

ATTACHMENT 1

Bath and North East Somerset Council response to Bristol City Council Publication Draft Local Plan Regulation 19 consultation

Introduction

Thank you for the opportunity to comment on the Bristol City Council (Bristol CC) Publication Draft Local Plan under Regulation 19.

It should be noted that these comments also incorporate B&NES council's response to the letter from Bristol City Council, dated 31st October 2023, related to the Bristol Local Plan – Regulation 19 Duty to Co-operate.

Since work on the West of England Combined Authority (WECA) Spatial Strategy was halted in May 2022 the Local Plans of the WECA area unitary authorities (B&NES Council, Bristol CC and South Gloucestershire Council) will address strategic and non-strategic (or local) matters. The three authorities have been co-operating on planning policy issues for many years and continue to engage on a constructive and on-going basis on our respective Local Plans through the Duty to Co-operate (DtC).

Following preparation of a Local Plan Partial Update B&NES Council has formally launched preparation of its new full Local Plan through publishing a Launch Document in November 2022. A Local Plan Options document is due to be considered by B&NES Cabinet on 1st February 2024 as the basis for public consultation. If it is approved, consultation on the Options document, under Reg 18, will take place in February and March 2024, moving towards a Draft Local Plan later in 2024. As such preparation of the Bristol Local Plan is running significantly in advance of preparation of the B&NES Local Plan and we will continue to co-operate with Bristol CC on any implications arising from this. We welcome the joint working that has been undertaken with Bristol CC to date and will continue to co-operate with regards to cross boundary, strategic matters arising in our Local Plans and associated engagement with communities and stakeholders.

This council's comments set out below focus on strategic, cross boundary matters. Many of these matters are also addressed in a Statement of Common Ground (SoCG) that has been prepared to outline the co-operation and approach taken to such matters that are relevant across the WECA area and therefore, to the preparation of the WECA area unitary authorities Local Plans. The comments below should be read in conjunction with the SoCG.

B&NES Council Comments

B&NES Council welcomes and is broadly supportive of the approach Bristol CC has set out in its Publication Draft Local Plan.

Housing Requirement and Delivery

Bristol CC's position in respect of its housing need and housing delivery is understood as set out in the Publication Draft Local Plan. This is consistent with that set out in the letter of 31st October 2023. An evidence based local need of 2,503 per annum, excluding the 35% uplift is identified. Over the Local Plan period to 2040 that equates to a local need of 45,054.

The evidence underpinning the Publication Draft Local Plan indicates that there is the potential to deliver an average of around 1,925 homes a year over the 18-year plan period from 2022 to 2040 (total of 34,650 over the plan period to 2040). This deliverable capacity forms the basis for the proposed Bristol Local plan housing requirement. Bristol CC is seeking to ensure that as much of the housing need as possible should be met within their local authority boundary. The delivery figure is derived from different sources of urban capacity and incorporates assumptions about optimising densities, delivery and discount rates.

The above deliverable capacity based housing requirement results in an unmet need of 578 dwellings per annum (10,404 over the plan period). B&NES Council agrees with the approach Bristol CC has taken in identifying the unmet need. The unmet housing need only relates to the locally derived need and does not include the urban uplift for Bristol of 35%. This approach is in line with that set out in the Planning Practice Guidance regarding where the cities and urban centres uplift should be met:

'This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations...'

Paragraph: 035 Reference ID: 2a-035-20201216 - Revision date: 16 12 2020

The above has since been echoed within the revised NPPF (December 2023), albeit it is noted that the Bristol CC Local Plan will be examined under the September 2023 NPPF.

As referenced above Bristol CC have written formally to its neighbouring authorities outlining the above unmet need and requesting that B&NES Council explores through its local plan process whether it could accommodate a proportion of Bristol's unmet locally derived housing need. Accordingly B&NES council's response to the unmet need request will be established through the preparation of the B&NES Local Plan, informed by evidence and engagement with communities and other stakeholders. The B&NES Local Plan will establish a strategy and identify locations/sites for meeting B&NES housing needs (as evidence through a Local Housing Needs Assessment) and considering whether there are sustainable and suitable locations to accommodate an element of Bristol CC's unmet need. The individual and cumulative impact of development sites will need to be carefully considered through the Local Plan process. Bristol CC's recognition of this approach is welcomed.

Student Housing and Gypsy & Traveller Pitch Requirements

Regarding student accommodation B&NES council understands that Bristol CC has established that such needs can be met within Bristol and no unmet need has been identified separate to the above housing matters. Concerning Travellers sites Bristol CC note the level of need is relatively small in scale and the city council is expecting it to be accommodated within the city boundaries. This approach is welcomed by B&NES Council and we will continue to co-operate on the assessments of need for various forms of housing.

Economy

The Bristol Publication Draft Local Plan sets out a strategy for the city's economy which, in addition to protecting employment land for such uses, focuses the growth of higher intensity workspace in Bristol City Centre including Bristol Temple Quarter and St Philip's Marsh, identified areas of regeneration and the city's town, district and local centres. The substantial industrial, distribution and port/port related industrial area at Avonmouth is the core focus for industrial regeneration and new development allocations there support further expansion.

Bristol CC considers that the strategy set out in the emerging plan appropriately addresses the needs for commercial development in Bristol over the plan period and as such no requirement for employment space outside the city has been identified. This is also consistent with the letter of 23rd October 2023.

B&NES notes the Bristol CC approach and will continue to work with the city council on economic policy and strategy given the close relationship with the economy in B&NES.

Green Belt Release and Areas of Development adjoining B&NES

Through Policies DS10 and DS12 it is proposed to remove land from the Green Belt adjoining and up to the boundary of B&NES Council administrative area south of the A4 and to allocate the land for residential led mixed-use development. Through the B&NES Local Plan Options document and subject to Cabinet approval on 1st February an option for development in this locality on land within B&NES (i.e. the Hicks Gate area) will be tested and consulted upon.

Reference in the Bristol Publication Draft Local Plan to the potential consideration of land for development through the B&NES Local Plan and Bristol CC's commitment to working with B&NES Council to consider the impacts and opportunities; to assess infrastructure requirements; and to ensure integrated and well-planned communities are created to the benefit of existing and future residents is welcomed.

Through the B&NES Local Plan, and if land in this area were to be brought forward as an allocation, 'exceptional circumstances' will need to be demonstrated justifying the removal of land from the Green Belt. Further work will be needed in assessing the impact on the Green Belt of removing land within B&NES and allocating it for

development, in conjunction with the land already proposed to be removed from the Green Belt at Bath Road, Brislington.

The options under consideration in B&NES may include land north of the A4. It is noted that in the Publication Draft Bristol Local Plan it is proposed to only remove land to the south of the A4 and that as such Bristol CC have concluded that 'exceptional circumstances' do not exist to remove any land to the north of the A4 within the Bristol administrative area. If through the B&NES Local Plan land is removed from the Green Belt in the Hicks Gate area including land north of the A4 there may be a need to review and re-consider the Green Belt boundary in the wider area north of the A4 to ensure that a robust and logical Green Belt boundary is defined (in accordance with the NPPF) that also takes into account future placemaking. This work will be undertaken closely with Bristol CC and the mechanism would be through the review of the Bristol Local Plan.

The supporting text to Policy DS12 also references the potential to relocate the Brislington Park and Ride facility to land within B&NES close to the Hicks Gate roundabout and in so doing providing a transport interchange facility. This reference reflects a committed project in the West of England Joint Local Transport Plan 4 and is supported by B&NES. The potential to create a transport interchange close to the Hicks Gate roundabout is being considered allied to and alongside the development option outlined above. The location and form of the transport interchange will need to be considered in the B&NES Local Plan. It should be noted that this land currently lies in the Green Belt. Therefore, relocation of the Brislington Park and Ride and development of a transport interchange close to the Hicks Gate roundabout is therefore contingent upon exceptional circumstances to justify removal of the land from the Green Belt.

In summary B&NES Council is committed to working closely with Bristol CC on development to create a new neighbourhood in this area, that may contribute towards meeting housing need in both Bristol and B&NES (subject to progression of our Local Plan).

Other areas of development in or close to the Green Belt

The Bristol Publication Draft Local Plan also proposes to remove land from the Green Belt and allocate it for residential led development close to the B&NES boundary at Elsbert Drive, Bishopsworth. B&NES comments on the Bristol Local Plan Review: Draft Policies and Development Allocations - Further Consultation November 2022 (under Reg 18) noted the relationship of this allocation with north-western B&NES and associated villages/communities, including Chew Magna. Therefore, B&NES Council requests continuing dialogue with Bristol CC regarding the assessment of transport and other infrastructure impacts and proposed mitigation measures for this development allocation.

Transport

B&NES Council has reviewed the published documents and we are unable to identify detailed assessment of the transportation impact of the proposals, in

particular on the B&NES network. We note from the Interim Transport Evidence Information Note that further assessment and modelling will take place and we look forward to working with Bristol to understand the potential impacts and mitigation this may identify.

Other Strategic Cross-Boundary Matters

In summary B&NES is supportive of the approach of Bristol CC in respect of the cross boundary strategic matters outlined below, which broadly aligns with B&NES Councils' approach in our adopted Local Plan and/or the emerging Local Plan. As set out above in relation to other policy areas we would request that we are kept informed as the Local Plan progress towards submission, its examination and adoption.

Renewable energy: the approach in the Publication Draft Local Plan is welcomed. Continuing dialogue on this matter is requested given the sub-regional importance of renewable energy provision within the context of each authority's climate emergency declaration.

Biodiversity and Nature Recovery: the approach of focussing the delivery of nature recovery towards projects identified in the West of England Green Infrastructure Strategy and areas within the emerging West of England Local Nature Recovery Strategy is broadly supported. Given the sub-regional nature of these strategies continuing engagement is important. In addition, dialogue between the two authorities will also need to continue relating to mechanisms for off-site Biodiversity Net Gain delivery e.g. securing through conservation covenants or S106 agreements, on land in some locations within Bristol CC administrative area.

Flood Risk: B&NES have worked with Bristol CC on the Bristol Avon Flood Strategy, in particular in relation to hydraulic modelling to inform the SFRA work supporting the B&NES Local Plan. This co-operation is welcomed and should continue as necessary in progressing our Local Plans. B&NES Council is also supportive of the approach outlined in the Bristol Publication Draft Local Plan relating to sustainable urban drainage and delivering green infrastructure benefits and flood resilience. This aligns with B&NES Council approach.

In conclusion B&NES Council look forward to continuing to work with Bristol CC on strategic cross boundary matters as the Local Plan progresses towards examination.