

LOCAL PLAN PARTIAL UPDATE CONSULTATION FEEDBACK

Reason for the Partial Update:

As a result of the withdrawal of the Joint Spatial Plan and the need to address some urgent issues in B&NES a partial update of the Core Strategy and Placemaking Plan (together comprising the Local Plan) is being progressed. The Council published a commencement document in April this year for public consultation, setting out its intention to prepare the Local Plan partial update, the proposed scope of the update and programme for its preparation.

Feedback received:

The commencement document and accompanying schedule of policies was published in April for a six-week period of consultation. Given Covid-19 circumstances the consultation was principally undertaken on-line and flexibility was given in respect of the consultation comments deadline. The consultation has generated significant interest from a range of stakeholders including residents, parish councils, residents' associations in Bath and developers/planning agents.

A summary of the wide range of issues that were raised is set out in the Annex below. Many of the comments related to specific sites or potential policy approaches/solutions. These issues are important and will be considered as the options document is prepared.

Next Steps:

The next stage is to prepare the Local Plan partial update options document, which will set out potential options for replenishing housing supply, as well as policy approaches for those policies that are being revised. Due to Covid-19 the publication of and consultation on the options document will now take place early in 2021 (and not November 2020 as previously stated in the commencement document). The Council still intends to work closely with parish councils, representing local communities, in considering and preparing options. Therefore, we will be in touch again later in the year to outline this process.

Following consultation on the options document the Council will progress preparation of the Draft Local Plan for consultation later in 2021.

Call for sites and West of England Spatial Development Strategy:

The Partial Update consultation was accompanied by a 'call for sites' for housing and economic purposes to inform our Housing and Economic Land Availability Assessment (HELAA) evidence base and also sites for renewable energy.

Over 150 submissions were received, 46 of which were sites that had not been considered previously in the HELAA. We will assess these sites and include them in the evidence base to inform the Partial Update and future Local Plans.

The next call for sites review period will close on **20th October 2020**, sites can be submitted via the [form on our website](#).

This latest call for sites period is being commenced because the West of England Combined Authority (WECA) has recently announced its intention to prepare a Spatial Development Strategy (SDS) for the WECA area.

The SDS will cover the WECA area covering S Gloucestershire, B&NES and Bristol City and is being prepared with full collaboration from those authorities. The SDS is a high level strategic plan that will establish the overall requirement for additional homes and jobs and a spatial strategy. Each council will also develop new Local Plans, that will need to be consistent with this work.

The information gathered through HELAA will form part of the evidence base for the SDS and the B&NES Local Plan. While the SDS is not looking to identify specific sites, feedback through this process will provide understanding of the capacity and supply across the region. Further information can be found here:

<https://www.westofengland-ca.gov.uk/west-of-england-joint-planning/>

The evidence base for the Local Plan and WECA SDS are closely related. We are proposing that all sites and information submitted in our recent 'call for sites' which ended in June 2020 will be passed on to WECA for consideration in the SDS process.

ANNEX - COMMENTS SUMMARY

Process and Programme

- **The programme is realistic** though all efforts should be made to **streamline the process** without prejudicing the need to undertake full and proper consultation.
- The Partial Review will need to be the subject of the **Duty to Cooperate** to consider any **cross-boundary** implications including how to meet **Bristol's unmet housing needs** and to prepare Statements of Common Ground.
- The Partial Update is not appropriate. **Local Plan full review** is needed as evidence base for Core Strategy is out of date and there are significant changes in circumstances and national policies. Strategic policies should look ahead over a minimum fifteen-year period from adoption to anticipate and respond to long-term requirements and opportunities. The Core Strategy end date is 2028/29, which is only nine years away.
- Greater **clarity** needed around **review process** and the most appropriate solution (amending policies e.g. to ensure policies accord with current NPPF) or addressing implementation issues
- Following **the West of England CA Strategic Development Strategy** timetable, the Council should focus its efforts on working with its neighbours to collectively agree revised arrangements for future **sub-regional planning** in parallel with the preparation of **a New Local Plan**.
- Appears to be bureaucratic, complicated process and Covid-19 has meant residents have received inadequate notification of the consultation. People without internet access do not have a voice in the consultation process
- Clear consideration should be given to the content of made and **emerging Neighbourhood Plans** to avoid conflict between policies.

Scope and approach

- **The scope of policies** being updated **should be broadened**. The housing and employment requirements for the District should be reviewed to ensure that the Local Plan continues to plan for the most appropriate growth targets, particularly housing and workspace/jobs. As calculations of housing need in the Core Strategy pre-date the Standard Methodology, the figures need to be re-evaluated.
- **Covid-19:** There is a need for specific policies to address problems exacerbated by the effects on the **economy and society of Covid-19** including the increase in migration to rural areas.
- **Climate and Nature Emergency:** Support the Partial Update addressing the climate and nature emergency but concerns these key issues cannot be addressed without reviewing the spatial strategy and other policies as well as the viability evidence.

- Climate and Nature emergency should be at the **core of all policies** and as such more policies need to be included within the scope of the review e.g. design policies, GI and nature conservation policies.
- Policies need to better encourage more **renewable energy generation** (geothermal, wind farms and solar farms) and implementation of a Council insulation scheme. Creation of more public green/allotment spaces with a new co-ordinated **Nature Recovery network** and delivery of **Biodiversity Net Gain**. Renewable energy projects need to be consistent with the AONB designations and management plans.
- Climate Emergency will require a change of emphasis and attitude towards the quality and **sustainability (carbon impact)** of housing, the sustainability of transport, and local renewable energy generation including cross border collaboration for renewable energy.
- Government's Future Homes Standard would set new requirements and there would be no purpose for local authorities to use planning policies to achieve the same outcome.

Policy and Site Issues

- **Housing:** More **housing should be facilitated** to meet specific needs e.g. Including those of **older people**, **affordable housing**, high density **co-living**, **micro housing** and **self-build**, but needs to be based on robust evidence.
- **Green Belt** encircling the urban areas cannot be addressed by partial, non-strategic reviews of individual development areas.
- Various support for and proposed **new development sites** including at North Keysham, Hicks Gate, Green Belt land around larger settlements and greenfield land in Somer Valley and rural areas (avoid having to remove land from the Green Belt).
- Various **objections** to existing **allocated sites** which therefore need to be reviewed (e.g. Sulis Down, Bath Recreation Ground etc), as well as sites promoted by developers and HELAA sites.
- New housing sites (if required) must be allocated in areas **well served by sustainable** means of transport – avoid rural locations reliant on the private car
- Need for **viability testing** to understand impact of zero carbon requirement e.g. it may require trade-offs in respect of other requirements/aspirations
- **Student accommodation:** Mixed response - support for more purpose-built student accommodation (PBSA) to avoid further HMOs; no more HMOs and PBSAs in the city except on campuses (including removing the Bath Spa University Newton Park campus from the Green Belt). Alternatively the constraints of both campuses means that it is unrealistic to accommodate all PBSA on campus therefore more PBSA should be allowed in the city centre in Bath.

- Need to control short term lets. PBSA should not be used as **short term lets**.
- Support to revise **Policy H2 (HMO)** to include a change of use from small HMOs to large HMOs.
- A new policy about the usage of **artificial and hybrid grass pitches** in the authority
- **Parking policies** should be revised quickly in line with the climate emergency and current applications should not be subject to outdated requirements (including new requirements for student accommodation, HMOs and co-living)
- Policies should prioritise **reducing the need to travel**.
- Greater development of **public transport corridors and sustainable travel** including walking and cycling. Car parking numbers in the centre of Bath should be reduced to discourage car travel pollution. Refer to the **clean air zone**. **Rural transport issues** must be included within the scope.
- Should keep **Covid19 reduced pollution levels** by the removal of large HGVs (including the introduction of the weight limit over Cleveland Bridge) and through traffic, reduce significantly the health, safety and climate change threats that impact on the quality of life for B&NES residents.
- Collaborate with Wiltshire and Dorset and Department of Transport to route traffic away from the current excessively used A46-A36 SRN route and A46-A4 going towards Bristol.
- Other strategies and key projects should be referenced in the Local Plan such as the **Green Infrastructure** Strategy, **Bath Riverline** Project, Bathampton Meadows GI proposals etc

Text copies of the comments received can be found on our website. Please note that supporting documents/attachments to representations are available on request.

https://beta.bathnes.gov.uk/sites/default/files/2020-08/local_plan_partial_update_launch_representations.pdf