre. This clearly demonstrates that Whitchurch is a sustainable location for residential development.

The potential for Whitchurch to be a suitable location for development is clearly recognised in the latest iteration of the Housing and Economic Land Availability Assessment (which details significant land holdings that are in the process of being promoted through the Strategic Land Availability Assessment. However, these are nearly all large sites that would have relatively long lead-in and build out times, and we consider there is a need to introduce some flexibility in the approach to delivery in this location, by identifying smaller, readily available sites such as the site at Oaklea, Sleep Lane, Whitchurch.

Whitchurch has already been identified in both the Core Strategy and the Place Making Plan as a suitable location for release of a site from Green Belt at Staunton Manor Farm (Horse World) between Sleep Lane and Staunton Lane. Planning Applications 16/04615/FUL and 16/02055/FUL for this site are currently pending consideration and the most recent HELAA suggests that a further site to the east that is currently a transport depot will become available for development, together with some adjacent non-green belt land in 2017. To the north west of our client's land, across Sleep Lane, is another consented site which is under construction and nearing completion (Planning Application 14/05288/VAR). Our client's land at Sleep Lane would form a small, readily deliverable extension to the wider Horseworld site, increasing housing supply by around 20 units that would readily integrate with both the existing urban fabric to the west of Sleep Lane and new development to the north and east. The site is not otherwise constrained and in infrastructure terms its development would not be reliant on the completion of the surrounding consents.

As part of our consultation response, we enclose the following documents which illustrate how residential scheme of circa 20 No. homes, based on 2 storey houses (2-4 bedroom) with small gardens and associated parking, could be accommodated on land at Oaklea, Sleep Lane:

- Site Location Plan – Keep Architecture
- Proposed Sketch Scheme Layout – Keep Architecture
- Wider Context Plan – Keep Architecture
- Transport Technical Note - WYG

Further Information available within the original representation: Yes

ID: 7266 / 1 Name: G. M. Nowak

Organisation:

Agent:

Comments on the proposed scope and content of the Core Strategy Review

Comments on the proposed programme for the preparation of the Core Strategy review

Specific observations on the Core Strategy review

I would like to draw your attention to the land between Crocombe Lane and Lippiatt Lane in Timsbury, known as Meadow View, Timsbury.

This plot does not fall within the Timsbury Development Plan, but would be a suitable site for building as it is already closely surrounded on two sides and is situated between the Bloomfield Estate and a recent development at the bottom of Crocombe Lane.

As an infill site it would be much more appropriate for building than those designated directly off North Road, Timsbury.

I would like this plot of land to be considered when future development in Timsbury is discussed.

Further Information available within the original representation: No

Bath & North East
Somerset Council

