

Bath & North East Somerset Placemaking Plan

COUNCIL'S RESPONSE TO ID/1 - INITIAL QUESTIONS TO THE COUNCIL

Q1. Could the Council please provide details of all errors / omissions in the submission plan?

1.1 The corrections are attached as Annex 1. As explained in the foreword to the Placemaking Plan, the text and policies of the Core Strategy are included showing the extent of Regulation 8(5) supersessions. For the purposes of the recent consultation on the Draft Placemaking Plan the convention adopted was to identify all new text on which comments could be made by highlighting it in grey. This applied to the Placemaking Plan text and any Regulation 8(5) supersessions (see below). Where there have been supersessions to the Core Strategy by removing text from the Core Strategy policies these are shown as 'struck through' as well as being highlighted in grey.

Q2. Is the Placemaking Plan intended to incorporate a partial review of the CS?

2.1 The Placemaking Plan does not incorporate a partial review of the Core Strategy.

2.2 Following the process of preparing and adopting the Placemaking Plan the existing Core Strategy will still be a DPD (Part 1 of the Local Plan) and is not revised through partial review. The Placemaking Plan is a separate DPD in its own right (Part 2 of the Local Plan).

2.3 As part of the process of preparing the Placemaking Plan certain elements of certain Core Strategy policies are sought to be superseded under Regulation 8(5) of the Town & County Planning (Local Planning) (England) Regulations 2012. So far as relevant regulation 8 provides as follows:

8.

(4) Subject to paragraph (5), the policies contained in a local plan must be consistent with the adopted development plan

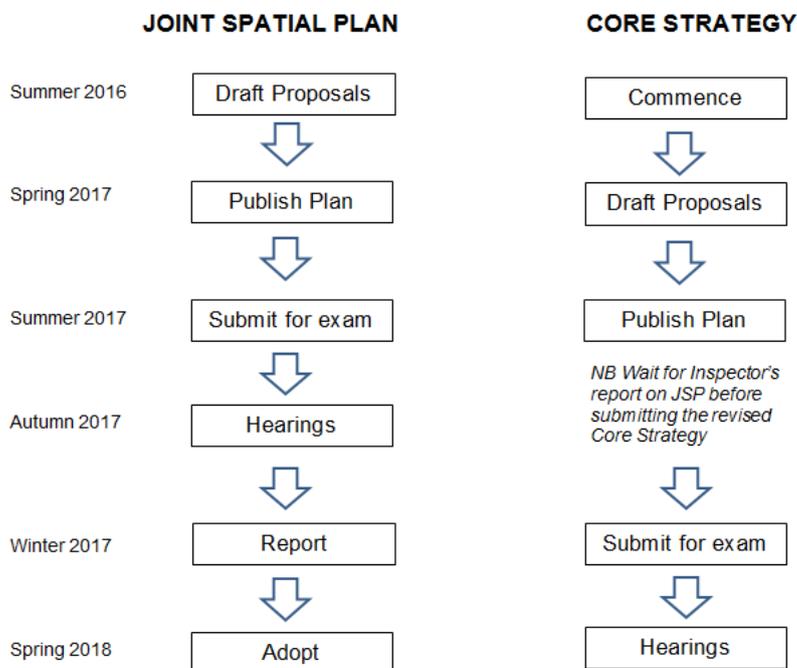
(5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.

2.4 It would have been possible, although highly confusing, for the Council to have stated in the Draft Placemaking Plan that Policy 'X' of the Core Strategy is superseded by the deletion of specified words and the insertion of new words. In order to provide clarity and for ease of understanding the Council has given effect to the supersessions by putting all of the text of the Core Strategy policies into the Placemaking Plan and showing in grey the extent of the supersessions proposed by the Placemaking Plan.

2.5 The result is that the Core Strategy remains in place but certain policies have been superseded to the extent shown in grey in the Placemaking Plan. The supersession of certain parts of certain policies seeks to address a limited range of specific issues that are not fundamental in terms of the strategic approach of the Core Strategy or the Placemaking Plan.

- 2.6 The process of supersession of policies was undertaken in accordance with Regulation 8(5). As required by the Regulations the Council has clearly identified and listed the Core Strategy Policies to be superseded by the Placemaking Plan, in Volume 6, Appendices and Glossary (see p. 21) and in respect of Policy SB13 (which supersedes Core Strategy Policy B3c) in Volume 2, Bath (see paragraph 195 on p.93).
- 2.7 By including all of the Core Strategy text in the Placemaking Plan the beneficial and practical extent is that if the Placemaking Plan is adopted it will show the complete current policy position including the Core Strategy policies as superseded under Reg 8.
- 2.8 The review and potential revision of the Core Strategy will be undertaken as a separate process as set out in the Council's Local Development Scheme (LDS). Supplemental to ID/1 the Inspector has also asked whether the partial review of the Core Strategy has now commenced in accordance with the Council's published LDS.
- 2.9 In the Council's published LDS the partial review of the Core Strategy is programmed to commence early in 2016. The partial review of the Core Strategy has not commenced and the Council is considering a review of the Local Development Scheme at its meeting in May 2016 in which a basis and programme for the review of the B&NES Core Strategy is recommended (see Council report attached as Annex 2). The timetable for the review of the Core Strategy proposed in the Council Report will align closely with the preparation programme of the West of England Joint Spatial Plan (JSP), but allowing for key JSP milestones to be achieved in order to avoid abortive work on the review of the Core Strategy. The overarching programme of both plans which will be reflected in the amended LDS is illustrated below:

PLAN PROGRAMMES



Q3. Where the Placemaking Plan text supersedes that of the adopted Core Strategy, is it in compliance with the adopted version?

3.1 The formal review of the Core Strategy has therefore not yet begun, but under the 2012 Regulations a policy which supersedes an existing policy within the adopted Development Plan does not need to be consistent with the adopted policy (see regulation 8 (4) & (5) in paragraph 2.3 above). In the case of the Core Strategy Policies to be superseded by those in the Placemaking Plan the changes are limited in nature and do not undermine and therefore, do comply with the fundamental approach of the Adopted Core Strategy.

Q4. Could the Council clarify to what extent, if at all, the proposal to make changes to the CS were made clear in the consultation material, particularly at the Regulation 18 stage?

4.1 During the Regulation 18 stage the Council was not proposing to amend the Core Strategy text and supersede part of Core Strategy policies. The decision to supersede elements of the Core Strategy with the Placemaking Plan was made during the preparation leading up to the publication of the Draft Placemaking Plan. This decision was ratified in the Report to the Council's Cabinet on 2 December 2015 (CD/PMP/G25) seeking approval of the Pre-submission Draft Placemaking Plan for public consultation prior to submission to the Secretary of State for examination.

<https://democracy.bathnes.gov.uk/documents/s39313/E2787%20Placemaking%20Plan.pdf>

4.2 Consultation material relating to the Regulation 20 stage highlighted the fact that the Draft Placemaking Plan has included the Core Strategy as proposed to be superseded for clarity and ease of understanding. This included the mail-out to all consultees (see page 8 the Regulation 22(1) (c) Consultation Statement - CD/PMP/G13). The Council considers that this gives individuals and organisations reasonable opportunity to respond to the extent of proposed supersessions to Core Strategy policies.

Q5. Have the changes to the CS been the subject of Sustainability Appraisal?

5.1 Yes, the changes to the Core Strategy (proposed replacement policies) have been the subject of Sustainability Appraisal (SA). The SA Report Annex F (CD/PMP/G9/8) outlines the screening of the Core Strategy changes undertaken. Those elements of the Core Strategy policies to be superseded that are likely to give rise to significant effects were the subject of full SA. This is presented in the SA report Annex G (CD/PMP/G9/9).

Q6. Is it the Council's intention to have any further discussions with representors? If so, could the Council please confirm when any Statements of Common Ground are likely to be completed?

6.1 The Council is intending to have further discussions with representors with regard to the issue set out below. At this stage the Council anticipates being able to prepare Statements of Common Ground with representors by the dates indicated below.

Site SB7: Green Park Station West & Sydenham Park

The agents representing British Land who own a significant portion of the Sydenham Park site have expressed the view that the urban design framework set out in the Draft Placemaking Plan 'remains very ambitious and has significant challenges which have not

been overcome since the Options version of the Draft Plan'. The Council will seek to resolve these challenges with the agents for British Land as well as adjoining land owners, and would envisage agreeing a Statement of Common Ground by the end of June 2016.

Q7. Is any other substantial work / reports likely to be undertaken for the examination, and if so, what is the timetable for such work?

7.1 Two areas of evidence base work, which are underway, remain to be completed. These are listed below.

Site SSV9: Old Mills Industrial Estate

Lambert Smith Hampton are currently undertaking a study assessing the implications for demand of employment land in the Somer Valley (and specifically the site allocated in the Placemaking Plan at Old Mills Industrial Estate) of the recent designation of the Enterprise Zone. It is anticipated that this work will be completed and the report submitted to the Inspector and published on the Council's Examination website by 31st May 2016.

Policy H7: Viability assessment of housing accessibility standards

In response to issues raised by representors in respect of Policy H7 the Council has commissioned an extension to the viability work previously undertaken by BNP Paribas (CD/PMP/S2) to assess the viability of implementing the optional technical standard (Building Regs, M4(2)) alongside other policy requirements. It is anticipated that this work will be completed and the report submitted to the Inspector and published on the Council's Examination website by 10th June 2016.

Q8. Please give an indication of the Council's position on main modifications?

8.1 In accordance with section 20(7C) of the 2004 Act the Council requests that the Inspector makes any modifications needed to rectify matters that make the Plan unsound and/or not legally compliant.

Placemaking Plan and the inclusion of Core Strategy text – formatting errors

The table below identifies where changes to the Core Strategy supporting text and policies have been incorrectly formatted when incorporated into the Draft Placemaking Plan as submitted for Examination in April 2016 alongside the corrected version for the purposes of clarity. The table includes a number of Core Strategy paragraphs which had been omitted from the Submitted Placemaking Plan in error.

The text shaded grey denotes a change to the adopted Core Strategy (CS) text and where text has been deleted, this is indicated as 'strike through'. The correct version is set out in the far right hand column.

Plan Ref.	Vol & page	Text formatted as it appears in the Placemaking Plan	Corrected version
Volume 1 - District-wide Strategy and Policies			
Para 97 [CS, para 6.16]	Vol 1, p.60	The UK Renewable Energy Strategy sets out to achieve 15% of energy to be generated from renewable sources by 2020, comprising 30% of electricity and 12% of heat. In 2007, the District's electricity supply from renewable sources was only approximately 0.06 MWe (Regen SW, 2010), which is less than 0.1%. By 2015, the District's electricity supply from renewable sources had risen to 12.82 MWe.	The UK Renewable Energy Strategy sets out to achieve 15% of energy to be generated from renewable sources by 2020, comprising 30% of electricity and 12% of heat. In 2007, the District's electricity supply from renewable sources was only approximately 0.06 MWe (Regen SW, 2010), which is less than 0.1%. By 2015, the District's electricity supply from renewable sources had risen to 12.82 MWe.
Policy CP4 (first para) [CS, p.143]	Vol 1, p.68	The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the three identified "district heating priority areas", shown indicated on Diagram 19 (Bath Central, Bath Riverside and Keynsham High Street), and shown in detail in the associated evidence base, and development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development	The use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating will be encouraged. Within the three identified "district heating priority areas", shown indicated on Diagram 19 (Bath Central, Bath Riverside and Keynsham High Street), and shown in detail in the associated evidence base, development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where and when this is available, unless demonstrated that this would render development unviable.

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		unviable.	
<p>Para 280 [CS, para 6.56]</p>	Vol 1, p.117	<p>A well-designed, managed and integrated network of GI provides a wide range of direct and indirect benefits to people, places and wildlife. Where this is linked with good public access and recreational opportunities it provides invaluable assets for developing and supporting healthy, happy and vibrant local communities. This includes a greater sense of community, improved health and well-being and also in harnessing, sustaining managing the natural environment it will deliver services that are essential to quality of life. It will provide local solutions to mitigate and adapt to climate change. GI can also help local responses to sustainable travel, wildlife habitats, local food production, sustainable water management including use of sustainable drainage and conserving or enhancing sense of place, landscape character, historical and cultural features. It can deliver economic benefits and opportunities, assisting is a positive factor in eco-tourism, business location and investment decisions.</p>	<p>A well-designed, managed and integrated network of GI provides a wide range of direct and indirect benefits to people, places and wildlife. Where this is linked with good public access and recreational opportunities it provides invaluable assets for developing and supporting healthy, happy and vibrant local communities. This includes a greater sense of community, improved health and well-being and also In harnessing, sustaining managing the natural environment it will deliver services that are essential to quality of life. It will provide local solutions to mitigate and adapt to climate change. GI can also help local responses to sustainable travel, wildlife habitats, local food production, sustainable water management including use of sustainable drainage and conserving or enhancing sense of place, landscape character, historical and cultural features. It can deliver economic benefits and opportunities, assisting is a positive factor in eco-tourism, business location and investment decisions.</p>
<p>Policy CP8 [CS, p.154]</p>	Vol 1, p.123	<p>The general extent of the Green Belt is set out on the Core Strategy Key Diagram. The detailed boundaries and inset villages a redefined on the Policies Map. The openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy.</p> <p>Delivery: Delivery will be through the Development Management process. The Existing Buildings in the</p>	<p>The general extent of the Green Belt is set out on the Core Strategy Key Diagram. The detailed boundaries and inset villages a redefined on the Policies Map. The openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy.</p> <p>Delivery: Delivery will be through the Development Management process. The Existing Buildings in the Green Belt SPD</p>

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		Green Belt SPD will continue to guide decisions on proposals within the Green Belt.	will continue to guide decisions on proposals within the Green Belt.
Table 8 <i>[CS, p.155]</i>	Vol 1, p.124	<p>Purposes of including land in the Green Belt:</p> <p>1 To check the unrestricted sprawl of Bath and Bristol.</p> <p>2 To prevent the merging of Bristol, Keynsham, Saltford and Bath.</p> <p>3 To assist in safeguarding the countryside from encroachment.</p> <p>4 To preserve the setting and special character of Bath.</p> <p>5 To assist in urban regeneration of Bath and Bristol by encouraging the recycling of derelict and other urban land.</p> <p>To preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt.</p> <p>Objectives for the use of land in the Green Belt:</p> <p>1 To provide opportunities for access to the open countryside for the urban populations of Bath, Bristol, Keynsham and Norton Radstock.</p> <p>2 To provide opportunities for outdoor sport and outdoor recreation near Bath, Bristol and Keynsham.</p> <p>3 To retain attractive landscapes and enhance landscapes.</p> <p>4 To improve damaged or derelict land.</p> <p>5 To secure nature conservation interests.</p> <p>To retain land in agricultural, forestry and related uses.</p>	<p>Purposes of including land in the Green Belt:</p> <p>1 To check the unrestricted sprawl of Bath and Bristol.</p> <p>2 To prevent the merging of Bristol, Keynsham, Saltford and Bath.</p> <p>3 To assist in safeguarding the countryside from encroachment.</p> <p>4 To preserve the setting and special character of Bath.</p> <p>5 To assist in urban regeneration of Bath and Bristol by encouraging the recycling of derelict and other urban land.</p> <p>To preserve the individual character, identity and setting of Keynsham and the villages and hamlets within the Green Belt.</p> <p>Objectives for the use of land in the Green Belt:</p> <p>1 To provide opportunities for access to the open countryside for the urban populations of Bath, Bristol, Keynsham and Norton Radstock.</p> <p>2 To provide opportunities for outdoor sport and outdoor recreation near Bath, Bristol and Keynsham.</p> <p>3 To retain attractive landscapes and enhance landscapes.</p> <p>4 To improve damaged or derelict land.</p> <p>5 To secure nature conservation interests.</p> <p>To retain land in agricultural, forestry and related uses.</p>
Para 465	Vol 1, p.177	The 2008-09 recession and subsequent depression to	The recent 2008-09 recession and subsequent

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<i>[CS, para 6.83]</i>		2013 has served to remind us that it is in demonstrates that it is everyone's interest to support the development and growth of a prosperous economy across B&NES. The Sustainable Community Strategy recognises that we must act at a local level to create prosperity through economic growth, whilst working towards a low carbon economy. The Development Plan will support and deliver elements of the B&NES Economic Strategy (2014-30), which aims to create the conditions for jobs growth throughout the District, leading to a more diverse, productive and resilient economy which provides better opportunities for all.	depression to 2013 has served to remind us demonstrates that it is everyone's interest to support the development and growth of a prosperous economy across B&NES. The Sustainable Community Strategy recognises that we must act at a local level to create prosperity through economic growth, whilst working towards a low carbon economy. The Development Plan will support and deliver elements of the B&NES Economic Strategy (2014-30), which aims to create the conditions for jobs growth throughout the District, leading to a more diverse, productive and resilient economy which provides better opportunities for all.
Para 466 <i>[CS, para 6.84]</i>	Vol 1, p.177	A scarcity of resources – both natural and financial, an aging population, competition from overseas, and the loss of jobs in the traditionally strong local sectors, are all factors driving the need for change. The District's economy has a predominance of public sector related, retail, leisure and tourism employment and has the lowest weekly workplace wages and productivity in the West of England. These activities are extremely important to the District, but in recent times, lower-value activities such as some types of manufacturing, have lost ground, suffering job losses. It is therefore critical that the economy looks to offer more opportunities to its resident population.	A scarcity of resources – both natural and financial, an aging population, competition from overseas, and the loss of jobs in the traditionally strong local sectors, are all factors driving the need for change. The District's economy has a predominance of public sector related, retail, leisure and tourism employment and has the lowest weekly workplace wages and productivity in the West of England. These activities are extremely important to the District, but in recent times, lower-value activities such as some types of manufacturing, have lost ground, suffering job losses. It is therefore critical that the economy looks to offer more opportunities to its resident population.
Para 467 <i>[CS, para 6.85]</i>	Vol 1, p.177	The District's economy is also dominated by micro and small businesses, which reflect an entrepreneurial spirit. Particularly productive activities include engineering, technology-related activities, and some	The District's economy is also dominated by micro and small businesses, which reflect an entrepreneurial spirit. Particularly productive activities include engineering, technology-related activities, and some

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		creative industry activities, such as publishing and sound recording. The area is also home to critical business networks which can support and guide new businesses. The District, having more residents educated to degree level than the national average, is therefore well equipped to take up job opportunities locally, should they be created. The District is also well placed to build on its international reputation in order to promote investment.	creative industry activities, such as publishing and sound recording. The area is also home to critical business networks which can support and guide new businesses. The District, having more residents educated to degree level than the national average, is therefore well equipped to take up job opportunities locally, should they be created. The District is also well placed to build on its international reputation in order to promote investment.
Para 468 <i>[CS, para 6.86]</i>	Vol 1, p.177	B&NES will aim to build on its considerable strengths and pursue a smart growth agenda, i.e. promotion of a higher value added economy rather than relying only on volume growth. This will focus on several key areas as put forward by the Economic Strategy: <ul style="list-style-type: none"> • Business support and development: • Employability and skills • Business premises and infrastructure • Promoting Investment 	B&NES will aim to build on its considerable strengths and pursue a smart growth agenda, i.e. promotion of a higher value added economy rather than relying only on volume growth. This will focus on several key areas as put forward by the Economic Strategy: <ul style="list-style-type: none"> • Business support and development: • Employability and skills • Business premises and infrastructure • Promoting Investment
Para 469 <i>[CS, para 6.87]</i>	Vol 1, p.177	By 2029 the end of the plan period, the District will have a more environmentally sustainable economy with increased local employment many more jobs, less overall commuting, a reduction in the contribution made by commerce and industry to the carbon footprint of the area, and a strong low carbon business sector. It will have a more socially inclusive economy with continuing high levels of economic participation, a focus on lifelong learning, and increased and relevant workforce skills. It will have a more diverse, productive and resilient economy due	By 2029 the end of the plan period, the District will have a more environmentally sustainable economy with increased local employment many more jobs, less overall commuting, a reduction in the contribution made by commerce and industry to the carbon footprint of the area, and a strong low carbon business sector. It will have a more socially inclusive economy with continuing high levels of economic participation, a focus on lifelong learning, and increased and relevant workforce skills. It will have a more diverse, productive and resilient economy due to the increase in the

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		to the increase in the availability of knowledge-based jobs, where knowledge-based workers can find jobs and where local innovation can grow commercially.	availability of knowledge-based jobs, where knowledge-based workers can find jobs and where local innovation can grow commercially.
Para 470 [CS, p.169]	Vol 1, p.177	Delivery: Sites will be are identified and allocated in the Placemaking Plan to meet the identified employment space requirements. Delivery of economic development will also be facilitated by the B&NES Economic Strategy, the Council as a key land and property owner, it's the Regeneration Delivery Plans activities and the Development Management process. Working alongside local communities and partners will be essential to deliver the ambitions of the Economic Strategy and developers may be asked to support the objectives of the Strategy through a Targeted Recruitment, Training and Supply-chain Protocol.	Delivery: Sites will be are identified and allocated in the Placemaking Plan to meet the identified employment space requirements. Delivery of economic development will also be facilitated by the B&NES Economic Strategy, the Council as a key land and property owner, it's the Regeneration Delivery Plans activities and the Development Management process. Working alongside local communities and partners will be essential to deliver the ambitions of the Economic Strategy and developers may be asked to support the objectives of the Strategy through a Targeted Recruitment, Training and Supply-chain Protocol.
Policy CP12 [CS, p.171]	Vol 1, p.200	Delivery (last para) Main town centre uses will be subject to the sequential and impact tests set out in the NPPF, Policy CR1 and Policy CR2.	Delivery (last para) Main town centre uses will be subject to the sequential and impact tests set out in the NPPF.
[CS, para 6.70]	-	<i>Omitted in error</i>	Waste The JWCS Development Plan Document (March 2011) sets out the planning strategy for the provision of waste management infrastructure within the West of England. The Strategy is being prepared by the four West of England unitary authorities of B&NES, Bristol, North Somerset and South Gloucestershire Councils.
[CS, para	-	<i>Omitted in error</i>	The JWCS applies to all waste, with the exception of

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6.71]			radioactive waste, which is dealt with at a national level and sets out the authorities' aspirations for all levels of waste management until 2029: prevention; recycling; recovery; and disposal. When adopted, the JWCS policies will supersede the Local Plan waste policies. Details can be found at www.westofengland.org/waste/planning
[CS, para 6.72]	-	<i>Omitted in error</i>	The West of England's Joint Residual Municipal Waste Management Strategy (June 2008) sets a framework for managing municipal residual waste generated in the West of England. The B&NES Waste Strategy 'Towards Zero Waste 2020' provides the steps we need to take now and over the next few years to reduce the amount of waste that we produce, to recycle as much as possible and to develop new ways of treating the remaining waste.
Policy CP13 [CS, p.175]	Vol 1, p.245	<p>New developments must be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p> <p>The Council will work in partnership with adjoining authorities, local communities and relevant agencies and providers to ensure that social, physical and green infrastructure is retained and improved for communities.</p> <p>Developer contributions will be based on the Planning Obligations SPD and its successors.</p> <p>Infrastructure proposals should not cause harm to the integrity of European wildlife sites which cannot be mitigated.</p>	<p>New developments must be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.</p> <p>The Council will work in partnership with adjoining authorities, local communities and relevant agencies and providers to ensure that social, physical and green infrastructure is retained and improved for communities.</p> <p>Developer contributions will be based on the Planning Obligations SPD and its successors.</p> <p>Infrastructure proposals should not cause harm to the integrity of European wildlife sites which cannot be mitigated.</p>

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		<p>Delivery:</p> <p>The Core Strategy will be supported by an Infrastructure Delivery Programme which will set out Infrastructure requirements and estimated costs, and suggested delivery mechanisms and phasing schedules for infrastructure delivery. Delivery of the policy will be through the Development Management process. Developer contributions will be sought through the use of planning obligations, as set out in Section 106 of the 1990 Town & Country Planning Act and based on the Planning Obligations SPD and its successors. The Council's preparation of a Community Infrastructure Levy charging schedule which came into effect on 6th April 2015 (or similar local tariff) may be considered. Delivery will also require working in partnership with public and private bodies.</p>	<p>Delivery:</p> <p>The Core Strategy will be supported by an Infrastructure Delivery Programme which will set out Infrastructure requirements and estimated costs, and suggested delivery mechanisms and phasing schedules for infrastructure delivery. Delivery of the policy will be through the Development Management process. Developer contributions will be sought through the use of planning obligations, as set out in Section 106 of the 1990 Town & Country Planning Act and based on the Planning Obligations SPD and its successors. The Council's preparation of a Community Infrastructure Levy charging schedule which came into effect on 6th April 2015 (or similar local tariff) may be considered. Delivery will also require working in partnership with public and private bodies.</p>
[CS, p.178]	-	<i>Omitted in error</i>	<p>Table 9 Monitoring of Strategic Objectives</p> <p><i>Set out on pages 19 - 22 below</i></p>
Volume 2 - Bath			
<p>Para 2</p> <p>[CS, para 2.02]</p>	Vol 2, p.2	<p>At the beginning of Victoria's reign Bath was the 9th largest town in England with a population of nearly 50,000. Thereafter Bath lagged behind the national level of industrial urban expansion and instead Bath refined its image as a place of genteel residence and retirement. Many pinned their hopes of a social revival with Brunel's Great Western Railway, but this did little to reignite the popularity of the city. Instead the railways served to crystallize an industrial strip of mills and foundries along the River Avon as far as</p>	<p>The Victorian city struggled to cope with its Georgian legacy. At the beginning of Victoria's reign Bath was the 9th largest town in England with a population of nearly 50,000. Thereafter Bath lagged behind the national level of industrial urban expansion and instead Bath refined its image as a place of genteel residence and retirement. Many pinned their hopes of a social revival with Brunel's Great Western Railway, but this did little to reignite the popularity of the city. Instead the railways served to crystallize an industrial strip of</p>

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		Twerton. Towards the end of the Victorian period the Corporation sought to revive the city as a spa upon the rediscovery of its Roman origins. However, little came of efforts to establish Bath as a leading therapeutic centre.	mills and foundries along the River Avon as far as Twerton. Towards the end of the Victorian period the Corporation sought to revive the city as a spa upon the rediscovery of its Roman origins. However, little came of efforts to establish Bath as a leading therapeutic centre.
Vision (para 1) [CS, p.39]	Vol 2, p.7	Bath's natural, historic and cultural assets, which combine to create a unique sense of place of international significance, will be conserved and enhanced to maintain the city's key competitive advantage and unique selling point as a high quality environment, to live, grow a business, visit and invest.	Bath's natural, historic and cultural assets, which combine to create a unique sense of place of international significance, will be secured conserved and enhanced to maintain the city's key competitive advantage and unique selling point as a high quality environment, to live, grow a business, visit and invest.
Policy B1 (2)(c) [CS, p.41]	Vol 2, p.9	c. Achieve the net additional increase to the stock of office premises of 40,000 m2 (GIA) by enabling the development of 60,000m2 (GIA) of new space, linked to a release of 20,000m2 of that which is qualitatively least suitable for continued occupation, or which has been changed as a result of the introduction of permitted development rights.	c. Achieve the net additional increase to the stock of office premises of 40,000 m2 (GIA) by enabling the development of 50,000m2 60,000m2 (GIA) of new space, linked to a release of 10,000m2 20,000m2 of that which is qualitatively least suitable for continued occupation, or which has been changed as a result of the introduction of permitted development rights.
Policy B1(3)(a) (final bullet point) [CS, p.41]	Vol 2, p.9	Subject to compliance with all other policy considerations residential development will be acceptable in principle provided the proposal lies within the existing urban area of Bath as defined by the Green Belt boundary.	Subject to compliance with all other policy considerations residential development will be acceptable in principle provided the proposal lies within the existing urban area of Bath as defined by the Green Belt boundary.
Policy B1(8)(a) & (c) [CS, p.43]	Vol 2, p.10	a. Manage the provision of around 1,000 new hotel bedrooms between 2011 & 2029 500-750 new hotel bedrooms to widen the accommodation offer for the city, increase overnight stays and the competitiveness	a. Manage the provision of around 1,000 new hotel bedrooms between 2011 & 2029 500-750 new hotel bedrooms to widen the accommodation offer for the city, increase overnight stays and the competitiveness

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		<p>of the Bath as a visitor and business destination.</p> <p>c. Enable the provision of enhanced facilities for interpretation of the World Heritage Site in the Central Area and for the nationally designated City Archives.</p>	<p>of the Bath as a visitor and business destination.</p> <p>c. Enable the provision of enhanced facilities for interpretation of the World Heritage Site in the Central Area and for the nationally designated City Archives.</p>
<p>Para 34 [CS, para 2.35]</p>	<p>Vol 2, p.11</p>	<p>The overall purpose of the strategy is to provide a framework within which decisions can be made about the appropriate height of new buildings in Bath. It will inform decisions about the value of sites, the Placemaking Plan and will act as a development management tool in the consideration of planning applications. The Strategy has been compiled in such a way that it can be used as the basis for a Supplementary Planning Document.</p>	<p>The overall purpose of the strategy is to provide a framework within which decisions can be made about the appropriate height of new buildings in Bath. It will be used to inform decisions about the value of sites, the Placemaking Plan and will act as a development management tool in the consideration of planning applications. The Strategy has been compiled in such a way that it can be used as the basis for a Supplementary Planning Document.</p>
<p>Policy B2(4)(d) [CS, p.49]</p>	<p>Vol 2, p.36</p>	<p>Manage the provision of around 1,000 new hotel bedrooms between 2011 & 2029 500–750 new hotel bedrooms to widen the accommodation offer for the city, increase overnight stays and the competitiveness of the Bath as a visitor and business destination.</p>	<p>Manage the delivery provision of around 500–750 1,000 new hotel bedrooms between 2011 & 2029 to widen the accommodation offer for the city, increase overnight stays and the competitiveness of the Bath as a visitor and business destination.</p>
<p>Para 153 [CS, para 2.17d]</p>	<p>Vol 2, p.69</p>	<p>The area formerly occupied by the Stothert and Pitt engineering company and adjoining land has been earmarked for a major programme of residential-led regeneration for a number of years. Western Riverside is was first allocated for residential led development in Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007). This policy is-was supported by a Master Plan Supplementary Document (March, 2008). This is a complex site that has, inter</p>	<p>The area formerly occupied by the Stothert and Pitt engineering company and adjoining land has been earmarked for a major programme of residential-led regeneration for a number of years. Western Riverside is was first allocated for residential led development in Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007). This policy is-was supported by a Master Plan Supplementary Document (March, 2008). This is a complex site that has, inter alia,</p>

Plan Ref.	Vol & page	Text formatted as it appears in the Placemaking Plan	Corrected version
		<p>alia, required flood mitigation and remediation works to decommission and remove the Windsor Gas Holder Station. However, but significant planning development management and implementation progress has been made with the delivery of phase I commencing in December 2010. Much of the land is derelict or vacant but other parts are occupied. Not all areas within the Western Riverside zone may be regenerated during the Pan period e.g. part of the Lower Bristol Road frontage where there are car showrooms that are successfully trading and investing in their estate. However, should such land become available the strategy is to enable residential-led redevelopment. The estimated housing potential of this area for the plan period is around 2,200.</p>	<p>required flood mitigation and remediation works to decommission and remove the Windsor Gas Holder Station. However, but significant planning development management and implementation progress has been made with the delivery of phase I commencing in December 2010. Much of the land is derelict or vacant but other parts are occupied. Not all areas within the Western Riverside zone may be regenerated during the Pan period e.g. part of the Lower Bristol Road frontage where there are car showrooms that are successfully trading and investing in their estate. However, should such land become available the strategy is to enable residential-led redevelopment. The estimated housing potential of this area for the plan period is around 2,200.</p>
<p>Para 155 [CS, para 2.17f]</p>	<p>Vol 2, p.69</p>	<p>The Core Strategy Western Riverside policy area is a smaller area than that to which the 2007 Local Plan Policy (GDS.1/B1) and its accompanying SPD applies. It does not include the majority of the area referred to as Western Riverside East aside from the area covered by the approved outline planning permission to the north of the Homebase car park. Western Riverside East in now conceptualised as forming part of the Central Area because of the commercially led mixed use emphasis being sought for this area.</p>	<p>The Core Strategy Western Riverside policy area is a smaller area than that to which 2007 Local Plan Policy (GDS.1/B1) and its accompanying SPD applies. It does not include the majority of the area referred to as Western Riverside East aside from the area covered by the approved outline planning permission to the north of the Homebase car park. Western Riverside East in now conceptualised as forming part of the Central Area because of the commercially led mixed use emphasis being sought for this area.</p>
<p>Para 156 [CS, para 2.17g]</p>	<p>Vol 2, p.69</p>	<p>The spatial strategy retains the planning principles that have been established for this area within Local Plan Policy GDS.1/B1 for Western Riverside continues to apply to the area shown in Diagram 8 and is saved as part of the Development Plan. For Riverside East,</p>	<p>The spatial strategy retains the planning principles that have been established for this area within Local Plan Policy GDS.1/B1 for Western Riverside continues to apply to the area shown in Diagram 8 and is saved as part of the Development Plan. For Riverside East, Policy</p>

Plan Ref.	Vol & page	Text formatted as it appears in the Placemaking Plan	Corrected version						
		Policy GDS.1/B1 and the BWR SPD will apply alongside Policy B2 until CIL is adopted to supersede extant planning obligations guidance and the Placemaking Plan is adopted to supersede extant other guidance in the BWR SPD. policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007) and the 2008 Masterplan SPD. The principles of GDS.1/B1 are rolled forward into Placemaking Policy SB.8. The 2008 Masterplan SPD will continue to give further guidance in respect of the implementation of this policy	GDS.1/B1 and the BWR SPD will apply alongside Policy B2 until CIL is adopted to supersede extant planning obligations guidance and the Placemaking Plan is adopted to supersede extant other guidance in the BWR SPD. policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007) and the 2008 Masterplan SPD. The principles of GDS.1/B1 are rolled forward into Placemaking Policy SB.8. The 2008 Masterplan SPD will continue to give further guidance in respect of the implementation of this policy.						
Policy B3(2)(b) [CS, p.46]	Vol 2, p.74	b There are a number of heritage-listed and non-designated heritage assets in the area pertaining to its industrial past, including Brunel's Great Western Railway, the façade of the Bath Press and two 1960/70s industrial buildings of innovative construction and offering adaptable accommodation for a range of industrial users	b There are a number of heritage-listed and non-designated heritage assets in the area pertaining to its industrial past, including Brunel's Great Western Railway, the façade of the Bath Press and two 1960/70s industrial buildings of innovative construction and offering adaptable accommodation for a range of industrial users						
Policy B3(2)(f) [CS, p.46]	Vol 2, p.74	f The intensification of Twerton Riverside as area is an accessible location due to its the proximity to of Oldfield Park station	f The intensification of Twerton Riverside as area is an accessible location due to its the proximity to of Oldfield Park station						
Policy B3 (Risks) (d) [CS, p.46]	Vol 2, 75	d There is a danger that redevelopment will fail to connect to the riverside path or, the Two Tunnels Greenway and the sustainable route that follows the alignment of the former Midland Railway and miss the opportunity to enhance walking and cycling routes	d There is a danger that redevelopment will fail to connect to the riverside path or, the Two Tunnels Greenway and the sustainable route that follows the alignment of the former Midland Railway and miss the opportunity to enhance its walking and cycling routes						
[CS, p.60]	-	Omitted in error	<table border="1"> <thead> <tr> <th colspan="2">Table 4 – District and Local Centres within Bath</th> </tr> <tr> <th>District and Local Centres</th> <th>Local Centres</th> </tr> </thead> <tbody> <tr> <td>Neighbourhood</td> <td>1. Chelsea Road</td> </tr> </tbody> </table>	Table 4 – District and Local Centres within Bath		District and Local Centres	Local Centres	Neighbourhood	1. Chelsea Road
Table 4 – District and Local Centres within Bath									
District and Local Centres	Local Centres								
Neighbourhood	1. Chelsea Road								

Plan Ref.	Vol & page	Text formatted as it appears in the Placemaking Plan	Corrected version	
				2. Weston High Street
			Weston and Newbridge	3. Julian Road 4. St James' Square 5. Margaret's Buildings 6. Lansdown Road
			Lansdown and Camden	7. Camden Road & Fairfield Road 8. Larkhall 9. London Road 10. Nelson Place East & Cleveland Place 11. Walcot Street
			Larkhall, Fairfield Park, Grosvenor and Walcot	12. Widcombe Parade 13. Bathwick Street 14. Bathwick Hill
			Widcombe and Bathwick	15. Moorland Road (District Centre) 16. Bear Flat (Wellsway)
			Oldfield Park and Bear Flat	17. The Avenue 18. Bradford Road 19. Frome Road 20. Upper Bloomfield Road
			Odd Down, Foxhill and Combe Down and	21. Twerton High Street 22. Mount Road

Plan Ref.	Vol & page	Text formatted as it appears in the Placemaking Plan	Corrected version
			Moorlands
<p>Policy B3c (1), (2), (12) & (15) [CS, p.66]</p>	<p>Vol 2, p.95</p>	<p>POLICY SB13 Former MoD Ensleigh and Royal High Playing Field(formerly Core Strategy Policy B3c)</p> <p>Development Requirements and Design Principles</p> <p>1. Around 400 dwellings</p> <p>2 Enable the comprehensive redevelopment of the whole site. It should become more self-contained with its own local facilities. Development should reflect best practice as embodied in ‘By Design’(or successor guidance) ensuring that it is well integrated with neighbouring areas</p> <p>12 A primary school is to be provided on the former Royal High Playing Field site</p> <p>15 Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.</p>	<p>POLICY SB13 Former MoD Ensleigh and Royal High Playing Field (formerly Core Strategy Policy B3c)</p> <p>Development Requirements and Design Principles</p> <p>Land adjoining Ensleigh MOD site as shown on the Key Diagram is identified for the development of 120 dwellings during the Plan period. The Placemaking Plan will allocate a site for comprehensive residential led mixed use development comprising the Ensleigh MOD site and the land adjoining it. The planning requirements relating to the land adjoining the Ensleigh MOD site are set out below.</p> <p>1. Residential led mixed use development of around 120 dwellings in the plan period. Around 400 dwellings</p> <p>2 Be developed to a comprehensive Masterplan for the wider Ensleigh MOD site and in accordance with the Council’s Concept Statement for the MoD Ensleigh site. The wider site Enable the comprehensive redevelopment of the whole site. It should be more self-contained with its own local facilities. Development should reflect best practice as embodied in ‘By Design’ (or successor guidance) ensuring that it is well integrated with neighbouring areas.</p> <p>12. Educational needs generated by the development must be met; a primary school is to be provided on larger site comprising the Ensleigh MOD site and the land adjoining it, unless an alternative solution can be found and agreed with the Education Authority. A</p>

Plan Ref.	Vol & page	Text formatted as it appears in the Placemaking Plan	Corrected version
			<p>primary school is to be provided on the former Royal High Playing Field site</p> <p>15. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.</p>
<p>Para 199 [CS, para 2.26b]</p>	<p>Vol 2, p.96</p>	<p>Bath City Football Club, who own Twerton Park football stadium is in the middle of a Community Buyout process, the outcome of which will not be known until well into 2016. Previously it has stated that the site will be available for redevelopment during the Plan period, that it intended to leave Twerton Park and sell it or facilitate a land swap elsewhere in B&NES on which it can build a new facility. In addition to the football club the adjacent car park is also used for the weekly Twerton Market. The site will may therefore be available for redevelopment as part of a residential/mixed-use scheme during the Plan period. The details of any such scheme can be determined through the Placemaking Plan. Any scheme should preferably benefit or at least not adversely affect the local centre at Twerton. There is considerable uncertainty and the Council does not currently 'budget' for any development occurring here is endeavouring to assist the Football Club to identify a suitable alternative location and this can be progressed in the Placemaking Plan. A site allocation is made so that there is no site specific gap should the site become available.</p>	<p>Bath City Football Club, who own Twerton Park football stadium is in the middle of a Community Buyout process, the outcome of which will not be known until well into 2016. Previously it has stated that the site will be available for redevelopment during the Plan period, that it intended to leave Twerton Park and sell it or facilitate a land swap elsewhere in B&NES on which it can build a new facility. In addition to the football club the adjacent car park is also used for the weekly Twerton Market. The site will may therefore be available for redevelopment as part of a residential/mixed-use scheme during the Plan period. The details of any such scheme can be determined through the Placemaking Plan. Any scheme should preferably benefit or at least not adversely affect the local centre at Twerton. There is considerable uncertainty and the Council does not currently 'budget' for any development occurring here is endeavouring to assist the Football Club to identify a suitable alternative location and this can be progressed in the Placemaking Plan. A site allocation is made so that there is no site specific gap should the site become available.</p>
<p>Policy B5 (new first</p>	<p>Vol 2, p.118</p>	<p>Overall Approach</p>	<p>Overall Approach</p>

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para) [CS, p.71]		Planning decisions should enable, as far as possible, the aspirations of the University of Bath and Bath Spa University to be met, within the context of environmental sustainability and the need to deliver the full spectrum of other development requirements for the city, in the city.	Planning decisions should enable, as far as possible, the aspirations of the University of Bath and Bath Spa University to be met, within the context of environmental sustainability and the need to deliver the full spectrum of other development requirements for the city, in the city.
Volume 4 - Somer Valley			
Para 18 [CS, para 4.15]	Vol 4, p.8	There is already a significant number of housing commitments in the Somer Valley and a limited capacity to generate new jobs. New housing in the Somer Valley will therefore be restrained in the interest of sustainability but some additional housing is likely to come forward on brownfield sites. The Housing Development Boundary has been reviewed in the Placemaking Plan to facilitate this and to reflect recent planning permissions on greenfield sites. However in light of the objective of economic led revitalisation, it is important that the additional housing does not significantly worsen the balance between homes and jobs and the out-commuting problems and the Council may therefore seek to ensure an economic benefit from new housing.	There is already a significant number of housing commitments in the Somer Valley and a limited capacity to generate new jobs. New housing in the Somer Valley will therefore be restrained in the interest of sustainability but some additional housing is likely to come forward on brownfield sites. The Housing Development Boundary will be reviewed in the Placemaking Plan to facilitate this and to reflect recent planning permissions on greenfield sites. However in light of the objective of economic led revitalisation, it is important that the additional housing does not significantly worsen the balance between homes and jobs and the out-commuting problems and the Council may therefore seek to ensure an economic benefit from new housing.
Para 19 [CS, para 4.15a]	Vol 4, p.8	Local designations such as Housing Development Boundaries and Core Business Areas have been reviewed and are shown on the Policies Map. shown on the Policies Map (saved from the existing Bath & North East Somerset Local Plan) will be reviewed as part of the Placemaking Plan.	Local designations such as Housing Development Boundaries and Core Business Areas have been reviewed and are shown on the Policies Map. shown on the Policies Map (saved from the existing Bath & North East Somerset Local Plan) will be reviewed as part of the Placemaking Plan.
Para 95	Vol 4, p.39	<ul style="list-style-type: none"> • A strong, high quality education sector across the 	<ul style="list-style-type: none"> • A strong, high quality education sector across the

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[CS, para 4.22]		age ranges including Norton Radstock Bath College Somer Valley Campus.	age ranges including Norton Radstock Bath College Somer Valley Campus.
Volume 5 - Rural Areas			
Para 13 [CS, para 5.13]	Vol 5, p.5	In line with a national policy of restraint there will only be limited development in the rural areas to address the issues identified above. The Core Strategy directs appropriate levels of housing and employment development to the most sustainable villages where there is development capacity. Outside these villages development is more restricted. However, the need for local affordable housing and employment can also be met mainly through the exceptions policy. Community facilities and shops are generally acceptable within villages. This approach provides for the development of around 1,120 homes and 500 jobs in the rural areas, including an additional 250 dwellings over existing commitments during the plan period. Further detail on the strategy and policy framework for delivering development in the rural areas is set out in the Districtwide chapter.	In line with a national policy of restraint there will only be limited development in the rural areas to address the issues identified above. The Core Strategy directs appropriate levels of housing and employment development to the most sustainable villages where there is development capacity. Outside these villages development is more restricted. However, the need for local affordable housing and employment can also be met mainly through the exceptions policy and Local Plan rural diversification Policy ET.18 . Community facilities and shops are generally acceptable within villages. This approach provides for the development of around 1,120 homes and 500 jobs in the rural areas, including an additional 250 dwellings over existing commitments during the plan period. Further detail on the strategy and policy framework for delivering development in the rural areas is set out in the Districtwide chapter.
[CS, para 5.16]		<i>Omitted in error</i>	The Core Strategy policy framework for some of the villages in the south of the District includes policies in both the Somer Valley section and the Rural Areas District-wide section.
[CS, para 5.44]		<i>Omitted in error</i>	Land identified in the Local plan at Whitchurch and Temple Cloud/Clutton for the purposes of potential village bypasses will remain safeguarded. These schemes will be reviewed through the Placemaking

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			Plan.
[CS, para 5.46]		<i>Omitted in error</i>	Delivery Parish Councils will have a key role in identifying sites for development through the Placemaking Plan. Parish Planning will also continue to contribute to the evidence base to demonstrate community priorities, as well as to mechanisms for delivery. This will allow the community to influence the benefits of new development in their locality.
[CS, para 5.47]		<i>Omitted in error</i>	The rural exceptions policy will function through partnership working between the Parish Councils, the Council's housing department and Registered Social Landlords.
[CS, para 5.48]		<i>Omitted in error</i>	Partnership working between the Council, parishes, other agencies and the voluntary sector will continue to assist with managing issues of accessibility between home, work and leisure, and with issues of access to rural services in particular. Examples include schemes such as Dial-a-Ride, 'the Galleries' shop and cafe in Freshford and the rural outreach hub in Chew Magna.
[CS, para 5.49]		<i>Omitted in error</i>	Private developers will play an important role in bringing forward and developing small scale housing developments in villages which meet the RA1 criteria and to the delivery of employment sites.

Table 9 Monitoring of Strategic Objectives

Strategic Objective	Policy	Indicator	Target
1. Pursue a low carbon and sustainable future in a changing climate	CP3 Renewable Energy	<ul style="list-style-type: none"> Proportion and number of renewable energy schemes granted planning permission annually Amount of renewable energy generated by installed capacity, for electricity (MWe) and heat (MWth) Amount of renewable energy generated from renewable energy sources annually (measured via 'Feed in Tariff data). 	By 2029 110MWe (Electricity) 165 MWth (Heat)
	CP4 District Heating	<ul style="list-style-type: none"> Number Location of heat priority areas where policy district heating schemes have started to be implemented Proportion and number of Combined Heat and Power schemes granted planning permission annually 	
	CP5 Flood Risk Management	Number of planning permissions granted contrary to Environment Agency advice.	
2. Protect and enhance the District's natural, built and cultural assets and provide green infrastructure	CP6 Environmental Quality	<ul style="list-style-type: none"> Change in priority habitats (in hectares) Number of nature conservation sites that are enhanced annually Number and proportion of housing schemes achieving Building for Life 12 (BfL12) score of no 'reds' annually (post-construction monitoring) Number of principal listed buildings recorded as 'at risk' on the Council's Buildings at Risk Register Number of up to date Conservation Area Appraisals and Management Plans in place 	<p>Maintain or increase the area of priority habitats by 2029</p> <p>Annual increase in the proportion of assessed housing schemes that meet the Building for Life 12 (BfL12) scoring no 'reds'</p> <p>Reduce the number of principal listed buildings recorded as 'at risk' on the Council's Buildings at Risk Register</p> <p>Increase the number of up to date Conservation Area Appraisals and Management Plans in place</p>

Strategic Objective	Policy	Indicator	Target
		<ul style="list-style-type: none"> • Adoption of Historic Environment related SPDs <p>A range of indicators to monitor implementation of the actions identified in the World Heritage Site Management Plan are also identified in the Management Plan.</p> <p><i>Protection of Greenfield land through prioritising development of previously developed sites relates also to regeneration and housing delivery objective – see indicator and quantification below</i></p>	
	CP7 Green Infrastructure	A range of indicators to monitor the provision and enhancement of green infrastructure are being developed through of the Green Infrastructure Strategy	
3. Encourage economic development, diversification and prosperity	DW1 District-wide spatial strategy and Place based spatial strategies: B1 KE1 SV1 RA1&2	<ul style="list-style-type: none"> • Amount of floor space developed type (office/industrial) in sqm, by place annually and total since 2011. Gains, losses and net. • Amount of floor space on previously developed land by type (office/industrial) in sqm, by place annually and total since 2011. Gains, losses and net. • Employment land available by type • Change in work place jobs by sub-area • Number of planning consents for business premises in rural areas • Economic growth forecasts from the Office of Budget Responsibility (OBR) as well as from bodies such as Oxford Economics, 	<p>Deliver space to provide 10,300 net additional jobs between 2011 & 2029 as set out in the places below</p> <p>Bath: 2011-2029</p> <ul style="list-style-type: none"> • Office floor space – net gain of about 40,000m² • Industrial floor space – net loss of about 40,000m² • Net increase of 7,000 jobs <p>Keynsham: 2011 –2029</p> <ul style="list-style-type: none"> • Office floor space – net gain of about 7,200 m² • Industrial floor space –net gain of about 8,300m²

Strategic Objective	Policy	Indicator	Target
		Cambridge Econometrics, NIESR	<ul style="list-style-type: none"> • Net increase of about 1,600 jobs Somer Valley: 2011- 2029 <ul style="list-style-type: none"> • Office floor space – net gain of about 2,700m2 • Industrial floor space – net loss of about 14,400m2 • Net increase of about 900 jobs
4. Invest in our city, town and local centres	CP12 Centres and retailing	<ul style="list-style-type: none"> • Proportion of new retail floor space provided within the centres listed in the hierarchy annually in total since 2006 • Health of the centres as indicated by retail floor space losses, vacancy rates and land use mix changes in each of the centres listed in the hierarchy (city/town centres – annually and district/local centres – periodically) • Market share of comparison goods spending in Bath city centre and the town centres 	<p>Health of each centre as measured by the indicators specified is maintained or enhanced</p> <p>The market share of comparison goods spending as measured by household surveys undertaken about every 5 years is maintained or enhanced</p>
5. Meet housing needs	DW1 District-wide spatial strategy	<ul style="list-style-type: none"> • total housing stock by tenure and type • housing permissions granted by tenure and type • housing permissions developed by tenure and type • housing delivery trajectory showing completions and forecast completions • % affordable housing secured on qualifying sites • Change in resident student numbers • Change in purpose-built student 	<p>Around 13,000 homes, comprising 9710 market homes and 3290 affordable homes 2011-2029.</p> <p>40% or 30% affordable housing secured on large sites depending on geographic location</p> <p>20% or 10% affordable housing secured on small sites depending on geographic location</p> <p>Growth in student numbers matches growth in purpose-built accommodation at each plan review.</p>

Strategic Objective	Policy	Indicator	Target
		accommodation	
	Place based spatial strategies B1 KE1 SV1 RA1& RA2	<ul style="list-style-type: none"> As above but broken down for (Bath, Keynsham, Somer Valley & rural areas) 	
		<ul style="list-style-type: none"> Percentage of new homes provided on previously developed land annually and since 2006 in B&NES 	Around 80% of new housing provided between 2011 and 2029 should be on previously developed land
	CP10 Housing mix	<ul style="list-style-type: none"> Annual residential dwelling completions broken down by size of property (number of bedrooms) and tenure 	
	CP11 Gypsies, travellers travelling showpeople	<ul style="list-style-type: none"> Net additional gypsy and traveller pitches provided annually and since 2011 	Delivery indicators to be identified in the Gypsy and Traveller DPD.
6. Plan for development that promotes health and well being	CP13 Infrastructure Provision. Place based strategies (AQMA's) B1 KE1	Annual progress on the delivery of infrastructure will be reported via the Infrastructure Delivery Programme. Including: <ul style="list-style-type: none"> Progress on scheme delivery and funding Status and risk of infrastructure planned Annual Progress Report on Air Quality management Areas as submitted to DEFRA (by Environmental Health) 	By 2016 within the Bath AQMA and Keynsham AQMA annual average concentrations of Nitrogen Dioxide (NO ₂) not to exceed 40µg/m ³
7. Deliver well connected places accessible by sustainable means of transport		<ul style="list-style-type: none"> 11 transport related indicators are monitored as part of JLTP3. http://www.travelplus.org.uk/ 	

Bath & North East Somerset Council	
MEETING	Council
DATE:	12th May 2016
TITLE:	B&NES Core Strategy Review
WARD:	All
AN OPEN PUBLIC ITEM	
List of attachments to this report:	
Attachment 1: Summary of the Revised Local Development Scheme	

1 THE ISSUE

- 1.1 This report outlines the scope and basis of the forthcoming partial review of the B&NES Core Strategy and updates the B&NES Local Development Scheme.

2 RECOMMENDATION

- 2.1 That the Council;

- a) Authorises the Strategic Director for Place to make arrangements to commence the revision of the B&NES Core Strategy in accordance with the scope set out in para 5.14 below and the timetable set out in the revised Local Development Scheme in Attachment 1, and
- b) Agrees amendments to LDS as set out in Attachment 1 and resolve that the revised LDS will have effect from 20th May 2016
- c) Approves allocation of reserves within the financial planning reserve of £30k for 2017/18 to fund the additional staffing requirement.

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 3.1 Preparation of the Core Strategy is funded from the LDF budget and is resourced by the Planning Policy Team, drawing on expertise from other Council departments as required.
- 3.2 The proposed approach to review the Core Strategy described in this report is a larger task than that previously proposed, but it still does not entail a full review of

the Core Strategy. The resource requirement is therefore higher but this is mitigated by;

- a) Much of the evidence base needed to support the JSP is of direct relevance to the Core Strategy review; and
- b) The timetable for the review of the Core Strategy being amended as set out in the revised LDS so that the substantial work occurs after the Placemaking Plan public examination

3.3 The additional staffing resource requirement, after mitigation by re-timetabling the Core Strategy review, amounts to £30k. This will need to be addressed as an approved commitment when the Budgets for 2017/18 are considered.

3.4 Preparation of land-use planning policies will inevitably have an impact on the value of land & buildings, which in turn would impact Council Tax and Business Rates. However, impacts to Council Tax and Business Rates cannot be taken into consideration as part of the assessment and preparation of the Planning Policies.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

4.1 Both the JSP and the revision to the Core Strategy must be prepared in compliance with the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). Once adopted, they will both be statutory Development Plan Documents (“DPD”).

4.2 Preparation of the Plans has also accorded with national policy in the National Planning Policy Framework (“NPPF”) and guidance in the National Planning Practice Guidance (“NPPG”). In particular, the Council has sought to ensure that the JSP and the revised Core Strategy are sound in that they (inter alia);

- a) Have been **positively prepared** – the plans seek to meet objectively assessed needs for development, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
- b) are **justified** – the plans are the most appropriate strategies, when considered against the reasonable alternatives, based on proportionate evidence;
- c) are **effective** – the plans are deliverable; and
- d) are **consistent with national policy** – the plans enable the delivery of sustainable development

4.3 Any changes to the Core Strategy must be subject to a Sustainability Appraisal (“SA”) and Strategic Environmental Assessment (“SEA”) in line with the requirements of the SEA Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004). It must also be subject to an integrated Habitats Regulation Assessment (“HRA”) in line with the requirements of the Conservation of Habitats and Species Regulations 2010 (“the Habitats Regulations”).

- 4.4 A Local Development Scheme is required under Section 15 of the Planning and Compulsory Purchase Act 2004.
- 4.5 Changes arising from the Planning & Housing Bill will have implications for the preparation of the JSP and the Core Strategy review and these will need to be taken into account as the Bill proceeds to enactment.

5 THE REPORT

Background

- 5.1 The B&NES Core Strategy was adopted in 2014 following a prolonged and complex preparation process involving some difficult decisions for the Council to review the Green Belt in order to release land for housing. Critical to the successful adoption of the Core Strategy by Full Council in 2014 was the demonstration that Bath had a separate Housing Market Area (HMA) to that of Bristol. This enabled the plan to be found sound at examination but the sub-regional issue of how the unmet housing need arising from Bristol should be accommodated remained outstanding.
- 5.2 Full Council accepted the Inspector's recommended arrangements for the review of the Core Strategy. This included 2 options, both linked to the need to address the Bristol housing issue. The two review options were;
- (a) when the Bristol Plan is reviewed in 2016, if Bath no longer has its own HMA, then the B&NES SHMA would need to be reviewed as part of the wider Bristol SHMA. The scope of the review would be dependent on the outcome of the SHMA update but it could lead to a more substantial review of the Core Strategy.
 - (b) if the evidence showed that Bath remained a separate HMA, then there would be no need to review the B&NES SHMA but only undertake a partial review of the Core Strategy to consider whether it was appropriate to accommodate any unmet Bristol need.
- 5.3 All four Councils signed a Memorandum of Agreement (MoA) in 2014 which committed them to aligning their plan reviews through the Joint Spatial Plan (JSP). Notwithstanding the benefits of joint working, the reason for this commitment by B&NES is that whilst Bath has a separate HMA, the HMA boundaries are in reality quite complex and the western part of B&NES lies within the Wider Bristol HMA. Therefore, under the Duty to Co-operate (Localism Act 2011), B&NES is obliged to co-operate with the other UAs on this Plan.

Update on JSP Progress

- 5.4 Preparation of the JSP is progressing on target. The Issues & Options consultation concluded in late January with around 2,000 comments received on the JSP and the Joint Transport Study (JTS) combined. Work is now progressing on the preparation of the Draft JSP scheduled for completion in June 2016. Evidence shows that Bath continues to have its own HMA and hence the B&NES Strategic Housing Market Assessment (SHMA) has not been reviewed at this stage although a partial review of the Core Strategy is still necessary. This approach has avoided the need to consider a new housing target for B&NES now,

so soon after the Core Strategy was adopted and limits the risk of undermining the adopted Core Strategy in advance of the scheduled five-year review. However, this has resulted in B&NES being out of step with the other three UAs who are all obliged to undertake full reviews of their housing need. This inconsistency has raised concerns about the increased risk of unsoundness of the JSP. This concern has also been raised through the Issues and Options consultation for the JSP and remains a risk.

5.5 Preparation of the JSP is therefore progressing on the basis of a review of the Wider Bristol SHMA only but the housing need will be accommodated across all four UAs. Locations in B&NES, and especially in the B&NES part of the Wider Bristol HMA, are being considered as 'equal contenders' with other locations in the WoE to meet the housing need. Under this approach, the B&NES SHMA is not reviewed and only a partial review of B&NES Core Strategy is required to make changes to accommodate some of the sub-regional housing need, with the quantum and locations being determined via the JSP. The work is being aligned with the Joint Transport Study (JTS) in light of the crucial link between new development and infrastructure, especially transport.

5.6 The JSP is a high level, strategic plan and it will be the role of the UA Local Plans (formerly Core Strategies) to allocate the sites for development closely following the JSP. In the case of B&NES, whilst the housing figure of 13,000 dwellings from 2011 to 2029 remains unaltered, the Core Strategy will need a partial review to accommodate additional housing to be allocated at new strategic development locations for the period 2016 to 2036. However, these locations are most likely to be needed only post 2026 unless the demands of 5-year Housing Land Supply (HLS) warrant some early limited releases.

Risks

5.7 The position of B&NES in the JSP always posed a limited degree of risk but as work has progressed, the following issues have arisen;

- a. Unlike the HMA geography, the whole of the WoE sub-region has been identified as a Functional Economic Market Area (FEMA) instead of separate Bristol & Bath FEMAs. This has exacerbated the existing mismatch between the evidence base and the geography of the Plan. Not only is there a different geography between the housing requirement and the plan area but there is now also a spatial mismatch between the strategies for accommodating the housing and the jobs. This adds to the complexity in devising the spatial strategy and increases the risks of unsoundness.
- b. Similarly, the JTS is being formulated on a WoE basis whereas the housing growth relates only to part of the sub-region which makes it difficult to formulate a co-ordinated approach to transport infrastructure for the whole of the sub-region. This also undermines the case for new investment in infrastructure in the eastern part of B&NES.
- c. The JSP has been cited as a key vehicle for delivering the Devolution proposals but this partial evidence base provides a less robust position on which to base

investment in infrastructure in the WoE because the development needs for only part of the sub-region are being considered.

- d. the key development locations in B&NES will be used for the Wider Bristol need. There will be no opportunity to request that the other UAs accommodate any unmet B&NES need at the time of the 2019 review because the JSP spatial strategy will have been agreed by then.

Alternative Approach

- 5.8 In light of the concerns outlined above, there is a window of opportunity for B&NES to review its role before the draft JSP is prepared. This is scheduled for publication in June 2016. This alternative approach is for B&NES to align with the other UAs and review the B&NES SHMA now instead of 2019 as part of the JSP. This would address most of the risks of the current approach.
- 5.9 Initial informal assessments indicate that if the B&NES SHMA was updated now, the likely increase in housing need to 2036 would be relatively limited and would relate primarily to rolling forward the spatial strategy beyond 2029 to 2036. The actual figure can only be properly determined by undertaking a full SHMA review but the annual housing requirement is likely to be lower than that in the current Core Strategy.
- 5.10 The key implications of the alternative way forward are set out below.
 - a) the Core Strategy is reviewed once (not twice in five years) and in lock-step with adjoining UA partners
 - b) it enables consideration of the whole picture of housing and economic growth cohesively, comprehensibly and holistically and this addresses the legal advice that the current approach risks JSP being found unsound at examination,
 - c) any new housing apportioned to B&NES is not just to meet 'Bristol overspill' but can help to meet B&NES' own housing needs. Therefore, some of the best locations for new development could be used to meet the needs of B&NES,
 - d) this approach provides the opportunity for the other UAs to accommodate any B&NES overspill housing if the preponderance of national & international environmental designations in B&NES limit the capacity of B&NES to accommodate new housing,
 - e) whilst the likelihood that development locations in the eastern and southern parts of the district would also now be needed, this enables a more comprehensive approach and makes a more robust case for securing large scale infrastructure investment in the eastern part of the district because it can be directly linked to growth for the whole district,
 - f) because the net increase in housing need arising from B&NES is relatively small, it is likely to have limited impact on the overall housing requirement for each UA,

- g) The pressure on 5-year HLS is not exacerbated and might even be ameliorated in the short term in the light of the emerging lower growth forecasts
- h) As with the existing approach, much of the new housing can be phased to beyond 2026, depending on 5-year HLS requirements.
- i) there is the possibility of opening up the Core Strategy to a wider review on existing locations and other policy areas, but this risk is limited because these locations are the outcome of an independently endorsed examination, are part of an adopted plan and they are needed for 5-year HLS.

Scope of Core Strategy review

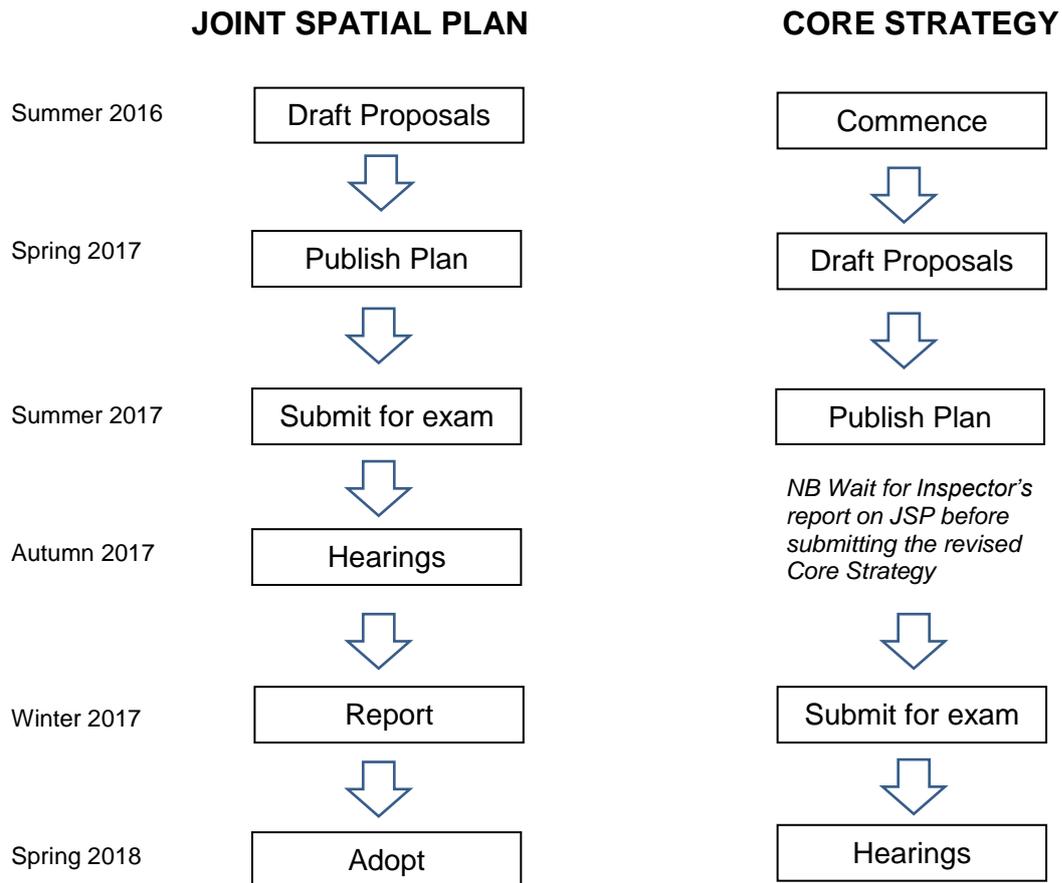
- 5.11 If members were minded to agree the revised approach, then the scope of the review needs to be clearly established. This would need to be set out in a *pre-commencement document* to formally launch the review. The review would still be a *partial* review and would be restricted to the following issues;
- a) A revised Housing Requirement for B&NES for the period 2016 to 2036, including affordable housing based on a updated SHMA
 - b) The formal allocation of sites in the strategic locations included in the JSP to meet identified development needs, and setting development and infrastructure requirements
 - c) Establish a strategy for and identify any other sources of housing land supply not identified in the JSP to meet identified development needs,
 - d) The affordable housing policies
 - e) A revised five-year Housing Land Requirement assessment
 - f) Inclusion of new policies or amendments to existing policies arising from a-c above; or from new legislation eg the Starter Homes Initiative; or from any other significant changes in circumstances and evidence to ensure that the plan is up-to-date.

- 5.12 Depending on the outcome of the Housing and Planning Bill, the allocations in the revised Core Strategy might be designated as sites with *Permission in Principle*. It is essential that existing allocations and commitments in adopted plans are retained in order to maintain the Council's housing land supply including the five-year HLS. Loss of any sites could make the District's housing land supply vulnerable.

Local Development Scheme Amendments

- 5.13 The timetable of the review of the Core Strategy needs to align closely with that of the JSP but allowing for key JSP milestones to be achieved in order to avoid abortive work on the review of the Core Strategy. The timetable for the revision of the Core Strategy will need to be set out in the Local Development Scheme (LDS – see Attachment 1). The overarching programmes of both plans are illustrated in the LDS extract below.

PLAN PROGRAMMES



5.14 As a result of legislative changes, the position in plan-making in B&NES, and the interrelationship between different plans, is already quite complex entailing;

- a) Some saved policies from the adopted 2007 Local Plan
- b) The adopted Core Strategy
- c) The JSP & the Placemaking Plan under preparation

5.15 The interrelationship of these plans will be explained in the revised LDS but in essence, the Existing Core Strategy and the Placemaking Plan will be combined to form a new B&NES Local Plan due to be adopted in 2016, replacing any outstanding saved policies from the old 2007 Local Plan. This new Local Plan will then be amended by the JSP/Core Strategy review, to be adopted in 2019.

5.16 Other changes to the Local Development Scheme are included in Attachment 1

Conclusion

- 5.17 It has become evident that changing circumstances has made the existing position of B&NES less favourable than when the JSP project began. These risks can be addressed by aligning the B&NES position more closely with the other UAs and reviewing the B&NES SHMA now instead of 2019. Whilst this approach is not without risks, these are outweighed by the advantages.
- 5.18 Moreover, the overarching issue in either option is that by being involved in the JSP, B&NES will need to accommodate an additional housing requirement via the JSP. The quantum is unlikely to be significantly affected whether the B&NES SHMA is updated or not, although the locations might be. Bringing forward the review of the B&NES SHMA also brings additional benefits in terms of reduced risk of unsoundness of the JSP, a more robust basis to plan for infrastructure and enabling the best development locations to be used to meet the housing needs of B&NES. The risk that there would be a successful challenge to existing Core Strategy commitments is limited.
- 5.19 Therefore, on balance, it is concluded that it is in B&NES interests to align with its partners in the WoE and bring forward the update of the B&NES SHMA as part of the evidence base for the JSP.

6 RATIONALE

- 6.1 The reason for the recommendations are is to provide clarity on the scope of the Core Stratgey review and the LDS timetable.

7 OTHER OPTIONS CONSIDERED

- 7.1 The Council could undertake a full review of its SHMA in 2019 as currently timetabled.

8 CONSULTATION

- 8.1 The Council's Monitoring Officer (Head of Legal and Democratic Services and Council Solicitor) and Section 151 Officer (Divisional Director – Business Support) have had the opportunity to input to this report and have cleared it for publication.
- 8.2 Cabinet Programme Board have been updated and had opportunity to feed into the works underway.

9 HUMAN RIGHTS AND EQUALITIES

- 9.1 The review of the Core Strategy is at an early stage and any revision to it will be subject to a democratic process. As such, it is not considered that any issues arise under the Human Rights Act 1998 or the Equality Act 2010.

10 RISK MANAGEMENT

10.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact persons	<i>Lisa Bartlett 01225 477550 Simon de Beer 01225 477616</i>
Background papers	<p>B&NES Core Strategy 2014</p> <p>National Planning Policy Framework</p> <p>National Planning Practice Guidance</p> <p>JSP Issues & Options Consultation document</p> <p>Transport Study Topic Paper</p> <p>Strategic Housing Market Assessment Volume 1</p> <p>Strategic Housing Market Assessment Volume 2</p> <p>Economic Development Needs Assessment</p> <p>B&NES Local Development Scheme</p>
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