

**Consultation on the B&NES Local Plan
Issues & Options Document (Phase 1a)
22 November 2017 - 10 January 2018**

**COMMENTS
FORM**

You are invited to comment on the Issues & Options document.

You are strongly encouraged to make your comments on-line via the Local Plan consultation portal www.bathnes.gov.uk/localplan

However, if you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your response to the questions in the Issues & Options document. It would be helpful if you could complete a separate form for each question in the document you are responding to.

Please send your completed form(s) using email to local_plan2@bathnes.gov.uk. Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Your comments will be used to inform the next stage of the Local Plan preparation.

Part 1: Contact details			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
Personal Details		Agent Details (if applicable)	
Title	Mr & Mrs	Title	
First Name	R	First Name	Chris
Surname	Young	Surname	Beaver
Job Title <i>(only if applicable)</i>		Job Title	Director
Organisation <i>(only if applicable)</i>		Organisation	PlanningSphere Ltd
Email	c/o Agent	Email	chris@planningsphere.co.uk
Address	██████████	Address	CoWorking Bath
	██████████		The Guild, High Street
	███		Bath
Postcode	██████	Postcode	BA1 5EB
Date		Date	9 th January 2018

Part 2:

Which question in the Issues & Options document are you commenting on? Q1, Q3

Questions relating to the options and paragraphs have been numbered in the document for you to refer to in your response.

2.2 Please make your comments as succinct as possible.

PlanningSphere act on behalf of Mr & Mrs R Young who are the freehold owners of land south of Wellow Lane, Peasedown St John. We are instructed to comment on the Council's current round of consultation on its Issues and Options Local Plan Document.

Vision Section of Local Plan Document

Q1 - Have we identified the critical issues facing the District over the next 20 years?

We note that the Issues and Options document intends to allocate strategic sites at locations identified in the Joint Spatial Plan (JSP) and that in addition, other development opportunities will be identified and allocated building on those already identified in the Place Making Plan. However, we are concerned that the focus for the strategic and non-strategic allocations in the Issues and Options Document is at present largely focused on housing whereas it should also consider employment and mixed use. Given that the Review is at a relatively early stage, involvement at this time is clearly crucial in helping to influence and shape this review, hence our comments set out below.

Employment Sites

JSP Policy 4 focuses on the growth of existing employment centres such as Enterprise Zones and Enterprise Areas and the approach it takes by accommodating employment growth is largely through Local Plans. We consider that given this the Local Plan Review should take the opportunity to review the level of accessible and deliverable employment sites that can contribute to meeting economic growth in the district including recognising the contribution that smaller employment sites can make to delivering sustainable economic growth.

Our client's site to the south of Wellow Road, Peasedown St John, is well located on a main road with good public transport links between Midsomer Norton and Bath and would not only build on an existing successful employment location to the north around the Circle Hospital and Mercedes car dealership showroom but would also help provide accessible employment opportunities both for residents of Peasedown St John and the wider Somer Valley. We also consider that a further element of housing could also be incorporated into the site to create a sustainable mixed-use development (see below). An element of housing could also cross-subsidize site-wide infrastructure to assist in providing serviced employment plots.

Housing Sites

Paragraph 3.01 of the Issues and Options document is welcomed in that it notes that the new Local Plan has a key role in establishing how the 'non-strategic growth' of around 700 new dwellings will be delivered and that this figure is in addition to the existing Core Strategy growth requirement and effective from 2016 (the start of the new Local Plan period).

Given the ongoing pressing need for the identification of land for housing within Bath and North East Somerset, we highlight the importance of including and allocating additional non-strategic sites as part of the Core Strategy Review process to ensure that the combined Local Plan has identified a sufficient supply of housing sites to meet housing need in the new Local Plan period 2016-2036.

The identification and allocation of smaller, non-strategic sites, such as land to the south of Wellow Road, Peasedown St John would also meet the aspirations set out in the Housing White Paper for diversifying the housing market and enabling faster delivery of sites. The Housing White Paper provides an analysis of housing delivery issues, and sets out a direction of travel in terms of government policy to enhance the diversity of supply. The three solutions advocated in the

Please note that names and comments will be published

Housing White Paper, p14-15, are: (1) plan for the right homes in the right places; (2) build more homes faster; and (3) to diversify the housing market. Key to increasing housing delivery through diversifying the housing market is the role of SME builders and the supply of suitable sites for this part of the construction sector. In particular, paragraph 1.29 states:

“Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive.”

Furthermore, small sites are often considerably less constrained than larger sites and are by their nature more attractive to SME builders who do not want lag times between site purchase and delivery, which would further support the aspirations of the Housing White Paper in terms of the need to accelerate delivery to boost the supply of housing.

The Core Strategy Review process therefore needs to ensure that a variety of sites are identified as part of the District’s housing supply.

Spatial Strategy Section

Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

We consider that *Option 1: Continue the hierarchical approach* is the most likely to option to meet the high level of housing need in the District, provide a sustainable pattern of development, particularly with respect to access to public transport and services, whilst retaining the character and vitality of rural communities. However, the wording of any policy approach should make it clear that as well as recognising opportunities in more sustainable settlements like Peasedown St John, further opportunities within the Bath area are also available and these are likely to be highly sustainable sites especially in terms of access to services, employment and transport. These sites should be included as part the non-strategic allocations and would allow additional flexibility in terms of helping to assist faster delivery, as they would not have the long lead in and build out times of larger sites and would also diversify the housing land market, as they would be attractive to access by SME builders.

Whilst there is a focus on the development on larger strategic sites, such as Western Riverside these are challenging sites with significant infrastructure and viability issues and those sites which have made a start are currently being built out by large house builders. Such sites by their nature would have a considerable lead time and a long build out. There would also be very limited opportunities for SME developers to access such large sites with high up front costs. There are a number of smaller sites available across the District but these are often highly constrained brownfield sites which are difficult to develop due to viability and heritage concerns. In order to maintain a pipeline of delivery in the District, in line with the aspirations of the Housing White Paper, we consider that the allocation of smaller non-strategic sites is necessary particular where these sites have limited constraints.

Our client’s site, to the south of Wellow Road is well located adjacent to existing housing in Peasedown St John. The allocation of our client’s site for a mixed employment and housing site would represent a logical extension to the settlement, having similar characteristics to the allocated site and contributing to meeting housing need, but also by increasing the variety of plots available to smaller developers. It is also readily available and deliverable now.

Please expand this box or attach a separate sheet if you require more space.

2.3 Are there any other comments you wish to make on the issues and options?

No.

Please expand this box or attach a separate sheet if you require more space.

See our website for more information and to make your comments on-line:

www.bathnes.gov.uk/localplan

West of England Joint Spatial Plan - Publication Representation Form

The West of England councils - Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire councils are inviting representations on the Publication Document of the West of England Joint Spatial Plan. These will be considered by the examining Inspector in the context of the soundness and legal compliance of the Plan.

Please return this form by Wednesday 10th January 2018.

Email to: comment@jointplanningwofe.org.uk **or post to:** West of England Joint Spatial Plan, C/o South Gloucestershire Council, Planning, PO Box 1954, Bristol BS37 0DD

This form has two parts:

Part A – Personal Details

Part B – Your representation.

Please fill in a separate sheet for each representation you wish to make.

To ensure your representation is restricted to issues of soundness and legal compliance, you are advised to refer to the accompanying **Guidance Document** and make your representation on this official form that has been specifically designed to assist you in making your representation.

Please be aware that all comments made on the Joint Spatial Plan will be publicly available.

Anonymous forms cannot be accepted and so to submit your form you must include your details below.

You should refer to section 5 in the Guidance Document for advice on how to make a **joint representation**.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, complete only the Title, Name and Organisation boxes in 1. below adding the agent's details in 2 below.

Title*	Mr & Mrs	Mr
First Name*	R	Chris
Last Name*	Young	Beaver
Job Title (where relevant)		Director
Organisation* (where relevant)		PlanningSphere Ltd
Address Line 1	██████████	CoWorking Bath
Address Line 2	██████████	The Guild
Address Line 3	████	High Street
Address Line 4		Bath
Post Code	██████	BA1 5EB
Telephone Number		01225 300056
E-mail Address	c/o Agent	Chris@planningsphere.co.uk

Signature

Date

Part B - Your Representation

Please use a separate form for each representation made and read the accompanying **Guidance Note** that accompanies this form before you complete it.

Name or Organisation:

Q1. On which part of the Joint Spatial Plan are you commenting? Please see the note above.

Chapter Paragraph Policy

Key Diagram

Q2. Do you consider the Joint Spatial Plan to be:

Legally compliant?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Compliant with the Duty to co-operate?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

Q3. Please give details of why you consider the Joint Spatial Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Joint Spatial Plan or its compliance with the duty to co-operate, please also use this box to set out your representation.

PlanningSphere act on behalf of Mr & Mrs R Young who are the freehold owners of land south of Wellow Lane, Peasedown St John. We are instructed to comment on BANES Council's current round of consultation on its Issues and Options Local Plan Document and the Joint Spatial Plan.

We broadly support the JSP spatial priority to pursue inclusive economic growth by accommodating the economic growth objectives of the LEP Strategic Economic Plan and the spatial strategy support for the delivery of 82,500 jobs in the Plan period to ensure more inclusive growth and life changes for all, across the West of England, and to improve accessibility to jobs. This priority is delivered through Policy 4 – The Employment Land Requirement. Whilst this Policy rightly focuses on the growth of existing employment centres such as Enterprise Zones and Enterprise Areas the approach it takes by accommodating employment growth is largely through Local Plans. We consider it should do more to recognize the contribution that smaller employment sites can make to meeting the requirement and reducing unsustainable travel patterns.

Our client's site to the south of Wellow Road, Peasedown St John, is well located on a main road with good public transport links between Midsomer Norton and Bath and would not only build on an existing successful employment location to the north around the Circle Hospital and Mercedes car dealership showroom but would also help provide accessible employment opportunities both for residents of Peasedown St John and the wider Somer Valley. A further element of housing could also be incorporated into the site since the JSP spatial strategy also focuses on boosting the supply of housing including the recognition of the role of non-strategic sites in sustainable locations in meeting this need. An element of housing could also cross-subsidize site-wide infrastructure to assist in providing serviced employment plots.

Please continue on a separate sheet/expand box if necessary

Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:

Policy 4 and its supporting text should be modified to acknowledge the contribution smaller employment and mixed-use sites can make to meeting the employment, increasing accessibility to jobs reducing unsustainable travel patterns.

Please continue on a separate sheet/expand box if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the Examination?

No, I do not wish to participate at the examination hearings

Yes, I wish to participate at the examination hearings

Q6. If you wish to participate, please outline why you consider this to be necessary.

Please continue on a separate sheet/expand box if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.

Name

Chris Beaver

Date

9th January 2018

All representations must be received **no later than Wednesday 10th January 2018**

Please keep a copy of this form for future reference.

