

# Local Plan 2022-2042

Launch Consultation – Findings Report

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

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## Introduction

This report summarises the findings from the public consultation on the Bath and North East Somerset Local Plan Launch Document, which took place from **4 October 2022 to 15 November 2022**. The purpose of the consultation was to gather feedback and comments from the public on the Local Plan launch document, which sets out the proposed key issues and priorities for planning in the Bath and North East Somerset area over the next 20 years.

The launch document sets out the scope and purpose of the new Local Plan, the key issues it will address and information on its preparation. We are consulting on its content to ensure that communities and stakeholders are given a say from the very start of the Local Plan preparation process.

## Methodology

The consultation was conducted online, and members of the public were invited to share their feedback and comments through an online survey. In addition, the Council held a [virtual event](#) to provide further information and facilitate discussion around the key issues and priorities identified in the Local Plan launch document. Further stakeholder engagement is proposed in order to inform preparation of the Options document, but this is not covered in this report.

## Summary of findings

A total of 114 responses were received during the consultation period. The majority of respondents were individuals living in the Bath and North East Somerset area, although a small number of responses were also received from local businesses, community groups, and other organisations. The issues raised in the responses are summarised below and will be considered carefully by the Council in progressing the Local Plan.

Overall, respondents were generally supportive of the Local Plan launch document and the priorities and objectives set out within it. Key themes identified in the feedback included:

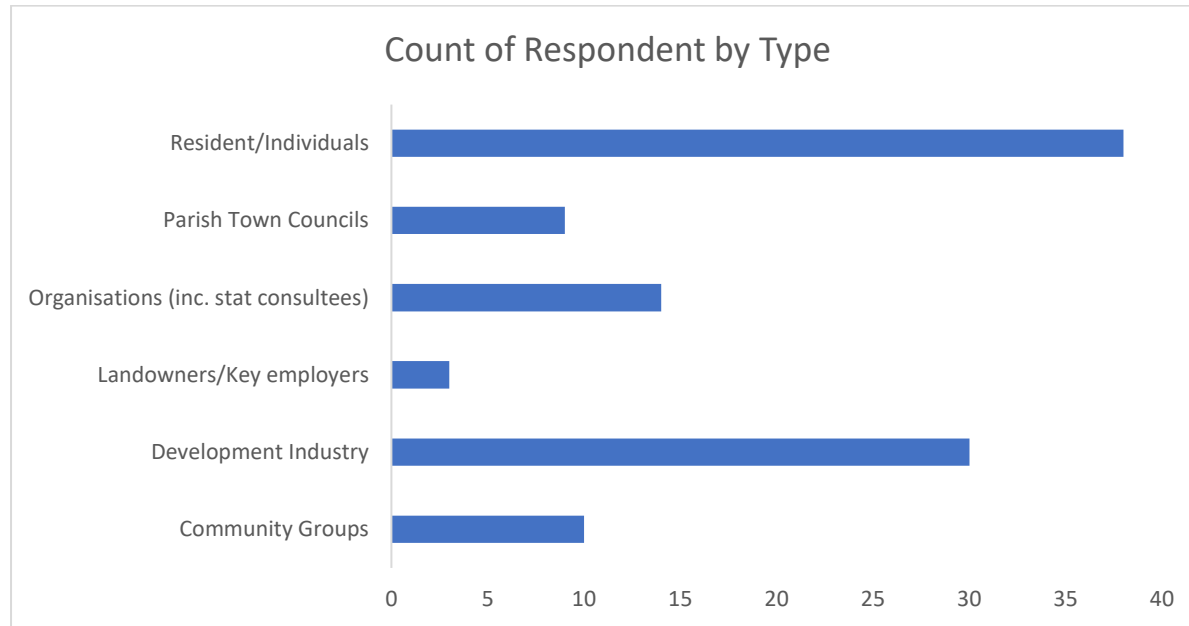
- **Housing:** There was a general consensus among respondents that there is a need for more affordable housing in the area, particularly for young people and families. However, there were concerns raised around the impact of new developments on the local environment and infrastructure, and a number of respondents called for more sustainable and environmentally friendly approaches to housing development particularly in light of the Council's climate and ecological emergency declarations.
- **Transport:** Respondents identified transport as a key issue, with a particular focus on improving public transport links and reducing congestion on the roads. There were also calls for more investment in cycling and walking infrastructure to encourage active travel.
- **Environment:** Many respondents highlighted the importance of protecting and conserving the local environment, including green spaces, wildlife habitats, and heritage sites. There were calls for more action to tackle climate change and reduce carbon emissions, with a particular emphasis on promoting renewable energy and reducing reliance on fossil fuels.
- **Economy:** Respondents were generally supportive of the council's objectives to support sustainable economic growth and create job opportunities in the area. However, there were calls for more investment in local infrastructure, such as broadband and transport links, to support business development.
- **Infrastructure:** Many respondents raised concerns around the capacity of local infrastructure, particularly in relation to healthcare, education, and community facilities. There were calls for more investment in these areas to ensure that local communities have access to the services they need.

## Responses

The consultation received 114 responses from a total of 104 consultees, of which sixty-eight were submitted by residents or individuals.

Comments could be submitted via an online form or by email. Over half of the comments received (64) were submitted online.

The online questions included qualitative and quantitative data for analysis (e.g., do you agree with our primary ambitions). The responses have been summarised in the tables in the following sections along with qualitative data/responses from both online and email representations



Details of organisations or groups that responded to the consultation are shown below:

<b>Parish/Town Councils and Community Groups</b>	<b>Development Industry</b>	<b>Organisations and Landowners/Key employers</b>
<p>East Harptree Compton Dando Camerton Saltford South Stoke Whitchurch Village Keynsham Englishcombe Priston</p> <p>CVAF C&amp;NEWG (nature) FoBRA Friends of the Recreation Ground Lansdown Crescent Association Pulteney Estate Residents' Association The Widcombe Association Committee The Bath Alliance for Transport and Public Realm Saltford Environment Group Joint Local Access Forum South of Bath Alliance (SOBA)</p>	<p>Edward Ware Homes Sovereign Housing Association Taylor Wimpey Strategic Land and Vistry Group Redrow Homes Limited Richborough Estates Duchy of Cornwall Crest Nicholson (Hicks Gate) Crest Nicholson (Manor Road, Saltford) Curo Group LiveWest and J E Sheppard &amp; Sons (Sawmills) The Silverwood Partnership Gladman Developments Ltd Beaunash Properties Ltd M7 Planning McLoughlin Planning on behalf of Caddick Land Robert Hitchins Ltd Persimmon Homes Severn Valley Bow Tye Ltd Mactaggart and Mickel Society of Merchant Venturers South West Housing Association Planning Consortium Wessex Water and Mr Charles Carr Fenton Energy Ltd. Watkin Jones Group Ecomotive Limited Standard Life Assurance Limited McCarthy Stone Taylor Wimpey UK Ltd The Hignett Family Trust Key Properties Ltd</p>	<p>Gloucestershire CC (Minerals &amp; Waste) Historic England Mendip Hills AONB Partnership National Highways The Coal Authority Woodland Trust Sport England The Canal &amp; River Trust Bath &amp; West Community Energy Theatres Trust Natural England CPRE BANES Group of Bristol and Avon Branch Cotswolds Conservation Board</p> <p>Bath Spa University Royal United Hospitals Bath NHS Foundation Trust University of Bath</p>

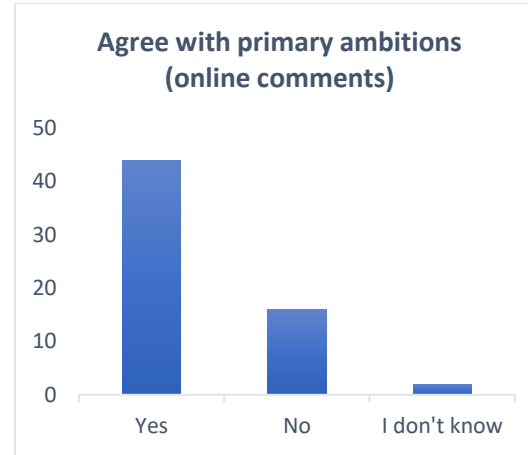
## Primary Ambitions

The primary ambitions identified in the scope of the Local Plan were as follows:

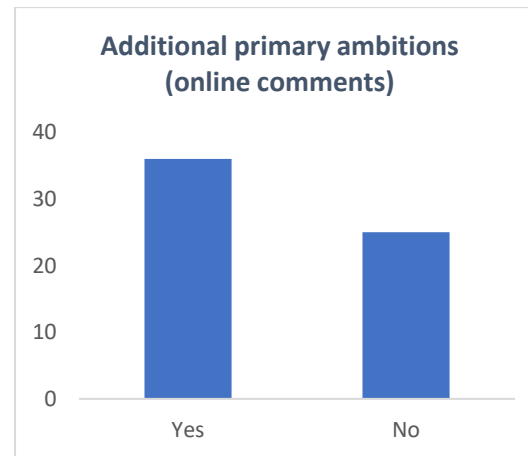
- Responding to the challenge of the **climate emergency** and facilitating the goal of net zero carbon by 2030
- Establishing a transformational approach to **protecting and enhancing nature**
- Maximising the delivery of **affordable housing** to respond to the district's demographic, social and economic needs
- Creating opportunities for sustainable economic development, the types of **jobs** that are needed in our communities, and the right type of space available for businesses to grow

## Quantitative Analysis

Most of the online responses agreed with the primary ambitions



A majority also had additional ambitions that they would like to include as primary ambitions



## Additional primary ambitions raised in responses

- Facilitate safe passage for pedestrians, cyclists, and users with impaired mobility
- Reduce traffic in urban areas
- Provide green open recreational spaces and habitats
- Protect Green Belt and green fields
- Promote sustainable transport
- Provide community, cultural, and social facilities
- Maintain the essential character of cities, towns, and villages
- Protect and enhance access to nature
- Protect and enhance World Heritage status
- Ensure road transport and utility infrastructure is in place before development
- Consider the health & wellbeing of the community
- Address affordable housing crisis
- Consistency with adopted council policies
- Consider social, economic, and environmental factors for sustainable development
- Maximise market and affordable housing
- Move the housing crisis from 'other issues' to a primary ambition
- Flexibility in approach to meet zero carbon objective
- Boost all forms of housing to meet the ambition of improving people's lives

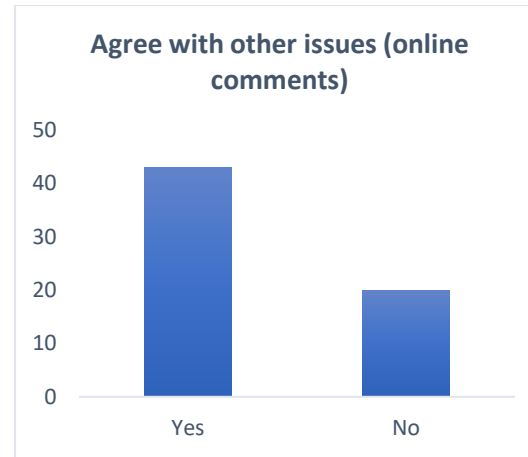
## Other issues

The other issues identified in the scope of the Local Plan were as follows:

- Delivering **high quality development** that supports vibrant, healthy, successful communities, and addresses inequalities
- Ensuring new development is aligned with the necessary **infrastructure**, including community facilities and green infrastructure
- Protecting and enhancing the beauty of our **environment**
- Setting an approach to **sustainable transport and movement** which facilitates behavioural change and the 15-minute neighbourhood concept
- Increasing **renewable energy** generation
- Setting a positive strategy for the conservation and enjoyment of the **historic environment**
- Creating vibrant **town and city centres**

## Quantitative Analysis

Most of the online responses agreed with the other ambitions



## Additional other issues raised in responses

- Mass transit and sustainable transport
- Collaboration with neighbouring authorities and joined up thinking
- Targeted approach to improve the lives of people in deprived areas
- Provision of green spaces, habitats, and protection of the Green Belt
- Community, cultural, and social facilities
- Public transport options for rural areas
- Careful management and enhancement of the World Heritage Site/ Protecting the Outstanding Universal Value of the World Heritage Site.

- Zero-carbon new builds and retrofitting existing properties
- Provision of health care and education
- Community-led housing and Self-Build
- Emphasis on rural communities and local food
- Development of towns outside of Bath to reduce commuting
- Access to nature and biodiverse green spaces
- Net Zero carbon by 2030
- Social and affordable housing
- Importance of housing, health and social care, and infrastructure
- No more student accommodation or high-end housing schemes
- Renewable energy and addressing the climate emergency
- Flexibility in market housing to reflect local circumstances and viability



## Engagement Strategy

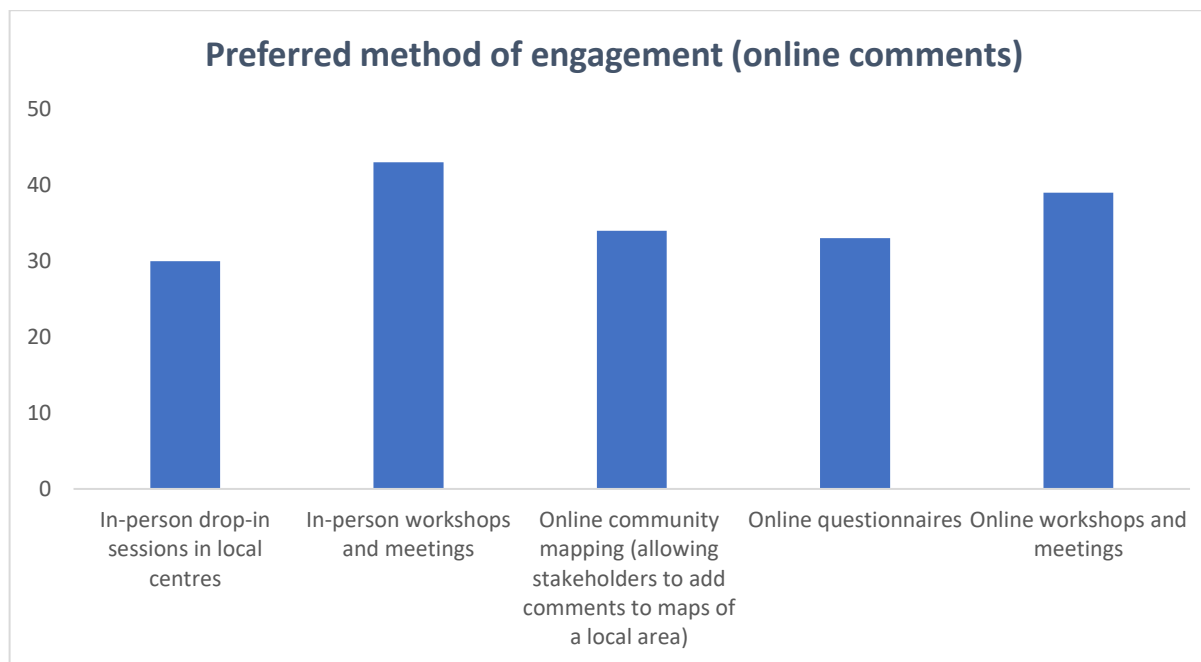
Details of our approach to engagement were set out in an Engagement Strategy, published alongside the Launch Document, setting out the opportunities for key stakeholders to be involved in the preparation of the Plan.

The online questionnaire included a question on preferred methods of engagement for consultees.

### Quantitative Analysis

The table shows the count of responses from a group of stakeholders regarding their preferred methods of engagement. The options listed are in-person drop-in sessions, in-person workshops and meetings, online community mapping, online questionnaires, and online workshops and meetings.

The most popular options for engagement were in-person workshops and meetings with 43 responses and online workshops and meetings with 39 responses.



### Additional comments on engagement

Comments outlined that the stakeholders involved should comprise a diverse group, including: residents (including older and young people), schools, farmers and landowners, investors, asset managers, local councils, community speed watch groups, environmental NGOs, local-access-forum, heritage groups, allotment associations, direct involvement of ratepayers, single interest groups (such as Sustrans), woodland trust, wildlife trust, canal and rivers trust, the NHS, residents associations, universities, action groups, developers, public transport groups, neighbouring authorities, local food producers, Self-Build groups, and key anchor institutions such as universities and hospitals.

Landowners and developers would like to be involved in the consultation process, and there were calls for a wide-ranging and inclusive consultation, with the aim of addressing the statutory consultee deficit experienced by Bath city residents arising from the city not being parished.

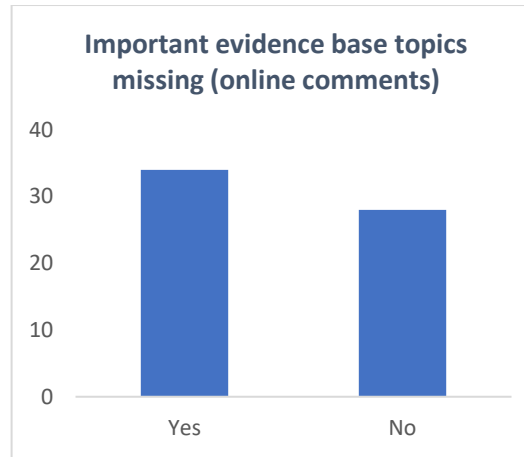
## Evidence base

The Launch document identified the following broad areas of evidence base required for the Local Plan

- Climate change
- Health and well-being
- Housing need
- Economic strategy
- Transport
- Cultural strategy
- Design and placemaking
- Flood risk
- Green Belt
- Landscape
- Habitats, ecology and Biodiversity Net Gain
- Renewable energy
- Air, soil and water quality
- Green Infrastructure
- Infrastructure Delivery
- Viability

## Quantitative Analysis

Online responses indicated that further areas of evidence would be required



## Additional other evidence areas raised in responses

- Secure energy supply, not just renewable
- Improving people's quality of life and sense of personal security
- Access to high-quality open spaces for sports and physical activity
- Assessment of open space and recreation needs
- Historic environment
- Evidence of barriers to social mobility and well-being
- Levelling up the extremes of wealth in Bath
- Traffic and speed road management
- Sustainable construction for new and existing buildings
- River cleanliness
- Rural community needs
- Increasing wetland habitats
- Transport and green infrastructure before housing
- Education
- Tourism/visitor economy

- Updated Housing Needs Study
- Needs for older persons housing
- Creative industries
- Electric charging infrastructure
- Public transport
- Cultural hubs
- Climate Change: Progress to net zero by 2030 and adaptation measures
- Views of local communities collected during consultation as important evidence
- Review of the success of the current Local Plan
- Student accommodation
- Digital infrastructure
- Creative thinking on local facilities and services for health and social care
- Evidence relating to dark skies and tranquillity
- Innovative construction methods and materials for a sustainable industry
- Redevelopment of existing poorly maintained infrastructure and buildings
- Updated HELAA
- Duty to cooperate and heritage missing from topics
- Design Code SPD should be consulted on alongside draft versions of the plan
- Continue Green Belt Assessment
- Evidence base should reflect government objectives for growth, energy, and home ownership and be flexible/enable future changes.

## Other issues raised

### Consultation

- Need for more direct 'in person' contact in public consultations, not just online
- Need to consider the impact of plans on people who already live in the areas
- Ensuring public engagement at each step of the process to give communities a role in decision making
- Give plenty of notice for new information and consultation events throughout the process.
- Online questionnaire is too restrictive

### Programme and evidence

- Concerns about cost of Council resources and potential delays in decision-making
- Long implementation timeline and implications of potential change in administration
- The duty to cooperate should be fully engaged and the Green Belt review should be conducted, with first consideration given to land well-served by public transport.
- EiP time assumed too short
- The use of the Doughnut economics model to frame decisions for the local plan is supported but its effectiveness in resolving competing issues is unclear.

### Policies

- Maintaining strong policies promoting and protecting the district's cultural, community, and social facilities in line with paragraph 93 of the NPPF
- Journey to Net Zero (JNZ) policy needs to be incorporated into the Local Plan drawing from JNZ Transport Strategy
- Request for more public art
- Support for affordable eco-tiny housing and land for Self-Build.
- Providing infrastructure to support development
- The new local plan should include an Infrastructure Policy to ensure the impact of new housing development on infrastructure and health services delivered by the RUH is appropriately mitigated and funded.
- Climate change requires education and community empowerment to create change, but the importance of enabling resilient communities can get lost in the need to meet housing numbers.
- The JSP failed due to lack of evidence to support policies, so the Local Plan process should not be a tick-box exercise.

### Bath

- Giving prominence to preserving Bath Recreation Ground as a green open space
- Stopping the conversion of residential houses into student HMOs

### Somer Valley

- Imbalance between infrastructure spending in Bath and areas outside the city like Midsomer Norton

- Expand local authority boundary to include new developments

### Rural

- Rural areas need improved local services and amenities, and viable mass-transit options
- Protecting Green belt land and focusing on brown field and land banked areas for development
- Avoiding development that is out of proportion in small villages
- Whitchurch Village is not a sustainable location to satisfy the NPPF rules related to B&NES. We must not accept City of Bristol housing numbers if they try to 'dump out of city' easy developments that add nothing to the economic or social value of B&NES

### Development Management issues

- Use SAP as the basis of energy calculations in Sustainable Construction Checklist
- Additional safeguards needed to ensure that planning policy is applied effectively when considering planning applications
- Considering the unenforceability of planning laws and conditions due to lack of resources at the council
- Consulting on updated CIL charging schedule
- SPD on community developments to address nature, renewable energy, zero-carbon housing and affordability.

## **Conclusions**

The consultation on the Bath and North East Somerset Local Plan Launch Document has provided valuable insights into the priorities and concerns of local communities in the area. Overall, there was strong support for the objectives and priorities set out within the document, although there were also concerns raised around the impact of new developments on the local environment and infrastructure.

The Council will use the findings from the consultation to inform the development of the Local Plan over the coming months and will respond to the issues raised through the preparation of and consultation on the Options document. The Council will continue to engage with local communities and stakeholders throughout the process.