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Dear Simon,

## **Bath and North East Somerset Local Plan Partial Update Proposed Submission Draft (Regulation 19)**

Thank you for consulting Wiltshire Council on the above draft of your Local Plan Partial Review. Wiltshire Council welcomes the opportunity to formally comment on the 'Bath and North East Somerset Local Plan Partial Review (Regulation 19)'.

### *Housing Needs*

Wiltshire Council welcome the approach to the partial update in addressing a shortfall in housing supply as housing delivery is forecast to slow towards the end of the adopted Core Strategy plan period 2011 to 2029 following strong delivery rates over the first half of the plan period. Action taken to identify and allocate additional sites up to 2029 to ensure needs continue to be met is supported.

Following an adjustment to the anticipated supply, review of the delivery of the remaining sites and incorporation of a windfall allowance, Bath and North East Somerset has an estimated supply of 4,671 homes from 2021 to 2029. When assessed against the remaining Core Strategy requirement to be met up to 2029, which is provided as 4,850 homes, there is shortfall of nearly 200 dwellings. Bath and North East Somerset then take account of the future supply shortfall against the Housing Delivery Test, which is unable to take account of past over-delivery. This assessed the shortfall on the basis of delivering 722 dwellings per annum, which is the annual need derived from the Core Strategy requirement of 13,000 homes. The outcome is a shortfall of 1,100 dwellings for which land is identified by the proposed submission draft of the Local Plan Partial Update.

Wiltshire Council's supports the approach to meeting this identified housing needs in full within the Bath and North East Somerset local authority boundary.

### *Habitats Regulation Assessment*

Wiltshire Council has reviewed the Habitats Regulation Assessment (August 2021) supporting the Local Plan Partial Update Draft Plan (Reg 19) Consultation and have no

substantial concerns relating to the conclusion of the appropriate assessment. It is noted however, that the in-combination assessment does not consider the Wiltshire Housing Site Allocations Plan (Adopted Feb 2020) (WHSAP). Housing site allocations at Trowbridge were considered to have potential for adverse effects on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) due to potential impacts on functionally linked land. One of the issues Wiltshire has had to address through the Trowbridge Bat Mitigation Strategy Supplementary Planning Document is the potential for developments to cause effects through recreational pressure at woodlands used by breeding Bechstein's bats. The developments lie up to 3km from the woodlands, which in turn lies a minimum of 9km from the SAC parcels. It is accepted that this is a judgement call for Bath and North East Somerset's ecologists and it may be felt that in-combination effects of the Partial Update and WHSAP can be excluded due to the level of mitigation that Wiltshire is putting in place. Nonetheless, it is unlikely that these are the only woodlands supporting Bechstein's bats and is something that the Partial Review, and indeed future full Local Plan reviews, may need to consider further.

## *Transport*

Wiltshire Council considers that overall, the Plan sets out to be very ambitious in addressing the carbon challenge with a significant push towards sustainable transport. These comments should be read in conjunction with previous comments made during the Regulation 18 consultation.

There are some concerns of wider implications, including on Wiltshire highways and communities, if the Class C Clean Air Zone (CAZ), outlined in paragraph 589f, is to be elevated to a Class D CAZ (i.e. to include cars and motorcycles) there will be potential for further wide implications, including on Wiltshire's highway network and communities. Therefore, if Bath and North East Somerset Council is minded to change the current CAZ to a Class D, then this should be accompanied by a robust assessment to understand the wider implications of such a change on neighbouring authority areas.

Wiltshire Council consider that the following text (shown in *italics*) is inserted to ensure that point 3 of Policy ST1 is sound:

"POLICY ST1: PROMOTING SUSTAINABLE TRAVEL **AND HEALTHY STREETS:**

3). ~~Reduce~~ The growth and the overall level of traffic and congestion **are reduced** by measures which encourage movement by public transport, bicycle and on foot, including traffic *and demand* management *measures* and assisting the integration of all forms of transport;"

In response to paragraph 605a, the Council would like to reiterate comments made to the Regulation 18 consultation, that the walking and cycling corridor from Bath to Bradford on Avon along the Kennet & Avon Canal is a particularly important route that is in need of improvement, both for commuting and for encouraging tourism. It would also be desirable if the Bath cycle hire network aimed to eventually expand along this corridor (including connections to Freshford and Avoncliff Rail Stations) to Bradford on Avon.

Following on from our response to questions Q5b and Q18b during the Regulation 18 consultation, the council consider the following additions (shown in *italics*) to paragraph 619 of the Local Plan Partial Update are required:

**“... B&NES will continue to work towards identifying and developing innovative solutions to increase existing levels of sustainable transport options intercept trips into Bath from the east liaising with Wiltshire Council and transport operators at appropriate stages.”**

Reflecting the above, it is considered that the following wording (shown in *italics*) should also be included in POLICY ST6:

**“Transport Interchange** ~~PARK AND RIDE:~~

**2) Proposed site(s) have been thoroughly evaluated, including their impacts on neighbouring authority areas, with a robust evidence base demonstrating that the most suitable and sustainable site has been selected;**

*7) Relevant neighbouring authorities and transport operators have been consulted on the potential cross boundary and service implications of new transport interchanges.”*

## *Climate Change*

In response to climate change, Bath and North East Somerset Council are updating their Local Plan to make new homes to be built to achieve Net Zero Carbon, with better insulation, lower carbon building materials and lower carbon heating systems which is welcomed by the council. Key policies are SCR6 Sustainable Construction for Residential Buildings, SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings and SCR8 Embodied Carbon. Several of the policies being proposing would be the highest in the country. It is noted that Bath and North East Somerset has worked very closely on a shared evidence base with other councils, including Bristol, North Somerset, South Gloucestershire as well as Cornwall. Cambridgeshire has a very similar policy approach. The approach taken to gathering this evidence to underpin the key policies is welcomed.

We look forward to engaging with you further to discuss the above comments.

Yours sincerely



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