

Local Plan Consultation Response

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

This feedback has been compiled from comments from members of the Twerton and Whiteway Community Network, which is comprised of residents and local organisations.

We have also submitted feedback through the online form, where possible, however many sections that are relevant to this neighbourhood do not have a corresponding comments box.

We request that this is reviewed in a non-automated process and will email data_protection@bathnes.gov.uk and request this.

2.13

Despite the areas of Twerton and Whiteway being directly referenced as areas where communities are struggling, there is a notable lack of attention devoted to them in this Plan.

There seems to be no mention as to how to address the current indices of deprivation (which are specifically referenced) via planning policy.

5.11 “Parts of some Wards in Bath experience inequalities in health and wellbeing outcomes, including Twerton, Whiteway and Foxhill, and the built and natural environment can play an important role in addressing inequalities” – this sounds good, but it is impossible to draw out from the document what could or will be done around this.

The only direct references seem to be:

- **5.15** - regarding Purpose Built Student Accommodation for Twerton Riverside (which is unlikely to hold any benefit for existing residents)
- The existing policy from the Plan’s Partial Update regarding Twerton Park (**5.64/5.65**)
- Also **9.286** a ‘minor designation change’ to Twerton High Street which Hazel Thorp (High Street Regeneration Team) assures us is a very trivial issue of changing a designation from retail to housing in a unit that has been housing for many years

3.13

It is stated as fact that ‘the provision of additional student bedspaces in Purpose-Built-Student-Accommodation **would reduce the amount of general need housing**’ but is there an evidenced link between recent increases in PBSA locally and family homes being freed up? It would be interesting to know the statistics for Bath & North East Somerset if so, because anecdotally a lot of people see PBSA and HMOs **both** increasing in numbers.

Regarding addressing the housing need, there seems to be no policy in the Plan regarding second homes and how the issue of wealth hoarding might address housing demand and homelessness in the area. Can this be part of planning policy and for there to be exploration into other ways of freeing up accommodation to meet housing need? There has already been an agreed hiking on council tax on second homes – can there be policy around implementing this sooner rather than later to discourage people making a profit while other people are in housing crisis?

5.25

The language used in the Plan is passive in discussing what housing providers ‘could’ do to improve quality of life – words like ‘could’/’potential’ rather than ‘should’/’must’ or even ‘will’.

Is the Council, as Planning, able to be less passive in pushing for housing providers to improve their properties, as part of the Climate Strategy? And is there scope within the Local Plan to oblige housing providers to keep at least their basic legal responsibilities to tenants, as part of the Wellbeing Strategy? Curo residents are consistently reporting the challenges they face trying to get repairs done and damp/mould addressed, as well as significant insulation problems. People deserve liveable homes that do not cause health problems. We see here in 5.25 that ‘overall numbers of housing need to increase in order to access Homes England funding’ - what incentive if any then is there for retrofitting when the focus is on increasing the quantity rather than the quality of existing stock?

There is no connection made here to the indices of deprivation that are referenced early in the document and how these issues intersect. If the Plan is serious about

preventative action then there is a need to highlight the impact that living conditions have on wellbeing and other social factors.

9.23/9.24

Regarding regeneration, and linking to retrofitting and Curo's responsibilities as a social landlord, there's no mention of safeguarding tenant rights when 'redevelopment-led regeneration of social housing' happens.

What happens to tenants when their homes are redeveloped?

Do they get their tenancy restored once the work is complete, or do they have to be permanently uprooted? With the Bradford Park redevelopment in Foxhill, residents were forced to reapply to the council housing list.

Regarding the vote between options A and B, where A is around ensuring there is 'no net loss of affordable housing **subject to social balance considerations**' and B is 'no net loss of affordable housing **subject to social balance considerations AND viability considerations**',,, option B should be disregarded in favour of option A so as not to allow for developers to claim alleged viability issues as a reason not to build/reinstate social housing stock.

9.295 & 9.302

This references how planning policy should be 'promoting social interaction, making spaces safe and accessible, and creating places that enable and support healthy lifestyles', and then 'encouraging development of NEW community facilities', but there seems to be **no means by which to bolster and preserve existing facilities**, e.g. prioritising plans submitted by existing services providing trusted services, such as Youth Connect South West in Whiteway.

There is no option to comment online on this section as it does not exist on the local-plan-options webpage.

9.324

Twerton and Whiteway has a great network of green space that needs to be preserved – it is an integral characteristic of the area

It would be good to have the Plan acknowledge very specifically that what we do in and with our green spaces has a massive impact downstream, as in we can capture water and mitigate against flash floods, through the way we plant and shade, maintain and green the area. These factors mean that we can slow water and reduce temperatures in the future.

There is capacity for gardens to mitigate climate escalation and for green spaces to be maintained for carbon capture and for food growing (as the food system is further weakened). There is room for radical thinking in B&NES' policy making around the potential for Twerton and Whiteway to set up a network of community gardens that would impact wellness, provide skills, free food and community cohesion. With the arrival of More Trees BANES and the plan for the wildflower nursery at Bath City Farm we will have an area known for its plant nurseries. The scope for climate resilience and a concentration of skills in Twerton and Whiteway could tie in with addressing social, environmental and health challenges.

9.457

Other than this mention of the Clean Air Zone there seems no other meaningful acknowledgement of the impact of the CAZ so far.

For all the mention of sustainable transport there are no other real acknowledgements of this scheme. Traffic in Southdown/Whiteway has increased along residential and school routes such as Whiteway Road as a result of the CAZ, and it is having an impact on air quality. This should be recognised and factored into planning decisions.

9.79

'Affordable' rate of rent –

Answer to A or B is **A** - the rate of 'affordable' rent must be set at equivalent to or lower than LHA. Otherwise it ceases to be 'affordable' and will mean that anyone claiming benefits cannot realistically live in private accommodation.

General points:

- The process of commenting on the Plan is very inaccessible – there's vast amounts of jargon, several links don't work, and figuring out how and where to respond is very difficult. This feels ironic given that the council has 'giving people a bigger say' as one of their two core strategic policies
- While there is lots of wording around preventative work to address social inequality, and a 'commitment to improving frontline services', there is no mention of the wider context of cuts and national policy that frame what is possible locally. It therefore feels quite unrealistic and inauthentic in what it offers.
- Page link from 'BANES corporate priorities' to 'Transformative plan-making and Doughnut economics' goes to a page about a restaurant call The Bird.

As representatives of the Twerton and Whiteway Community Network, we welcome further communication on these issues going forward.

Sincerely,

Kate Bevan & Sally Harris

hello@twertonandwhiteway.org