



**The Bear Flat  
Association**

for those living and working in Bear Flat, Bath



# **BFA Response to Local Plan Consultation**

**Bear Flat Association submission on the  
Bath and North East Somerset Council Local Plan  
2022 – 2042 Options Document**

<https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf>

April 2024



**Chapter 2** Questions following paragraph 2.27:

1. Do you agree with the scope of the spatial priorities we have outlined?
2. What do you think are the key elements of a sustainable and healthy place?

The Bear Flat Association (BFA) supports the Spatial Priorities. The underlying aim for the fourth of the Key Issues and Challenges, Transport and Connectivity (paragraph 2.15) is to *“Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities”*. As Bear Flat is severed by Wellsway, which carries large volumes of traffic, we fully support the aim to promote sustainable transport, with further investment in public transport and infrastructure for active travel.

We also support the aim to safeguard and expand locally available services and facilities, notably on Bear Flat which is a designated Local Centre, in order to reduce the need for residents to undertake excessive car travel for retail, leisure and other purposes.

Paragraph 2.7 of the Local Plan Options document states that our economy is under-performing, and an insufficient supply of employment land is perceived as a challenge for the future. Paragraph 2.16 on Culture and Community Identity, states that protection of existing cultural and community facilities contributes to health and wellbeing; cultural and creative industries can play an important role in the local community. The Local Plan should acknowledge, at an early stage, the presence of the existing Town, District and Local Centres, which arguably have had a difficult period with shops and other business closures in recent years. District and Local Centres may not have premises and sites suitable for large-scale business development, but should provide opportunities for small and medium size enterprises to set up and grow.

In answer to Question 2 above, vibrant town, district and local centres are “key elements of a sustainable and healthy place.”

Page 16 of the Options document includes a table of strategy/delivery plans adopted by B&NES. The Economic Strategy, Business and Skills Plan, and the Active Travel Masterplan are not yet adopted but are “in development”. Hopefully, these evidence documents will demonstrate the importance of protecting and enhancing the hierarchy of centres. Town, district and local centres should be referenced in Chapter 2 of the Options document, as



strengthening and supporting them should help the spatial priorities to be achieved. Amendments to give greater prominence to the hierarchy of centres would accord with paragraph 2.22 of the Options document which describes the Economic Doughnut Model and refers to “Clean, safe and vibrant neighbourhoods”.

**Chapter 3** Question following paragraph 3.54 :

Any comments on the key requirements identified for the Local Plan including housing need? Are there any extra needs which should be included?

The BFA is broadly supportive of the chapter and its identification of key requirements. There is a difference between paragraphs 3.2 and 2.21 of the Options document, with 3.2 stating that Economic Strategy “has been prepared” and 2.21 that it is still “in development”.

Paragraph 3.2 refers to economic under-performance over the last 20 years, and a lack of space for businesses. The approach is described as - to focus on developing B&NES as a leader in green inclusive growth, upskilling residents and working with businesses to find new market opportunities. As part of this approach, Chapter 3 of the Local Plan should refer to the role which existing town, district and local centres might play in offering support and providing suitable space for new and expanding businesses.

Paragraph 3.42 on Transport Requirements highlights the vision and objectives which include zero carbon mobility and climate resilience, health and wellbeing for local communities, and creating better places. Paragraph 3.45 states there is a need for a change in approach, and 3.54 describes developing an Active Travel Masterplan. The BFA strongly supports measures to encourage greater use of public transport, walking and cycling, so that the impact of heavy car usage - particularly along Wellsway through our local centre - can be minimised.

**Chapter 4** Spatial Strategy – Principles and Locations Options

Questions following paragraph 4.42:

1. The role of sub-areas in accommodating new development and supporting infrastructure?
2. What approach to distributing development across B&NES should we follow?

Paragraph 4.20 describes, and Figure 11 illustrates, four sub-areas, namely Bath; Bristol and Bath corridor; Somer Valley; Rural areas. The BFA is satisfied



that all sub-areas should make a contribution towards meeting development needs over the plan period to 2042. We wish to see levels of housing development on sites in Bath and the Somer Valley matched by the provision in suitable locations of new employment space, retail, community facilities, and infrastructure, so that healthy and self-contained neighbourhoods are created, or reinforced. We are particularly concerned that new development in southern Bath or the Somer Valley should not exacerbate existing high levels of traffic through Bear Flat.

Paragraph 4.33 of the Options document describes available land and location options with potential for development, based on the Housing and Employment Land Availability Assessment (HELAA). Figure 12 shows HELAA sites across Bath, including Lyncombe Hill, South of Greenway Lane to Fox Hill, west of Entry Hill and Englishcombe. Whilst these potential sites are outside Bear Flat, the BFA would need to be satisfied that major development in these locations did not have a harmful impact on Bear Flat. In addition to our concerns about future levels of through traffic, Bear Flat is located within the Bath Conservation Area, where character and appearance must be preserved or enhanced. The BFA carried out a Character Appraisal of our part of the Conservation Area in 2020, identifying important features, including long-distance views. The BFA has particular concerns about proposals for new housing development on Lyncombe Fields, where the community, with BFA as a co-promoter, has been working to improve access and enrich biodiversity so contributing to the Local Plan aim of nature recovery addressing the B&NES Ecological Emergency. Protection of our area's assets should be considered when the distribution of new development sites across B&NES is decided.

Some of the illustrations in Chapter 4 of the Options document are unclear and/or have no key, notably Figure 8 – Map of National Landscapes and WHS; map showing Flood Risk (SFRA); travel to work from the 2021 Census; Figure 12 illustrating Green Belt land; and Figure 10 from the WECA Green Belt assessment.

### **Chapter 5** – Bath: Area overview.

Question – Do you agree with the approach on this page? Is there something else that should be included, and for what reasons?

The Key Issues for Bath are described below paragraph 5.11 of the Options document. Paragraph 5.12 lists 10 priorities and objectives, the eighth of which is *“to provide for a network of local centres and neighbourhoods that support day to day living and a strong sense of community engagement and involvement*



*in local projects, and ensure the provision of community infrastructure". This should be expanded to refer clearly to the established hierarchy of town, district and local centres.*

Greater emphasis on supporting and growing town, district and local centres should influence the Key Issues for Bath as follows: (a) there is evidence that some centres are challenged by outlet closures, so that positive action to provide space for established, growing and emerging businesses would be beneficial; (b) the city suffers from significant traffic congestion, and centres such as Bear Flat would benefit from policy to reduce travel to work in the city centre by car, and improve the public realm for people walking and cycling along Wellsway; (c) vibrant centres can provide places that are inclusive to people of all ages and abilities, addressing the problem of residents who feel disconnected from Bath. Bear Flat is a sustainable neighbourhood with buses, shops, open spaces etc., within walking distance for most residents and workers of the city centre. Bear Flat is an exemplary 15-minute community.

The BFA has produced a Vision for Bear Flat, based on consultation with local residents and businesses, and has discussed proposals for better traffic management along Wellsway with B&NES Officers. The BFA would strongly support a reference to the Bear Flat Vision, and to other district and local centres where projects for enhancement are underway, within Chapter 5 of the Local Plan. The Vision is at: <https://bearflat.org.uk/a-vision-for-bear-flat-centre/>

Progress has been made to achieve the Vision, with renovation of the Victorian drinking fountain and its setting, and the installation of Christmas lights on Bear Flat in December 2023, plus active engagement with B&NES and WECA to achieve changes to the A367. The BFA would strongly support a reference to the Bear Flat Vision and its progression, and to other district and local centres where projects for enhancement are underway, within Chapter 5 of the Local Plan.

### **Chapter 9** – Development Management Policy

The Options Document proposes to retain Policy CP12 Centres and Retailing, from the existing Local Plan, subject to amendments to the Bath city centre primary shopping area and to selected district and local centre boundaries. The BFA supports the proposed amendments, noting that Bear Flat will be retained as a local centre with no boundary changes.

However, the BFA is disappointed that Policy CP12 and the town centre retail hierarchy is barely mentioned until Chapter 9 of the Options Document. Its



inclusion under “development management” implies that the upcoming Local Plan will not be taking a pro-active approach to grow and enhance the centres. The BFA wishes to see its Vision for Bear Flat taken forward in a positive way in the upcoming new Local Plan. We consider that the promotion of more vibrant centres across B&NES could have a range of economic, social and environmental beneficial effects. Policy for centres should be addressed earlier in the Local Plan and their role inter-woven with other policies for new development, health and wellbeing, and sustainability.

#### **Annex 4**

Question – Are the proposed new Local Green Spaces identified in Appendix 4 effective and justified?

The BFA strongly supports designation of The Gore, at the junction of Bloomfield Road and Wellsway, as Local Green Space. The Gore is located at the southern end of Bear Flat local centre, and is highly visible for people travelling through the area, as well as local people. It is within easy walking distance for most of Bear Flat’s residents. The Gore is demonstrably special to the local community as it includes the recently renovated, landmark Victorian water fountain. The Gore is a small triangle of grassland with trees, and is not an extensive tract of land. It therefore meets the Government requirements for designation, is effective and justified, and should be made.

Bear Flat Association

[planning@bearflat.org.uk](mailto:planning@bearflat.org.uk)

[www.bearflat.org.uk](http://www.bearflat.org.uk)

\* \* \*