

Bath & North East Somerset's

Draft Placemaking Plan (Pre-Submission version)

Consultation Statement
Regulation 22(1) (c)

April 2016



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1. Introduction

- 1.1 This statement sets out the consultation and community involvement undertaken for consultation on Bath and North East Somerset Council's Draft Placemaking Plan (Pre-Submission version). This is in accordance with Regulation 22 (1) (c) of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 This statement explains the consultation undertaken and details of who has been consulted; details of how they were consulted; and a summary of the issues raised.

2. Consultation overview

- 2.1 As well as ongoing engagement with stakeholders, the following stages of consultation have been undertaken in the preparation of the Placemaking Plan.

Regulation 18	<p>Launch Consultation (25 July - 20 September 2013)</p> <p>The Council published the Placemaking Plan Launch document for a period of 8 weeks to stimulate discussion about the issues facing the District.</p> <p>Options Consultation (27 November 2014 – 30 January 2015)</p> <p>Building on the Launch consultation and the issues raised, the Council developed the Options document. This was published for consultation for a period of 9 weeks.</p>
Regulation 19	<p>Placemaking Plan (Pre-Submission) (16 December 2015 – 3 February 2016)</p> <p>Further to the issues and options stages, this was a formal statutory stage of the consultation process. The Draft Placemaking Plan was published for public consultation for a period of 7 weeks from 16th December 2015 – 3rd February 2016.</p>

Only the Pre-Submission publication stage is covered by this report. The issues and options stage of the consultation is described in the separate Regulation 18 Consultation Statement which also explains the purpose the Placemaking Plan and the approach to engagement, participation and consultation used in line with the Council's Neighbourhood Planning Protocol (Statement of Community Involvement).

3. Publication of the Draft Placemaking Plan



- 3.1 The Draft Placemaking Plan was agreed for publication on 3rd December 2015. This was to provide the opportunity for consultees to make formal representations to an independently appointed Inspector about its soundness.
- 3.2 The Draft Placemaking Plan was published for consultation for a 7 week period between 16th December 2015 and 3rd February 2016.

4. Availability of documents

- 4.1 The Draft Placemaking Plan and links to the supporting material and other information were made publicly available at the usual 'Deposit Stations' across the District (see paragraph 5.3 below). The Council's website was the main means by which the consultation documents and supporting evidence could be accessed (see paragraph 5.6 below). Whilst consultees were encouraged to view documents and submit comments electronically, paper copies were made available if requested to ensure inclusivity.

5. Information on the Consultation

Notification mailout

- 5.1 Notification that the Council had published the Draft Placemaking Plan was sent to all those on the Local Development Framework mailing list including statutory consultees and a range of other stakeholders on 15th December 2015. This included an explanation about this stage in the process; that representations were invited on whether the Plan complies with statutory

requirements and on its soundness; guidance on how to make comments; the time period in which they should be received and brief information on the next stage. Whilst the mailout encouraged people to submit their comments on-line or electronically using the standard Representation Form provided, it was made clear that letters would also be accepted. The Statement of Representations Procedure was included as part of the mailout.

Press release and coverage

- 5.2 A press release was issued which was picked up in local newspapers, newsletters and featured on other organisations' websites together with Council publications, including:

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pages 12-13

Local Press

- ▶▶ Bath Echo
- ▶▶ The Bath Chronicle
- ▶▶ Keynsham Voice
- ▶▶ Council's Connect magazine

Websites

- ▶▶ Bathampton Parish Council
- ▶▶ Bath Preservation Trust
- ▶▶ Saltford Business Network
- ▶▶ Timsbury Community Website
- ▶▶ West Harptree Parish Council

Printed Information

- 5.3 The Draft Placemaking Plan (in six volumes), Sustainability Appraisal Report, Habitats Regulations Assessment, Statement of Representations Procedure, Comments Forms and Guidance Note together with an explanatory note were made available to view at the following deposit stations:

- One Stop Shop, Lewis House, Manvers Street, Bath BA1 1JG
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- Riverside, Temple Street, Keynsham BS31 1LA
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- The Hollies, High St, Midsomer Norton BA3 2DT
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- All libraries in Bath & North East Somerset. A list of all the libraries, including information on opening hours is available on the Council's website at www.bathnes.gov.uk/libraries

Representation form

- 5.4 The Council produced the standard Representation Form for those who wished to comment on the Draft Placemaking Plan in line with current good practice for this stage in the process plus accompanying Guidance Note. It included clear information on how to respond using the form. These were available in printed form at the 'deposit stations' and could be downloaded from the Council website: www.bathnes.gov.uk/placemakingplan

Council Website

- 5.5 A dedicated webpage set up for the Draft Placemaking Plan could be accessed via links from the main Planning Policy webpage where it was advertised as a News item at the start of the consultation.
- 5.6 The webpage set out the following information:
- An overview of the Placemaking Plan: what it comprises and how it will be used once adopted
 - Draft Placemaking Plan: explanation about this formal stage of the plan preparation process, and that the representations are invited only on whether the Plan complies with statutory requirements and on its soundness; guidance on how to make comments.
 - Format of the Draft Placemaking Plan: explanation that the Draft Placemaking Plan and the Core Strategy had been combined into one document for clarity but as the Core Strategy is already adopted, comments could only be made on the Placemaking Plan part. It explained that the difference between the Placemaking Plan text and the Core Strategy text is made clear in the amalgamated document.
 - Consultation details: links to the Draft Placemaking Plan and supporting documents (see below); explanation of out how to respond, including comments form and details of where hard copies of the consultation material could be viewed. The Draft Placemaking Plan (Pre-Submission version) was produced in six volumes:
 - Volume 1 - District-wide
 - Volume 2 - Bath
 - Volume 3 - Keynsham
 - Volume 4 - Somer Valley
 - Volume 5 - Rural Areas
 - Volume 6 - Appendices
- Other key documents supporting the Draft Placemaking Plan were:
- The Sustainability Appraisal
 - Habitats Regulations Assessment and Appendix
 - The evidence base documents
 - Statement of Representations Procedure

Twitter



- 5.7 As with previous consultations on the Placemaking Plan a tweet was released via the Council's main twitter account [@bathnes](#) at the start of the consultation period. This sought to augment the traditional media and digital methods of publicity so as to reach a wider audience. The Bath Chronicle also tweeted the consultation details.

Direct Contact Information

- 5.8 In line with standard good practice an email address and contact telephone number was provided on all the consultation material, mail-outs, and website for those who wanted to ask direct questions and seek further information.

Keynsham consultation event

- 5.9 An informal drop-in event was held at the Key Centre, Keynsham Methodist Church on 15 September 2015. This was principally for the residents of Keynsham, to provide them with the opportunity to have their say on a range of issues affecting the future of the town including the delivery of the following projects:

- Key principles and recommendations within the draft Keynsham Transport Strategy
- Possible site options for a new Leisure Centre in Keynsham
- Site proposal for employment land East of Keynsham
- Draft Keynsham Conservation Area Appraisal and Management Plan
- Draft Keynsham and Saltford Air Quality Action Plan.

- 5.10 This event received wide press coverage. There was a dedicated webpage for this event. The display material associated with Placemaking Plan element of the event is included in Appendix 1 for information.

Consultation events for Joint Spatial Plan

- 5.11 The publication of the Draft Placemaking Plan coincided with consultation on the emerging West of England Joint Spatial Plan Issues and Options (9 November 2015 - 29 January 2016). A number of drop-in events took place across the District as part of the Issues and Options consultation. This provided an opportunity to include a display panel about the Placemaking Plan and how to make representations on the Draft Placemaking Plan. Council officers were available to answer any questions arising.

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page 20-21

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page 22

6. Representations on the Draft Placemaking Plan

Consultation feedback

- 6.1 Consultation on the Draft Placemaking Plan generated around 600 representations. These representations relate to many aspects of the Plan. A number of key issues were raised in terms of the plan.
- 6.2 The most significant issue arising relates to housing land supply and objections seeking the allocation of alternative or additional sites for development. Some argue that the Placemaking Plan should be planning for a greater level of housing development for the following reasons:
- There is a strategic context for significant future housing needs as demonstrated via the Strategic Housing Market Assessment for the Wider Bristol Housing Market Area (West of England Joint Spatial Plan)
 - Core Strategy requirement of 13,000 homes is not a 'cap' and nor are the individual 'policy area' requirements – other suitable/sustainable sites should be allocated in excess of this figure
 - The need to better account taken of market signals
 - Need for more flexibility in the Plan
 - Sites identified in SHLAA will not deliver housing as expected
 - An over reliance on brownfield sites
- 6.3 Other key issues arising from the representations are listed below:
- University Campus expansion
 - Bath – university expansion/student accommodation and HMOs
 - Bath Park & Ride
 - Bath sites
 - Keynsham sites
 - Somer Valley sites
 - Rural Areas sites
 - Procedural issues
 - Transport issues in Bath
 - Highways England, Historic England and Environment Agency issues
 - Residential development and primary school capacity
 - Local Green Spaces
 - Parking standards
 - Housing standards
 - Renewable energy, design and environmental issues

Summary of key issues raised

- 6.4 The main issues arising from the responses to the Pre-Submission Draft Placemaking Plan consultation are summarised in Appendix 2 together with the Council's initial response.

A dark grey square icon with a folded bottom-right corner, containing the text 'Appx 2' in white.

Appx 2

Text for mailout for Draft Placemaking Plan - December 2016

Planning Policy
Planning Services
Bath & North East Somerset Council
PO Box 5006
Bath
BA1 1JG

01225 477548

planning_policy@bathnes.gov.uk

15th December 2015

Dear Sir / Madam,

Draft Placemaking Plan – Pre-Submission version.

Following consultation on the Placemaking Plan options a year ago, the Council is publishing the Draft Placemaking Plan for comment for a seven week period between 16th December 2015 and 3rd February 2016.

The Placemaking Plan complements the adopted Core Strategy by providing a set of detailed planning policies and site allocations for Bath and North East Somerset. When adopted, the Placemaking Plan, together with the Core Strategy, will help shape what development takes place and where and will be used for determining planning applications in Bath and North East Somerset up to 2029.

This document has been informed by ongoing engagement and work with local communities. At this stage you are being asked to comment on whether the Draft Plan has been prepared in accordance with legal requirements - '**legally compliant**' -and whether it is 'sound'. The National Planning Policy Framework (NPPF) sets out the four **Tests of Soundness** against which the Draft Plan will be assessed by the Planning Inspectorate. A sound document will be:

- **Positively prepared** – the plan seeks to meet objectively assessed development and infrastructure requirements, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
- **Justified** – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan is deliverable; and
- **Consistent with national policy** – the plan enables the delivery of sustainable development

The Draft Placemaking Plan and the Core Strategy have been combined into one document for clarity but as the Core Strategy is already adopted, comments can only be made on the Placemaking Plan part. The difference between the Placemaking Plan text and the Core Strategy text is made clear in the amalgamated document. Please note the Draft Plan has been produced in six volumes for ease of reference:

- Volume 1 - District-wide;
- Volume 2 – Bath
- Volume 3 – Keynsham

- Volume 4 - Somer Valley
- Volume 5 - Rural Areas
- Volume 6 - Appendices

Key documents supporting the Draft Placemaking Plan are:

- The Sustainability Appraisal
- Habitats Regulations Assessment

How to make comments

Guidance on how to comment on the Draft Placemaking Plan and where it can be viewed will be available on the Council's website: www.bathnes.gov.uk/placemakingplan

The Draft Placemaking Plan can also be viewed at all libraries in the District and the main Council offices (One Stop Shop, Lewis House, Bath; The Hollies Midsomer Norton and Civic Centre One Stop Shop, Keynsham) during normal opening hours.

Please also refer to the Statement of Representations Procedure below.

You are strongly encouraged to make your comments on-line via www.bathnes.gov.uk/placemakingplan. Alternatively you can request a comments form for completion which should either be emailed to placemaking_plan@bathnes.gov.uk or posted to Planning Policy, Planning Services, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Please make sure that you clearly reference which part of the Draft Plan you are commenting on (site, policy, paragraph, diagram, map or table plus the Volume number). If you would like help in completing the form, you can call us on 01225 477458.

Consultation on the Draft Placemaking Plan runs from 16th December 2015 to 3rd February 2016. Please ensure that your comments reach us by no later than **5pm on 3rd February 2016**.

What happens next?

Once all comments have been received, the Council will submit the Draft Placemaking Plan, changes to the Policies Map, the Sustainability Appraisal and a copy of the comments received during the consultation, for examination by an independent Planning Inspector. The Examination hearings will be held before the Inspector and are scheduled to take place in Summer 2016. If found sound, it is anticipated the Placemaking Plan will be adopted in December 2016.

Should you have any queries, please do not hesitate to get in contact with the Planning Policy team on 01225 477548 or by email at placemaking_plan@bathnes.gov.uk

Yours faithfully,

Lisa Bartlett
Divisional Director – Development

Statement of Representations Procedure

**Bath & North East
Somerset Council**

**Publication of Bath & North East Somerset Council's
Pre-Submission Placemaking Plan Development Plan Document**

**Regulation 19, 20 and 35 of the Town and Country Planning (Local Planning)
(England) Regulations 2012**

**Statement of Representations Procedure
and availability of Documents**

Draft Placemaking Plan (Pre-Submission version)

Subject matter and area covered

The Placemaking Plan complements the strategic framework in the adopted Core Strategy by setting out detailed development and design principles for identified and allocated development sites, as well as a range of policies for managing development and protecting valued assets across Bath and North East Somerset. This is the Pre-Submission document. The Placemaking Plan covers all of Bath and North East Somerset.

Making representations

Representations can be made over a seven week period, between **16th December 2015 and 3rd February 2016**.

Guidance on how to comment on the Draft Placemaking Plan and where it can be viewed will be available on the Council's website: www.bathnes.gov.uk/placemakingplan

You are strongly encouraged to make your comments on-line via www.bathnes.gov.uk/placemakingplan. Alternatively you can request a comments form for completion which should either be emailed to placemaking_plan@bathnes.gov.uk or posted to Planning Policy, Planning Services, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Copies of the Form and Guidance Note are available online, at the Council offices, from all public libraries or by contacting the Planning Policy Team (details below).

Tests of Soundness

All comments received at this stage must relate to legal compliance or the tests of soundness. The National Planning Policy Framework (NPPF) sets out the four tests of soundness against which the Draft Plan will be assessed by the Planning Inspectorate. A sound document will be:

- **Positively prepared** – the plan seeks to meet objectively assessed development and infrastructure requirements, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
- **Justified** – the plan is the most appropriate strategy, when considered against the

reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan is deliverable; and
- **Consistent with national policy** – the plan enables the delivery of sustainable development

See the 'Guidance Note for Respondents' for details. Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential. Anonymous forms cannot be accepted.

Request to be notified

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- that the Placemaking Plan has been submitted for independent examination
- the publication of the recommendations of any person appointed to carry out an independent examination of the Placemaking Plan
- the adoption of the Placemaking Plan

A notification request is at the end of the representation form.

Availability of documents

The Pre-Submission consultation documents, including the Draft Placemaking Plan are available to view on the Council's website at www.bathnes.gov.uk/placemakingplan and available for inspection at:

- One Stop Shop, Lewis House, Manvers Street, Bath BA1 1JG
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- One Stop Shop, Keynsham Civic Centre, Market Walk, Keynsham, BS31 1FS
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)
- The Hollies, High St, Midsomer Norton BA3 2DT
Monday –Thursday (9.00am – 5.00pm), Friday (9.00am - 4.30pm)

Copies will also be available at all Bath & North East Somerset libraries. A list of all the libraries, including information on opening hours is available on the Council's website at www.bathnes.gov.uk/libraries

If you need further information or assistance, please contact the Council's Planning Policy Team by telephoning 01225 477548 or by emailing planning_policy@bathnes.gov.uk.

Press Release text

Bath & North East Somerset Council is inviting comments on the Draft Placemaking Plan

Following consultation on the Placemaking Plan options a year ago, the Council is publishing the Draft Placemaking Plan for comment for seven weeks between **16th December 2015 and 3rd February 2016**.

The Placemaking Plan complements the adopted Core Strategy by providing a set of detailed planning policies and site allocations for Bath and North East Somerset. When adopted, the Placemaking Plan, together with the Core Strategy, will help shape what development takes place and where and will be used for determining planning applications in Bath and North East Somerset up to 2029.

This is a formal stage and people are being invited to comment on whether the Draft Plan has been prepared in accordance with legal requirements and whether it is 'sound'.

Further information and guidance on how to comment on the Draft Placemaking Plan and other supporting documents is available on the Council's dedicated Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan

The same information will be available in all libraries in Bath & North East Somerset and the main Council offices (One Stop Shop, Lewis House, Bath; The Hollies Midsomer Norton and Civic Centre One Stop Shop, Keynsham) during opening hours.

Comments should reach us no later than 5pm on Wednesday, 3rd February 2016.

Once all comments have been received, the Council will send the Draft Placemaking Plan and all the comments received during the consultation for Examination by the Secretary of State in the Spring 2016. It is anticipated that the Placemaking Plan will be adopted at the end of 2016.

Examples of press coverage for the Placemaking Plan

www.bathnes.gov.uk/latestnews

Have your say on planning

Two key planning documents – the Bath & North East Somerset Placemaking Plan and the Joint Spatial Plan for the West of England – are being published for the public to view and comment on.

The Draft Placemaking Plan, due to be published in the week beginning 14 December, complements the adopted Core Strategy and sets out detailed planning policies for Bath and North East Somerset up to 2029.

These include:

- spatial frameworks for and allocating sites for development in Bath, Keynsham, the Somer Valley and the Rural Areas
- designations where there is a need to identify and protect valued assets, such as landscapes settings of settlements or Local Green Space
- a range of District-wide criteria-based planning policies

At this stage the public is being asked to comment on whether the Plan meets the four tests of 'soundness': whether it has been positively prepared; whether it is justified; whether it is effective; and whether it is consistent with national policy.



News round-up



Insulation grant available

A Council grant of up to £6,000 is available through the Energy at Home scheme for B&NES residents for solid wall insulation. The grant can be accessed by homeowners, private landlords and private tenants, but is only available for a limited time. Grants for other energy-saving measures are also available, plus extra support for those most in need. Contact the Energy at Home Advice Service to find out what you may be eligible for. Freephone 0800 038 5680 or visit www.energysathome.org.uk

Awards deadline

The deadline for the Chairman's Community Awards is looming, so if you would like to vote you'll need to get your nomination in by 12 noon on Friday 27 November. This year, for the first time, the Awards will feature the category of Carer of the Year. Last year there were 79 nominations, which included volunteers, community leaders, associations and local...

Extract from the Winter edition of the Council's Connect Magazine Available on-line and distributed to around 76,000 households across the District

Give your views on planning document for Bath and North East Somerset

By [SamPetherick](#) | Posted: December 19, 2015 | By Twitter: @sampetherick



Bath

Comments (0)

People are being asked to comment on a document that will in part "be used for determining planning applications in our area up to 2029".

Comments are sought for a draft placemaking plan that is being prepared by [Bath and North East Somerset Council](#).

Councillor Liz Richardson (Conservative, Chew Valley North) is the cabinet member for homes and planning.

She said: "This is an important document that sets out a vision for how and where there will be development in future years, whilst maintaining the character of the area."

The Bath Chronicle 19th December 2015

Comments Form and Guidance Note

**Bath & North East
Somerset Council**

**Draft Placemaking Plan
(Pre-Submission version)
Representation Form**

(For official use only)

Rec'd: Ack:

Respondent No:

The Council is inviting representations on the Draft Placemaking Plan. These will be considered by the examining Inspector in the context of the soundness and legal compliance of the Plan.

Please return this form to Planning Services by 5pm on Wednesday 3rd February 2016.

Email to: planning_policy@bathnes.gov.uk **or post to:** Planning Policy, Planning Services, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

This form has two parts: Part A – Personal Details Part B – Your representations(s).

Please fill in a separate sheet for each representation you wish to make

To ensure your representation(s) is restricted to issues of soundness and legal compliance, you are requested to refer to the accompanying Guidance Note and to make your representation on this official form that has been specifically designed to assist you in making your representation.

Please be aware that all comments made on the Draft Placemaking Plan will be publically available. Anonymous forms cannot be accepted and so to submit your form you **must** include your details below.

You should refer to para 12 in the Guidance Note for advice on how to make a joint representation.

Part A

1. Personal Details* 2. Agent's Details (if applicable)

** If an agent is appointed, complete only the Title, Name and Organisation Boxes in 1. below adding the agent's details in 2 below.*

Title*		
First Name*		
Last Name*		
Job Title (where relevant)		
Organisation* (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Post Code		
Telephone Number		
E-mail Address		

Signature

Date

Appendix 1

Q5. Please set out what change(s) you consider necessary to make the Draft Placemaking Plan legally compliant or sound, having regard to the test you have identified at Q3 above where this relates to soundness. You will need to say why this change will make the Draft Placemaking Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

Q6. If your representation is seeking a change; do you consider it necessary to participate at the oral part of the Examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

Q7. If you wish to participate, please outline why you consider this to be necessary.

necessary

Please continue on a separate sheet if

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.

Representations may be accompanied by a request to be notified at a specified address of any of the following: that the Draft Placemaking Plan has been submitted for independent examination; the publication of the recommendations of any person appointed to carry out an independent Examination of the Placemaking Plan; and the adoption of the Placemaking Plan.

Name

Date:

Thank you for your time to complete and return this representation form. Please keep a copy for future reference.

All representations must be received no later than 5pm on Wednesday 3rd February 2016.

Guidance Notes for Respondents

Introduction

1. These notes are intended to assist you to make representations on the Draft Placemaking Plan prior to its submission to the Secretary of State for Communities and Local Government. This is the final representations stage for the Draft Placemaking Plan before its submission for independent Examination by a Planning Inspector.

Format of the Draft Plan

2. The Draft Placemaking Plan and the Core Strategy have been combined into one document for clarity but as the Core Strategy is already adopted, comments can only be made on the Placemaking Plan part. The difference between the Placemaking Plan text and the Core Strategy text is made clear in the amalgamated document. The Draft Plan has reproduced in six volumes:

Volume 1 - District-wide

Volume 2 - Bath

Volume 3 - Keynsham

Volume 4 - Somer Valley

Volume 5 - Rural Areas

Volume 6 - Appendices

3. During the Examination period, the Inspector will consider the representations received alongside the submitted Draft Placemaking Plan before deciding whether the Plan can be adopted by the Council. Representations may be to either support or object on the grounds explained below, and the Representation Form provides for support or objection to be expressed.

4. The purpose of the Examination, as detailed in the Planning and Compulsory Purchase Act 2004, is to determine whether the Local Plan is 'legally compliant' and 'sound'. Therefore if you are making a representation about:

- how the Local Plan was prepared in relation to the 'Duty to Cooperate', or legal and procedural requirements, this would mean that your concern is whether the Local Plan is **legally compliant**, and,
- if you don't think that the content of the document is 'positively prepared', 'justified', 'effective' and 'consistent with national policy', then the concern is with the '**soundness**' of the Local Plan.

Legal Compliance

5. You should consider the following before making a representation on legal compliance:

- Whether the Local Plan is in the current Local Development Scheme (LDS) and whether the key preparation stages been followed. If the Draft Placemaking Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Local Plan should be in general accordance with the

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Council's Statement of Community Involvement '[My Neighbourhood: The Neighbourhood Planning Protocol for Bath & North East Somerset](#)'.

- The Local Plan should comply with the [Town and Country Planning \(Local Planning\) \(England\) Regulations\) 2012](#).
- Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors. The Council is required to provide a Sustainability Appraisal Report and Habitat Regulation Assessment Report when the Draft Placemaking Plan is published. Do you consider that this is deficient and the Sustainability Appraisal or Habitat Regulation Assessment Report has not been undertaken effectively?
- The Local Plan must have regard to the Sustainable Community Strategy (SCS)
- All Councils preparing new Local Plans are required to comply with the Duty to Co-operate (DtC) to ensure effective planning for strategic matters. The aim of the DtC is to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters.

6. If you consider that the Draft Placemaking Plan is not legally compliant, your representation should make clear the precise reasons why in relation to the legal and procedural requirements set out above.

Soundness

7. It is anticipated that the majority of representations will relate to the 'soundness' of the Draft Placemaking Plan. The Council considers that the Draft Placemaking Plan it intends to submit for Examination is sound. The Inspector has to be satisfied that the Local Plan is positively prepared, justified, effective and consistent with national policy.

8. To be sound a Local Plan should be:

- Positively prepared - This means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified - This means that the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - This means that the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy - This means that the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

9. If you wish to make a representation seeking a change to the Draft Placemaking Plan you should make clear in what way it is not sound having regard to the four tests set out above. You should try to support your representation by evidence showing why the Plan should be changed. It will be helpful if you also say precisely how you think it should be changed.

10. Representations should cover succinctly all the information, evidence and supporting information necessary to support/ justify the representation and the suggested change.

11. After this stage, further submissions will be only be possible at the request of the Inspector,

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based on the matters and issues he/she identifies for Examination.

12. In circumstances where there are individuals/ groups/ organisations who share a similar view as to how the plan should change, it would be helpful if individuals/ groups/ organisations make a single representation. It would also be useful if the group/ organisation state how many people the submission is representing and how the representation was authorised.

13. If you think the content of the Draft Placemaking Plan is not sound because it does not include a policy where it should do, you should consider the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with already covered by any other policies in the Draft Placemaking Plan or is it dealt with in another Plan, for example the Core Strategy?
- If the policy is not covered elsewhere, in what way is the Draft Placemaking Plan unsound without the policy?
- If the Draft Placemaking Plan is unsound without the policy, what should the policy say?

The Examination

14. You should also use the Representation Form to let the Council know if you want to speak to the Inspector at the Examination.

15. The majority of representations will be considered by way of written representations. Written representations are an efficient way for the majority of representations to be dealt with and they carry equal weight to those heard in person by the Inspector. The nature of the Examination will depend in part on the extent to which those submitting representations feel that it is necessary to explain their representation to the Inspector in person.

16. If no-one uses their right to speak to the Inspector, the Inspector may choose to carry out the whole Examination using written representations.

Publicity for the Keynsham consultation event

Keynsham

Find out more about plans for up to 500 homes

Scottish housebuilders MacTaggart and Mickel Homes (M&M) are inviting local people to a public exhibition today (Thursday 17th December) to provide information about their development plans for land to the east of Keynsham, south of Bath Road.

The company is proposing a new community of up to 500 new homes on the site next to the Chandag estate, which will include residential development, a primary school together with large areas of public open space. The land was formally identified as part of a mixed use allocation in B&NES Core Strategy and this exhibition marks the next step prior to a formal planning application.

The first phase will include up to 250 homes of different sizes including affordable housing. There will also be community orchards, allotments, play areas, a new wetland park and improved access to Manor Road Community Woodland.

Residents are invited to view the exhibition between 4-7pm above the library at Keynsham Civic Centre. Specialist advisers will be available to answer any questions or discuss any issues. All information will also be downloadable from the company's website at www.macmicgroup.co.uk/land/england/keynsham

The deadline date for consultation responses has been extended to 15th January.

Keynsham

New leisure centre to feature in 'high quality' redevelopment of Riverside

Keynsham's new leisure centre will be at the Riverside as part of a visionary redevelopment for the area although the exact location and facilities available have yet to be decided.

At the December meeting of the B&NES Council Cabinet, members unanimously adopted the latest draft of the Placemaking Plan in which the leisure centre is identified as part of a mixed development of the Riverside and adjacent fire station site. The remainder of the area will be split between office and residential use.



The Placemaking Plan effectively puts the flesh on the bones of the Core Strategy which the council adopted last year, by identifying precise locations for the aims set out in it. A process of consultation has been ongoing, involving the public and town and parish councils throughout B&NES, and in September Keynsham residents were invited to give their views on a range of issues involving the town.

The location for the new leisure centre proved to be the most controversial of these, particularly when it became apparent that the replacement would have no sports hall, squash courts or spectator seating for the swimming pool. The council originally responded that consultation with user groups to determine exactly what would be included would take place once a final decision on the site was agreed. Then, on the day following this

month's cabinet meeting, B&NES Council Leader Tim Warren announced on local radio that the new facility would at least have spectator seating and a dry sports hall.

Planning application

The draft Placemaking Plan acknowledges that further consultation will have to take place regarding the facilities and there are still other significant issues to be resolved, particularly ownership of the land. While B&NES owns the freehold of the Riverside, everything other than the current leisure centre is on a long-term lease to an asset management company. As we reported last month, that company had applied to the council for a prior determination on whether it could transform the office space into apartments using permitted development rights instead of submitting a formal planning application. That request has now been withdrawn after it emerged the Civic Centre parking spaces belonging to the office building revert to public use in the evenings and weekends so could not be used for residents of the apartments.

The fire station has been empty since last month with cover currently being provided from Brislington until the new fire station opens at Hicks Gate next year. Initially, the fire station site had been earmarked for an office development to house the Avon & Somerset Fire & Rescue HQ and while no decision has been confirmed publicly, The Week In learnt earlier this year that an alternative site was being considered at Emersons Green. The Temple Street site also lies within Keynsham Conservation Area which will also impact on the ultimate redevelopment.

High quality design

However, the wording of the proposed new policy KE2b in the draft document certainly suggests something far more



The fire station is included in the development.

imaginative than the current monolith. The vision is for a 'high quality design which enhances the Conservation Area' together with varied roof heights, a high quality public realm along Temple Street and 'suitable additional parking to mitigate the transport impact of the development'.

The pedestrian link between Riverside and the park will also be enhanced through new footpaths and greenery. The new development will be expected to incorporate infrastructure for the council's district heating priority plan and will be expected to connect to the system when it becomes available.

KEYNSHAM • SALTFOED

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12°C Monday 21 Dec
Rain
Humidity: 91%
Wind: 41.7 mph West South West
Wind gust: N/A

21st December 2015

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Views sought from community on Keynsham's future at drop-in event

With plans being drawn up to determine everything from Keynsham's future road system to the location of the town's leisure centre, residents are being invited to have their say at a drop-in event this month.

Rath & North East Somerset Council wants to hear the community's views on a wide range of proposals that will shape the town over coming years.

The documents being drawn up will all form part of the council's Placemaking Plan, which will detail where developments will take place and protect community assets.

The drop-in event on Tuesday, September 15, will include exhibitions and information on:

- Key principles and recommendations within the draft Keynsham Transport Strategy;
- Possible locations for a new leisure centre in Keynsham, GLL, the new organisation responsible for leisure facilities in the town, will be present to talk through proposals;
- Site proposal for employment land to the east of the town, between Keynsham and Salford;
- Draft Keynsham Conservation Area Appraisal and Management Plan;
- Draft Keynsham and Salford Air Quality Action Plan.

Proposals included in the Keynsham Transport Strategy include trialling a one-way system in the High Street, an overhaul of the busy Hick's Gate roundabout and revamps of some of the town's most well-used junctions.

Meanwhile, the Conservation Area Appraisal proposes that the conservation area - which covers parts of the town centre to protect features of historic interest - is extended.

Councillor Charles Gerish (Conservative, Keynsham North), Cabinet member for finance and efficiency, said: "We've brought together consultations for a number of different initiatives, so that people can consider the overall plans for the future and we want as many people as possible to get their views heard."

As well as the drop-in event, information will be available online from September 15 at www.bathnes.gov.uk/services/your-council-and-democracy/consultations.

Cllr Tim Warren (Conservative, Mendips) leader of the council, said: "It's important that local people are involved in shaping the future of their community. The council is committed to ensuring that happens and taking a holistic approach to ensure Keynsham's future is sustainable."

The event will mark the start of a six-week public consultation plan on the draft Keynsham Conservation Area Appraisal, Conservation Area boundary change map and Conservation and Salford Air Quality Action Plan.

Residents will be able to submit their comments on the other proposals at the event or until October 2.

It will be followed by an eight-week formal consultation period on the Placemaking Plan later in the year.

- The drop-in event will take place on September 15 from 2-8pm at the Key Centre, Keynsham Methodist Church, in the High Street.

[Facebook](#) [Twitter](#) [G+](#) [YouTube](#)

Display Boards for the Keynsham event

WELCOME TO TODAY'S CONSULTATION EVENT



Bath & North East Somerset Council

INTRODUCTION

- Welcome to the consultation event.
- The role of the Placemaking Plan is to help enable the delivery of high quality development.
- It adds the detail to the strategic context set by the Core Strategy.
- Combined, the Placemaking Plan and the Core Strategy will provide the Masterplan for the town.
- The Masterplan will be developed through a series of consultations.
- Some of the projects on display today, and we will be taking your feedback.
- Thank you for your input.

THE PLACEMAKING PLAN

- Aims to facilitate high quality, sustainable and well connected places.
- It will complement the Core Strategy and once adopted replace the current Local Plan.
- It will allocate some sites for development and will contain policies for considering planning applications.

Bath and North East Somerset Placemaking Plan

- Today's exhibition is an informal consultation event.
- It is part of the process of adopting the Placemaking Plan as a statutory planning document.
- Last year we consulted on an early version of the Placemaking Plan called an 'options document' which many of you commented on.
- Later on this year we will consult formally on what is intended to be the final version (called the 'draft document') for 6 weeks.
- After the draft document consultation we will submit the Plan to the Planning Inspectorate for examination alongside your comments.

Bath & North East Somerset Council

THE CORE STRATEGY

VISION

Keynsham is a historic town that occupies a strategically important location between Bristol and Bath and is therefore well placed to improve and attract investment. It will continue to act as a market town and service centre for the surrounding area. In responding to the loss of a major employer, it will evolve as a more significant business location. Keynsham will expand to accommodate a growing population, ensuring it retains its independence and its separate identity within an attractive rural setting. It will become a more sustainable, desirable and well connected place in which to live and work, with an enhanced town centre inspired by its heritage, cherished rivers, park and green spaces.



Bath and North East Somerset Core Strategy

- The Core Strategy is the Council's overarching strategy in April 2014.
- It runs until the year 2029.
- It provides the context for the Placemaking Plan.
- It allocates 2,150 new homes and 1,600 new jobs to be delivered at Keynsham.
- It removes some land from the Green Belt at East Keynsham and South West Keynsham for development.
- But it maintains the key Green Belt purpose of preventing the town from merging with Bristol and Saltford.
- It seeks to enhance the Conservation Area ensuring that local character is strengthened by change.

Bath & North East Somerset Council

THE PROJECTS ON DISPLAY TODAY

- We suggest that you start with the boards to your left
- Please ask Officers at the boards about how to make comments
- The Core Strategy and Placemaking Plan will be implemented over time, with a commitment to the vision, achieved through incremental steps.
- The five projects on display today are part of this process of implementation.



THE PROJECTS

- Keynsham Transport Strategy
- Air Quality Management Plan
- Conservation Area Appraisal and Management Plan
- Leisure Centre relocation options
- East of Keynsham Employment Land masterplan

Bath & North East Somerset Council

Display Board used alongside the consultations on the West of England Joint Spatial Plan

HAVE YOUR SAY ON THE DRAFT PLACEMAKING PLAN

QUICK GUIDE TO THE CONSULTATION

ABOUT THE PLACEMAKING PLAN

Following consultation on the Placemaking Plan options a year ago, the Council is publishing the Draft Placemaking Plan for comment for 7 weeks between 16th December 2015 and 3rd February 2016.

The Placemaking Plan complements the adopted Core Strategy by providing a set of detailed planning policies for Bath and North East Somerset. This includes:

- spatial frameworks for and allocating sites for development in Bath, Keynsham, the Somer Valley and the Rural Areas
- designations where there is a need to identify and protect valued assets, such as landscapes settings of settlements or Local Green Space and
- a range of District-wide criteria-based planning policies

This document has been informed by ongoing engagement and work with local communities and other key stakeholders.

When adopted, the Placemaking Plan, together with the Core Strategy, will help shape what development takes place and where and will be used for determining planning applications in Bath and North East Somerset up to 2029.

The Placemaking Plan will help deliver the housing requirements set out in the Core Strategy and covers the same time period up to 2029. Work on the West of England Joint Spatial Plan, which looks ahead to 2036, will help inform the review of the Bath and North East Somerset Core Strategy due to commence in 2016 alongside other West of England authorities in order to ensure housing needs in the wider area, including those related to Bristol, are met.

Bath & North East Somerset Council

HAVING YOUR SAY

At this stage you are being asked to comment on whether the Draft Plan has been prepared in accordance with legal requirements and whether it is 'sound'.

The National Planning Policy Framework (NPPF) sets out the four Tests of Soundness against which the Draft Plan will be assessed by the Planning Inspectorate. A sound document will be:

1. **Positively prepared** – the plan seeks to meet objectively assessed development and infrastructure requirements, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
2. **Justified** – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. **Effective** – the plan is deliverable; and
4. **Consistent with national policy** – the plan enables the delivery of sustainable development

The Draft Placemaking Plan and the Core Strategy have been combined into one document for clarity but as the Core Strategy is already adopted, comments can only be made on the Placemaking Plan part. The difference between the Placemaking Plan text and the Core Strategy text is made clear in the amalgamated document.

WHERE TO FIND MORE DETAILS

Guidance on how to comment on the Draft Placemaking Plan and where it can be viewed will be available on the Council's website: www.bathnes.gov.uk/placemakingplan

The Placemaking Plan Options document can also be viewed at:

- All libraries in the district
- Main Council offices (One Stop Shop, Lewis House, Bath; The Hollies Midsomer Norton and Civic Centre One Stop Shop, Keynsham) during opening hours

HOW TO MAKE COMMENTS

You are strongly encouraged to make your comments on-line via the Placemaking Plan webpage www.bathnes.gov.uk/placemakingplan

Alternatively you can:

- Complete a comments form and send it by email to placemakingplan@bathnes.gov.uk.
- Send your completed form or comments in a letter to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Please make sure that you clearly reference which site or policy you would like to comment on using the reference numbers highlighted in this summary and in the Draft Placemaking Plan.

If you would like help in completing the form, please speak to one of the officers or call us on 01225 477458.

Your comments should reach us no later than 5pm on Wednesday, 3rd February 2016.

WHAT HAPPENS NEXT

Once all comments have been received, the Council will submit the Draft Placemaking Plan, changes to the Policies Map, the Sustainability Appraisal and the comments received during the consultation, for examination by the Secretary of State.

Submit to Secretary of State	Spring 2016
Examination Hearings Period	Summer 2016
Receipt of Inspector's report	Autumn 2016
Adoption and publication	Winter 2016

KEY ISSUES RAISED THROUGH CONSULTATION ON DRAFT PLACEMAKING PLAN

Plan ref	Respondents	Issue	Recommended Action
Whole Plan	Various developers	<p>Plan preparation process/scope:</p> <ul style="list-style-type: none"> Combining Core Strategy and Placemaking Plan at this stage and amending some parts of Core Strategy has resulted in a disjointed document and confusion as to what is being consulted upon and how this relates to the Local Development Scheme and/or some assuming all of the Core Strategy is available for comment Sustainability Appraisal is inadequate Duty to cooperate (DtC) statement has not been produced – legal compliance issue Consultation documents changed during consultation period and respondents not all advised – process therefore, flawed Maps included in Appendices not all at a scale where boundary changes/new boundaries are clear Major and minor textual errors in Plan, including missing part of Policy ST8, that need to be corrected 	<p>Relationship between Core Strategy and Placemaking Plan to be clearly articulated to the Inspector.</p> <p>DtC statement to be submitted to Inspector.</p> <p>Consultees advised via Placemaking plan website that Policies map available to view electronically at all scales.</p> <p>Include whole of Policy ST8 in schedule of limited changes to submit alongside the Plan.</p>
District-wide strategy/ housing supply and place based sections	Various developers/ land owners	<p>Housing land supply and allocation of alternative or additional sites for development:</p> <p>Developers have raised the following issues in suggesting that the Placemaking Plan should be planning for a greater level of housing development:</p> <ul style="list-style-type: none"> strategic context of very significant future housing needs as 	<p>The housing land supply based on the most recent progress in bringing forward sites has been reviewed. It is concluded that there is risk to delivery of some of the sites which are relied upon to deliver the 13,000 core</p>

Plan ref	Respondents	Issue	Recommended Action
		<p>demonstrated via SHMA for Wider Bristol HMA (informing West of England Joint Spatial Plan)</p> <ul style="list-style-type: none"> • impending related review of the B&NES Core Strategy's housing requirement • Core Strategy requirement of 13,000 homes is not a 'cap' and nor are the individual 'policy area' requirements – other suitable/sustainable sites should be allocated in excess of this figure • need to better take account of market signals • need more flexibility in the Plan • sites identified in SHLAA will not deliver housing as expected • over reliance on brownfield sites <p>In order to address these issues a range of sites are proposed for allocation (mainly in Keynsham and Somer Valley), including:</p> <ul style="list-style-type: none"> • Uplands, Keynsham • Land west of Keynsham (around 200 dwellings to contribute towards local need and strategic requirement identified via JSP) • Broadleaze Nursery, east of Keynsham (to meet local housing need, in particular for affordable housing) • Larger scale development between Keynsham and Saltford • Allocate/develop safeguarded land to east of Keynsham now • Rymans Engineering, Radstock • Land North of Kilmersdon Road, Manor Farm, Haydon, 	<p>strategy housing requirement, but this is offset by other sites forthcoming. It is not considered that the risk is so great as to warrant the identification of new housing sites at this stage and that the appropriate time to review is as set out in the Core Strategy i.e. a 5 year review in 2019/20 to ascertain whether the 13,000 is still the appropriate housing target and whether any changes in the spatial strategy are required to ensure its delivery.</p>

Appendix 2

Plan ref	Respondents	Issue	Recommended Action
		<p>Radstock</p> <ul style="list-style-type: none"> • Land parallel with Five Arches Greenway, Radstock • Land at Tynning Hill, Radstock • Land off Bath Old Road, Radstock • Land at Smallcombe Road, Clandown, Radstock • Rear of 46 Radstock Road, Midsomer Norton • Land to east of Church Road, Peasedown • Paulton Printing Works (releasing Care Retirement Community land) • Land north of Temple Inn Lane, Temple Cloud • Land at Wells Road, Hallatrow • Former Garden Nursery, Temple Cloud • Land south of Loves Hill, Timsbury 	
Whole plan and spatial strategy	Highways England	Generally supportive of the spatial strategy and site allocations and promotion of sustainable means of transport. Potential concern around the amount of development within Bath, particularly focussed in the Enterprise Area, and potential for negative impact on the strategic road network. Need to ensure all necessary transport infrastructure measures are identified in the Placemaking Plan and the Infrastructure Delivery Programme.	No changes to Plan at this stage required for soundness – consider issues at Examination
Whole plan	Environment Agency	Generally supportive of the Plan with regard to environmental issues and specifically flood risk/implementation of the sequential approach, taking account of climate change, and associated	No changes to Plan at this stage required for soundness – consider issues at Examination and whether

Appendix 2

Plan ref	Respondents	Issue	Recommended Action
		<p>policy/site requirements. Some broad suggestions that the Plan could be improved through the following:</p> <ul style="list-style-type: none"> • cross references to flood emergency planning/response • include references to pertinent regulatory frameworks in relation to water supply/quality • greater prominence to considering water source protection across the District • cross references to national guidance on contamination assessments • review nature conservation policies (which are supported by EA) in context of national biodiversity toolkit 	<p>minor changes to improve the Plan could be made</p>
<p>Policies RA1 and RA2 (rural strategy)</p>	<p>Various developers</p>	<p>Changes to Policy RA1 (inclusion of reference to requirement for a primary school) and the inclusion of Policy LCR3A stating that residential development will only be permitted where primary school has capacity or can expand is not justified/in accordance with the NPPF and will negatively affect housing delivery in the rural areas. This approach may also mean Core Strategy requirements for rural areas cannot be met.</p>	<p>No change – consider issues through Examination</p>
<p>Policy LCR6A and specific Local Green Spaces</p>	<p>Landowners and residents</p>	<p>Local Green Space (LGS) - the process of and approach to designating LGS in terms of the application/interpretation of the NPPF is questioned i.e. has the Council designated LGS that is 'demonstrably special' and meets the criteria?</p> <p>Many representations relating to individual spaces:</p>	<p>No change – consider issues through Examination</p>

Plan ref	Respondents	Issue	Recommended Action
		<ol style="list-style-type: none"> 1. Proposing previously nominated or new spaces should be designated, including: <ul style="list-style-type: none"> • Beechen Cliff school • land at Breaches Gate East Keynsham • land south of Staddlestones, Midsomer Norton • LGS18 designation (land at Whitelands/Tynning, Radstock) should be extended to include all land referred to as the “Green batch” 2. Proposing new spaces for designation: <ul style="list-style-type: none"> • undeveloped land on northern part of University of Bath campus 3. Proposing that designated spaces should not be designated, including: <ul style="list-style-type: none"> • Millers Walk, Bathampton • Adj. Bramble Cottage, Farmborough • Parkers Mead, East Harptree • Land south of Lower Road, Hinton Blewett 	
Policy ST7: parking standards	Various, including developers and Federation of Bath Residents Association (FOBRA)	<p>Parking standards - implications of changing approach to parking standards not adequately tested e.g. in terms of traffic generation, especially in Bath. Need to ensure Parking Standards support delivery of Bath Transport Strategy.</p> <p>Sharp distinction between inner and outer parking areas in Bath is unacceptable as results in major difference in standards either side</p>	No changes to the Plan should be made at this stage. Issues to be considered through Examination.

Appendix 2

Plan ref	Respondents	Issue	Recommended Action
		of boundary line within the Enterprise Area. Zero parking standard for student accommodation is unacceptable as Universities also discourage car parking/use.	
District-wide Policies SCR2-4, D1 and D6, RE6, HE1 and 2, ST1, ST3 and ST6	Historic England	Generally supportive comments. In order to closely accord with the NPPF the Plan's policies relating to renewable energy development; design; re-use of rural buildings; and transport infrastructure should be amended to refer to considering and mitigating impact on heritage interests and assets.	Make limited changes to some Policies (see Appendix 2) – submit alongside Draft Plan
Policy H7 (Housing standards)	Registered Housing Providers and other developers	Housing Accessibility and Space Standards for affordable housing have been inappropriately 'passported' into the Planning Obligations SPD. Application of accessibility standards to all market housing (via Policy H7) is inappropriate. The application of standards to both affordable and market housing needs to be robustly evidenced (in terms of need and viability).	No changes to Plan at this stage – consider issues at Examination
District-wide Policies, including those relating to renewable energy; design; environmental issues	Various	Variety of issues raised on District-wide Development Management policies – developers consider some policies too prescriptive/restrictive and not in line with NPPF, others consider some aspects of policies require definition and clarification.	No change – consider issues through Examination
Bath - strategy	FOBRA and other stakeholders	The strategy should be more explicitly articulated and clearer regarding the limits to University expansion i.e. housing and employment spaces are the first priority; retail and hotel	No change – consider issue through Examination

Plan ref	Respondents	Issue	Recommended Action
		<p>developments are a lower priority; and the expansion of the universities for academic and student accommodation should be limited to on-campus development within the existing site boundaries without any further intrusion into the Green Belt and the Cotswold Area of Outstanding Natural Beauty.</p> <p>Others consider the strategy fails to meet needs/demands that it should prioritise e.g. for student accommodation, key worker housing, HMOs.</p>	
Bath – university expansion/ student accommodation	Universities FOBRA, student accommodation providers and residents	<p>Approach of the Plan to University expansion, provision of student accommodation and implications for the city:</p> <p><u>Universities/student accommodation providers</u></p> <ul style="list-style-type: none"> • Consider the Plan is too restrictive and that it should better facilitate changing aspirations of Universities e.g. through looking at more creative solutions • University of Bath is a major driver of educational opportunity and economic growth in the City and District, and the Plan should play an important role in supporting its continued success • The Plan should be based on meeting student accommodation/university growth as a priority (not subordinate to meeting housing/employment needs) and Policy B5 needs amending to positively enable off-campus provision, particularly outside EA/city centre • Site allocations/Policy B5 should be more flexible in 	No change – consider issues through Examination

Plan ref	Respondents	Issue	Recommended Action
		<p>allowing an element of student accommodation on key sites and smaller stand-alone sites e.g. through reference to improving viability</p> <p><u>FOBRA/various residents</u></p> <ul style="list-style-type: none"> • Consider the Plan does not adequately control/limit growth of the Universities • The Plan should not include student expansion projections/numbers as these are subject to change – they should be included in a separate Student Accommodation Strategy • Off-campus student accommodation provision should be strictly controlled and further accommodation should be focussed on-campus only • Growth of HMOs needs to be better managed/controlled across the city as a whole e.g. limiting annual growth to a specified number or setting a lower proportion of properties that can be HMOs tailored to specific locations 	
Bath Park and Ride (Policy ST6)	Various, including Historic England, FOBRA and BPT	<p>A clear and robust case for East of Bath P&R (considered alongside and related to other transport measures) needs to be set out and the impact of a P&R on all heritage assets will need to be thoroughly assessed (including using the ICOMOS guidance).</p> <p>Policy on P&R should better reflect the need to balance protection of Green Belt/AONB against public benefits of P&R including to WHS through removing traffic.</p>	No change to the Plan – issue to be considered at Examination.

Appendix 2

Plan ref	Respondents	Issue	Recommended Action
		Less specific references to P&R as being the solution to transport problems in the city should be made, thereby enabling other solutions further out from the city e.g. park and link to be considered.	
Bath (site specific issues)	Various stakeholders, including developers and land owners	Range of specific issues raised on sites allocated for development. Key issues raised include: <ul style="list-style-type: none"> • SB2 (the Rec) – should make clear that additional car parking should not form part of development on this site • SB4 (Quays North) – should make provision for hotel uses and cultural/arts venue. Alternative solution for coach parking/drop needs to be identified. • SB7 (Sydenham Park/Green Park station) – policy too prescriptive in terms of uses and the design principles are too onerous. Sainsbury’s supportive of option involving their relocation but only if they stay on the wider site • SB8 (Westmark part of Western Riverside) and SB16 (Burlington Street) – policies should allow for student accommodation • SB11 (MoD Foxhill) – concern about impact of development on AONB 	No change – consider issues through Examination
Keynsham	Various residents and developers	Issues include: <ul style="list-style-type: none"> • Need to ensure re-provided Leisure Centre meets current/future needs 	No change – consider issues through Examination

Appendix 2

Plan ref	Respondents	Issue	Recommended Action
		<ul style="list-style-type: none"> • Infrastructure, including transport network, unable to cope with new development – ensure specific transport improvements are identified and delivered • Site specific issues e.g. employment floorspace in Somerdale and reference to Broadmead Peninsula opportunities 	
Somerset Valley	Various residents and developers	<p>Issues include:</p> <ul style="list-style-type: none"> • Vision for Radstock – refer to Radstock-Frome railway • Policy SV1 too restrictive by limiting housing to within the HDB • Objection to safeguarded land for educational purposes at Norton Hill as undeliverable and land at White Post (in association with housing development) within Mendip DC area being pursued by Education Funding Authority • Enterprise Zone references need to be accurate • Site specific issues e.g. policy requirements for Old Mills allocation and Welton Bibby and Baron site and Former St. Nicholas Primary School 	No change – consider issues through Examination
Rural Areas	Various residents, developers and Parish Councils	<p>Issues raised are primarily site specific. Key issues include:</p> <ul style="list-style-type: none"> • Timsbury - land East of St Mary’s Primary School (SR15): potential for access improvements to the school should be better facilitated as this was one of the major reasons for allocating the site. Extent of development area shown and dwelling capacity is too great; need to protect more land as LGS and concern about loss of views/viewing point; harm to 	No change – consider issues through Examination

Plan ref	Respondents	Issue	Recommended Action
		<p>rural character; and dangerous access onto North Road</p> <ul style="list-style-type: none"> • Timsbury – land south of Loves Hill should have been allocated as more suitable/less constrained than SR15 and enables housing needs to be met (also subject of a current planning application for 45 dwellings) • West Harptree – Leacroft House site (SR2) should not be limited to 17 dwellings given sustainability of village and site location • West Harptree is a RA1 village and additional site should be allocated • East Harptree – Pinkers Farm (SR5) should not be allocated or some policy criteria are too onerous • East Harptree – land at Ashwood, Church Lane should be allocated as it is more suitable/deliverable and less constrained than either site allocated in the Draft Plan and housing will help keep village facilities viable • Land at Hinton Blewett should be allocated for development (19 dwellings) to help address local need for affordable housing • Temple Cloud – two sites put forward for allocation to help meet strategic requirement and both also considered to be in sustainable locations and technical work shows suitable/deliverable 	