The Bear Flat Association

for those living and working in Bear Flat, Bath



Bath & North East Somerset Draft Local Plan Regulation 19 Consultation

Bear Flat Association Response

1 Housing targets

BFA recognises the acute problem faced by the Council to meet the new housing target for 27,324 new homes over the 18-year period: a major uplift from the 14,000 new homes planned in 2024.

The justification behind the lower figure of 22,000 new homes makes sense. It is compatible with the National Planning Policy Framework (NPPF) paragraph 11(b) that allows for lower figures where significant adverse impacts of the higher figure can be demonstrated. As B&NES has a double-inscribed World Heritage Site (WHS), includes parts of two National Landscapes (Cotswolds and Mendip Hills) and extensive Green Belt land, plus nature conservation designations, it is demonstrably sensitive to new development.

Also, a Bear Flat resident (Chris Pound, ex-Bath City Council) recalls that a comparable dispensation was granted to Bath during the era of Avon County Council. This precedent could be written up were this to be helpful in the event of the 22,000 target being challenged

2 Spatial distribution

Somer Valley's share of the 22,000 target is 4,600 houses. A number of the residents of these will inevitably commute to Bath, mostly on the A367, and hence through Bear Flat. The local impact of this for us could be harmful.

But to the 4.600 homes are to be added a proportion of the Rural Areas 2,600 homes that are located in the A367 'catchment area' plus occupiers of the new development on the southern edge of Bath at Odd Down/Sulis. Thus, there might be an additional 6,000 homes where the residents' route to Bath (a magnet not only for commuting, but also for shopping, leisure, education and training etc) will be the A367, funnelling more traffic onto Wellsway and Wells Road, where there is already some congestion.

The impact of the planned new homes in the Somer Valley on Bear Flat would be significant, with increased noise, disturbance, pollution, risk of road accidents and severance of the Local Centre. Increased traffic on the A367 through Bear Flat would be a cause for concern. This statement remains true, notwithstanding the SVL scheme currently on site at Bear Flat (at the Wells Road/Wellsway junctions with Hayes Place, Bruton Avenue, Bloomfield Avenue and Shakespeare Avenue). BFA has supported this scheme in principle, and it should moderate the harmful impact of traffic, but the issue of increased traffic from new housing development to the south of Bath is more fundamental than reallocating highway space.

A further point is that residential expansion of 22,000 homes is hard to reconcile with the Plan's ambition for carbon neutrality: unless there is a radical change in transport demand.

3 Balanced communities

To limit the number of trips made into Bath from Somer Valley and other areas south of the City, the Local Plan must seek balanced communities where jobs are available near the new housing and where opportunities for shopping, leisure, education and training etc. exist nearby too.

That a Growth Zone of 5,000 – 8,000 homes north of Midsomer Norton has been held back from this Local Plan because it is contingent on major transport infrastructure is a welcome indication of the Council's resolve to keep residential and employment growth in step.

We support the objective of matching housing growth with economic development: 'Job growth – around 22,000 – maintain balance' as it was summarised at a Consultation webinar. That's good on paper, but of course LPAs cannot command jobs

to arise. LPAs can provide room for growth, and it is encouraging that new employment floorspace is included in the Local Plan.

The Somer Valley Enterprise Zone (SVEZ), however, is set to deliver only around 1,300 jobs and 35,800 square metres of high-quality commercial space. This is welcome, but not enough by itself to realise balanced communities when some 6,000 new homes are envisaged.

BFA wishes the Local Plan to be as realistic and rigorous as possible in promoting employment and commercial growth, and on curbing the extent of traffic generation on the A367 from new residential development.

4 Transport

Alongside balanced communities, the other way that the Local Plan could address the problem identified above (the impact of additional traffic) is to ensure that development is supported by measures to improve public transport and encourage active travel.

The three objectives in Bath Transport Strategy (paragraphs 2.51-2.54) – to create great quality places by improving the public realm, improving travel choices, and encouraging a shift towards sustainable travel for appropriate journeys – are strongly supported. Implementation and management or enforcement will require ongoing commitment and detailed attention from the Council and its partners. The Plan should make this clear.

5 Centres Hierarchy and Main Town Centre Uses

BFA is pleased to note that Policy 6.28 of the draft Local Plan includes Bear Flat as Local Centre no.15. The importance of the Local Centre to the Bear Flat community was set out in *A Vision for Bear Flat Centre*, produced by the BFA in 2020. Residents, traders and operators have worked together on schemes to improve and promote the Centre, notably renovation of the listed Victorian fountain and greening of the space at The Gore, enhanced street signage, and annual installation of Christmas lights above the business outlets. The Somer Valley Links project (SVL) will bring enhanced pavements and road crossings, reduced carriageway width to give a more welcoming and safe environment for people in the Local Centre who are visiting the shops, Bear Inn and other outlets.

The Local Plan should express its support for the ongoing vitality and viability of the Bear Flat Local Centre. In addition, Appendix 5 should include a map of the Bear Flat Local Centre, alongside the maps of other named District and Local Centres.

6 Policy D6 Amenity

This policy from the current Local Plan must be retained, and should be mentioned in the forthcoming new Plan. As a core design and development management policy, it requires all new development to provide for appropriate levels of amenity and safeguard the living conditions of neighbours. With major new housing and employment development in future, Policy D6 will have significance. The impact of development on existing buildings and occupiers will require detailed attention, notably in the case of the terraced houses on Bear Flat which have been in place for more than 100 years and where the gradient of the Avenues means very careful attention is required in assessing the impact of house extensions, and a presumption against extensions that extend beyond the rear building line.

Bear Flat Association

October 2026

planning@bearflat.org

www.bearflat.org.uk