

Commencement Document
Consultation Report

November 2017

CONTENTS

2. Introduction	p.1
3. About the Core Strategy Review	p.1
4. Consultation approach	p.1
5. Information on the Consultation	p.2
6. Representations on the Commencement Document	p.4
Appendix 1 - consultation material	p.5
Appendix 2 - summary of key issues raised through the consultation and officer responses	p.13

1. Introduction

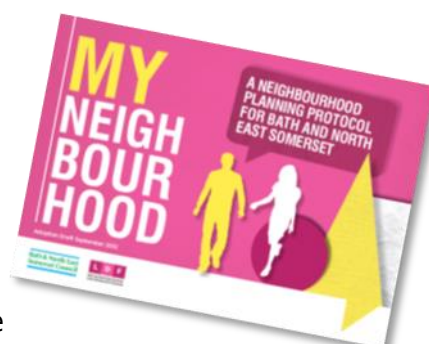
- 1.1 This statement sets out the consultation and community involvement undertaken during the preparation of Bath and North East Somerset Council's Core Strategy Consultation Review. This is in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 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 the consultation undertaken and details of 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 through the preparation of the Issues and Options stage under Regulation 18.

2. About the Core Strategy Review

- 2.1 Bath & North East Somerset's Core Strategy, adopted in July 2014, includes a commitment to an early review of the housing requirement. This review is being undertaken alongside the West of England Joint Spatial Plan which will provide a new strategic planning context for all four West of England areas including Bath & North East Somerset. It will set the revised housing numbers for Bath & North East Somerset and an affordable housing target up to 2036. .
- 2.2 The review will entail amalgamating the Core Strategy and the Placemaking Plan into a combined new Local Plan and will allocate strategic sites at locations identified in the Joint Spatial Plan and other development opportunities will be identified and allocated. This is also an opportunity to look again at other policy areas such as renewable energy targets and what infrastructure is needed to support additional development.

3. Consultation approach

- 3.1 The Council attaches significant importance to working with local communities in planning and placemaking, and our local approach is set out in the Council's **Neighbourhood Planning Protocol** (Statement of Community Involvement). This is in line with the Localism Act 2011 through which communities are further empowered to help shape the future of development in their neighbourhoods.



- 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.

4. Information on the Consultation

Notification mailout

- 4.1 Information about the consultation was issued by email /letter on 7th November 2016 to all those on the Local Development Framework mailing list which included statutory consultees and a range of other stakeholders. A total of 3546 mailouts (comprising 2660 emails and 886 letters) were sent.

Appx 1
pages 5

Press coverage

- 4.2 An article publicising the consultation on the B&NES' Core Strategy Review, which ran concurrently with the consultation on the West of England Joint Spatial Plan 'Emerging Spatial Strategy', was featured in the Winter edition of the Council's Connect magazine. This was distributed to around 76,000 households across Bath and North East Somerset.

Appx 1
pages 7

Availability of documents

- 4.3 The Council's website was the main means by which the consultation documents were accessible. The Commencement Document and links to further information how to make comments on-line were made publicly available at the nominated 'Deposit Stations' across the District, namely the main Council offices in Bath, Keynsham, and Midsomer Norton and all public libraries (see below for details) as well as the community library at Combe Hay.
- 4.4 The Commencement Document together with an explanatory note and summary leaflet were made available to view at the following deposit stations:
- One Stop Shop, Lewis House, Manvers Street, Bath BA1 1JG
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
 - Riverside, Temple Street, Keynsham BS31 1LA
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
 - The Hollies, High St, Midsomer Norton BA3 2DT
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
 - All libraries in Bath & North East Somerset. A list of all the libraries, including information on opening hours is available on the Council's website at www.bathnes.gov.uk/libraries
- 4.5 Whilst consultees were encouraged to view documents, paper copies were made available if requested to ensure inclusivity.

Response methods

- 4.6 Whilst the mailout encouraged people to submit their comments online via the Council's Consultation Website or by email, letters responding to the consultation were also accepted to ensure inclusivity.

Council Website

- 4.7 A web page relating to the consultation could be accessed via links from the main Planning Policy webpage on the dedicated Core Strategy review webpage where it was advertised as a News item at the start of the consultation.
- 4.8 The webpage set out the following information:

Appx 1
pages 8-
11

- Reasons for the Core Strategy Review
- the strategic context for the Core Strategy Review
- explanation that the Council was consulting on the proposed scope, content and programme for the Core Strategy Review
- Consultation Details: how to respond, links to the consultation material including comments form and details of where hard copies of the consultation material could be viewed

Direct Contact Information

- 4.9 An email address and contact telephone number was provided on all the consultation material, mail-outs, and website for those who wanted to ask direct questions and seek further information.

5. Stakeholder consultation

- 5.1 As consultation on the Commencement Document took place at the same time as the West of England's consultation on Joint Spatial Plan (Emerging Spatial Strategy) and the Joint Transport Study, B&NES Council was able to display information on the Core Strategy Review consultation alongside the West of England consultation display boards. This allowed the general public and interested stakeholders viewed the information on both consultations concurrently during November and December 2016. Details of where and when the exhibitions could be viewed during normal opening hours are listed below at the three principle urban areas of Bath, Keynsham and Midsomer Norton.

Appx 1
page 12

- Keynsham
Keynsham library Monday 7 November – Friday 18 November
- Somer Valley
The Hollies reception, Midsomer Norton Monday 21 November – Friday 2 December
- Bath
Bath One Stop Shop, Lewis House Monday 5 December – Friday 16 December

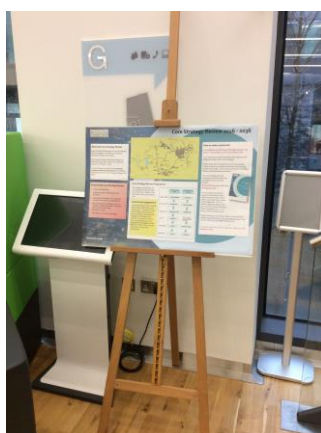
6. Representations on the Commencement Document

Consultation feedback

- 6.1 Total 76 (53 received via email and 23 completed the questions using the on-line consultation system) = 2% response rate.
- 6.2 The response profile is categorised as follows:
- 5 statutory consultees (Historic England, Highways England, Coal Authority, Natural England and Network Rail)
 - 3 neighbouring local authorities (Wiltshire, Bristol and North Somerset)
 - 6 Parish/Town Councils (Clutton, Peasedown St John, Midsomer Norton, Saltford, South Stoke and Stowey Sutton)
 - Bath Spa University and the University of Bath
 - National/regional bodies (NHS Property Services, Sport England, British Archaeological Trust, CPRE Avonside, Railfuture Severnside)
 - Bath Preservation Trust
 - Local interest groups (Woodland Trust, Newton St Loe Conservation Group, Oldfield Park Residents Association, Saltford Environmental Group)
 - Developers promoting land in Whitchurch Keynsham, Hicks Gate, East Harptree, Haydon, Bath and Radstock) = 15
 - Developers only responding to the consultation questions = 6
 - Local residents = 19
- 6.3 A Schedule of comments received has been prepared and can be viewed on the Council's website and accessed via this link: http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs-review/csr_schedule_of_comments.pdf

Summary of main points raised

- 6.4 The main points arising from the responses to the consultation on the Commencement Document are summarised in **Appendix 2** together with officer responses. These will be used to inform the next stage in the preparation of the new Local Plan 2016 to 2036.



Bath & North East Somerset Council

Title First Name Surname
Company
Address Line 1
Address Line 2
Address Line 3
Address Line 4
SPostcode

Planning Policy
Planning Services
Bath & North East Somerset Council
PO Box 5006
Bath
BA1 1JG

Direct line:(01225) 477548
Minicom: (01225) 477535

E Mail: planning_policy@bathnes.gov.uk

Date:

Dear Title First Name Surname

Have your say on the Bath & North East Somerset Core Strategy Review

About the consultation

The Council is reviewing its Core Strategy and we are writing to invite your views on the proposed content, scope and programme for the Core Strategy Review for the period 2016-2036. Your involvement at this early stage is important in helping to influence and shape this review.

About the Core Strategy Review

Bath & North East Somerset's Core Strategy, adopted in July 2014, includes a commitment to an early review of the housing requirement. This review is being undertaken alongside the West of England Joint Spatial Plan which will provide a new strategic planning context for all four West of England areas including Bath & North East Somerset. It will set the revised housing numbers for Bath & North East Somerset and an affordable housing target up to 2036.

The Core Strategy Review will allocate strategic sites at locations identified in the Joint Spatial Plan and other development opportunities will be identified and allocated. This is also an opportunity to look again at other policy areas such as renewable energy targets and what infrastructure is needed to support additional development.

How to make comments

The proposed scope of the review is set out in the Core Strategy Review commencement document. Consultation on the commencement document runs from 7th November to 19th December 2016. You are encouraged to make comments online or via e-mail to core_strategy@bathnes.gov.uk

The Core Strategy Review commencement document can be viewed on the Council's website via www.bathnes.gov.uk/corestrategyreview. It can also be viewed at all libraries in the District and the main Council offices (One Stop Shop, Lewis House, Bath BA1 1JG; The Hollies, Midsomer Norton BA3 2DT and Civic Centre One Stop Shop, Keynsham BS31 1FS) during normal opening hours.

Bath & North East Somerset - *The place to live, work and visit*

Comments should be made no later than **5.00 p.m. 19th December 2016**. It would be helpful if you could focus your comments just on the proposed content, scope and programme for the Core Strategy review at this stage.

Other relevant consultations

Please note that consultation on the Core Strategy Review commencement document is taking place at the same time as the West of England's consultation on the **Joint Spatial Plan and the Joint Transport Study**. The Joint Spatial Study sets the context for the B&NES Core Strategy review. Further details on this consultation can be accessed on the West of England website: www.jointplanningwofe.org.uk

The Examination Hearings on the **Placemaking Plan** ended on 13th October 2016. Once the Council has received the Inspector's interim report, we will be consulting on the Inspector's recommended Main Modifications to the Placemaking Plan. You will be notified separately about this consultation. Further information on the Placemaking Plan can be viewed via www.bathnes.gov.uk/placemakingplan.

Should you have any queries, please do not hesitate to get in contact with the Planning Policy team on 01225 477548 or by email at planning_policy@bathnes.gov.uk

[Closing]

Simon De Beer
Policy & Environment Group Manager

Extract from Connect magazine issued 29 November 2016

Better planning for all

Following last year's campaign to gather people's thoughts on the approach and priorities for a Joint Spatial Plan, the four West of England councils are keen to get communities involved in drawing up plans which will steer development in the West of England over the next 20 years.

This Plan sets out updated housing and jobs targets, along with potential locations to accommodate development. One of its key objectives is to make the most of brownfield land before greenfield locations are identified for development. The joint Transport Vision will provide more detail on the transport improvements needed to address current transport issues and support new growth.

Your input so far has helped influence the emerging plan. We need your local knowledge to help steer future development proposals to the most appropriate places.

For full details, plus planned events across the area and how to make comments, visit www.jointplanningwofe.org.uk/

The Council is also reviewing its Core Strategy and is seeking your views on the scope of this review. The Joint Spatial Plan will



Make sure you have your say

provide the context for the review by setting the revised housing numbers for B&NES up to 2036 and an affordable housing target. The **Core Strategy Review** will allocate strategic sites at locations identified in the Joint Spatial Plan, and other development opportunities will be identified and allocated. This is also an opportunity to look again at other policy areas such as renewable energy and what is needed to support additional development.

Local involvement at an early stage makes a better plan. So visit the website for details: www.bathnes.gov.uk/corestrategyreview

Please let us have your views no later than **Monday 19 December.** ■

Search

A-Z	A	B	
C	D	E	F
G	H	I	J
K	L	M	N
O	P	Q	R
S	T	U	V
W	X	Y	Z

Login/Register

Home » Consultations » Core Strategy Review

Core Strategy Review



The Council is reviewing its [Core Strategy](#). We are seeking your views on the proposed content, scope and programme for the Core Strategy Review for the period 2016-2036. Your involvement at this early stage is important in helping to influence and shape this review.

Bath & North East Somerset's [Core Strategy](#), adopted in July 2014, includes a commitment to an early review of the housing requirement. This review is being undertaken alongside the [West of England Joint Spatial Plan](#) which will provide a new strategic planning context for all four West of England areas including Bath & North East Somerset. It will set the revised housing numbers for Bath & North East Somerset and an affordable housing target up to 2036.

Why are we consulting?

The Core Strategy Review will allocate strategic sites at locations identified in the [Joint Spatial Plan](#) and other development opportunities will be identified and allocated. This is also an opportunity to look again at other policy areas such as renewable energy targets and what infrastructure is needed to support additional development.

Respond Online

Consultation Dates

Consultation Dates: 07/11/2016 - 09:30 to 19/12/2016 - 17:00
Status: Open

Other Related Information

Areas Covered

All Areas

Related Links:

[View more information on the Core Strategy and other Planning Policy related consultations taking place on the Planning Policy website](#)

Contact Details

Planning Policy,
 Bath & North East Somerset Council, Lewis House, Manvers Street, Bath, BA1 1JG

core_strategy@bathnes.gov.uk



Login/Register

Planning and Building Control ▲

Planning Policy

Authority's Monitoring Report

Brownfield Register

City of Bath World Heritage Site Setting

Community Infrastructure Levy

Core Strategy

Current Planning Policy Framework

Energy Networks

Evidence Base

Glossary of Terms and Abbreviations (Planning Policy only)

Green Infrastructure

Houses in Multiple Occupation

Planning Policy

Last updated: 4th November 2016

The Planning Policy team is responsible for providing planning policies to guide future development in the district. These policies will be set out in the Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) listed below.



The Planning Policy Website

- To navigate through our pages please either use the Planning Policy menu on the left of the screen (or bottom on some mobile devices), or
- use the [Planning Policy Index](#) which lists all of the pages available within the Planning Policy website which is kept as up-to-date as possible.

Highlights:

- The [Core Strategy Commencement Document](#) is published and the consultation runs from 9:30am on Monday 7th November to 5pm on 19th December 2016.
- The [Placemaking Plan - The Examination Hearings Sessions](#) have finished. The Council has issued [BNES/PMP/013](#) in response to the Inspector's note ID/16.
- Details of the current planning policy framework for Bath & North East Somerset can be found via [this link](#)
- The [Local Development Scheme \(LDS\)](#) includes the published programme and timetable of forthcoming Planning Policy work. Please consult it as it is updated when the programme or schedule changes. Summary information can also be found on the [Local Development Framework \(LDF\)](#) page.

If you cannot find the information you want, or if any hyperlinks are broken, please contact the Planning Policy Team using the contact details available on this page.

[Return to the top of the page](#)

Leader's Blog



Services in Your Area

Post code

Post Code / Street N

Search

Find local information where you live

Events Listings

« **November 2016** »

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

[Add an event](#) [View all events](#)
Council meetings

More like this

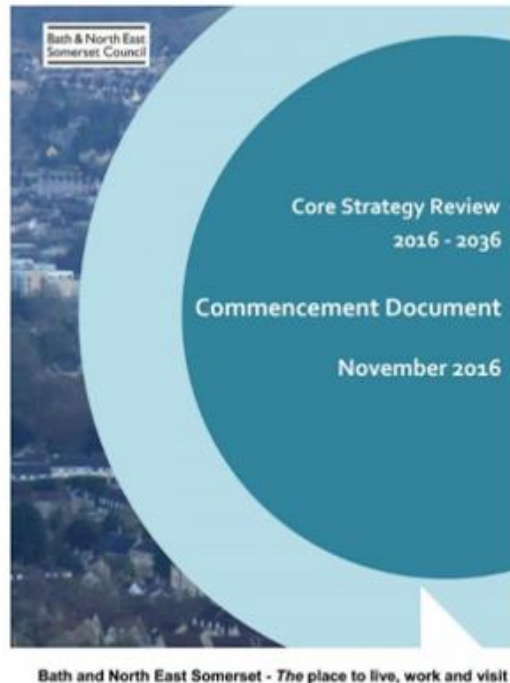
- [Employment related EIAs](#)
- [Housing policies and performance](#)
- [Planning](#)

Links

- [Planning Applications:](#)

[Home](#) » [Services](#) » [Planning and building control](#) » [Planning policy](#) » [Core strategy](#) » [Core Strategy Review](#)

Core Strategy Review



Contents

1. [Have your say on the Bath & North East Somerset Core Strategy Review](#)
2. [How to make comments](#)
3. [Other relevant consultations](#)

4th November 2016

1. Have your say on the Bath & North East Somerset Core Strategy Review

The Council is reviewing its [Core Strategy](#). We are seeking your views on the proposed content, scope and programme for the Core Strategy Review for the period 2016-2036. Your involvement at this early stage is important in helping to influence and shape this review.

Bath & North East Somerset's [Core Strategy](#), adopted in July 2014, includes a commitment to an early review of the housing requirement. This review is being undertaken alongside the [West of England Joint Spatial Plan](#) which will provide a new strategic planning context for all four West of England areas including Bath & North East Somerset. It will set the revised housing numbers for Bath & North East Somerset and an affordable housing target up to 2036.

The Core Strategy Review will allocate strategic sites at locations identified in the [Joint Spatial Plan](#) and other development opportunities will be identified and allocated. This is also an opportunity to look again at other policy areas such as renewable energy targets and what infrastructure is needed to support additional development.

The proposed content, scope and programme of the review are set out in the [Core Strategy Review Commencement Document](#).

2. How to make comments

The Consultation runs from 7th November to 5pm on 19th December 2016. **You are encouraged to make comments online via the Council's Consultation Website** or via e-mail to core_strategy@bathnes.gov.uk. It would be helpful if you could focus your comments just on the proposed content, scope and programme for the Core Strategy review at this stage.

The **Core Strategy Review Commencement Document** can also be viewed at all libraries in the District and the main Council offices during normal opening hours:

- One Stop Shop, Lewis House, Bath BA1 1JG;
- The Hollies, Midsomer Norton BA3 2DT; and
- Civic Centre One Stop Shop, Keynsham BS31 1FS).

Comments should be made no later than 5.00 p.m. 19th December 2016.

[Back to the contents list](#)

3. Other relevant consultations

Please note that consultation on the **Core Strategy Review Commencement Document** is taking place at the same time as the West of England's consultation on the Joint Spatial Plan and the Joint Transport Study. The Joint Spatial Study sets the context for the B&NES Core Strategy review. Further details on this consultation can be accessed on the West of England website: www.jointplanningwofe.org.uk

The Examination Hearings on the Placemaking Plan ended on 13th October 2016. Once the Council has received the Inspector's interim report, we will be consulting on the Inspector's recommended Main Modifications to the Placemaking Plan. You will be notified separately about this consultation. Further information on the Placemaking Plan can be viewed via www.bathnes.gov.uk/placemakingplan. For further information and any queries, please contact with the Planning Policy team on 01225 477548 or by email at placemaking_plan@bathnes.gov.uk.

[Back to the contents list](#)

Bath & North East Somerset Council

Core Strategy Review 2016 - 2036

About the Core Strategy Review

Bath & North East Somerset Council is reviewing its Core Strategy. This will set the District's planning framework up to 2036.

This review is being undertaken alongside the West of England Joint Spatial Plan which will provide the strategic context.

We are inviting your views on the **proposed content, scope and programme** for the Bath & North East Somerset Core Strategy Review 2016-2036.



Focus of the Core Strategy Review

- Vision and Objectives
- Spatial strategy for Bath & North East Somerset
- Addressing the strategic requirement for housing and employment development
- New site allocations (strategic and non-strategic) in Bath, Keynsham, the Somer Valley and the Rural Areas
- Affordable housing
- Renewable energy and heat targets

Core Strategy Review Programme

This diagram summarises the Core Strategy review timetable and shows how it relates to the preparation of the Joint Spatial Plan.

Community engagement

Local involvement in plan-making helps make a better and more relevant plan. The review of the Core Strategy will be prepared with community and stakeholder engagement throughout the process in accordance with the planning regulations and 'My Neighbourhood: Neighbourhood Planning Protocol' (the Council's Statement of Community Involvement).



How to make comments

Consultation on the Core Strategy review runs from 7th November to 19th December 2016.

Your involvement at the outset will help influence and shape the review of the Core Strategy.

Please focus your comments just on the proposed content, scope and programme for the Core Strategy review at this stage. This is set out in the Core Strategy Review commencement document.

The Core Strategy Review commencement document can be viewed on the Council's website:

www.bathnes.gov.uk/corestrategyreview



The document can also be viewed at all libraries in the District and the main Council offices (One Stop Shop, Lewis House, Bath BA1 1JG; The Hollies, Midsomer Norton BA3 2DT and Civic Centre One Stop Shop, Keynsham BS31 1FS) during normal opening hours.

Please make your comments online on the Council's website www.bathnes.gov.uk/corestrategyreview or via e-mail to planning_policy@bathnes.gov.uk.

Comments should be made no later than 5.00 p.m. 19th December 2016.

November 2016

Summary of key issues raised through the consultation and officer responses

Prescribed Bodies & local interest groups	Main points raised	Officer response
Historic England	Effective transport planning will need to be carefully managed.	Agreed that effective transport planning is key to a sound Local Plan within the context of all relevant environmental considerations.
Coal Authority	No specific comments at this stage but the Plan should continue to set out the strategic picture towards mineral safeguarding.	Noted. It is intended that the current policy framework for mineral safeguarding will be taken forward into the new Local Plan and only amended if national planning policy guidance relating to minerals changes in the meantime.
Highways England	<p>Agree with the scope and content of the CSR and content that through the links with the JSP and JTS matters of a strategic nature will be robustly considered and taken forward.</p> <p>The programme is ambitious but deliverable. Pleased to note the intention to wait for the Inspector's report on the JSP before submitting the revised Core Strategy for examination.</p>	Noted.
Network Rail	No comments at this stage but would request to be consulted on future stages as they have various locations they are looking to promote for housing purposes.	Noted.
Natural England	Valuable to review how the work being undertaken for the JSP (developing a strategic approach to ensuring development enhances rather than diminishes	Agreed. It is intended that the WENP work underpinning the JSP will be used to inform the preparation of the new Local Plan and, as such form, a critical

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>the natural capital of the area) might be fully embedded into the Local Plan.</p> <p>Assumes the significant environmental effects of implementing the current local plan are being monitored as per Planning Practice Guidance advice. Need to address this as part of the review.</p>	<p>element of the evidence base.</p> <p>The significant environmental effects of implementing the Local Plan will be monitored as per Planning Practice Guidance advice as sites come forward for development which have been identified as having a potentially significant environmental effects through the HRA.</p>
<p>North Somerset Council</p>	<p>Core Strategy Review as a title is misleading:</p> <ul style="list-style-type: none"> - now the role of the JSP to set out the strategic context in terms of housing numbers - timeframe is beyond the original Core Strategy so title could cause confusion - NPPF refers to Local Plans - Intention is to combine the adopted Core Strategy and Placemaking Plan into one Local Plan. <p>Timetable</p> <ul style="list-style-type: none"> - Check the dates in the diagram on page 6 - should be 2018. - Check the dates in the Commencement document match those in the LDS. 	<p>Agreed. The preparation of the new 'Local Plan 2016 - 2036' will be the mechanism by which the Core Strategy and Placemaking Plan will be formally combined into one Development Plan Document. The timetable for preparation of the new Local Plan has been amended to align closely with that of the JSP to allow for key JSP milestones to be achieved.</p>
<p>Wiltshire Council</p>	<p>The timetable for the review of the Core Strategy, with submission being timed to take place after the Inspector's report on the WoE JSP, seems sensible.</p> <p>Should highlight that it may not be just site allocations and</p>	<p>Noted.</p> <p>The Council intends to publish its proposed approach to meeting the Duty to Cooperate on strategic cross-boundary issues with adjoining local authorities and other prescribed bodies</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>infrastructure that can have cross boundary implications. Suggests para 17 needs to reflect the fact that some policy decisions/measures (in addition to those generated by the HRA process e.g. air quality action planning, noise planning, etc.) can also have cross boundary implications which should be subject to consideration under the duty to co-operate.</p>	<p>alongside the new Local Plan Issues and Options consultation documents.</p>
Bristol City Council	<p>No comments to make at this stage.</p>	<p>Noted.</p>
Clutton Parish Council	<p>Ensure "infrastructure" includes consideration of "broadband infrastructure".</p>	<p>Noted. The new Local Plan will need to ensure that all necessary infrastructure, including broadband is either in place or is able to be provided before sites can be allocated in the new Local Plan.</p>
Saltford Parish Council	<p>Would not support any further housing development on Green Belt land around Saltford.</p>	<p>Noted. The Council will be consulting on options for addressing the spatial distribution of non-strategic growth which will involve a review of the existing approach.</p>
Midsomer Norton Town Council	<p>Seeks assurance that the acceptance of the housing/ employment imbalance locally will not be reversed in any housing review.</p> <p>Trusts that area will not be excluded from infrastructure and transport need assessment and regeneration investment expected within the adopted Core Strategy 2014.</p> <p>Supports the links with the JSP,</p>	<p>The Council will be consulting on options for addressing the spatial distribution of non-strategic growth which will have regard to the balance between housing and jobs. The Bath and Somer Valley Enterprise Zone will now have a role in the regeneration of the area including the unlocking of key development sites unblocking barriers to delivery such as transport infrastructure.</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	JTS and the Placemaking Plan.	
South Stoke Parish Council	<p>Consider Bath and has reached its maximum capacity for new dwellings and any further major development would be extremely damaging to the openness of the Green Belt and to the AONB.</p> <p>Emphasises the importance of the 'Duty to Co-operate' with neighbouring Authorities, especially in view of a potential role towns in Wiltshire and Mendip, could/should have on the provision of affordable housing.</p>	<p>The Council will be consulting on options for addressing the spatial distribution of non-strategic growth across the District including how further development can be accommodated in Bath.</p> <p>The Council intends to publish its proposed approach to meeting the Duty to Cooperate on strategic cross-boundary issues with adjoining local authorities and other prescribed bodies alongside the new Local Plan Issues and Options consultation documents.</p>
Stowey Sutton Parish Council	<p>Broadly supports the scope of the review.</p> <p>Need to allow time within the programme for areas with adopted Neighbourhood Plans to begin their own review process to ensure continuing compatibility with the Core Strategy.</p> <p>Particularly concerned about Core Strategy policy RA1 and would wish to be involved in the review of this policy with reference existing issues for the village with transport, sustainability, employment and inadequate infrastructure.</p>	<p>Noted. The timetable for preparation of the new Local Plan has been amended to closely align with that of the JSP to allow for key JSP milestones to be achieved. Neighbourhood Plans can be reviewed as necessary within this context.</p> <p>The Council will be consulting on options for addressing the spatial distribution of non-strategic growth which is likely to involve a review of the existing approach to development in the rural areas.</p>
Peasedown St John Parish Council	<p>Agrees with the proposed scope and content of the Core Strategy Review.</p> <p>The programme works well alongside the West of England Joint Spatial Plan timings.</p>	<p>Noted. The new Local Plan, which incorporates the review of the Core Strategy, will be prepared within the context of the JSP. It is anticipated that many elements of the Core Strategy</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>Should focus only on those sections of the Core Strategy which require reviewing not the entire document.</p>	<p>and Placemaking Plan can be taken forward with minimum or no change.</p>
<p>Bath Preservation Trust</p>	<p>No scope to further expand Bath outwards should be given prominence in the Review and the Vision and Objectives.</p> <p>Areas of land promoted in the last Core Strategy but deemed inappropriate for development for evidenced environmental reasons (e.g. Weston slopes) should be excluded from the SHLAA.</p> <p>Seeks clarification of the scope of the WoE strategic Green Belt as this review as this will set the context for Core Strategy review.</p> <p>As well as a review of policy CP9 there needs to be a district-wide policy addressing the repeated challenges on viability grounds of policy requirements.</p> <p>Note the JSP transport plan may require changes to the Core Strategy on Transport - transport-related policies should be included in the scope of the plan review.</p> <p>Error in the printed programme - on page 6 of the commencement document two years are wrongly attributed.</p> <p>Given the timetable for the CSR, queries whether the housing requirement in the emerging JSP is a material consideration for speculative planning applications in the area or will the existing</p>	<p>The Council will be consulting on options for addressing the spatial distribution of non-strategic growth across the District including how further development can be accommodated in Bath.</p> <p>The WoE strategic Green Belt review has helped inform the selection of locations for the Strategic Development Locations (SDL) proposed through the JSP. The subsequent allocation of the SDLs through the Local Plan will necessitate a review of the Green Belt boundary in those locations. Any further review of the Green Belt boundary in B&NES will only be warranted should exceptional circumstances exist that necessitate the consideration of a Green Belt location.</p> <p>Policy CP9 will need to be reviewed to align with the JSP affordable housing policy as will any other policies to ensure conformity with the JSP and to take account of the JTP proposals.</p> <p>The Council is currently has a five year land supply and is working to the adopted Core Strategy housing figure. As the JSP progresses through plan-making process it will gain increasing weight as per NPPF, para 216</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>Local Plan be defensible.</p> <p>The duty to cooperate should be openly timetabled and a consultation process delineated given that B&NES might have to look to Wiltshire to share part of its housing requirement (particularly for affordable housing).</p> <p>Bath-specific issues which materially affect the ability of the local authority to deal with housing need include holiday lets, Airbnb-style party lettings, and the promotion of new homes to second homers or non-resident investors.</p>	<p>decisions on planning applications will be made in that context.</p> <p>The Council intends to publish its proposed approach to meeting the Duty to Cooperate on strategic cross-boundary issues with adjoining local authorities and other prescribed bodies alongside the new Local Plan Issues and Options consultation documents.</p> <p>If there is sufficient evidence to support the inclusion of a new planning policy framed to address a particular issue that can be dealt with through the planning system, options can be considered as part of the Regulation 18 consultation.</p>
Bath Spa University	<p>Considers that Policy B5 should be updated - unnecessarily restrictive as Newton Park is unable to meet future growth aspirations necessary to facilitate the University's continued contribution to the economy of Bath. The fragmented estate beyond Newton Park is proving to be impractical for a modern expanding university.</p> <p>Supportive of the commitment in in the Commencement Document that a review of the expansion objectives of the Universities and the relationship between student accommodation requirements/supply and the overall housing requirement will be undertaken.</p> <p>University has committed to</p>	<p>The Council acknowledges that the approach to accommodating the development needs of the City's two universities is a key policy area to be addressed further through the preparation of the new Local Plan in discussion with the universities and others.</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>rethinking the conventional campus approach and would welcome early engagement with B&NES to discuss the idea of a new community on the edge of Bath within the land ownership of the Duchy of Cornwall which could provide a mix of uses, including housing for students and residents alongside commercial floorspace to promote economic growth within the city.</p>	
<p>University of Bath</p>	<p>The Council's current development spatial strategy as set out in the Placemaking Plan is to seek to direct all University related development to the campus, and actively resist development elsewhere in the City.</p> <p>The recognition that the development figures in the policy are not considered by the Council to be a "cap" to development is welcomed as there are significant projects that must be brought forward prior to the likely adoption of the Core Strategy Review at the end of 2018.</p> <p>Maintains that priority should be given to academic and research development on the campus, and that student bed space accommodation should be provided elsewhere in the city.</p> <p>Concerned that Policy B5 is not included as a key policy that needs to be reviewed in this process.</p>	<p>The Council acknowledges that the approach to accommodating the development needs of the City's two universities is a key policy area to be addressed further through the preparation of the new Local Plan in discussion with the universities and others.</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>A sustainable strategy to ensure that the identified development needs are provided for is required, and that will need to be realised through changes to both Core Strategy Policy B5 and PMP Policy SB19.</p> <p>The role of the Sulis Club in providing additional capacity to meet the University' identified development needs and its current Green Belt designation will be a key matter for the Core Strategy Review.</p>	
Canal and River Trust	No comments to make at this stage.	Noted.
Railfuture Severnside	Feedback from the JSP and JTS consultation should be used to inform the CSR.	Agreed. The Local Plan 2016 - 2036 (incorporating the review of the Core Strategy) will need to have regard to the responses from the JSP and JTS consultation as relevant.
Woodland Trust	Concerned current Core Strategy policies do not provide adequate protection for ancient woodland and ancient trees.	Noted but Placemaking Plan Policy NE6 ensures that development directly or indirectly affecting ancient woodland or ancient trees will not be permitted. It is intended that this policy will be taken forward into the new Local Plan.
British Archaeological Trust	No comments to make at this stage.	Noted.
Sport England	Need to ensure the evidence base for sport and recreation is complete and up to date.	Agreed. The Council will ensure any evidence needed to support the new Local Plan is relevant, proportionate and up to date.
CPRE Avonside	Clarity in the role of Neighbourhood Plans in the planning process.	The role of Neighbourhood Plans in the planning process is set out on the Council's Neighbourhood

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>Include a review of the duty to co-operate with neighbouring authorities, particularly Bristol.</p> <p>Clarity needed on how detailed transport plans for proposed developments will take account of their effect on congestion and pollution locally and within neighbouring authorities.</p> <p>Should ensure that developments are only approved subject to guaranteed funding for improvements needed in this area and other types of infrastructure including fast broadband communication.</p>	<p>Planning webpage and the Development Plan webpage.</p> <p>The Council is already liaising closely with adjoining authorities on the JSP and other strategic issues. This will continue with regard cross-boundary strategic issues through the Duty to Cooperate during the preparation of new Local Plan as necessary.</p> <p>The new Local Plan will allocate the Strategic Development Locations identified within B&NES with detailed development requirements having regard to proposals in the Joint Transport Plan.</p> <p>A full and comprehensive site appraisal of its suitability, including their impact, will be undertaken before any suitable and development non-strategic sites are allocated in the new Local Plan. Policies will specify development principles associated with each site including any necessary infrastructure required.</p> <p>Key infrastructure will be identified in the Infrastructure Delivery Programme.</p>
NHS Property Services	<p>When planning for new settlements, the Council should work with NHS commissioners and providers to ensure that an adequate healthcare infrastructure is provided to support new residential development.</p>	<p>Agreed. The Council intends to liaise with NHS commissioners as appropriate to ensure necessary healthcare infrastructure is aligned with the provision of new development. The suitability of any surplus NHS property for residential development can be part of these discussions through</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
	<p>Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where declared surplus to requirements there should be a presumption that such sites are suitable for housing (or other appropriate uses), and not be subject to restrictive policies or periods of marketing.</p>	<p>the One Public Estate Programme and assessed through the HELAA.</p>
<p>Newton St Loe Conservation Group</p>	<p>Requests that a Food Security and Sustainability Plan is included in the scoping of the JSP and Core Strategy review.</p> <p>Note there is no stakeholder or community engagement process evident in the timeline of the plans, but imagine it is implicit. Requests that this is articulated at the start of the process so that local people will be more empowered to participate in the process, and all concerned parties can be prepared for and engage within the given timelines.</p> <p>Need more transparency about the methodology for scoping the number of houses and levels of housing required, target markets, and especially where affordable housing quotas are currently not met, or have not achieved their specified goal.</p>	<p>The Council's Local Food Strategy underpins relevant policies in the adopted Placemaking Plan and will remain pertinent to the preparation of the new Local Plan.</p> <p>The Local Development Scheme publishes the broad programme for the preparation of the new Local Plan and indicates when public consultation will take place. Notification of consultation (mailout) at each key stage in the plan-making process will provide further details on the scope and nature of engagement for that stage. All community engagement and more formal consultation will be delivered in line with guidance in the Neighbourhood Planning Protocol.</p> <p>The JSP will provide the strategic context for the new Local Plan and will set the level of housing to be provided in B&NES and will include a policy on affordable housing quotas to be achieved. the data underlining the</p>

Prescribed Bodies & local interest groups	Main points raised	Officer response
		Publication version of the JSP can be found on the West of England JSP website: https://www.jointplanningwofe.org.uk
Oldfield Park Residents Association	Oldfield Park in particular warrants greater policy protection from purpose built student accommodation and HMOs (student/ non-student) given the effect an over concentration of HMOs has had on the balance of the local community. A more effective policy intervention is required and new policy and/or amendments to existing CS policies. Full consideration of this should therefore be included in the CS Review.	The spatial planning of the Universities and the growth of Student Accommodation will be one of the key areas to be addressed through the new Local Plan. This will be considered in the context of the wider spatial strategy for Bath and the competing demands for space in the City.
Saltford Environmental Group	There should be a commitment to no housing development on any parcel of Green Belt land in Saltford	Noted. Exceptional circumstances will need to be demonstrated to remove any land from the Green Belt.

LOCAL RESIDENTS' KEY CONCERNS AND OBSERVATIONS

- No more housing along the A4 between Keynsham and Saltford
- No more development in the Green Belt
- Concerns about the impact of more development on the highway infrastructure
- Need an integrated transportation policy
- No Saltford bypass
- No development at Whitchurch
- Provision of sufficient affordable housing is an issue
- Land banking by developers should be prevented
- No development on Grade 1 agricultural land as it is a non-renewable resource
- Address the need for student accommodation
- Vital part of the review should be to assess the impact of the two universities Bath

- Not clear from the Commencement Document whether the Local Plan will be reviewing at the Green Belt boundary
- Development at Whitchurch must incorporate planned improvements to infrastructure and amenities
- Commencement Document is too complemented, full of jargon and is ambiguous
- Don't cap housing numbers at villages as development is essential to maintain the character and setting of rural settlements
- Improve the quality of the existing housing stock
- Consider the redevelopment of the housing estates in Twerton as is proposed at Foxhill

Officer response

Comments noted. The JSP provides the strategic context for the Local Plan reviews for the four West of England councils. It proposes Strategic Development Locations at Whitchurch and to the north of Keynsham. The JSP stresses the importance of new development being properly aligned with the provision of the necessary strategic infrastructure particularly transport and this will be reflected in the new Local Plan. This is underpinned by the Joint Transport Study.

Through the Issues & Options consultation the Council will be exploring options for accommodating non-strategic growth requirements with the intent of allocating suitable and deliverable sites in the most sustainable locations at a later stage in the plan-making process. This will include reviewing the approach for accommodating residential development in the villages; taking into account potential constraints on future development such as flood risk, landscape character, historic assets, the best and most versatile agricultural land and ecology; whether exceptional circumstances exist to warrant removing land from the Green Belt for housing.

It is recognised that the spatial planning of the Universities and the growth of Student Accommodation is a key area to be addressed through the new Local Plan.

The Council will endeavour to make future planning documents it prepares clear, accessible and user-friendly as possible.

DEVELOPERS' KEY CONCERNS AND OBSERVATIONS

Proposed scope and content

JSP as the strategic context

- In addressing the JSP revised housing requirement for B&NES, a series of non-strategic sites should also be identified within both the Core Strategy review and the JSP rather than leave their identification to preparation of a later plan to ensure that housing needs are met in a shorter timescale.

- Whilst both the JSP and the B&NES Core Strategy review have been co-ordinated for public consultation, none of the more specific detail from the JSP has been used to inform the B&NES Core Strategy review commencement document.

Officer response

The JSP provides the strategic context for the four West of England UAs' Local Plan reviews. The Council is intending to allocate suitable and deliverable sites through the new Local Plan in order to help meet non-strategic growth requirements. The timetable for preparation of the Local Plan has been amended to closely align with that of the JSP to allow for key JSP milestones to be achieved ahead of those in the Local Plan. In that way the Local Plan will ensure conformity with the JSP.

Scope of the review

- The CRS must comprise a full Local Plan review, resulting in a composite and up-to-date Local Plan that makes proper provision to 'meet' full objectively assessed needs, and therefore remedies the accepted deficiencies of the current DPDs.
- The CRS should include only what is necessary to implement the development strategy and to ensure policies are up to date.
- Need to deal properly with the issue of how any shortfall in the five year supply of housing land in the plan area as a whole, or how any shortfall in any part of the plan area is dealt with in other parts of the plan area.
- The commencement document has not touched upon a strategy of where to focus the additional growth.
- Essential to identify development opportunities and allocate strategic and non-strategic sites in sustainable locations to meet the whole range of identified needs in full.
- Critical that the process of preparing the Core Strategy Review provides for continuing flexibility in the scope and content of the plan.
- Support for the intention to review student numbers, expansion objectives, requirements and supply and to ensure this is properly included in the new plan.
- Need to set out the spatial strategy for the area as well as the role of settlements, such as Midsomer Norton (the Somer Valley is now an Enterprise Zone and there is clear intention to develop this area as a strategic employment location).

Officer response

The Local Plan 2016 - 2036 will incorporate the review of the Core Strategy and will include the housing target for B&NES. Through the allocation of sites for the Strategic Development Location and other non-strategic growth, the Council aims to meet its full objectively assessed needs by the end of the Plan period.

The preparation of the new Local Plan will be the mechanism by which the Core Strategy

and Placemaking Plan will be formally combined into one Development Plan Document. It is anticipated that many elements of the Core Strategy and Placemaking Plan can be taken forward with minimum or no change. It is intended that the strategic policy framework for B&NES will be developed with sufficient flexibility to respond to change throughout the Plan period.

It is recognised that the approach to accommodating the development needs of the universities is a key policy area to be addressed further through the preparation of the new Local Plan.

The Council will be consulting on options for addressing the spatial distribution of non-strategic growth which will involve a review of the existing approach and the role of the settlements in meeting housing and employment growth within the Plan period.

Duly to Cooperate

- The Core Strategy Review should also recognise the relationship that BANES has not only with the West of England but also with Mendip and Wiltshire especially in terms of how unmet need can/should be accommodated via however under the Duty to Co-Operate unpinned by robust evidence.
- The relationship between the plans and the different tiers of plan making is very important and should be clarified.

Officer response

The Council intends to publish its proposed approach to meeting the Duty to Cooperate on strategic cross-boundary issues with adjoining local authorities, Mendip and Wiltshire, and other prescribed bodies alongside the new Local Plan Issues and Options consultation documents. The Council will have regard to the PAS guidance in meeting its Duty to Cooperate and other good practice examples.

Agree that it is important to clarify the relationship between the plans and the different tiers of plan making in the new Local Plan.

Review of policies

- Notwithstanding the short period the Place-making Plan has been in operation, it is necessary to review all policies in both documents in light of practice so far.
- Support for the review of the following policies:
 - B5 Strategic Policy for Bath's Universities;
 - KE2 Town Centre/Somerdale Strategic Policy;
 - SV2 Midsomer Norton Town Centre Strategic Policy;
 - SV3 Radstock Town Centre Strategic Policy;
 - RA5 Land at Whitchurch Strategic Site Allocation; and
 - Core Policies: CP3, CP5, CP7, CP8, CP9, CP10, CP12, CP13

Officer response

Agreed. Currently adopted planning policies will be reviewed as a matter of course in the light of the JSP, resulting changes in strategy in the new Local Plan changes in national policy and advice, good practice and any operational issues experienced in applying the policies in decision making.

Green Belt Review

- Clear requirement to use the Green Belt as the most sustainable location to meet future needs and this should be addressed properly by both the JSP and the Core Strategy Review.
- Unclear what is meant by "Local" Green Belt Assessment - suggests a rather particular and, maybe, not comprehensive review or assessment which is not justified at this stage.
- Must incorporate both strategic and non-strategic reviews of Green Belt boundaries to ensure that sufficient land in appropriate locations is available to meet objectively assessed and other needs, including the needs of the University and other institutions.

Officer response

The WoE strategic Green Belt review has helped inform the selection of location of the Strategic Development Locations (SDL) as proposed through the JSP. The subsequent allocation of the SDLs through the Local Plan will necessitate a review of the Green Belt boundary in those locations. Any further review of the Green Belt boundary in B&NES will only be warranted should exceptional circumstances exist that necessitate the consideration of a Green Belt location.

Infrastructure

- In light of the anticipated timelines for the JSP and the CS Review, the infrastructure necessary to support the developments, and the range of land interests across the SDLs, would encourage the Council to provide allocation policies which set out mitigation and infrastructure requirements across the allocations.

Officer response

The Strategic Development Locations (SDLs) proposed through the JSP will be allocated in the new Local Plan and accompanied by the necessary development and infrastructure requirements to ensure the best possible solution is secured reflecting the high level Site Requirements for the SDLs identified in the JSP.

Proposed programme

- That the Core Strategy Review is commencing before the Placemaking Plan has been adopted is confusing and the status of all the relevant plans, the timescales they cover, and what will be superseded by what document is not clearly set out.
- The review programme is both optimistic and unrealistic.
- Does not allow flexibility to react to delays in the JSP, revisions of any policies within the JSP brought about through the consultation process.

Officer response

The preparation of the new 'Local Plan 2016 - 2036' will be the mechanism by which the Core Strategy and Placemaking Plan will be formally combined into one Development Plan Document. This will incorporate the review of the Core Strategy. The timetable for preparation of the Local Plan has been amended to closely align with that of the JSP to allow for key JSP milestones to be achieved ahead of those in the Local Plan. In that way the Local Plan will ensure conformity with the JSP and help avoid abortive work being undertaken.

Comments on overall approach

- Where the JSP is seeking to direct development the Bath Local Plan Review should then ensure these locations are capable of providing the quantum of development proposed through the JSP.
- Also seek to allocate smaller sustainable development sites to ensure a flexibility of supply.
- Policies, including formal site allocations, need to be responsive to changes and not be overly prescriptive in terms of the range and quanta of development required at particular sites or within specific policy areas.
- Need sufficient flexibility in establishing a strategy for accommodating housing and employment needs (including affordable housing and specialist forms of housing such as student accommodation).
- The economic benefits of supporting Student Accommodation and the growth of the City's two universities should not be overlooked in the emerging development strategy.
- Review the growth strategy for the rural areas.
- Necessary to update the Spatial Vision and Strategic Objectives of the adopted Core Strategy to reflect the more ambitious economic and housing growth aspirations set out in the Local Enterprise Partnership Strategic Economic Plan.
- Need to consider how emerging and new Neighbourhood Development Plans are to be prepared in timing terms in relation to the Core Strategy Review - suggest they are prepared one step behind the Core Strategy Review to avoid wasted and duplicated work.

Officer response

The Council will be consulting on options for addressing the spatial distribution of non-strategic growth within B&NES as proposed through the JSP which is likely to involve a review of the existing approach to development in the rural areas. It is intended that the strategic policy framework for B&NES will be developed with sufficient flexibility to respond to change throughout the Plan period.

The approach to accommodating the development needs of the universities is a key policy area to be addressed further through the preparation of the new Local Plan.

A review of the Vision and Strategic Priorities for the new Local Plan will form part of the Issues & Options consultation.

The timetable for preparation of the new Local Plan more closely aligns with that of the JSP to allow for key JSP milestones to be achieved. Made Neighbourhood Plans can be reviewed as necessary within this context.