

**Bath and North East Somerset Council**

**Local Plan 2022 – 2042**

**Options Consultation**

**February 2024**

**Topic Paper: Infrastructure**

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# 1 Background

- 1.1 The Council is preparing a new Local Plan (2022-2042). The Local Plan will set out a strategy and planning policy framework to help guide and shape future development and change, whilst also enabling greater climate and environmental resilience and protecting and enhancing our high quality natural and built environment, and key assets. In guiding change, the plan will be seeking to address key issues and challenges facing Bath and North East Somerset and its communities, including providing infrastructure to align with growth.
- 1.2 The purpose of this Topic Paper is to explain our approach to ensuring the infrastructure needed to support the growth in the Local Plan and achievement of sustainable communities is provided.

## 2 Launch Document Consultation and Engagement Responses

- 2.1 The Launch Consultation highlighted the need for infrastructure to support communities. 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.
- 2.2 In addition to the Launch Document consultation, a range of workshops were held with community representatives and other stakeholders around key issues and priorities of the new B&NES Local Plan. Sessions included workshops around Bath and its Environs, Keynsham and Saltford, Whitchurch Village, Somer Valley, rural areas of the district and also consultation with seldom heard groups.
- 2.3 Feedback included the issues summarised below:
  - Throughout the engagement process, residents highlighted how the local plan could be used to create healthier communities. Residents identified the need for reduced car use, supported by increased public and active transport infrastructure, to reduce pollution and increase physical activity. Green space was repeatedly identified as an important feature across B&NES, with residents appreciating the positive impact access to green space can have on mental wellbeing.
  - The food environment was often raised in various workshops. In particular, residents identified a need for more community food growing space, including allotments and orchards. The need for further community spaces was also a recurrent theme.

- Children and young people were identified as being particularly in need for safe spaces for play and socialise; “there is less and less to do for children and young people in the area”. The deterioration and loss of play parks were repeatedly identified as having a significant impact on local children and families. It was felt there needs to be investment and improvement into play parks, and that the opportunity should be taken to make them truly accessible and inclusive.

### **3 Current position**

- 3.1 In January 2023 the Local Plan Partial Update (LPPU) was adopted. The Core Strategy policy relating to infrastructure CP13 was not updated, however some of the policies which require infrastructure to be provided, such as sustainable transport and biodiversity net gain policies were updated in the LPPU, and the Planning Obligations Supplementary Planning Document (SPD) was updated to reflect the LPPU policies, and various other changes. The SPD came into force at the same time as the LPPU was adopted in January 2023.
- 3.2 At this early stage of preparing the Bath and North East Somerset (B&NES) Local Plan 2022-2042, the growth strategy and the sites to be allocated for development are not confirmed and therefore the infrastructure needed to support growth is not yet fully known.
- 3.3 However, the current B&NES draft Infrastructure Delivery Plan (IDP) which relates to the Local Plan up to 2029 will act as a baseline for assessing infrastructure. This brings together evidence summarising existing infrastructure provision across B&NES and highlights current known capacity issues and proposed /committed infrastructure that is required as a result of development up to 2029.
- 3.4 The new Infrastructure Delivery Plan will set out the infrastructure requirements for the Draft Local Plan 2022-2042. It will also include infrastructure currently planned (as part of the adopted Local Plan). The IDP will also take into account cross-boundary infrastructure issues arising from the ongoing duty to co-operate discussions, and the emerging Local Plans of our neighbouring authorities.
- 3.5 The preparation of the IDP is an iterative process. More detailed work on infrastructure requirements and delivery will be needed as the Local Plan progresses and the potential location options that are presented in the Options document are explored further.

- 3.6 In addition to understanding the infrastructure requirements relating to individual development locations it will also be crucial to consider cumulative impact of development across a wider area e.g. in relation to education and school places; health facilities; and transport. Solutions will therefore need to address both location specific and wider cumulative impacts. This work will be undertaken in collaboration with key infrastructure providers and agencies.

## 4 Evidence

- 4.1 As part of the preparation of the Options Document, we have met with external infrastructure providers to understand constraints from their perspective, and the extent to which any constraints will have implications for future growth in the district.
- 4.2 By way of background, we provided key infrastructure providers with details of the proposed overall level of housing need within the district over the plan period to 2042, having regard to existing commitments, and identified proposed general growth areas. As the council is at the Options stage, responses from the providers have been generally high level (see para 4.3 below). However stakeholder engagement with providers will be ongoing throughout the preparation of the draft Local Plan and as detailed site allocation infrastructure requirements emerge.
- 4.3 The following key infrastructure types that are considered critical to the delivery of growth have been considered in the preparation of the Options.
- Schools – School capacity and ability to expand schools to accommodate growth is an issue in site selection and has been taken into account in the Options document. In addition, we have held meetings with our neighbouring authorities and recognise that cross boundary growth will have an impact on secondary school capacity, as secondary schools have wider catchment areas than primary schools. This issue will need to be addressed.
  - Sustainable transport connectivity and potential linkages have been particularly important in shaping the choice of locations for future development, and facilitating sustainable means of transport is vital in seeking to minimise carbon impact and address the climate emergency. Again, cross boundary impacts will be taken into account.

- Energy – We have held discussions with National Grid Electricity Distribution (NGED) in the preparation of the Options document regarding grid capacity constraints in relation to the growth locations. NGED has responded saying in summary that so long as there is sufficient notice of the growth locations and sites coming forward, the implications for the grid can be factored in to forecasting and any required upgrades can be scheduled into the general reinforcement programme, so that by the time developments are coming forward there will already be sufficient capacity.
- Water and Sewage – We have held discussions with Wessex Water and Bristol Water regarding constraints affecting growth in principle. Wessex Water has responded with detailed comments regarding the growth areas and impacts on sewage water treatment plants, which have been taken into account in the Place assessments.
- Flood risk and Drainage – We have met with the Environment Agency (EA) and discussed the approach to the Strategy Flood Risk Assessment for the Local Plan. The EA have provided updated details of flood defence future requirements within the current IDP.
- Health – We have held discussions with NHS Property Services and the Integrated Care Board in the preparation of the Options document. NHS Property Services provided responses in relation to the growth areas, capacity issues and the impacts on primary care facilities. The NHS highlight that other healthcare and social care services will also be impacted by housing growth, however at this stage the impacts are not known. The impacts on these wider services will need to be considered and factored in over time.

4.4 Those issues such as green infrastructure and community facilities which are necessary for development to be acceptable in planning terms, and to meet the policy requirements in the Local Plan will also be identified as part of the site allocation process within the draft Local Plan, and will be subject to specific development management policies and requirements.

4.5 Following the consultation period, the feedback received will inform the next stages of preparation of the Local Plan and the preparation of the full Infrastructure Delivery Plan (IDP). The IDP will identify the specific infrastructure projects required as well as the phasing of infrastructure delivery, the costs and the available funding. It is crucial that new development is served by the timely provision of necessary supporting infrastructure.

## 5 Proposed Policy Approach

- 5.1 The Council is a direct provider of some of this infrastructure and will identify requirements arising from any planned growth and seek to ensure the earliest provision to address such requirements. In addition, the council will continue to liaise with other external infrastructure providers e.g. utilities, in order to understand current deficiencies or surpluses in provision; what the infrastructure requirements are arising from new development; the most appropriate solutions and the barriers to delivering these solutions. If barriers to infrastructure provision are insurmountable this would effectively prevent development taking place.
- 5.2 The proposed policy approaches referring to infrastructure are within various subject areas, including for example transport and green infrastructure, and will also be highlighted in the place area options. In addition, affordable housing, while not defined as infrastructure, has a major impact on site viability.
- 5.3 However, the Options document does refer to the existing adopted policy relating to infrastructure - policy CP13 – and proposes it is amended to ensure that infrastructure is provided at the earliest possible time to ensure that infrastructure is in place when new dwellings are occupied. Viability will however be an issue that needs to be taken into account in the timing of infrastructure.
- 5.4 We therefore propose to retain a generic policy requiring that new developments must be supported by the delivery of the required infrastructure to provide balanced and more self-contained communities. It will ensure that infrastructure is delivered at the earliest opportunity and in a co-ordinated way prior to occupation of new development. The policy will refer to developer contributions and an updated Planning Obligations Supplementary Planning Document.
- 5.5 The Option consulted on is as follows:
- Retain policy CP13 with minor amendment to reference the timely delivery of infrastructure to ensure that infrastructure is delivered at the earliest opportunity.