

Planning Policy Team
Bath & North East Somerset Council
By email to: Planning_policy@bathnes.gov.uk

Dear colleagues

RE: B&NES Local Plan Partial Update - Regulation 19 (publication) consultation

Thank you for contacting South Gloucestershire Council in relation to formal consultation on the Publication draft of Bath and North East Somerset's Local Plan Partial Update (LPPU), in line with the requirements of the Town and Country Planning (Local Planning) Regulations 2012.

For ease of reference, throughout these representations South Gloucestershire Council shall be referred to as the Council, South Gloucestershire or SGC, and Bath and North East Somerset or B&NES will be used to refer to Bath and North East Somerset Council.

The Council understands that this consultation document relates to a partial update to B&NES' existing Local Plan, and that B&NES will be undertaking a full review of its Local Plan, alongside the West of England Combined Authority (WECA) Spatial Development Strategy (SDS). Through doing so, appropriate account will need to be taken of the strategic planning issues facing the wider Bristol sub-region, which includes the need to plan for additional homes, jobs, green and other infrastructure, above and beyond that within the scope of the Partial Review. SGC is committed to working with WECA, the Combined Authority Unitary Authorities and its other partners to develop the SDS and looks forward to continuing to work together on this, and through the other established areas of joint working in the West of England.

The Council also understands that the scope of the changes proposed through the LPPU is confined to those areas that can be addressed without changing the spatial priorities; the spatial strategy; or the strategic housing and job growth requirements in the B&NES Core Strategy and Placemaking Plan. These changes are set out in a schedule of changes for reference and are also helpfully shown for information in separate volumes, which set out the changes detailed in the schedule incorporated into the relevant sections of the Plan (i.e., those which are proposed to be updated through the LPPU).

Procedural issues

The Council has been involved in the preparation of the B&NES Local Plan Partial Update throughout the Regulation 18 stage, both in its capacity as an adjoining authority (through the Duty to Cooperate, and as illustrated through the [Statement of Common Ground](#)) and as a neighbour, with a long and productive history of joint working.

South Gloucestershire Council notes that the B&NES Local Plan Partial Update has been published in line with the Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012, and these representations are made in line with Regulation 20 (of the same Regulations).

Officers have reviewed the LPPU and consider that the LPPU has been positively prepared, the approach being proposed is justified and deliverable over the plan period covered by the Core Strategy and the Placemaking Plan (so it is effective) and has been prepared in line with national planning policy. The Council therefore considers that the Plan is 'sound' in line with the requirements of national planning policy (para 35) and relevant supporting guidance.

Officers also consider that the LPPU has been prepared in accordance with relevant legislative and procedural requirements, including through the preparation of a sustainability appraisal which has informed the development of the Plan.

General commentary

For the purposes of these representations, the Council has focussed on the district-wide policies. South Gloucestershire has previously made comments in relation to changes to the Keynsham policy area, through the Duty to Cooperate, owing to its proximity to and potential importance for nearby communities within South Gloucestershire.

South Gloucestershire Council understands the context in which the LPPU has been prepared, and generally supports the approaches being proposed, and specifically those updates presented to policies aiming to better address B&NES' declaration of climate and ecological emergencies. The Council also declared a Climate Emergency in July 2019 and will be preparing policies to address such issues in South Gloucestershire through developing its own Local Plan 2020.

Responding to Climate Change

As part of addressing the Climate Emergency, the Council recognises the importance of retrofitting existing buildings to improve their energy efficiency and thus their adaptability to climate change, as is required by updated Policy CP1.

The Council also supports the approach being taken through updated Policy CP3, which seeks to deliver a rapid and large-scale increase in local renewable energy generation. This approach addresses several important considerations including general criteria for the assessment of proposals for renewable and low-carbon generation, as well as providing support for opportunities for co-location and community-led schemes. The policy requirements set out for wind and ground mounted solar schemes appear logical and address the issues associated with those specific technologies.

In addition to Policy CP1, SGC notes the importance of sustainable construction for new build residential and non-residential development and supports the approaches being taken through new Policies SCR6 and SCR7. As part of this approach, the Council notes and supports the change from the carbon reduction metric to 'energy use' for operational emissions, with SCR6

requiring zero operational emissions by reducing heat and power demand and then supplying all energy demand through onsite renewables. Similarly, SCR7 requires major new build non-residential development to maximise carbon reduction. The approach taken through both policies

of only resorting to offsetting in very specific circumstances is supported, as is the approach to addressing overheating (requiring the CISBE method) set out in SCR6. SGC also notes and supports the approach to embodied carbon being proposed through new Policy SCR8.

South Gloucestershire considers the requirements (set out in new Policy SCR9) for EV charging infrastructure to be incorporated into all new developments (both residential and non-residential) to be an appropriate and useful addition to the Local Plan, as is the consideration of grid capacity.

Environmental quality

The Council supports the inclusion of new and updated policies relating to environmental quality, and particularly those which respond to B&NES' declaration of an ecological emergency.

More specifically, South Gloucestershire supports the new requirements of Policy NE3, which sets out that development resulting in significant harm to biodiversity will not be permitted and includes updated considerations in relation to designated and important habitat sites. It also helpfully sets out the very limited circumstances where development impacting on irreplaceable habitats could be acceptable.

New Policy NE3a, which requires major developments to demonstrate and secure in perpetuity a biodiversity net gain (BNG) of at least 10% is also very much supported, as is the stated intention to bring forward a requirement of 15% BNG through B&NES' Local Plan Review.

Similarly, the requirement (through updated Policy NE5) for development proposals to demonstrate that they make a positive contribution to regional Nature Recovery Networks (NRN) and create or maintain local ecological networks is supported.

The updated position set out through the additions/ updates to Green Infrastructure (GI) Policies CP7 and NE1 and related supporting text, particularly with reference to strategic GI projects in the Plan area are considered helpful and consistent with the aims of the LPPU.

Building a prosperous economy

The Council recognises and supports the increased emphasis on climate and environmental measures in this section of the Plan, and the importance of the promotion of sustainable transport to achieving these aims.

Similarly, South Gloucestershire notes the link made between travel and exercise and sustainable travel, highlighting the benefits of non-car travel in promoting the health of the population, and the link between reduced traffic and both health and the safety of non-car users. In the same vein, the Council supports the link drawn between traffic reduction and the protection and enhancement of the environment. Read as a whole, the new and amendments sections really highlight the benefits of the promotion of sustainable transport and the critical nature of its incorporation into new

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development, for the range of substantial environmental and health benefits doing will bring. The Council therefore supports the expression of these principles through the updates proposed to Policy ST1, which promotes sustainable travel and healthy streets.

Similarly, updated Policies ST2 and ST2A promote the safeguarding of Sustainable Transport and Active Travel Routes respectively and set out that development which prejudices these routes is unacceptable.

The Council also supports the updates proposed to Policy ST3, which requires development proposals to be designed in line with the sustainable transport hierarchy, and promotes the use of sustainable modes, as well as placing a strong emphasis on safeguarding and enhancing existing infrastructure, as well as provide appropriate facilities for new development. Officers are particularly pleased to note the inclusion of reference to the Mass Transit corridor between Bristol and Bath being explored by WECA which it is considered will relieve through travel pressures in the southern part of South Gloucestershire.

The Council also understands and supports the updates proposed to Policy ST7, and the increased emphasis they place on sustainable modes of transport, and notes the issues cited in relation to parking, many of which are similar to those experienced in parts of South Gloucestershire. To this end, we would request to be kept informed regarding the preparation of the Transport and Development SPD as it progresses.

In summary, the Council considers that the updates proposed through the LPPU are sensible and necessary and will go a long way to addressing the key strategic issues highlighted at updated paragraph 23. Allied to this point, we would advise that there appears to be a minor typographical error in relation to the changes proposed to this section, with the new text proposed referred to as para 24c (but which follows on from new paras 23a and 23b).

We hope these representations are helpful. Please feel free to contact us if you require any clarification or would like to discuss further.

Yours sincerely,

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South Gloucestershire Council