

**Bath & North East Somerset  
Local Plan (Core Strategy /Placemaking Plan)  
2011-2029**

**Partial Update**

**Options Consultation  
January 2020**

**Bath & North East Somerset Local Plan  
Partial Review - Consultation Statement**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

# **Bath & North East Somerset Local Plan Partial Review - Consultation Statement**

## **1 Introduction**

- 1.1 This statement sets out the consultation and community involvement undertaken during the preparation of Bath and North East Somerset Council's Local Plan Partial Update. This is in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The Planning Regulations require that the Council must consult each of the statutory consultees, general consultation bodies, public and business community on the Local Plan and invite each of them to make representations on its scope and content.
- 1.3 This statement explains how the consultation undertaken and who has been consulted; details of how they were consulted; and a summary of the issues raised and how those main issues have been addressed.
- 1.4 At this stage the Consultation Statement focusses on explaining consultation undertaken at the launch or commencement stage. The Consultation Statement will be subsequently updated following each stage of plan preparation. Therefore, it will next be updated and published alongside the Draft Plan (Regulation 19) setting out details of the options consultation.

## **2 About the Local Plan Partial Update**

- 2.1 The Local Plan is made up of the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a period from 2011 to 2029. The Council had already started work on a new Local Plan, to cover the period 2016 to 2036; however, the withdrawal of the Joint Spatial Plan means that work on this plan will not continue. The partial review will update some policies within the Core Strategy and Placemaking Plan. This partial update is not a new Local Plan, and will not roll forward or change the plan period of the adopted Core Strategy and Placemaking Plan.
- 2.2 The partial update will address important issues including the following:
  - The need to update particular policies to address changes in circumstances and national policy & legislation since the Core Strategy was adopted in 2014, particularly the Council's declaration of a Climate Emergency
  - Update and replenish housing supply in order to ensure the Core Strategy requirement can be met

- Review and update policies relating to the development of the Universities and the impacts of student accommodation on communities
  - Review and update some other site specific policies/allocations.
- 2.3 The Commencement document was presented as a discussion document, designed for community and stakeholder engagement and to generate discussion on the scope of the partial update, why it is being prepared and the programme for its preparation. Alongside the commencement document the list of Core Strategy & Placemaking Plan policies proposed to be updated at this time was also published for comment.

### **3 Consultation approach**

- 3.1 With the introduction of the Localism Act, communities are empowered more than ever before to help shape the future of development in their neighbourhoods. The Council attaches significant importance to working with local communities in planning and placemaking in accordance with the Council's corporate priority of giving people a bigger say, and the local approach is set out in the Council's [Neighbourhood Planning Protocol](#) (Statement of Community Involvement).
- 3.2 The information set out in this consultation report demonstrates compliance with the Neighbourhood Planning Protocol methods of community involvement and outlines the consultation activities undertaken, who was consulted, and how they were consulted.

## Launch consultation (Commencement Document) (April – June 2020)



### 4 Introduction

- 4.1 In order to initiate discussion on the Local Plan Partial Update the Council prepared a Commencement Document which was agreed for consultation by [Single Member Decision on the 23<sup>rd</sup> of March 2020](#). The commencement document and accompanying schedule of policies was published for consultation, in compliance with [Regulation 18 of the Local Plan Regulations](#), between the 6<sup>th</sup> of April and 1<sup>st</sup> of June 2020.
- 4.2 Due to the unprecedented situation caused by Covid-19, and after careful consideration by the Council, the consultation was held online only. The consultation was opened for a longer period than would usually be the case, with an 8-week consultation period, and flexibility was given in respect of the consultation comments deadline. As would normally be the case at the commencement stage no public events or exhibitions were planned to take place alongside the publication of the commencement document.
- 4.3 As outlined above the purpose and scope of the Local Plan Partial Update is to update some policies within the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a period from 2011 to 2029. This partial update is not a new Local Plan, and will not roll forward or change the plan period of the adopted Core Strategy and Placemaking Plan.
- 4.4 The partial update addresses important issues including the following:

- The need to update particular policies to address changes in circumstances and national policy & legislation since the Core Strategy was adopted in 2014, particularly the Council's declaration of a Climate Emergency
- Update and replenish housing supply in order to ensure the Core Strategy requirement can be met
- Review and update policies relating to the development of the Universities and the impacts of student accommodation on communities

4.5 The Commencement document was presented as a discussion document, designed for community and stakeholder engagement and to generate discussion on the scope and timetable for the Partial Update. To aid the respondent a series of questions were included at strategic points in the text to stimulate debate. These were:

- Do you have any comments on the proposed scope and content of the Local Plan Partial Update, and the policies to be updated?
- Do you have any comments on the programme for the preparation of the Local Plan Partial Update?
- Do you have any other specific observations to make on the Local Plan Partial Update?

## **5 Information on the Consultation**

### **Notification mailout**

- 5.1 Information about the consultation was issued prior to the start of the consultation period by email/letter on 6<sup>th</sup> April 2020 to all those on the mailing list which included statutory consultees and a range of other stakeholders. Whilst the mailout encouraged people to submit their comments electronically using the comment form provided, it was made clear that letters would also be accepted.
- 5.2 The Parish and Town Councils were mailed separately with the same information.

### **Press release and media coverage**

- 5.3 A press release was issued to remind residents and others of the opportunity to comment on the Commencement document and list of policies proposed to be updated. This was picked up in the local press including:

## **Local Press**

- Bath Echo
- Bath Newseum
- Family Matters

## **Comment Form**

- 5.4 The Council produced a Comment Form in the form of a SurveyMonkey website for those who wished to respond to the consultation. It included clear information on how to respond using the form.

## **Dedicated webpage**

- 5.5 A webpage relating to the consultation could be accessed via links from the main Planning Policy webpage and on the dedicated Local Plan webpage.
- 5.6 The webpage set out the following information:

- An overview of the purpose of Local Plan Partial Update and the reasons why a review is being undertaken
- Consultation Details: how to respond and links to the consultation material, including the comments form
- Next steps following the consultation and other opportunities for users to get involved with planning policy, e.g. responding to the call for sites

## **Direct Contact Information**

- 5.7 An email address was provided on all the consultation material, mail-outs, and website for those who wanted to ask direct questions and seek further information.
- 5.8 For respondents unable to comment electronically, written comments could be posted to the Council's mailing address.

## **Call for Sites**

- 5.9 The consultation also included a 'call for sites' exercise, enabling communities and other stakeholders to submit sites they consider to be potentially suitable for development for housing, employment uses or renewable energy development through the Local Plan Partial Update.

- 5.10 The sites submitted would inform the technical evidence supporting the Local Plan, such as the Housing and Economic Land Availability Assessment (HELAA). The HELAA is a technical assessment process of the suitability of land for development, which also includes availability and achievability. The HELAA process does not affect the planning status of any land which is assessed.

## **6 Stakeholder engagement**

- 6.1 As would normally be the case at the commencement stage no public events or exhibitions were planned to take place alongside the publication of the commencement document.
- 6.2 To assist Parish and Councils a recorded presentation was issued during the consultation in order to explain the purposes of the consultation and the call for sites and address some of the more common queries. The presentation included an audio commentary.

## **7 Representations on the Commencement document**

- 7.1 The consultation generated around 400 representations from a range of stakeholders including residents, parish councils, residents' associations in Bath and developers/planning agents.
- 7.2 By the end of the consultation approximately 200 respondents had submitted comments using the on-line consultation system, around 180 by email and 4 by post.
- 7.3 [A Schedule of the comments](#) received can be viewed on the Council's website.

### **Summary of the main issues raised through the consultation**

- 7.4 A summary of the wide range of issues that were raised is set out in **Annex 1**. Many of the comments related to specific sites or potential policy approaches/solutions. These will be useful in informing the next stages in the Local Plan process.
- 7.5 The consultation at this stage was principally seeking views on the urgent issues it is proposed to address and therefore, the proposed scope of the policies to be updated, as well as the process and programme for undertaking the partial update. The key issues covered in comments in this regard can be briefly summarised as:
- Process of reviewing policies and selection of those to be updated needs to be clearer e.g. to ensure all policies accord with the current NPPF
  - Need to ensure the climate emergency is fully addressed through the partial update and therefore, some additional policies need to be reviewed and updated now

- The plan period should be extended so that the updated Local Plan covers a period of at least 15-years from adoption, as required by the NPPF
- Related to this the housing requirement should be reviewed and the updated plan should be planning for a greater level of housing to reflect likely increased levels of need arising from the standard method and to help meet unmet needs arising in Bristol
- Insufficient evidence of the shortage of housing supply and the need to replenish it has been set out
- Some of the existing Placemaking Plan site allocations that are not shown for review should be included in the partial update to address site specific issues
- Scope of the partial update must include policies to facilitate addressing nature emergency e.g. relating to Green Infrastructure, Biodiversity Net Gain
- Support for the preparation programme but need to ensure communities and stakeholders are involved in the process taking account of Covid-19 restrictions

7.6 A fuller summary of the main issues raised is set out in the table below, along with how the Council has considered these issues in progressing the Local Plan partial update towards next stage (Options consultation under Regulation 18).

## 8 Next Stage

8.1 There will be further opportunities to comment on the content of the Local Plan Partial Update, as the update progresses towards becoming adopted. The table below outlines to the proposed stages to adoption of the Local Plan Partial Update:

7th January – 18th February 2021	Options consultation (Regulation 18)
Spring 2021	Formal consultation on Draft Partial Update (Regulation 19)
Autumn 2021	Plan submission for examination by a planning inspector appointed by the Secretary of State (Regulation 21)
Winter 2021/22	Examination hearings
Spring 2022	Adoption



## ANNEX 1: LOCAL PLAN PARTIAL UPDATE COMMENCEMENT CONSULTATION COMMENTS SUMMARY

### Process and Programme

MAIN ISSUES RAISED	COUNCIL CONSIDERATION/RESPONSE
The programme is realistic though all efforts should be made to <b>streamline the process</b> without prejudicing the need to undertake full and proper consultation.	Agreed.
The Partial Review will need to be the subject of the <b>Duty to Cooperate</b> to consider any <b>cross-boundary</b> implications including how to meet <b>Bristol's unmet housing needs</b> and to prepare Statements of Common Ground.	The partial update will be subject to the Duty to Cooperate and Statements of Common Ground will be prepared as appropriate. The partial update will replenish housing supply to meet the Core Strategy requirement and in accordance with its spatial strategy.
The Partial Update is not appropriate. <b>Local Plan full review</b> 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.	The partial update is needed in order to address some important issues in the short term. The update will ensure policies conform with NPPF 2019. The full review of the Local Plan will be undertaken within the context of and to deliver the WECA Spatial Development Strategy. The full review will address longer term issues, it will be progressed in a timely manner commencing later in 2021 (see Local Development Scheme).
Greater <b>clarity</b> needed around <b>review process</b> and the most appropriate solution (amending policies e.g. to ensure policies accord with current NPPF) or addressing implementation issues	Options document outlines the partial update/review process and ensures policies are updated to accord with current NPPF as soon as possible.
Following the <b>West of England CA Strategic Development Strategy</b> timetable, the Council should focus its efforts on working with its neighbours to collectively agree revised arrangements for future <b>sub-regional planning</b> in parallel with the preparation of a <b>New Local Plan</b> .	Agreed. In the mean time the partial update will address important issues in the shorter term.
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	Government has made it clear that plan-making must continue despite covid-19. Whilst consultation will necessarily need to focus on on-line engagement the Council will publicise the consultation widely and facilitate comments being submitted via other means where possible.
Clear consideration should be given to the content of made and <b>emerging Neighbourhood Plans</b> to avoid conflict between policies.	The Council will provide advice to parish & town councils as appropriate in order to ensure alignment of Neighbourhood Plans with the Local Plan partial update.

## Scope and approach

MAIN ISSUES RAISED	COUNCIL CONSIDERATION/RESPONSE
<p><b>The scope of policies</b> being updated <b>should be broadened</b>. 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.</p>	<p>As this is a partial update of the Core Strategy and the Placemaking Plan reviewing the housing and job growth requirements is not appropriate and falls outside scope of the Plan. The partial update is limited to ensuring the policy framework supports the delivery of the Core Strategy housing and job growth/employment space requirements. Both the strategic housing and employment requirements will be reviewed through the WECA Spatial Development Strategy and new B&amp;NES Local Plan.</p>
<p><b>Covid-19:</b> There is a need for specific policies to address problems exacerbated by the effects on the <b>economy and society of Covid-19</b> including the increase in migration to rural areas.</p>	<p>Consideration will be given to addressing some policies in order to help facilitate post covid-19 recovery. The longer-term impacts on rural migration will need to be evidenced and then addressed through the new Local Plan (full review) as appropriate.</p>
<p><b>Climate and Nature Emergency:</b> 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.</p>	<p>Policies will be updated in order to help better address the climate and ecological emergencies. These policies will be viability tested alongside the other policies in the Local Plan.</p>
<p>Climate and Nature emergency should be at the <b>core of all policies</b> and as such more policies need to be included within the scope of the review e.g. design policies, GI and nature conservation policies.</p>	<p>The scope of policies included in the Local Plan Partial Update has been broadened to include the key policies that need to be updated to help address the climate and ecological emergencies.</p>
<p>Policies need to better encourage more <b>renewable energy generation</b> (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 <b>Nature Recovery network</b> and delivery of <b>Biodiversity Net Gain</b>. Renewable energy projects need to be consistent with the AONB designations and management plans.</p>	<p>These issues will be addressed through the partial update as far as appropriate and will be supported by work on other Council projects e.g. Biodiversity Net Gain Supplementary Planning Document.</p>
<p>Climate Emergency will require a change of emphasis and attitude towards the quality and <b>sustainability (carbon impact)</b> of housing, the sustainability of transport, and local renewable energy generation including cross border collaboration for renewable energy.</p>	<p>The Local Plan Partial Update will emphasise moves to zero carbon development. Cross border collaboration on these issues will be progressed through the WECA Spatial Development Strategy.</p>
<p>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.</p>	<p>Implementation/adoption of Future Homes Standard has not yet been determined by the government. Local policy options are to be presented related to whether and how Future Standards are adopted.</p>

## Policy and Site Issues

MAIN ISSUES RAISED	COUNCIL CONSIDERATION/RESPONSE
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.	The partial update will seek to facilitate further provision of housing based on available evidence.
<b>Green Belt</b> encircling the urban areas cannot be addressed by partial, non-strategic reviews of individual development areas.	Should replenishing housing supply necessitate consideration of Green Belt sites the review of Green Belt and demonstration of the necessary exceptional circumstances will be undertaken in accordance with the NPPF.
Various support for and proposed <b>new development sites</b> 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).	Noted. Sites to be considered for allocation in accordance the spatial strategy set out in the Core Strategy.
Various <b>objections</b> to existing <b>allocated sites</b> which therefore need to be reviewed (e.g. Sulis Down, Bath Recreation Ground etc), as well as sites promoted by developers and HELAA sites (including over 100 representations regarding RAD25/26).	Noted. Existing site allocations will be reviewed to reflect current circumstances and in accordance with the current NPPF and the Core Strategy/Placemaking Plan policy framework.
New housing sites (if required) must be allocated in areas <b>well served by sustainable</b> means of transport – avoid rural locations reliant on the private car	New site allocations will be considered in accordance with the spatial strategy of the Core Strategy which seeks to focus development on locations well served by sustainable transport.
Need for <b>viability testing</b> to understand impact of zero carbon requirement e.g. it may require trade-offs in respect of other requirements/aspirations	Draft Plan (Reg 19) will be subject to viability testing.
<b>Student accommodation:</b> 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.	The policy approach to providing student accommodation will be reviewed and updated through the Local Plan partial update, including provision on the Universities' campuses.
Need to control short term lets. PBSA should not be used as <b>short term lets</b> .	The approach to short-term residential lets will need to be considered within the context of national legislation.
Support to revise <b>Policy H2 (HMO)</b> to include a change of use from small HMOs to large HMOs.	Noted. Policy options are presented in the options document.
A new policy about the usage of <b>artificial and hybrid grass pitches</b> in the authority	Noted. The options document sets out information on this issue within the context of the scope and requirements of the planning system.

<p><b>Parking policies</b> 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)</p>	<p>Parking standards are proposed to be reviewed and revised in line with the climate emergency through the preparation of a Parking Standards Supplementary Planning Document in parallel with the Local Plan Partial Update.</p>
<p>Polices should prioritise <b>reducing the need to travel</b>.</p>	<p>Noted. This is an important aspect of helping to address the climate emergency and will be considered through the Local Plan Partial Update.</p>
<p>Greater development of <b>public transport corridors and sustainable travel</b> including walking and cycling. Car parking numbers in the centre of Bath should be reduced to discourage car travel pollution. Refer to the <b>clean air zone</b>. <b>Rural transport issues</b> must be included within the scope.</p>	<p>The sustainable transport policies are proposed to be revised through the partial update to place greater emphasis on sustainable transport modes. The partial update will need to reflect and work alongside other Council projects e.g. Liveable Neighbourhoods.</p>
<p>Should keep <b>Covid19 reduced pollution levels</b> 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&amp;NES residents.</p>	<p>Noted. The Local Plan Partial Update will need to support and work alongside other relevant Council projects addressing the impact of HGVs in the city and other transport impacts that affect quality of life.</p>
<p>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.</p>	<p>Work continues on this issue and will be reflected in and facilitated by the development of B&amp;NES planning policy as appropriate (note that this is likely to fall outside the scope of the Local Plan Partial Update).</p>
<p>Other strategies and key projects should be referenced in the Local Plan such as the <b>Green Infrastructure Strategy</b>, <b>Bath Riverline</b> Project, Bathampton Meadows GI proposals etc</p>	<p>Agreed that relevant GI projects will be referenced and their delivery facilitated through the Local Plan Partial Update as appropriate (see Options document).</p>