

## BATH & NORTH EAST SOMERSET CORE STRATEGY EXAMINATION

### COUNCIL RESPONSE TO ID/51

#### 1.0 INTRODUCTION

- 1.1 This note sets out the Council's response to the questions raised by the Inspector in his note ID/51 in which he is seeking factual clarification on past consultation arrangements and, in particular, the level of publicity in respect of the proposed allocation at East Keynsham.
- 1.2 This response firstly clarifies the position regarding the Council's Statement of Community Involvement to provide the general context for the response.

#### 2.0 STATEMENT OF COMMUNITY INVOLVEMENT

- 2.1 The Council's Statement of Community Involvement (SCI) adopted in 2007 (CD5/13) was superseded by the document entitled *My Neighbourhood: The Neighbourhood Planning Protocol* which was adopted in September 2012. The Neighbourhood Planning Protocol (NPP) is not included in the Core Documents list although it is referred to in Consultation Summary Reports relating to both the March 2013 and November 2013 proposed changes to the Core Strategy (page 1 of CD9/PC5 and page 2 of CD12/20). The NPP has been publicly available since its adoption in 2012 on the Council's website [www.bathnes.gov.uk/neighbourhoodplanning](http://www.bathnes.gov.uk/neighbourhoodplanning) with hard copies available at Council's main offices in Bath, Keynsham and Midsomer Norton plus all public libraries within the District.
- 2.2 Paragraph 23 of the NPP sets out how the Council will engage local communities and refers to a toolbox of methods which the Council will use to encourage community involvement and Appendix A details the toolbox of community involvement methods.
- 2.3 Appendix A states that the Council will undertake area notification where site allocations are proposed, including notification by letter to addresses in the vicinity of the proposed allocation. It goes on to explain that the size and parameters of the area are to be determined by the size and nature of the site allocation proposed. This carries forward the approach adopted in the 2007 SCI.

### 3.0 COUNCIL'S RESPONSE TO THE INSPECTOR'S QUESTIONS

***Inspector's request:***

*Could the Council confirm whether or not:*

*Any such area notification by letter to residents/houses was undertaken in relation to the consultation in March 2013? If so, for which areas and how extensive?*

- 3.1 In March 2013, the Council consulted on the provision of additional land for housing and employment development at locations on the edge of Bath (Lansdown, Odd Down and Weston), on the edge of Keynsham (east and south west), and at Whitchurch village. These were not site allocations and comments were being sought on the principle of development in these broad locations. The consultation was widely publicised as reported in the Consultation Report (May 2013, CD9/PC5) and included an email/letter sent to all parties on the LDF mailing list. However, there was purposefully no direct notification by letter to residents in the vicinity of any of the proposed locations, not only as these were not allocations, but also because it was difficult to determine the extent of the areas likely to be affected by these proposals. It should be noted that the consultation events in each area were also widely publicised and well attended.
- 3.2 In order to reach as wide an audience as possible, the Council chose to use its magazine 'Connect' which was distributed via the Royal Mail to all households within Bath and North East Somerset. The Spring edition, which was issued in advance of the consultation, included a feature on the forthcoming Core Strategy consultation in an article entitled '*Residents have their say on the future of their area*' with details of where to find out further information (see Annex 1).
- 3.3 Similarly the 'Keynsham Voice', distributed to all households in Keynsham, Saltford, Compton Dando, Queen Charlton, Chewton Keynsham, Burnet and Willard, plus drop boxes at all local shops in the area, included a detailed News feature in its April 2013 edition encouraging residents to '*Have your say on extra homes*' plus details of the consultation events and how to get involved. There is specific mention of the two proposed Keynsham locations (see Annex 1).

***Inspector's request:***

*Could the Council confirm whether or not:*

*Any such area notification by letters to residents/houses was undertaken in relation to the consultation in November/December 2013? If so, for which areas and how extensive?*

- 3.4 In common with the March 2013 consultation due to the difficulty in determining the extent of the area likely to be affected by the proposed site allocation in each of the locations, and in light of the level of consultation

planned, the Council considered that the most effective way of reaching all residents in the District was to communicate the consultation via the Council's Connect magazine which is delivered to all households. The Winter edition of the Council's Connect magazine included a feature on the Core Strategy consultation listing the locations of the proposed site allocations (see CD9/PC5, page 15). Again the October 2013 'Keynsham Voice', amongst a number of other local publications, picked up on the story (see Annex 1 to BNES/58).

- 3.5 As before, all the events held in the vicinity of the proposed locations were well advertised and well attended.

***Inspector's request:***

*What was the purpose of the apparent late notification of some addresses in East Keynsham?*

- 3.6 Numerous local residents living adjacent to or in the vicinity of the proposed allocation at East Keynsham attended the Keynsham drop-in event. Some of the local Ward and Parish Councilors supplemented the Council's publicity with their own (mainly leafleting).
- 3.7 Towards the end of the consultation period the Council received a phone call from a local resident in the vicinity of East Keynsham stating that he had spoken to a number of his neighbours and concluded that, in his view, there had been insufficient publicity. In response and before the end of the consultation, some door to door leafleting in the vicinity of the East Keynsham allocation was undertaken. This leafleting supplemented the publicity already undertaken before and during the consultation period (including that referred to in paragraph 3.05 above). It became apparent that every single person who was spoken to during this leaflet drop was already aware of the proposal; many had attended the local event and seemed perplexed at receiving another copy of a leaflet which they already had taken away from the event.

***Inspector's request:***

*Does the Council consider that the requirements of the SCI have been met?*

- 3.8 The Council does consider that the requirements of the NPP (the Council's SCI) have been met. The two Consultation Reports (CD9/PC5 and CD12/20) referred to above set out in detail how each consultation was undertaken. Whilst going well beyond the statutory minimum requirements, the Council considers that the methods of engagement used in the case of both consultations were chosen to ensure maximum participation and were reasonable, appropriate and proportionate.
- 3.9 As discussed above, other than those residents already on the LDF mailing list, letters were not sent to individual households in the vicinity of any of the

locations at either consultation due to the uncertainty of the sphere of influence from such large proposals. However, every household in the District was notified of the consultation on the Proposed Changes to the Core Strategy in March 2013 and the proposed site allocations in the Amendments to the Core Strategy in November 2013 through the Council's *Connect* magazine and, in the case of the Keynsham area, the *Keynsham Voice* as well.

# Core Strategy

## Residents will have say on the future of their area



Developments adhere to strict policies

**A** public consultation, which is due to be held between March and May, will allow local residents to discuss the proposals outlined in the Council’s Core Strategy, and also voice their opinions on the future of their area. The consultation follows a recent Council meeting, where the Council considered the revised housing need and potential development locations for housing across the area.

It is important that new homes are built within a sound Core Strategy, namely for creating more homes for local people so there is greater choice, particularly for affordable homes, and also preventing unplanned or speculative development proposals being accepted. For more information visit [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy) ■

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# Have say on extra homes

The councillors have had their say, now it's time for residents to give their views on proposals that could see an extra 450 homes built on green-belt land around Keynsham.

Changes to the Core Strategy were agreed at a meeting of the full council at B&NES last month, setting out the number of homes to be built by 2029 - which has risen from 11,500 in the previous plan to 12,700.

Residents will now get their say with consultation running until May 8 and public events taking place across the district, including two in Keynsham on April 22 - from 1.30-3pm at Keynsham Key Centre and 4.30-7pm at Wellsway School.

Councillor Tim Ball, Cabinet Member for Homes and Planning, said: "Everyone at Bath & North East Somerset Council appreciates the strong feelings that local people have about the Core Strategy. This is the chance for residents to have their say about the future of their community. We are putting on a wide range of engagement events for people to find out more and submit informed comments to the council to pass onto the Inspector."

People can submit comments

at the consultation events. All consultation documents, including a comment form, are available on the council's website at [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy) or at Riverside during opening hours, and at libraries.

The strategy would allow 250 homes to be built on land adjoining east Keynsham and 200 homes on land adjoining south-west Keynsham. Land in other parts of B&NES has also been earmarked to accommodate the extra homes, including 200 at Whitchurch, 300 at Odd Down and 300 at Weston, Bath, and 120 at MoD Ensleigh.

The public events are on: April 8, 4.30-7pm, Whitchurch Village Hall; April 10, 4.30-7pm, South Stoke Parish Hall; April 11, 4.30-7pm, Weston All Saints Centre; April 15, 4.30 - 7pm, Lansdown Kingswood School; April 16, 4.30- 7pm, Odd Down St Gregory's College; April 18, 10.30am-noon, Westfield Methodist Church; April 18, 2-3.30pm, Radstock Methodist Church; April 18, 5.30-7pm, Midsomer Norton Town Council; April 22, 1.30-3pm, Keynsham Key Centre; April 22, 4.30-7pm, Wellsway School; April 30, 6-8pm, Bath One Stop Shop.

## News

# Next step for core strategy

A blueprint for future development across the Bath and North East Somerset - including green-belt sites around Keynsham - is moving on to the next stage of public inquiry.

The news comes despite concerns raised by an independent planning inspector over the core strategy document produced by the council.

The plan aims to set out how the authority will meet future housing and employment need for the next 15 years, and included proposals that 450 homes could be built on land to the south-west and east of the town, near the K2 site and off the A4. The blueprint proposes locations for 12,700 new homes across B&NES in all, some of which are on green-belt sites, as well as brownfield sites.

But the council was told its

revised strategy did not take into account unmet demand from neighbouring areas.

However, it has been announced the consultation process will still go ahead, giving everyone the chance to have their say on the number of new homes proposed and the locations suggested.

Councillor Tim Ball (Lib-Dem, Twerton), Cabinet Member for Homes and Planning, said, "It is good news that the core strategy will proceed.

"Let's be clear. Had the Inspector called a halt to the process, this would have played into the hands of developers and encouraged speculative development proposals around our area in unsustainable locations. Most probably, these locations would have resulted in a free for all green field land grab."