



COMMENTS ON B&NES PLACEMAKING PLAN (DRAFT, DECEMBER 2015)

The Bear Flat Association has read the B&NES draft Placemaking Plan and offers the following comments.

We consider the Placemaking Plan to be unsound because a) it is not positively prepared to meet the objectively assessed requirements for housing development in the most sustainable fashion, and b) it is not consistent with national policy which requires a plan to deliver sustainable development.

Volume 1 of the Placemaking Plan sets out objectives 1 and 7 for 'reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services', and delivering well-connected places accessible by sustainable means of transport. The earlier Core Strategy identified a number of strategic sites along the River Avon extending westwards from the city centre and at former MoD sites including Foxhill / Mulberry Park south of Bear Flat on the edge of Bath. Volume 2 of the Placemaking Plan concerns the city of Bath, which is arguably the best-connected part of the local authority area with the most sustainable transport infrastructure and the closest alignment of homes, jobs, infrastructure and services. However, aside from the strategic allocations which were identified in the Core Strategy, there is negligible attention given here to specific small sites in the city which could help deliver the housing numbers. The only site across the Widcombe / Lyncombe / Bear Flat area is south of Englishcombe Lane (40 dwellings - Policy SB17). By contrast, Volume 4 Somer Valley and Volume 5 Rural Areas envisage many small sites being developed for between 10 and 200 dwellings each in peripheral and rural locations which are far from employment concentrations, frequent public transport services, retail and other community facilities. It is difficult to understand how housing development some 10-15 miles from the centre of Bath with poor public transport, walking or cycling accessibility satisfies Objective 1 'reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services ...' or Objective 7 'deliver well connected places accessible by sustainable means of transport...'. The failure to identify more small sites within the city itself will lead to unsustainable dispersed development which is in conflict with the Placemaking Plan's stated objectives.

A consequence of the dispersal of new development to Somer Valley and the Rural Areas is likely to be more traffic on the radial roads into Bath. The implication for Bear Flat is increased traffic on Wellsway, Wells Road and Bloomfield Road, with additional pressure for on-street car parking spaces. This will raise levels of traffic congestion, road accidents, air pollution and noise having a negative effect on residential amenity and pedestrians' environment in the Bear Flat local shopping centre. There is concern that sustainable transport conditions in Bear Flat will not be realised i.e. the Plan (Policy ST5) will not be effective. The evidence data from annual reports on the Council website indicate that air pollution along Wells Road already exceeds air quality standards. Policy ST6 envisages expansion of the Odd Down Park and Ride, but we know at first hand that congestion continues to be severe at peak times even after the opening of the facility.

We do recommend that the Park and Ride buses should stop at Bear Flat to assist children and staff to and from Beechen Cliff and Hayesfield Schools.



The Housing and Economic Land Availability Assessment (HELAA) updated in April 2015 records a substantial shortfall in housing provision 2011-15 (only 1,588 dwellings rather than 2,888 dwellings delivered) and sets out some of the delays and difficulties associated with developing the Core Strategy's allocated large sites. The HELAA document also records the extent to which applications and appeals are being made for sites in the Rural Areas that are a long way from Bath city centre but are beyond Green Belt boundaries and the World Heritage Site where any development is likely to be refused. This transfer of pressure to rural areas reflects the absence of identified sites in Bath; it indicates that greater scrutiny of possible small sites in the built up area of Bath should have been undertaken before publishing the Placemaking Plan, i.e. there should have been more positive planning to promote infilling and intensification. A failure to identify enough sites for housing development in the city of Bath, combined with growth in the Universities' student numbers, will create pressure for more residential properties to be converted to Houses in Multiple Occupation (HMOs). The Article 4 Direction may not be able to cope. Paragraph 246 of Volume 2 describes this problem but does not put forward an effective solution.

BFA is not a NIMBY organisation. We did not object to the Mulberry Park brownfield site as its use for housing, well served by buses, makes planning sense. Equally, we will support sensible proposals for infilling and intensification in the suburbs of Bath. However, we do not see planning sense in substantially increasing housing to the south of the city. There is no rail service and road connections are inadequate for traffic at current levels such that buses are delayed with little scope for traffic management to alleviate this. We would encourage the Inspector to test a journey by car or by bus from the Somer Valley into Bath during the morning peak. At the very least, such housing needs to be matched by employment opportunities close by and the transport implications of schemes should be thoroughly assessed. Better still would be to shift the emphasis of housing further towards truly sustainable locations.

3rd February 2016