

Bath and North East Somerset Council Draft Core Strategy Representations by Plan Reference: Chapter 2 - Bath

Plan Reference: Chapter 2: Bath

Reference: 242\1 S

Respondent: Catherine Sourbut

Representation In particular I support and find sound

- (soundness):** a)the protection of the green belt surrounding Bath, including valuable farm land
b)the prioritisation of Brownfield sites for new housing development
c)the development of the MOD sites
d)the commitment to the environment and to protect local wildlife and habitats
e)reducing the housing numbers to represent a realistic need and affordable level of development and growth in the region
f)the development of western riverside
g)small scale infilling of new houses within existing neighbourhoods.
H)support of local farming and food production
i)the protection of the world heritage site and setting

I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 246\2 S

Respondent: Combe Hay Parish Council

Representation Particular elements of the Core Strategy Publication Version which are strongly supported by Combe

(soundness): Hay Parish Council.

12.The concept of the World Heritage Site and its Setting.

Page 52 paragraph 2.32

Page 53 paragraph 2.35

13.The expansion of the Odd Down Park and Ride site.

Page 56 paragraph 2.44

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\29

Respondent: Bath Heritage Watchdog

Representation Heading this section are inappropriate photographs. That view of the Buro Happold Offices (and note

(soundness): that they are happy in an old building!) is no longer available because the council granted permission for a strange timber structure reminiscent of a giant air filter against the end wall. The view of Bath is even more out of date, and if anything it just shows what destruction an unsympathetic council can wreak on a photogenic scene. The old picture of the centre of Bath when it was complete. The view today is completely different and it should be noted it was the local authority that were largely responsible for what we see today. The prominent tower of St James Church

was demolished to build Woolworths. 16th&17th Century houses and an elegant school behind it were demolished to make way for Marks & Spencers. Old Southgate was demolished to make way for a new concrete bunker with one of the then prominent new architects, who was feted and given an award for an unloved structure which was demolished after a very short life. It is now replaced by over-scaled 'pastiche' This is mentioned to highlight fears for our heritage because past events show it is at risk once the modernising bug strikes. The modern picture from the same viewpoint is far less picturesque.

Change sought to make sound: Use current pictures, not historic ones that can only serve to mislead.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\126

Respondent: Bath Heritage Watchdog

Representation (soundness): World Heritage, Regeneration and 'Place' is incompatible as a heading. Regeneration implies the replacement of something, which must reduce the heritage and damage the sense of place.

Change sought to make sound: Improve 2.05; Delete 2.07

make sound: Add a commitment to deliver the World Heritage Site Management Plan.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.01

Reference: 265\30

Respondent: Bath Heritage Watchdog

Representation (soundness): Setting the Agenda. While largely accurate the paragraphs tend to skirt around the Victorian and Edwardian eras, and fail to mention the contribution of Bath's industrial contribution to the world. The mills and foundries employed a large proportion of the population, and their products can still be found advertising Bath as their origin in many countries. This section completely ignores the fact that wartime bombing destroyed only about a thousand buildings, mostly in the suburbs, and it was the local authority that tore down vast swathes in the central area to accommodate the modernist reconstruction (most of the buildings were perfectly sound). There may have been debate about how Bath should change but the voice of the electorate has not been listened to. If the setting of the scene is not accurate, how can lessons be learned from the mistakes of the past?

Change sought to make sound: Rewrite this section to give a background that does not gloss over the true facts.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Bath: Strategic Issues

Reference: 102\7

Respondent: Federation of Bath Residents' Associations

Representation (soundness): Issue 10. Reference needed to the need for a Master Plan to tackle congestion and pollution in Bath.

Change sought to make sound: Alternative wording might be: "Bath suffers from high levels of congestion and air pollution throughout the main road network, including such iconic spaces as Queen Square and The Circus. A traffic Master Plan is required to address the problem. The spatial strategy should make the most of existing public transport infrastructure and planned investment so as to enable people to travel to and around the

city with less environmental impact and greater efficiency". (See FoBRA comment on Objective 2)

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\15

Respondent: Bath Green Party

Representation B3: Do you consider this list to be a reasonable summary of the key issues identified in the portrait?
(soundness): No.

a) We disagree with the second bullet point which identifies the need for growth. It should instead say "Make Bath a sustainable city with a diverse and resilient local economy which includes the production of the goods its needs and the provision of the services to maintain it. The city's economy should be built around the over-riding need to reduce CO2 emissions."

b) The fourth bullet point (about the river corridor) should include giving priority to creating public open space which includes safe walking and cycling routes into the city centre

c) The eighth bullet point (about tourism) should include taking the opportunity to make Bath an exemplar of 'green tourism' based on the reduction of CO2 emissions from this sector of the economy

d) We disagree with the need for continual development of the universities within the city, as this will create further pressure on the city's housing market. The geography of the city and the already identified need for housing development makes further development of the universities impossible to attain within the city. Any further development should take place in areas where there is less pressure on the housing market and a greater need for diversifying the economy with these types of jobs.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\2

Respondent: Duchy of Cornwall

Representation With reference to the Strategic Issues for Bath set out on page 29, the Duchy of Cornwall agrees that "**(soundness):** more housing and more affordable housing is needed to support economic growth", and that "there is a significant imbalance between the resident workforce and jobs," (extracts from paragraphs 6 and 7 on page 29 of the Core Strategy). In order to address these imbalances, there needs to be a commitment to providing a balance of jobs and housing in all new residential developments.

The Duchy of Cornwall adopts a model of providing at least one job per household in its sustainable urban extensions. At Poundbury, in Phases 1 and 2, we have achieved a ratio of more than one job per household, and in Phases 1 and 2 of the Newquay Growth Area we have recently achieved planning permission for this model.

Change sought to make sound: A sustainable urban extension on land West of Twerton could deliver this balance, through the provision of 1,500 or 2,000 homes with an equal number of jobs.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 256\3

Respondent: Councillor Andrew Furse

Representation •2a, para 12; there should be recognition of the (few) overseas and non-local students at City of Bath
(soundness): College.

Councillor Andrew Furse
Liberal Democrat,

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\31

Respondent: Bath Heritage Watchdog

Representation Point 2

(soundness): This must have been written by those who (wrongly) regard Bath's heritage as just the Georgian Core, and decry anything designed to blend into its surroundings as "pastiche" in order to promote contemporary change, without explaining what they mean by contemporary. The Georgians and others built what was contemporary for their day but it was based on a thorough understanding of the past, and Georgian Bath is in fact a pastiche of ancient Greece with some Roman influences. There is nothing inherently wrong with contemporary (or pastiche for that matter) provided it bears the character and scale and palette of materials that are embedded in 'Bathness'. But its advocates have a rather different style in mind, which makes the use of the word dangerous.

**Change sought to
make sound:** Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\32

Respondent: Bath Heritage Watchdog

Representation Point 3 Again the emphasis is on modern offices, and our comments on 1C Objective 3 and on DW1

(soundness): explain why this is inappropriate. The phrase "low carbon economy" is so unspecific as to be meaningless. See our comments on 1C Objective 1 for our interpretation of what this ought to mean.

**Change sought to
make sound:** Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\33

Respondent: Bath Heritage Watchdog

Representation Point 4 As written, it is acceptable, but elsewhere in the Core Strategy document there are proposals

(soundness): which will see the loss of industrial land and employment, so the document as a whole is contradictory.

**Change sought to
make sound:** Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\34

Respondent: Bath Heritage Watchdog

Representation Point 5 We question how this can be done given that currently approved plans are for a style of

(soundness): architecture that will spoil almost every view across Bath, and this document proposes a city in a state of upheaval and flux until at least 2026. Tourists will be deterred by large construction sites with their tower cranes, and they will be deterred even more by "contemporary" designs if they replicate what they could have seen anywhere else. Tourists enjoy the ambience of Bath, not just the few buildings that John Wood built.

**Change sought to
make sound:** Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\35

Respondent: Bath Heritage Watchdog

Representation Point 8 While we would not disagree with this as an overall statement, the currently favoured spurious **(soundness):** reasons such as the lack of a BRT bus route, lack of office space and a unacceptable and largely un-consulted vision should not be the drivers for redevelopment. Nor should there be development for developments sake. It must be argued that most recent developments hardly enhance the World Heritage Status and the Core Strategy does admit that it has been controversial. Building car parks on water meadows and allowing developers to ruin unspoiled valleys hardly indicate a willingness to protect the setting and the Green Belt. Recent history suggests that both the WHS and the Green Belt are secondary to a desire for development.

Change sought to Rewrite to address the points above
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\36

Respondent: Bath Heritage Watchdog

Representation Point 9. There is nothing to disagree with as written. But public realm has to be more than hard **(soundness):** surfaces and way-markers. Recent areas have promoted bland, sterile environments with few trees or green space. Finishes and/or product quality and/or workmanship do not appear to be up to the job as the debacle of Dorchester Street, the slate pavement in Milsom Place, the recently laid paving in Westgate Street, and St James Rampire prove. Apart from the areas around the main shops, there are poor standards of cleanliness and a reluctance to clear autumn leaves. It is also hard when Council departments are cutting staff to justify the amount of expenditure proposed, some of it for little return. We remember about £1m spent on Milsom Street just to create easily destroyed surfaces (including carved poetry in fancy writing) for the Park and Ride buses and delivery lorries to run over and damage.

Change sought to Rewrite to address the points above
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\37

Respondent: Bath Heritage Watchdog

Representation Point 10 Here we read the old chestnut of congestion. This mostly occurs at peak periods just as it does **(soundness):** in other cities. It is mostly caused by an excessive use of traffic lights: many of them create more problems than they solve, being cases badly sited and often badly phased. It could be argued one of the main causes is the buses. In Dorchester Street it is common to see buses blocking the progress of other buses. Frequent problems also occur in the relatively narrow streets in the suburbs from the over-sized bendy buses. It should be noted the current transport proposals have no obvious benefits, and there are bus lanes that cause so great a tailback that buses are stuck in the queue waiting to get to the start of the bus lane. There are build-outs for bus stops that appear to have no purpose other than to prevent other traffic passing a bus while it is stopped. The only thing that would enable more of the travelling public to use public transport would be reduced fares, see our comment on 1C Objective 7.

Change sought to Rewrite to address the points above
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\38

Respondent: Bath Heritage Watchdog

Representation Point 11 Old housing stock might not be as energy efficient as new buildings on a day to day basis, but
(soundness): it is certainly more sustainable as most of it has lasted some 200+ years, some six or eight times the life span of most of the current buildings. Our comments on 1C objective 1 give more details. There is an underlying concern that this issue is largely being used as a way to weaken or give more flexibility to policies currently protecting listed buildings, despite studies in hand to establish what is practical to improve the energy efficiency of listed buildings. There is an increasing use of energy consuming air conditioning in new builds instead of sash windows.

Change sought to make sound: Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\39

Respondent: Bath Heritage Watchdog

Representation Point 12 Agreed but the current situation where ordinary housing can be converted into student
(soundness): bedsits without needing planning permission also needs addressing. There should be a saturation Bath and North East Somerset's Core Strategy – Publication Stage Representation Form quota to prevent an excessive number of student dwellings in any given location, and HMOs should be classed as a business and the premises liable to business rates.

Change sought to make sound: Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\40

Respondent: Bath Heritage Watchdog

Representation Strategic Issues: Point1. This mentions characteristics and distinctiveness. These should be more clearly
(soundness): defines as "It is Bath and it has 'Bathness'." The approach to planning must be based on this above all else. Its success is based on the way it looks. Making it look like anywhere else to appease developers and architects' egos puts everything at risk. There need to be accurately defined design codes, and these must be enforced if the character of Bath is to avoid the death of a thousand cuts.

Change sought to make sound: Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\41

Respondent: Bath Heritage Watchdog

Representation Point 13 This strains credibility to breaking point when the council is prepared to interfere with a bat
(soundness): habitat in order to get a car park on Bathampton Meadows.

Change sought to make sound: Rewrite to address the points above

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 281\1

Respondent: Natural England

**Representation
(soundness):**

**Change sought to
make sound:**

Representation (legal compliance): Section 2 – Bath, Strategic Issues

Paragraph 13 – we are pleased to see that the Special Area of Conservation is included in the list of strategic issues for Bath and agree that care must be taken to ensure that the impact of change and development on bats is taken into account, however, the wording here needs to go further and specify that:

“in accordance with the Habitats Regulations, the impact of development on bats will be carefully assessed and mitigated if necessary.”

Change sought to make legally compliant:

Reference: 283\2

Respondent: Prior Park College and Paragon School

Representation 1b: Spatial Portrait and Key Strategic Issues

(soundness): The key strategic issues identifies that there will be a projected 17% increase in the number of 4-11 year olds in the district over the plan period. This will have a knock on effect within the future and it is therefore crucial that the Council plans and prepares for the expansion and enhancement of education facilities across all age groups.

Change sought to Summary

make sound: Prior Park College and Paragon School are very keen to protect its ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council needs to recognise the key role of the establishment and to plan for it's enhancement by continuing the College's designation as a major site within the Green Belt. If this designation is lost then the College will experience significant barriers to continue the ongoing programme of investment.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\9

Respondent: Stubbs Rich LLP

Representation Employment for All

(soundness):

I am fully in support of the policies (2a Strategic issue 4) which seek to increase employment opportunities within Bath. I agree that there is a need to secure skilled and semi-skilled industrial jobs as well as making provision for modern, flexible and efficient B1 space.

I agree with a comment made by David Trigwell, to Bath Architecture 2008, that the Bath Transport Package is one of the keys to supporting industry. Clearly significant need for manufacturing, over services, is the easy transport of materials and goods.

I agree that there is an opportunity to intensify the density of manufacturing space within Bath and support objective 3 which encourages this.

As has been identified in your economic studies, there is a market failure risk associated with the provision and intensification of workspace in Bath - in that rents are too low and construction cost too high. I encourage the Council to minimise the infrastructure burden placed on new employment development.

I encourage the Council to make a policy presumption in favour of employment development subject to the minimum threshold of conditions.

Climate Change Key Strategic Issue 1.12

I support this comment. Much stronger policy and other support will be required to achieve the carbon reduction figures than the proposed Core Strategy policies would achieve. The focus, as I objected to in the first consultation, is primarily on new development. By definition new development adds to the Carbon production of the area, no matter how sustainable that development is. I recommend the introduction of strong policy (and economic) support for retro-fitting the existing stock with energy reduction measures. It would, for example, make more sense for development to offset the expenditure on expensive onsite microgeneration by sponsoring the insulation and draft proofing of existing homes- the annual carbon saving would be 7 to 10 times greater for the same money.

The issue statement needs much stronger policy support particularly in favour of large scale wind turbines. Planning objections to these has derailed over 90% of current applications throughout the UK and if the Council is to have any prospect of fulfilling its carbon reduction goals, presumption in favour of large scale wind turbines. Planning objections to these has derailed over 90% of current applications throughout the UK and if the Council is to have any prospect of fulfilling its carbon reduction goals, presumption in favour of large scale wind turbines is essential for them to overcome the planning objections.

Specific comments

2a.Strategic Issue 7. How does the outbound and inbound employment flow compare with other economically vibrant cities? It is evident that flexibility supports growth and that a desirable level of float is beneficial to any system. What is that level, in terms of commuting, and by how much does Bath need to redress this imbalance to maintain economic growth?

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\4

Respondent: Liberal Democrat Group

Representation Strategic issues, point 12

(soundness): Factual amendment – the strategy should take account of the non-local (e.g. overseas) students at the City of Bath College who are relevant to the student housing market. This could be used throughout the document, perhaps by referring to “higher education providers”.

Change sought to make sound: “The development of the University of Bath, Bath Spa University and the City of Bath College requires strategic policy direction in order to secure the future of each institution and to ensure that the student population does not continue to drive the student lettings market to the detriment of the normal private housing stock and existing communities”.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.04

Reference: 306\1

Respondent: Bath Tourism Plus

Representation Dear Mr Trigwell

(soundness):
Core Strategy Consultation

I am writing on behalf of the Board of Directors of Bath Tourism Plus (BTP) in response to the publication of the Draft Core Strategy.

Background

The visitor economy is a key contributor to the prosperity of Bath and North East Somerset earning £330m p.a. and supporting 8,200 jobs. It receives 850,000 staying visitors and 3.5m day visitors. BTP is very supportive of the overall emphasis and direction of the Core Strategy and welcomes the recognition given to the economic contribution made by the tourism sector. In particular it supports the following statements:

- The strategy for the city must sustain the critical contribution of tourism to the economy. This means protecting and enhancing the characteristics that make the city special and ensuring that an appropriate level and range of visitor accommodation is maintained.
- The conservation and enhancement of the World Heritage Site (WHS) and its setting must be reconciled with contemporary socio-economic and environmental challenges, including climate change. Bath's WHS status and environmental quality is not an obstacle to economic growth – it is part of a strong 'brand', an incentive to and enabler of growth – however it does require that contemporary change is managed sensitively and that high quality design is achieved.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 306\2

Respondent: Bath Tourism Plus

Representation (soundness): In 2007 the B&NES Destination Management Plan (DMP) confirmed that Bath should focus on growing the economic contribution from visitors by developing the staying visitor market. The DMP identified accommodation supply as a constraint on growth and recommended a detailed study to inform planning decisions.

In 2009 the B&NES Accommodation Study confirmed the need to increase the number of rooms available to visitors. BTP accepts the recommendations of the B&NES Accommodation Study on the scale of supply needed to 2026. We welcome the fact that the Core Strategy recognises this need and makes provision for growth. BTP's view is that action in relation to accommodation supply is a priority and that failure to act will have the following implications for the destination:

- It will constrain the growth of leisure and business tourism.
- People may still visit Bath but stay elsewhere, adding to congestion without bringing wider economic benefits.
- An opportunity will be lost to create employment and jobs and add to economic diversity.
- An opportunity will be lost to complement related strategies. For example, the B&NES Retail Strategy emphasises the importance of refreshing the offer and achieving a mix of independent and mainstream provision. Improving the range of accommodation means that we can offer a complete experience to the visitor. Investment in upgrading visitor attractions, such as the Holburne Museum, will not be maximised and the opportunities created by developing events will be constrained by limited supply of rooms.

Now that we are unified in our view about the need for development, it is important to ensure that this growth is managed and that we collectively deliver the vision outlined above of sustainable development and well considered, high quality growth.

The Accommodation Study advocated that B&NES should be clear in stating the type of development that is right for the market and BTP fully supports this recommendation. Our view of priorities is as follows:

1. That priority should be given to bringing a conference facility on stream. This will need to be opportunistic, but if it can be realised by working with a hotel operator, then this should be encouraged. This will bring benefit to all accommodation providers in Bath and make better use of the existing infrastructure.

2. A four star internationally branded hotel – especially if a prospective operator can provide conference facilities as part of the development.
3. Boutique hotels – independent and branded
4. Branded budget provision – to be developed on peripheral sites

The study identified the fact that there is strong interest from developers and we need to work together to ensure that high quality development is what is delivered. We recognise the constraints in the planning system, but look to B&NES to exercise leadership in shaping the city in line with the aspirations in the Core Strategy. As the Accommodation Study said,

Planning policies alone are a blunt instrument for determining the scale, shape and mix of accommodation development. If the Council wants to directly influence the shape and size of the accommodation offer it will need to take a more pro-active role in terms of targeting selected hotel operators and developers, allocating sites for hotel development in the City centre, bringing together developers and hotel operators, and using its own land holdings to secure specific outcomes.

Other Concerns

The Core Strategy has been developed over a number of years, but the consultation is being done against a background of policy change being introduced by the Coalition government. BTP asks that B&NES takes full advantage of the opportunities presented by the localism agenda to shape development.

A good example of this is in relation to car parks. The BTP board also made a recommendation in relation to the parking as follows: New hotel development in the city should be required to make provision for parking. Failure to make this a requirement will put pressure on limited provision, reduce the quality of the visitor experience and increase the potential for tension between residents and visitors. BANES should facilitate this by working with developers to allocate designated parking spaces if a site, such as a boutique hotel, has no prospect of space on the development site.

On 3rd January 2011 the Coalition Government issued a press release outlining the intention to 'free up' local authorities in relation to car parking. An extract from the release says, Communities and Local Government Secretary Eric Pickles said:

"Whitehall's addiction to micromanagement has created a parking nightmare with stressed-out drivers running a gauntlet of unfair fines, soaring charges and a total lack of residential parking. The result is our pavements and verges crammed with cars on kerbs endangering drivers, cyclists and pedestrians, increased public resentment of over-zealous parking wardens and escalating charges and fines. "Today the Government is calling off Whitehall's war on the motorist by scrapping the national policy restricting residential parking spaces and instructing councils to push up charges. We expect councils to follow suit. From now on communities have the freedom to set competitive local charges that bring shoppers to the high street, proportionate enforcement and the right number of spaces for new development. We're getting out of the way and it's up to councils to set the right parking policy for their area."

In summary, BTP is excited by the opportunities for increasing the economic contribution from tourism and we welcome the vision set out in the Core Strategy. In our view what is now needed is the same visionary thinking in relation to delivery. We look to B&NES to take ownership of the implementation and to take a lead in ensuring that the vision of high quality, long term, development is what actually happens. BTP is keen to play a part in this and will support B&NES in any way it can.

Yours sincerely

Robin Bischert
Chief Executive

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.05

Reference: 265\127

Respondent: Bath Heritage Watchdog

Representation 2.05 Recommendations from the World Heritage Committee included enhanced protection of the **(soundness):** setting, and a number of recommendations for the Western Riverside. If there is a genuine desire to achieve all that is stated, embodying these recommendations in the strategy would be a good place to start. The summary of the Outstanding Universal Value omits the reference to Bath's visual homogeneity which is embodied in the criteria, and which is clarified in the Management Plan as a need to meet the test of authenticity in design, materials, workmanship or setting.

Change sought to Improve 2.05; Delete 2.07

make sound: Add a commitment to deliver the World Heritage Site Management Plan.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.06

Reference: 265\128

Respondent: Bath Heritage Watchdog

Representation 2.06 The vision referred to was largely not offered for public consultation to a sufficient degree. What is **(soundness):** have here are all the buzz words and soundbites in order to facilitate what are now termed 'modernist interventions'. Bath does not need to be re-branded and identified. We know where we are and where we live. We know what we like about it, and it is good enough to attract the tourists. And the need to preserve the Outstanding Universal Value places severe limitations on what is permissible in a contemporary context.

Change sought to Improve 2.05; Delete 2.07

make sound: Add a commitment to deliver the World Heritage Site Management Plan.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.07

Reference: 265\129

Respondent: Bath Heritage Watchdog

Representation 2.07 Giving Bath a 21st Century identity is directly contrary to the World Heritage Management **(soundness):**

Change sought to Improve 2.05; Delete 2.07

make sound: Add a commitment to deliver the World Heritage Site Management Plan.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\130

Respondent: Bath Heritage Watchdog

Representation The reference to places and neighbourhoods is merely the introduction of a policy of zoning without **(soundness):** using that word. It has been tried elsewhere and it has been an unmitigated failure. In fact underneath

the misleading descriptions are just the sort of developments that qualify for the description “ill conceived proposals”, that the current generation, let alone the next one will roundly condemn. This is a recipe for losing the World Heritage Status, and has no place hiding under this heading: if certainly has no place in a Core Strategy.

Change sought to Improve 2.05; Delete 2.07

make sound: Add a commitment to deliver the World Heritage Site Management Plan.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 306\3

Respondent: Bath Tourism Plus

Representation • The Bath spatial strategy has been prepared with this regeneration agenda in mind so that it

(soundness): contributes to the realisation of a distinctive and authentic 21st century identity for the city. As an international cultural asset, well considered and high quality growth is a key principle guiding the overall level, type and design of new development. The strategy prioritises the creation of enduring developments, places and neighbourhoods over ‘planning by numbers’ in order to deliver relatively short term targets. It seeks to shape development that will be appreciated and used well into the future and deflect ill conceived proposals that might be rejected within a generation.

Change sought to

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.08

Reference: 265\42

Respondent: Bath Heritage Watchdog

Representation 2.08 The Public Realm and Movement Strategy, whilst it has its roots in some good ideas and

(soundness): supportable aims, has led to an interpretation of some of these which is highly questionable. There is a feeling that despite considerable input from the locals, the programme is driven by those who lack a specialist knowledge of the city. It is also too targeted almost exclusively at the city centre, with the total neglect of certain areas.

Change sought to Include proposals for areas not covered by the Public Realm and Movement Strategy. Revisit the

make sound: proposals for street furniture by airing them for a proper public consultation.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Bath: The Vision

Reference: 132\1 S

Respondent: The Southgate Limited Partnership

Representation The overall spatial vision for Bath is supported. There is an acceptable balance between preserving the

(soundness): distinctive character of Bath with the need to ensure economic growth and strengthen Bath’s role as an important regional centre in the South West. Although the key stated objectives are supported, they do not take account of recent developments and improvements in Bath, such as SouthGate which have provided an enhanced and more attractive centre and enhanced Bath’s status by providing opportunities for sustainable city centre living, the provision of major new quality retail space and significant public transport improvements.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\16

Respondent: Bath Green Party

Representation B4: Does the vision capture the themes and ideas that should guide the future development of the city?

(soundness): No, it does not recognise the over-riding need for reducing CO2 emissions. Comments under B1-3 also apply here.

B5: Do the objectives successfully break down the vision into a series of specific goals against which to evaluate a strategy for Bath?

No, it specifically needs to also include points about:

a) Local food production

b) A local energy policy with the development of renewable energy production within B&NES

c) A local waste management system so that we are not reliant on 'exporting' waste to be disposed of elsewhere.

Point 8 also needs to affirm the priority which needs to be given to walking and cycling within the city.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 276\4

Respondent: Hignett Family Trust

Representation The proposed Vision for Bath does not reflect the feedback from the consultation process, or the SCS,

(soundness): nor does it address the key spatial development challenges that Bath faces. These were succinctly set out in Section 3 CSSO, page 75, see extracts below:

"Confirmation of the key spatial development challenges for Bath

3.20 Public responses to the 2007 Core Strategy Launch document and the Future for Bath & North East Somerset, the results of the various studies undertaken and our continuing contact with government agencies, local interest groups, surrounding parish council's, and other public service providers confirm that the key spatial issues and challenges facing Bath are:

The need to:

- Conserve and enhance Bath's built and natural environment, protect the outstanding universal values of the World Heritage Site and to manage change so that it reflects positively on Bath's international profile.
- Maintain Bath as an important economic and employment centre, enabling a realistic level of growth and job creation.
- Respond to housing shortages both of open market, social rented and intermediate properties and to bring forward a suitable mix of housing types and sizes.
- Physically regenerate large areas along the river corridor.
- Successfully integrate a new neighbourhood into the urban fabric of the city.
- Make sure that the shopping experience offered by the city centre is maintained and enhanced and to turn around the deterioration of the public realm.
- Make sure that local convenience shopping needs are well catered for.
- Maintain the city as an important visitor destination and manage the environmental impacts of tourism.
- Support the development of the universities and address the need for student accommodation.
- Make sure new development contributes to investment in social infrastructure and community facilities including school buildings, school places, healthcare, and leisure.

- Improve access into, and circulation within, the city by modes other than the car and to alleviate congestion.
- Underpin the spatial structure of the city with a green infrastructure network both to protect and enhance natural assets for their inherent worth and for recreational purposes.”

The text of CSSO goes on to explain:

“3.21 If these challenges are not addressed Bath’s standing relative to other domestic and international cities will decline across a wide spectrum of socio-economic and environmental indicators. Change is inevitable and in many instances desirable but it needs to be managed sensitively so that Bath becomes an incrementally better place to be.

3.22 The spatial vision proposes the key aims and ideas that will guide the evolution of Bath over the coming years. It is informed by an analysis of the characteristics of the city, the challenges it faces and the direction provided by the Sustainable Community Strategy, the Council’s Corporate Vision for Bath and North East Somerset, the Regenerative themes of the ‘Future for Bath and North East Somerset’ and the draft Regional Spatial Strategy for the South West.

3.23 Bath is a place of well-marked individuality and the spatial vision sets out to make sure that change is well managed to serve the well-being of residents, businesses and visitors whilst enhancing the city’s profile. Bath must be a ‘living city’ that accommodates the changing circumstances of a wide range of people whether they are making good or falling on hard times, settling down or breaking up, fitting in or dropping out, growing up or growing old.”

The new text for the Vision becomes much more about protecting the city against change, centralizing its development options to the Central Area and Western Corridor and the growth of a low carbon economy. The key political driver to avoid the need for any ‘urban extension’ to the city, is the desire to only focus on brownfield sites thereby limiting growth and investment. This ‘one option’ approach, ignores the huge challenges and uncertainty that comes with these sites. Their delivery is not proven, nor has the evidence upon which they are based, been subjected to scrutiny, including the SHLAA. It will be as part of this CS Inquiry process. The history of Bath’s reliance on these very options is amply demonstrated in the output from the Local Plan 2007, which shows a complete lack of delivery of jobs and homes in the City (see AMR) set against much more modest targets and a period of stronger economic growth. The continuing decline in Bath’s economy will be guaranteed with this Vision and this Strategy, as we move into a period of no/low public investment in economic growth in our cities and a dependence on the private sector. The Vision is full of great words but it is not founded in realism and will therefore suit those that seek little change and who are comfortable with the status quo.

The Vision should therefore reflect upon the realistic needs of the city for all, not just a small narrow group who prefer to conserve it at all costs. It is summed up by the 3 paragraphs, 3.21 -3.23 above, from the Council’s CSSO. The Vision should therefore be reworded taking the words from the CSSO page 79, Bath Spatial Vision, see below.

The Vision should provide proper support for the New Neighbourhood which will show the Council’s recognition of its role in securing Bath’s economic success whilst reducing carbon emissions.

Change sought to Action: Delete the Vision, 2b, on page 32 and replace with the following text from the CSSO, page 79*.

make sound: * the word “south” has been added to the text to properly reflect the geographic orientation of the proposed New Neighbourhood at Odd Down.

The Bath Spatial Vision Bath’s identity, founded on its cultural and built heritage, thermal springs and landscape setting, encapsulated in its designation as a World Heritage Site will be enhanced as the need for change is harnessed to strengthen its role as an attractive place for people to live and work and an appealing destination for shopping and tourist visitors.

Bath will be a prosperous and productive city with a buoyant, resilient and diversified carbon conscious economy, supported by an educated and multi skilled work force. The wealth created locally will benefit the sub-region as a whole and improve its competitive position both regionally and nationally.

Regeneration along the river corridor and the realisation of urban renewal opportunities within the

central area will make a clear statement of Bath's ambition for the future, whilst respecting and complimenting its cultural inheritance and renowned urban design traditions. The regenerative themes of water and well being, pleasure and culture, imagination and design, knowledge and invention and living heritage will combine to shape the evolution of the core part of city during the first part of the 21st century.

Economic development and employment growth will be supported by new housing, mostly within but also adjoining the city and tailored to a range of household types. Residents will benefit from a high quality range of health, educational, and recreational services and facilities that combine to enhance the liveability of existing neighbourhoods.

A new neighbourhood will grow as part of a mixed use urban extension to the south, south west of the city. Bath will draw its history of city building to create a contemporary model for long term urban development, demonstrating par excellence the integration of architecture, landscape setting and functionality.

Residential neighbourhoods will be served by vital and viable local service and shopping hubs which provide for the day-to-day needs of the suburbs. Residential areas will be linked to the city centre via sustainable modes of transport, whilst movement into and across the city will be managed to ensure efficient circulation and access in a manner that allows more environmentally responsible travel choices to be made.

New development both within and adjoining the city will be designed to enhance its surroundings and the impact on the wider environmental commons will be mitigated through sustainable construction methods.

As a tourist destination Bath will be a place which people aspire to visit not only for its built environment and historical interest but because it is simply an enjoyable place to be. A beautiful city, widely known, highly regarded, and in the premier league of historic European destinations. A vibrant, distinctive place with a strong independent and creative spirit reflected in the range and variety of its shops restaurants, cultural life, places to stay and access to beautiful countryside.

The text accompanying the Vision found at 2a , paras. 2.01 -2.09 will need change to reflect the changes , including the New Neighbourhood.

The Strategic Issues 1-13 on page 29 will need change to reflect the need for a flexible approach to secure delivery including a New Neighbourhood, the challenges facing the council by lack of delivery, loss of public sector employment over the next decade, climate change problems facing the City ie flooding , air quality congestion, ageing population etc etc.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 5: Bath Spatial Strategy

Reference: 143\5

Respondent: Bathampton Parish Council

Representation Indeed, the maintenance as open countryside in the Green Belt of the River Avon valley bottom land
(soundness): immediately east of the WHS should be declared in the CS as an immutable principle and clearly expressed in geographical terms on Diagram 5 (page 33).

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 162\5 S

Respondent: Batheaston Parish Council

Representation Bath Spatial Strategy Page 57 Diagram 5

(soundness): We strongly support the recognition of the River Avon corridor east of Bath as a key asset by its recognition on Diagram 5. However, we find the depiction of Bath Spa University and an east of Bath park-and-ride site at Bathampton Meadows in identical diagrammatic notation as confusing. For the reasons elucidated in our Representation 10 we oppose the latter and there recommend its diagrammatic representation be deleted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 162\11

Respondent: Batheaston Parish Council

Representation (b). Bathampton Meadows Park-and-Ride site

(soundness): Batheaston Parish Council continues to oppose the Bathampton Meadows Park-and-Ride site proposal for the following broad physical planning reasons:

1. B&NES's own consultants admit the development would have no significant relief from traffic congestion or traffic-generated air pollution is claimed for the development by the LPA;
2. It would offer no contribution to relief from the manifold other deleterious effects of heavy goods vehicle traffic passing through Bath along London Road and through Cleveland Place and Bathwick;
3. Traffic currently diverting to minor residential routes as a result of delays in London Road Bath would return;
4. The existing bus lane in London Road is served by 5 frequent stage-carriage bus services with 2 stopping places in the reserved lane; it is also used by cycles, motorcycles, and taxis;
5. The necessary consequent loss of on-street parking in Walcot Street and London Road would have a deleterious effect on existing commercial frontages, particularly Walcot Street's 'Artisan Quarter' activities.
6. The development would encroach on the Green Belt and neighbour the Cotswold AONB in a location which should form part of a geographically-defined open green buffer zone around the City of Bath World Heritage site. These 2 elements together are an important integrated component of an outstanding local scene;
7. The planned provision of 1400 spaces falls far short of the B&NES Council's estimate of the 1800 spaces needed, yet the physical constraints at the site would prevent any future expansion;
8. The scheme is one of four comprising the Bath Transport package which has been declared by the courts to be an integrated commitment; the business case for it does not take important issues into account.
9. The claim that the Package as a whole will save £700 millions over 80 years is inaccurate and covers too long a time span. Its forecast costs outweigh any benefits.
10. Within the last 10 years the use of the site for development has been rejected on several occasions either by the LPA itself or on appeal on the ground of its detriment to the environment.

If the Bathampton Meadows Park-and-Ride site be rejected the solution to the problem of the provision of an alternative location east of Bath may only be feasible in the area of another LPA. However, the latest estimates produced by the LPA show a greater proportion of traffic entering Bath from the north (A46) than from the east (A4). Though there would still be substantial traffic originating from the A4 this nevertheless indicates the need for a review of possible sites alternative to Bathampton Meadows, which should be deleted.

Change sought to make sound: (ii) On Diagram 5 delete 'East of Bath Park and Ride (NEW)' and show a diagrammatic representation of a Buffer Zone around the World Heritage Site.

Representation (legal compliance): The claimed public support for the scheme does not truly reflect the results of such public participation as was carried out in the devising of it. From the abandonment of the proposal to

establish a park-and-ride site at Lambridge, on land currently the training ground of Bath Rugby, the preparation of the Bathampton meadows scheme was pursued in secrecy until the publication of the completed planning application, when 2 presentation meetings, claimed as 'consultation' by the LPA, were held. We maintain this was wholly contrary to the LPA's adopted Statement of Community Involvement as the community was not consulted during the formulation of the proposal..

Change sought to make legally compliant:

Reference: 227\8

Respondent: London Road Area Residents Association

Representation Both diagrams 4 & 5 show 'Flood Storage Facility' as pink/orange dots within the river and in areas
(soundness): which are surely already in the flood plain of the river Avon.

In addition in Diagram 5 a small part of the railway is also included in the Area of search for location of Flood Storage facilities. This surely cannot be right and would lead to subsidence of the railway track.

Change sought to make sound: The dots should be removed from Diagrams 4 & 5 and a new map showing Areas of search for Flood Storage included in the Flooding section on pages 112 - 113

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\15

Respondent: London Road Area Residents Association

Representation i) The cancellation of the Regional Spatial Strategy plan for extra housing at Newton St Looe removes
(soundness): the pressure to enlarge Newbridge Park and Ride and further weakens the case for a dedicated Rapid Transit Bus route and the associated Compulsory Purchase Orders.

ii) The proposal to site a new Park and Ride on the ancient water meadows of Bathampton is contentious, unsound and in conflict with PPS 25 and various other policies. It will achieve none of the hoped for improvements to congestion and air quality locally or in Bath (as agreed by B&NES officers at the time of the planning applications) and will be a blot on the beautiful surrounding landscape as agreed by the Inspector at the 1990 Public Inquiry and several other reports since.

iii) After the removal of the unsuitable Lambridge site from the BTP, there was inadequate public consultation (in fact none!) on the selection of a more suitable alternative. Bathampton Meadows was announced as a fait accompli. However this site is overlooked by thousands of residents, is also too small and incapable of expansion because of the River Avon flood plain nearby.

iv) Sites in Wiltshire and South Gloucestershire were not considered and Charney Down airfield was discounted without proper examination. Considering that a large number of P & R customers come from neighbouring authorities these possibilities should have been more seriously investigated.

v) The beautiful landscape entry to Bath by road and rail (whether from east or west) is too important to be damaged by inappropriate developments and should be protected not only by Green Belt and Cotswold AONB designations but by World Heritage status and local policy protection.

vi) The supporting document for CP5 – Flood Risk Management actually suggests the possibility of using Bathampton Meadows as one possible site for Compensatory Flood Water Storage – presumably by lowering the land height of the car park. Alternatively will a reservoir be built deep below ground and then roofed over by a car park for 1400 cars ?

Flood compensation plans have already been rejected as intrusive and environmentally damaging by the council in the past and other consultants studies since have agreed that the harm done to this green valley could not be justified.

Change sought to make sound: i) Remove 'Expanded' Newbridge and 'New' East of Bath P&R sites from Diagram 5.

ii) The Bath Transport Package is flawed, out dated and unacceptably expensive (however it is to be funded). It should be thoroughly examined and the unsound elements within it should be dropped with the same rigour that the Coalition Government has grounded Harriers, cancelled Nimrods and withdrawn HMS Ark Royal ! Many of Bath's transport needs could be met by more and more efficient use of the existing Rail Infrastructure – upgrading the signalling between Keynsham and Bathampton would be a valuable start.

iii) As most P & R customers will have travelled from or through Wiltshire or South Gloucestershire it would seem more appropriate for plans for new Park & Rides to be over the boundary within the area

of those local authorities.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 246\15

Respondent: Combe Hay Parish Council

Representation The Core Strategy is unsound because –

- (soundness):** a. The Former Fullers Earth Works is incorrectly identified as the Former Fuller's Earthworks.
b. The settlement of Combe Hay is not identified, although the Combe Hay Parish boundary is contiguous with that of the City of Bath.

Change sought to a. Identify the Former Fullers Earth Works as such (not as the Former Fuller's Earthworks).

make sound: b. Insert the settlement of Combe Hay.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 257\7

Respondent: Valley Parishes Alliance

Representation We strongly advocate the recognition of the Avon Valley east of Bath as a distinctive key asset should

- (soundness):** be shown on Diagrams 4 and 5. For reasons elucidated in another representation we consider the diagrammatic representation of Park and Ride site at Bathampton meadows should be deleted. The Kennet and Avon Canal is dealt with separately in the representation on Policy CP7.

Change sought to Recognise the Avon corridor east and southeast of Bath as a key asset on Diagrams 4 and 5.

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\131

Respondent: Bath Heritage Watchdog

Representation The first thing to comment on is the map with its blue shaded central area. It is perhaps no coincidence

- (soundness):** that the boundaries appear to confirm what others call the 'Georgian' or Historic core, but the discrepancies between this map and that used later in 2.16 need to be resolved.

Change sought to Align the boundaries of the areas shown in the various maps.

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\132

Respondent: Bath Heritage Watchdog

Representation The annotation box says the historic character must be protected, which implies that the character of

- (soundness):** areas outside this central area are not similarly constrained. There is an extant SPD called the City Wide Character Appraisal which defines the character of each part of Bath and this should take precedence over vague strategic statements. Other areas are designated as having a specific use. This is back to the discredited policy of zoning; a policy which can only harm Bath.

Change sought to Clarify that protecting the character applies to all areas of the city.

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\133

Respondent: Bath Heritage Watchdog

Representation There is a discrepancy between the Objective of additional jobs alongside additional housing and the **(soundness):** assumption implicit in the note on the map that it is sufficient to lose thousands of MOD jobs and only to use the land thus freed for homes.

Change sought to make sound: Delete reference to MOD Ensligh.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\134

Respondent: Bath Heritage Watchdog

Representation We note the area for flood storage includes the Limpley Stoke Valley. Not only is it in Wiltshire, and **(soundness):** therefore not under B&NES control, but it is an area of special scenic value and the Valley Parishes Alliance (a united group of parish councils in the area) will fight tooth and nail to preserve it as it currently is. All the indications are that the Flood Storage aspirations in the Core Strategy will never be realised.

Change sought to make sound: Delete the references to flood storage that are outside the B&NES boundary.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\4

Respondent: The Bath Society

Representation 1.The cancellation of the Regional Spatial Strategy plan for extra housing at Newton St Looe removes **(soundness):** the pressure to enlarge the Newbridge Park and Ride and weakens the case for the dedicated Rapid Transit Bus route and the associated Compulsory Purchase Orders.

Change sought to make sound: remove referenve to BTP

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\5

Respondent: The Bath Society

Representation 2. The proposed Park and Ride site on the ancient water meadows of Bathampton is unsound and in **(soundness):** conflict with PPS 25. It will not achieve any of the hoped for improvements in traffic congestion and air quality locally or in the City generally (agreed by B&NES planning officers at the time of the planning applications). and will be a blot on the surrounding landscape as agreed by the Inspector at the 1990 Public Inquiry ..

3. After the removal of the unsuitable Lambridge Park and Ride site from the BTP, there was no public consultation on the selection of alternatives. Bathampton Meadows was announced as the site despite it being overlooked by thousands of residents, is too small and incapable of expansion because of the River Avon flood plain nearby.

4. Sites in Wiltshire and South Gloucestershire were not considered and Charmy Down airfield was discounted without proper examination.

5. The beautiful landscape entry to Bath by road and rail (whether from east or west) is too important to be damaged by inappropriate developments and should be protected not only by Green Belt and Cotswold AONB designations but by World Heritage status and local policy protection.

Change sought to make sound: 1.Remove 'Expanded' Newbridge and 'New' East of Bath P&R sites from Diagram 5.
make sound: 2.The Bath Transport Package is out dated and unacceptably expensive. It should be thoroughly examined and the unsound elements within it should be dropped. Many of Bath's transport needs

could be met by more and more efficient use of the existing Rail Infrastructure.

3. As most P & R users will have travelled from or through Wiltshire or South Gloucestershire it would seem more appropriate for plans for new Park & Rides to be over the boundary within the area of those local authorities.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\6

Respondent: The Bath Society

Representation 6. The supporting document for CP5 – Flood Risk Management suggests the possibility of using Bathampton Meadows as one possible site for Compensatory Flood Water Storage. Flood compensation plans have already been rejected by the council in the past as intrusive and environmentally damaging. Other consultants' studies since have agreed that the harm done to the valley could not be justified.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\32

Respondent: The Bath Society

Representation Diagram 5 Bath Spatial Strategy does not really show very much, but does, at least, act as a useful point of reference to the five 'sub-areas' which are each the subject of more detailed proposals.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 283\4

Respondent: Prior Park College and Paragon School

Representation Diagram 5 – Bath Spatial Strategy
(soundness): The College & Paragon School objects to the Bath Spatial Strategy diagram as it does not identify or define the College site which is currently designated as a major developed site within the Green Belt and seeks a new designation for the Paragon Site for the reasons stated above. Other major institutions such as the University of Bath and Bath Spa University are identified. The College seek clarity on the future of the designation, and request that the College is identified as a major developed site in the Green Belt.

Change sought to make sound: Summary
Prior Park College and Paragon School are very keen to protect its ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council needs to recognise the key role of the establishment and to plan for its enhancement by continuing the College's designation as a major site within the Green Belt. If this designation is lost then the College will experience significant barriers to continue the ongoing programme of investment.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 297\4 S

Respondent: Bath Rugby Club

Representation Page 33, Diagram 5

(soundness): We support the Inclusion of the Recreation Ground with the 'Central Area' definition.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy B1: Bath Spatial Strategy

Reference: 6\1

Respondent: Lady Christine Eldon

Representation I was shocked to hear that a draft replacement for the Local Plan has been published, just days before Christmas, using information proposed by developers to assess the suitability of the Lower Field of Beecham cliff School for housing development. Given that this foolish idea was rejected by the Council only 3 years ago, I find it incredible that this suggestion has been resurrected, especially in light of the increase in numbers of pupils at Beecham Cliff, and the greater emphasis placed by the Government on green infrastructure and the need for school playing fields. There has been no consultation with local residents, and the Strategic Housing Land Availability Assessment (SHLAA) is contrary to our views on many fronts, namely:
The SHLAA ignores the powerful arguments against the proposal set out by the Council in 2007 ,
The SHLAA ignores the effect on the setting of the listed Devonshire Buildings,
The SHLAA ignores the land's role as a green wedge and wildlife corridor, as well as Policy BH.15 on visually important open space,
The SHLAA ignores the current permissive use of the land for informal recreation by local residents,
The school has a real need for the playing field space, more so now than before, given the increase in school numbers,
Greenway Lane has frequent traffic issues, which will only be exacerbated by further development.

I urge you to reject these moves by developers to re-zone the land for housing when it is of such vital importance to Beecham Cliff School, and all the community around Greenway Lane.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 12\1

Respondent: Ms Molly Conisbee

Representation I wish to express my concern at the possible use of part of Beechen Cliff School playing fields for housing development. Green spaces are vital green lungs for any community, and the fields are used by many of us local residents for walking and other leisure purposes, as well as for sporting activities in the school.

There are a number of reasons why development on the fields would be inappropriate (apart from the seeming lack of local consultation). These include:

- Development runs roughshod over the views of local residents (at a time when Government are supposed to be handing control back to local communities)
- Space to exercise is crucial for growing young people and local residents who use the lower field (especially for older people, or those who have limited time or ability to access further afield for walking)
- We will lose green space for wildlife to thrive in
- We will experience even heavier traffic on surrounding roads (frequented by children walking to school) that are already used as rat-runs

Once we lose green spaces they are never reclaimed. It would be shortsighted in the extreme to allow development on this site; it will create no less than the privatisation of a valuable and valued civic

space.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 13\1

Respondent: Ms Annabel Jackson

Representation I am writing to oppose any suggestion that the Lower Field is suitable for housing development:

- (soundness):**
1. There are a growing number of families in the area and it is essential that we retain our open space for current and future families who will move into the area. I have been in the area for ten years and the number of children on Lyncombe Hill has increased from perhaps ten to well over 60: in another ten years similar changes might be expected.
 2. We already have serious traffic problems. Any increase in traffic must be seriously resisted. Where we are, at the top of Lyncombe Hill, the cars turn the corner very fast, we have no pavement and have to stand in the road to cross, and risk being hit by the speeding cars. We have notified the Council on many occasions about this serious risk, but this is not an easy problem to solve.
 3. Housing land targets have been reduced since 2007. There is even less of a case for developing the Lower Fields now than in 2003. Furthermore there are massive housing developments in the pipeline, at Southgate and the Riverside, for which demand has yet to materialise.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 14\1

Respondent: Mrs G. Lewis

Representation I understand the school has a strong need for the sports fields, especially since the government has

- (soundness):** reversed its decision and is now more formally promoting sport again. The land currently is a wildlife corridor and a green lung, and I have a horror at the thought of extra traffic.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 15\1

Respondent: Ms Jenny Newbury

Representation I am writing to express my objections to housing development on this land for the following reasons:

(soundness):

For a school of its size, Beechen Cliff is not over-endowed with playing fields and the loss of the lower field would be a severe loss. Although the piece of land in question is not level it provides a very useful exercise and practice area for the students. To lose it would confine the boys to an unacceptable extent and it would be a detrimental and irreversible step.

Housing development on this land would be a major loss of open green space for the local community and wildlife. It would also increase traffic congestion in the Greenway Lane area which is already a concern.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 16\1

Respondent: Mr Tom Battersby and Ms Tracey

Representation As the headmaster believes that the playing fields are required and pupil numbers have risen since the
(soundness): last time this issue was considered, we do not wish to see the already pressed sports facilities reduced.

In addition to the above, we feel that there are a number of other reasons for objecting to this potential change of use, namely:

- The Strategic Housing Land Availability Assessment (SHLAA) goes against the views of local councillors on this issue.
- Housing land targets have been reduced since this was last considered in 2007, so if the land was not appropriate for housing use then, surely it is even less so now.
- The decision is biased, as there has been no local consultation or consideration of the council's own assessment in 2007.
- Central government policy does not support disposal of playing fields.
- The SHLAA ignores the impact on the setting of the listed Devonshire Buildings.
- The SHLAA ignores policy BH.15 (saved from the Local Plan) on visually important open space.
- The SHLAA ignores the land's role as a green wedge and wildlife corridor.
- The SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents.
- The SHLAA has given insufficient attention to the traffic issues: it assumes they can be simply solved and this is far from clear.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 17\1

Respondent: Yves and Bett Dubois

Representation The Council rejected a similar plan about three years ago and we do not understand what can possibly
(soundness): justify the Core Plan and SHLAA. SHLAA ignores many well-known facts: there certainly is no more reason to all developing the Lower Field now than in 2007! There has been NO consultation of local Residents in establishing the SHLAA! The requirements of Beechen Cliff School are simply overlooked! SHLAA chooses to ignore the Government's policy on playing fields! SHLAA contradicts Policy BH.15! As local residents we frequently take our walk in the Lower Field. And there are several other arguments against this recent change of attitude towards Beechen Cliff Lower Field.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 18\1

Respondent: Mr Mathew Whitchurch

Representation The case for not selling the fields will be made to you by many. They are right as was proven to 2000.
(soundness):

In addition I offer the following thoughts.

- There is plenty of brown field sites in west Bath that could be used. I recall that government policy was to use brownfield before green field.
- Second there remains the case for physical exercise on open fields. Many people in UK are fat and unfit. Indeed the Army has to spend much longer is getting ex pupils from such schools up to standard than 20 years ago because fields were sold off. Future generations at school need to know that open fields are as important as any other training aid and by their use they will be less fat and fitter as years

go by. I recall that is government policy too.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 19\1

Respondent: Mr Michael Berry

Representation • Pupil numbers have risen at the school and the land is subject to even greater use than before. The
(soundness): current Headmaster's view is that the land is needed as playing fields.

- The SHLAA is absolutely contrary to recent views expressed by the Council and current government policy on development and disposal of school playing fields is now much tighter than three years ago.
- The SHLAA takes no account of the views of local residents or the arguments put forward by the Council three years ago.
- The SHLAA significantly impacts on the setting of Devonshire Buildings; a Grade II listed terrace of Georgian properties within the Bath World Heritage site.
- The SHLAA ignores the effect on the provision of local recreation facilities, the impact of traffic and the land's role as a wildlife corridor.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 20\1

Respondent: Ms Marianne LeRoy-Lewis

Representation The SHLAA is flatly contrary to the recently expressed views of councillors. Since 2007 housing land
(soundness): targets have been reduced; there is now even less of a case for developing the Lower Field for housing. The SHLAA assessment is superficially sweeping and over simply disposes of any consideration that stands in the way of the development project argument. Government policy on playing fields is now tighter than when disposal consent was given. The SHLAA ignores the impact on the setting of the listed Devonshire Buildings. The SHLAA completely ignores Policy BH 15 (saved from the Local Plan) on visually important open space. The SHLAA ignores the land's role as a green wedge and wild life corridor, including the importance of the hedge, sections of which would have to be removed. Importantly the SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents.

BUT above all the SHLAA gives entirely insufficient attention traffic issues. 18 households would not "insignificantly add to the volume of traffic". Taking into account the activity of a single household in terms of shopping, visiting cars, rubbish collection, deliveries and so forth, one would say that on the contrary 18 houses would severely overload the area's "narrow lanes and poor junctions" sic, to the point of gridlock at peak times.

With reference to the SHLAA's Development requirements: number 1 and 2 are incompatible and unattainable in the area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 21\1

Respondent: Mr Thomas Leland

Representation I am fully opposed to this change. The issue was considered in depth over the last ten years which
(soundness): resulted in the Council rejecting the idea of housing development there and I believe the case against development to be, if anything, greater now than it was when the Local Plan was finalised in 2007.

Since 2007 the school's numbers have grown and there has been greater support from Central Government to the need for sport in schools as well as improving the environment and quality of life of the whole population. It has been noticeable that the field is used even more now than in the past by both the school and the local residents who find it a treasured amenity.

Vehicular access to the site would also be a serious problem. Already the traffic in Greenway Lane has proved to be so excessive that the Council has been forced to reduce the speed limit, introduce unpopular speed bumps and close the entrance for traffic coming down Wellsway.

There appears to have been no consultation with the local residents prior to this proposed change being published. Had there been, the depth of local opposition would have been more evident.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 22\1

Respondent: Mr and Mrs C. Bulley

Representation The main reason for moving into this area was because of its status and we would be very upset if this
(soundness): Area Of Natural Beauty was to be destroyed just because a farmer wants to make a lot of money selling his land. The traffic chaos that would be caused by the extra traffic alone is too horrendous to contemplate! I realise Bath needs affordable housing but this area has already given a number of affordable homes and there are many brown field sites which could be used instead, before the destruction of such an Area Of Natural Beauty as we have here.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 25\1

Respondent: Dr Kate Jenkins

Representation The SHLAA report has ignored the considerable opposition of local councillors which was expressly
(soundness): stated in 2007 and at the time there was considerable local objection to the proposal to include the land in the Local Plan. The land was then kept out of the Local plan.

The SHLAA report author appears to have relied on the comments of the Government Inspector's comments about the usage of the field and it's being surplus to requirements of the school and local people. However those comments are not based on current fact. The boys of beechen cliff school play football informally on the field every day outside our house, and the field is used often during school hours for sports activities including team games and cross country. It appears that the field is used even more often in winter to preserve the turf on the playing field nearer to the school.

At weekends many local people use the fields for walking and for leisure activities such as kite flying and informal football and cricket. Our garden has an open aspect onto the field and we regularly hop over our wall to make use of the space there for these activities. On this basis I do not think a planning application could succeed and I urge the council's officers to remove LYN 6 from its SHLAA document. Other reasons that inclusion in the SHLAA is inappropriate are: no clear indication from the school that they currently wish to dispose of this land. Constraints on disposal concerning where the raised monies could be spent being a major issue.

The SHLAA document alludes to the traffic problem being solved by severing Greenway lane. Why is this document proposing this? It has no direct relevance to whether this land is suitable for development. The SHLAA report and inclusion of LYN 6 fails to take into account the impact that the loss or re-routing of footpaths through the school field would have on pupil's safe routes to school-a large number of them walk through the field to school at present.

The SHLAA fails to take into account the contribution of this land as a visually important open space. The land is clearly visible from the Wellsway and clearly links through to Alexandra Park. The land used to be allotment land and it should remain for the use of local people and the school. This land is not necessary for BANES to fulfil their housing criteria of 6000 homes by 2026. 2500 homes are planned at Western Riverside (a brownfield site) whereas only 18 homes would be provided by development on this useful bit of green space.

The Government Inspector also stated that the amenities of local residents could be protected by sensitive siting of any development. I disagree with respect to our own position as we live in a bungalow sited within 3m of the field. We have just spent a large amount of money on our house, the work having been done with planning approval and we stand to be disadvantaged by any proposed development. Having said that even if we did not live adjacent the field I would still urge that it should not be included in the SHLAA for all the other reasons stated above.

Change sought to make sound: The council should seek to utilise all its brown field or less sensitive sites before it allocates such a historic piece of green land to development. It is not necessary to include this land in the SHLAA and it should not be included.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 26\1

Respondent: Ms Nancy Robertson

Representation 1) The SHLAA is quite contrary to the recently expressed views of councillors.

(soundness): 2) The traffic in the Lane does not permit any further congestion especially on Lyncombe Hill.

3) This is an important space for local residents and for wildlife and any building thereon deprives everyone of a green place - so important in an overdeveloped area of the city.

4) Government guidelines show that there is not enough outdoor playing space for the number of pupils attending Beechen Cliff school.

5) The Headmaster of Beechen Cliff school considers the field is needed as playing fields.

6) The impact on the setting of the listed Devonshire Buildings has been ignored.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 27\1

Respondent: Mrs Angela Frith

Representation • The SHLAA is flatly contrary to the recently-expressed views of councillors.

(soundness): • Housing land targets have been reduced since 2007: there is even less of a case for developing the Lower Field now than then.

• The assessment in the SHLAA is too cursory: it ignores the powerful arguments against the proposal set out by the Council in its decisions in 2007, nor sought views from the local community: the effect is one of bias, which urgently demands revision.

• Government policy on playing fields is now tighter than when disposal consent was given.

• The school has a real need for the playing fields: since 2003 pupil numbers have risen, the daily use of the land by the school's pupils has intensified, and the current headmaster's view is that the land is needed as playing fields.

• The SHLAA ignores the impact on the setting of the listed Devonshire Buildings.

• The SHLAA ignores Policy BH.15 (saved from the Local Plan) on visually important open space.

- The SHLAA ignores the land's role as a green wedge and wildlife corridor.
- The SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents
- The SHLAA has given insufficient attention to the traffic issues: it assumes they can be simply solved, and this is far from clear.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 28\1

Respondent: Mrs Sue Kinchin-Smith

Representation (soundness): The very powerful arguments used by the Council to zone the Lower Field (LYN6) as open space included:

- A. Government emphasis on the value of school playing fields, and the importance of 'green infrastructure';
- B. B&NES' World Heritage Site Plan which stresses the need to protect the landscape setting of the city;
- C. The reduction of housing land targets and the availability of the Western Riverside site;
- D. Prevention of additional local car traffic being generated on Greenway Lane and the local road network;
- E. The increase in the number of pupils at Beechen Cliff since 2003.

I consider that the inclusion of this land in the SHLAA is flawed for the following reasons:

- a) It is contrary to the recently-expressed views of councillors;
- b) The assessment in the SHLAA ignores the arguments set out by the Council in its decisions in 2007;
- c) Beechen Cliff School needs the playing fields, as numbers at the School are continuing to increase (latest published number on roll 1145, January 2010 cf 1040 at Ofsted report in 2007 and 996 at Ofsted report in 2004)
- d) The SHLAA ignores the impact on the adjacent listed Devonshire Buildings;
- e) The SHLAA ignores policy BH.15 on visually important open space and ignores the land's role as a green wedge and a wildlife corridor;
- f) The SHLAA ignores the extensive permissive use of the land for informal recreation by local residents;
- g) The SHLAA has given insufficient attention to the chronic traffic issues on the local road network.

I am told that once a piece of land has been included in the SHLAA it is very difficult to remove it.

Change sought to make sound: However as LYN6 has been placed in the SHLAA without any consultation, I trust that it will be removed and the zoning of this land as open space will not be changed

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 29\1

Respondent: Sheila and Margret Youd

Representation (soundness): We wish to voice our objection to allowing development on Beechen Cliff School's lower playing fields for the following reasons :

1. This proposal is contrary to previous decisions and there has been no consultation.
2. The school playing fields are a green "wedge" used daily by pupils and local residents.
3. The playing fields are a wildlife corridor.
4. The footpaths across the fields are an important connecting route from the valley to the City, via Alexandra Park.
5. Government policy on playing fields is to protect these and not sell them off to developers.

6. The traffic issues in Greenway Lane are well understood – any large development will exacerbate the already difficult and dangerous traffic situation.
7. The SHLAA ignored Policy BH.15 (saved from the Local Plan) on visually important open space.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 30\1

Respondent: Chris Kinchin-Smith

Representation But in any event, the arguments against the housing development have always appeared strong:

- (soundness):**
- Prevention of additional local car traffic being generated on Greenway Lane and the local road network;
 - Government emphasis on the value of school playing fields, and the importance of 'green infrastructure';
 - B&NES' World Heritage Site Plan which stresses the need to protect the landscape setting of the city;
 - The reduction of housing land targets and the availability of the Western Riverside site;
 - The increase in the number of pupils at Beechen Cliff since 2003.

I was therefore horrified when I heard recently that the Lower Field has been included in the SHLAA for housing development, apparently purely at the instigation of one developer. How can it be that the whim of a developer is allowed to over-ride the democratic planning process which zoned the land as open space as recently as March 2007? I have been advised that once a piece of land has been included in the SHLAA it is very difficult to remove it. This seems extraordinary and I would welcome your clarification of the process for doing this.

I consider that this land's inclusion in the SHLAA is flawed for the following reasons:

1. It is contrary to the recently-expressed views of councillors;
2. The assessment in the SHLAA ignores the arguments set out by the Council in its decisions in 2007;
3. The school needs the playing fields – more now than ever;
4. The SHLAA ignores the impact on the adjacent listed Devonshire Buildings;
5. The SHLAA ignores policy BH.15 on visually important open space and ignores the land's role as a green wedge and a wildlife corridor;
6. The SHLAA ignores the extensive permissive use of the land for informal recreation by local residents;
7. The SHLAA has given insufficient attention to the chronic traffic issues on the local road network.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 31\1

Respondent: Mr and Mrs Kemp

Representation However we are very concerned that the Beecham Cliff School field (Lyn 6) has again been suggested as

- (soundness):** a housing site. As we recall it was only a few years ago that this site was considered by the full Council following a planning inspectors report. In the light of a lot of public concern it was rejected as a housing site. What has changed? In our opinion the case for retaining this area as an open field has increased. With the closure of Culverhay school there will be even more pressure on Beecham Cliff School, they will we are sure need to retain all the open play areas they can.

From a more general point of view we feel that these open green spaces are extremely important in Bath and give the city its unique character.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 32\1

Respondent: Mr Andrew Vickers

Representation 1. We have already rejected it as a potential building site. (2007)

(soundness): 2. It is a playing field for Beechen Cliff School and a recreational area for the wider community. If it is sold and developed it can never be reclaimed.

3. The traffic problems in the area will be made worse - i.e. 18 houses = 36 cars plus visitors and deliveries

4. The school and the school governor do not want to sell the land.

In my view the land should never be sold while a school (or Academy) occupies the land. If the land is sold the school will use any money received on improvements - possibly new classrooms - and take in more pupils giving them less room for sport and recreation

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 35\1

Respondent: Mr Paul Robinson

Representation • The Strategic Housing Land Availability Assessment (SHLAA) upon which, as I understand it, reliance is

(soundness): being placed is flatly contrary to the recently-expressed views of councillors.

- Housing land targets have been reduced since 2007: there is even less of a case for developing the Lower Field now than then.

- The assessment in the SHLAA is too cursory: it ignores the powerful arguments against the proposal set out by the Council in its decisions in 2007, nor sought views from the local community: the effect is one of bias, which urgently demands revision.

- Government policy on playing fields is now tighter than when disposal consent was given.

- The school has a real need for the playing fields: since 2003 pupil numbers have risen, the daily use of the land by the school's pupils has intensified, and the current headmaster's view is that the land is needed as playing fields.

- The SHLAA ignores the impact on the setting of the listed Devonshire Buildings.

- The SHLAA ignores Policy BH.15 (saved from the Local Plan) on visually important open space.

- The SHLAA ignores the land's role as a green wedge and wildlife corridor.

- The SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents

- The SHLAA has given insufficient attention to the traffic issues: it assumes they can be simply solved, and this is far from clear.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 36\1

Respondent: Mr Jim Canham

Representation Its disposal will remove part of an already limited school playing field, an OFSTED report stated the

(soundness): playing field was too small for the size of school. The school has over 1000 pupils and the closure of Culverhay School will surely increase the pressure to increase this number.

The Council rejected any development 3 years ago. The rejection was robustly supported by local Councillors Ian Gilchrist, David Bellotti and Marian McNeir.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 37\1

Respondent: Mr Gordon Rawlings

Representation I have lived in Devonshire Buildings for 37 years & have seen the field used for many recreational
(soundness): events. The one that comes to mind most readily is when the local youth football clubs used to play on the field. Green fields are to be preserved not sold off for the likes of Sainsbury's – as was the case with the Haysfield school. (How daft can one get to sell off a field that lies between two schools...). I object to the disposal of this field on the grounds that the SHLAA ignores the value of this field to the local community for recreational use.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 38\1

Respondent: Ms Marian McNeir

Representation I think it is inappropriate for the following reasons :

- (soundness):**
- 1] The school needs this space as an informal playing field especially in the light of Culverhay closing and boys transferring to BC -- this was a reason why Planning Permission for Development was refused in 2006 and it is even more relevant today.
 - 2] Access onto Greenway Lane is very tight and additional traffic would make it even more dangerous. The Lane already suffers as a rat run and accidents are waiting to happen.
 - 3] Local residents use the field with its footpath for recreational use. This is especially important in the adjoining very densely built up area of Bear Flat.
 - 4] It is inappropriate to sell off local school playing fields especially in an urban area and against Council policy.

I hope you will take these points seriously into consideration and I hope LYN 6 will be removed from the SHLAA.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 39\1

Respondent: Deirdre and Robert Sackett

Representation The reasons for not including the Beechen Cliff School lower playing field are many and well known.

(soundness): They include:

- World heritage site where the field forms part of the conservation area of Lyncombe valley and a wild life corridor extending to Beechen Cliff. The adjoining fields - of which it forms a continuity and direct link with well used footpaths - were given to the city to be held trust in perpetuity following a public subscription in 1869. The playing fields cannot be treated in isolation from this city conservation greenspace area. Your department should be our guardians.
- It is both used as a school playing field and an amenity by residents across the Lyncombe and Widcombe wards. Members of our family along with countless other resident in local wards regularly

walk here. You should not even consider taking public amenities from the many to give to the few. Once developed, the land can never be reinstated.

- The school governors and headmaster do not want this land developed
- Residents do not want this land which borders listed buildings developed
- The development of the site would add to the through traffic/rat running down Greenway Lane and Lyncombe Hill which has long been designated as unacceptable.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 40\1

Respondent: Ms Eileen Vickers

Representation The land must be kept as playing fields, it is used constantly by the children during their breaks etc. The **(soundness):** government policy re playing fields is well known. Other points that should also be taken into account is the fact that the SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents and insufficient attention has been given to traffic issues, which you are no doubt aware, have been the subject of numerous discussions/ debates over many many years. Do not hand over "open space" to developers - the space is needed by the children of the school and the future generations

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 43\1

Respondent: G. Bunn

Representation I strongly object to this proposal: school playing fields should be just for that purpose and not for the **(soundness):** profit of third parties. This government had stated that they were opposed to any sale of school playing fields so I do not see why encroachment onto a green space used by the school would be a necessary part of the Council's plans. Furthermore the suggestion that Greenway Lane should be closed for through traffic as a result is also impossible to contemplate: we use this road to collect our grandchildren from Paragon and Prior Park - the diversion down Wellsway would be lengthy and contribute to yet more pollution and multiplied daily by several hundred additional journeys by parents

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 44\1

Respondent: Peter and Caroline Laws

Representation One of the many attractive features of Bath is the open space and, one this is built upon, it cannot be **(soundness):** replaced. The Lower Field is extensively used, not only by the pupils of the school, but also by many local residents for playing games with their children, exercising their dogs and general recreational purposes and it forms an essential amenity in the area which must be preserved.

We understand that many people, including Prince William, are campaigning for the preservation of school playing fields, and the Queen, in her Christmas message, advocated the need to participate in sport and yet it is proposed by the council that these playing fields, which perform such a useful role, not only for the school, but also for the local community, should cease to be used as such. This really must be reconsidered and must not be allowed to happen.

The land in question provides a valuable space for wildlife and it is highly desirable that the wildlife be given every encouragement to survive and the development of the Lower Field will greatly reduce the amount of land available to wildlife.

Greenway Lane has a problem with excessive traffic at peak times and a much needed traffic calming scheme is about to be introduced. The addition of a significant number of households using Greenway Lane, and joining it at one of its narrowest points, which is already a bottleneck, is not to be encouraged and will further jeopardize the safety of children using Greenway Lane as a means of access to the school.

Furthermore, any development of the Lower Field will have a significant impact on Devonshire Buildings. These are very fine buildings which need to be preserved and nothing should be done to diminish their status. Bath is fortunate to have many fine buildings, which is why so many visitors come to it but they will have no reason to come if buildings such as these, and the environment to which they are located, are not fully protected from intrusive development.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 45\1

Respondent: Ms Annabelle Petter

Representation The school has insufficient space for informal games, the area is used extensively by the school now
(soundness): and also by the local community. The area is in a conservation area and is an important green space on the south side of Bath. To make matters worse the Planning department has also seen fit to decide that Greenway Lane will have to be closed in order to permit this development with turning heads being provided to allow traffic to turn at the end of the two cul-de-sacs so formed. This fails to take into account the large difference in height between Greenway Lane and the playing fields and the need to destroy the hedge to accommodate the turning heads. The hedge is holding back a very large amount of earth in the field and its destruction will destabilise the area with the risks of mud slides and rain run-off into Greenway Lane which has no proper drainage at that end. Major walls will have to be constructed to replace the hedge and the whole semi-rural aspect of Greenway Lane is to be ruined for the sake of a few houses that will make no appreciable difference to Bath's housing requirement. The effect of closing Greenway Lane on traffic in the South of Bath is also likely to be very serious.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 46\1

Respondent: Mr S. Petter

Representation The school has insufficient space for informal games: this was the case when the school made its
(soundness): application to sell the playing fields and school numbers have risen since then. The school claimed that making the existing Real Grass pitch into an Astroturf pitch would compensate for the loss of playing area. As one area would be replaced by an identical area this is manifestly untrue and as the pitch cannot be extended to make it full size it cannot be used for matches with/by other school or the outside community. If the school were to sell the playing field it would cause the children to find other informal play areas and Alexandra Park, being the only open area close-by, is likely to be taken over.

The playing field is an important green open space on the south side of Bath and forms part of the setting for the whole of Lycombe Vale. A development on the area would have a serious and deleterious effect on the area. Plans to close the road and introduce turning heads in the two cul-de-

sacs formed will have an even more serious effect on the area with the destruction of the old hedge in Greenway Lane and major earth removal and wall construction to hold back the destabilised area. It will also eat into the site and constrict the area available for development.

In view of the limited number of houses that can be built on the site, the amount of damage that will be done to the Conservation Area and the local visual amenity and the serious knock on effect to the traffic throughout the South of Bath it is essential that LYN 6 is taken out of the SHLAA now

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 47\1

Respondent: Mr William Robertson

Representation 1) The SHLAA ignores the land's role as a green wedge and wildlife corridor.

(soundness): 2) Government Policy on playing fields is now much lighter

3) The SHLAA is ignoring policy BH15 on visually important open space.

4) The school has a real need for the playing fields since pupil numbers have increased since 2003

5) The land is used by pupils daily and the Headmaster's view is that the land is needed as playing fields. This view should be upheld.

6) The SHLAA has ignored the traffic issues in the Lane which have already caused problems at a cost to the Council as well as the local residents

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 48\1

Respondent: Lt. Cdr. M. Phelp

Representation The SHLAA appears to ignore the powerful arguments for the retention of this field as an open space

(soundness): which were agreed by the Council in 2007 following representations by the local community (GREENWAY!) through our two councillors. The number of pupils is likely to increase with the closure of Culverhay School putting even more pressure on the Beechen Cliff playing fields. The Council has recently improved the safety for pupils crossing Greenway Lane en route to the school through Lower Field. This playing field is a visually important open space and should be retained as such.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 51\1

Respondent: Ms Laura Brown

Representation 1. Research shows that children need to be outside, particularly boys. The government agrees. It is

(soundness): retrogressive to think that Beechen will automatically benefit from increased funding (or does the sales profit go into a great pool of schools?) when it is well known that the sixth form at Beechen are not monitored for attendance anyway at this school and that outdoor exercise has been found to be an essential accelerator to learning.

2. The roads of Greenway Lane and all those leading into town from that point are well documented to have a traffic problem as they form a commuter and school rat run both into town and to the Paragon School.

3. New housing on such a scale in a specifically old part of Bath will change the nature of the City in the unattractive way that has afflicted parts of Lansdown and Fairfield Park. If we lose the character of Bath (as has already happened in the centre) we lose our commercial advantage from national and international tourism.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 52\1

Respondent: Ms Lisa Oestreicher

Representation As a resident of Bear Flat, mother and dog owner I am keenly aware of how valuable an amenity space
(soundness): the lower fields are to the local community. I pass by there daily either ferrying my child to school on foot (an activity encouraged by the Council) or walking my dog. I always encounter the fields in use by other residents and students. The fields are a well used and valued outdoor amenity space. Furthermore, the construction of new houses and the subsequent loss of open space will undoubtedly lead to further traffic congestion along Greenaway Lane – a thoroughfare already experiencing excessive traffic volume. I feel that I should also bring to your attention the obvious fact that the loss of the fields will result in greater housing density which will in turn impact on the number of children attending an already over subscribed school. The intended closure of Culverhay School will only make this impact felt more keenly. As the enrolment numbers increase the students will be faced with less sporting opportunity and reduced access to open space. Not only is this unfortunate for the children affected but I also understand that it is contrary to current government advice. Finally, I am also greatly concerned about the impact housing will have on the setting of the adjacent listed buildings in Devonshire Buildings and the surrounding conservation area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 53\1

Respondent: Ms Patricia Harbord

Representation Firstly I would point out that a majority of councillors voted in 2007 against the development of the
(soundness): Lower Field for housing, and that since then, several councillors have stated publicly their opposition to it. The land was zoned as open space in the Local Plan. A recent House of Commons Library Standard Note on Playing Fields and Public Open Spaces states that: 'Open Space is protected by planning guidance, saying it should not be built upon unless an assessment has shown it to be clearly surplus to requirements.'

The field is currently in use every schoolday by Beechen Cliff School as an informal playing field and recreation area. Pupil numbers at the school have risen since 2007, and the headmaster has stated that this area is needed as playing fields.

There has been much concern in recent years about increasing levels of obesity and resulting disease in the general British population, and especially among children and young people. This has been linked to decreasing levels of physical activity, which in turn has been linked to trends in the built environment which discourage walking, etc. The previous government failed to stop one such trend as it gave permission for the sale of over 200 school playing fields for development. The passage on planning in the recent Foresight Report sets out how obesity might be countered through public policy at local government level.

The loss of the Lower Field would affect not only the pupils of Beechen Cliff School, but also local

residents, who can be seen using it every day on a permissive basis for informal recreation purpose (walking, dog walking, etc.), and to whose health and wellbeing it likewise contributes. Research commissioned by Natural England has shown that people who perceive easy access to safe green spaces report higher green space use, more regular physical activity and lower risk of obesity', and Natural England states as the first of two goals in their ' Natural Health Service Manifesto' : ' To increase the number of households that are within five minutes' walk of an area of green space covering at least two hectares.' Building on the Lower Field, and other areas of green space in Bath, makes the achievement of this vision less likely, and adversely impacts on the health of local people.

Finally I would like to express my concern that the developers propose to deal with the difficulty of vehicle access to this awkward site by 'severing' Greenway Lane towards the western end. During the recent prolonged spell of snow and ice the eastern access to Greenway Lane via Lyncombe Hill, involving a bend on a steep gradient, was not safely negotiable by vehicle. If the western access to Greenway Lane was closed, the majority of residents would be unable to leave Greenway Lane except on foot in such weather, perhaps for many days, and there would be no safe vehicle access to their houses - including for emergency vehicles, unless these had four wheel drive and were fitted with snow tyres.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 54\1

Respondent: Mr John Toplis

Representation (soundness): Is contrary to the local plan which was approved by the Council in 2007, which stated that the field should remain as an open green space. This view was soundly supported by the local councillors and residents.

I consider the following are the main reasons for objecting to the proposed inclusion of the Lower Field in the SHLAA.

- The field is needed as it is currently used by the school for some of their sports and recreational activities, especially when the main fields become saturated with rainwater and are not suitable for playing on.
- OFSTED has said that the area of the school's fields are too small for their needs, especially since the number of pupils has increased since 2007. DFES have tightened their policy on playing fields since they permitted the land to be sold.
- The field is important in providing a green corridor for wildlife, including bats and badgers.
- The field is widely used by local residents for recreation, with designated footpaths for walkers, joggers and ramblers.
- It provides a contribution to the traditional semi-rural character of this part of Bath and is also important for the setting of the listed Devonshire Buildings

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 55\1

Respondent: Ms Pat Toplis

Representation (soundness): - The site is part of the green belt on the South side of Bath and is used generally by the surrounding community for recreation as well as by the school

- The site has a community function like a "village green" and has been in use for many years as a local resource. The people who use the site are ramblers, dog walkers, groups of children playing games and enjoying sports (eg. Football, kite flying and birthday party activities). It has even in the past been used

for car boot sales to raise funds for the school

- The boys of the school make continuous use of the site to relax during the school day and for sport

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 56\1

Respondent: Mr Mike Ross

Representation (soundness): a. As the council knows, the community has already rejected this proposal and we thought the idea was abandoned back in 2007.

b. Traffic is already a problem in Greenway Lane and it will be made worse by any development on the site.

c. The field forms a large part of the recreation area available to the school, which is already inadequate for the number of pupils.

d. The wider community uses the field out of school hours for walking and other recreational activities

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 57\1

Respondent: Mrs Joanna Ross

Representation (soundness): a. As the council knows, the community has already rejected this proposal and we thought the idea was abandoned back in 2007.

b. Traffic is already a problem in Greenway Lane and it will be made worse by any development on the site.

c. The field forms a large part of the recreation area available to the school, which is already inadequate for the number of pupils.

d. The wider community uses the field out of school hours for walking and other recreational activities

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 58\1

Respondent: Julian David

Representation (soundness): All the reasons why this land is unsuitable for development still apply. The school needs the play space, as is evidenced by its regular use. The local community would lose a much valued recreational space.

The setting of the listed buildings in Devonshire Buildings would be significantly degraded. The link between the green space of Beechen Cliff, the allotments and the fields behind Greenway Lane and Lyncombe Vale would be broken.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 59\1

Respondent: Mrs Jean Stidson

Representation With school numbers ever rising I feel that the land is needed for the boys to use for sports and outside
(soundness): activities

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 60\1

Respondent: Mr B. Stidson

Representation I understood a few years ago the Council itself ruled the site unsuitable for any such development.
(soundness):

I would bitterly regret the loss of the field to the students for recreational purposes, and on a personal basis the loss of a key element in a wildlife area which has provided much enjoyment to myself and indeed many residents - over more than forty years

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 65\1

Respondent: B. Doyle

Representation The field was excluded from the Local Plan in 2007 and I do not believe that anything has substantially
(soundness): changed since then, apart from the fact that some money was spent within the last year to establish the field with its footpath as part of a 'Safe Route to School' for Beechen Cliff pupils. This 'safe route' would have to be substantially altered in the event of development. The field plays an important part in providing recreation for schoolchildren and local residents alike, and is an important amenity.

In sum, my objections are as follows:

- The school should not sell off land suitable for sport and recreation, particularly as it is under-provided in this area as it is.
- The field is a valuable amenity, used regularly by locals and schoolchildren for recreation and sport.
- The school childrens' Safe Route to School would be compromised, and money spent on this work to date would be wasted.
- The character and semi-rural nature of Greenway Lane would be irreparably damaged.
- There are surely 'brown field' sites which could be considered rather than the unsuitable development of this green area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 66\1

Respondent: Mr Peter Martin

Representation Overdevelopment

(soundness): Deprive people of well used recreational space
Create further traffic problems
Spoil the setting of important listed properties.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 69\1

Respondent: Dr Stephen Hayward

Representation - the SHLAA goes against the recently expressed views of our local ward Councillors

- (soundness):** - the SHLAA ignores the current extensive permissive use of the land for informal recreation by local people
- Greenway Lane already suffers from too much traffic, and more housing would certainly add to this problem
 - a precedent would be set to develop other green areas of open land within the city of Bath; and
 - the land is part of a beautiful Conservation Area

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 70\1

Respondent: Mrs Caroline Hayward

Representation - the SHLAA is flatly contrary to the recently expressed views of our local ward Councillors

- (soundness):** - pupil numbers at Beechen Cliff School have risen in recent years, therefore the school has even more need of these playing fields now than before
- the land has a very important role as a green wedge and wildlife corridor in this Conservation Area; and
 - the subject of traffic issues arising from any development of this land has been insufficiently addressed

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 71\1

Respondent: Mrs Margaret Jeffery

Representation The beautiful Beech trees adjoining Greenway Court garden have a preservation order on them and

- (soundness):** must be protected. The area is a green space which is much used and needed by the local community for exercise and relaxation. The area too with the trees and the lovely old hedgerow is a haven for birds, flowers and other wildlife which need to be protected apart from the fact that our bird population is decreasing year by year. The traffic too seems to increase daily. There is also the consideration that Culverhay School is likely to close which will mean even more pupils at Beechen Cliff School. Other schools in the Bath area also used the field from time to time

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 72\1

Respondent: Ms Margaret Carter

Representation loss of amenity to children taking valuable exercise, adults walking, Beechen Cliff boys playing football

- (soundness):** etc at lunch times. Also useful open air playing area for Beechen Cliff School. My husband and I lived at 5 Devonshire Place overlooking this field for 43 years. I therefore know how much it is used and enjoyed

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 73\3 S

Respondent: Newton St Loe Conservation Group

Representation 2.07: The strategy prioritises the creation of enduring developments, places and neighbourhoods over ‘**(soundness):** planning by numbers’ in order to deliver relatively short term targets. It seeks to shape development that will be appreciated and used well into the future and deflect ill conceived proposals that might be rejected within a generation.

2.22: Within Bath's outer neighbourhoods the Ministry of Defence occupy three sites, at Foxhill, Ensleigh, and Warminster Road. It is anticipated that Warminster Road and Foxhill will become surplus to requirements within the next five years as the MoD consolidates its operations at Ensleigh. The Strategic Housing Land Availability Assessment suggests that Foxhill and Warminster Road could be redeveloped for about 850 homes. The Place making Plan will consider the capacity and prospects for these sites in more detail, including measures to enable sustainable travel to the city centre and local centres. For the purposes of the Core Strategy it is sufficient to highlight their suitability and availability for redevelopment and to observe that delivery by 2026 is a realistic proposition.

B1: Enable the development of 6,000 new homes within the city, increasing the overall stock of housing from 40,000 to 46,000.

Of these new homes about 3,500 will be delivered within the Central Area and Western Corridor, focused on ‘Western Riverside’ and about 2,500 homes will come forward within Bath's neighbourhoods where surplus Ministry of Defence land will play a major role and Enable housing associations to upgrade/intensify their stock and allow small scale infilling within existing neighbourhoods.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 74\1

Respondent: Mr Stephen Clarke

Representation I do not think that this valuable open space should be lost to the school and the community. Playing **(soundness):** fields should remain as playing fields and not become housing estates. Pupil numbers at the school have risen and therefore there is even more need for the playing fields to be preserved. I understand that the headmaster agrees with this view. The SHLAA ignores many of the important uses of this land including informal recreational use over many years.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 75\1

Respondent: Bath Independent Guest Houses Association

Representation What the Draft Core Strategy Document does not make clear is the base line from which these **(soundness):** additional rooms are calculated and that the VAS calls for steady growth in the number off rooms. There needs to be statement that makes it clear 750 is the maximum number. This makes the statements for the requirement of “500 – 750 additional hotel rooms” in policy B1 and B2 UNSOUND.

Change sought to make sound: We therefore insist that the Core Strategy Policy B1 Paragraph 8 refers to the VAS as its source of data for the growth in accommodation in Bath and that it states clearly that the baseline for the growth in

hotel rooms is 2008 and that there should be a steady growth of 500- 750 rooms upto to 2026 which includes 300-400 rooms upto 2016.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 76\1

Respondent: Mr Mark Jarvis

Representation (soundness): This field is a valuable open green space, used extensively by local residents who are freely permitted to use the field when the school is not using it. Local residents do not want to lose this amenity.

As well as the recreational use of the field, there is also a view from the field of the (listed) Devonshire Buildings which would be lost.

The headmaster of the school has apparently stated that the school needs the field as a playing field and does not want it turned into a housing development. Too many playing fields have been lost over the years, and once lost, they never come back. The need for playing fields will be even greater if Culverhay school closes, since there would probably be an expansion of pupil numbers at Beechen Cliff.

Houses built in this area would undoubtedly be expensive and would do nothing to ease the problem of the lack of affordable housing in the city. They would simply attract more well-off outsiders into the city.

Houses in this area would inevitably add to the traffic congestion at both ends of Greenway Lane, which is already quite serious at rush hour, particularly after the recent construction of 'traffic calming' impediments to the flow of traffic.

I believe the impetus for this idea has come from housing developers. Their reason for wanting to build houses on this field is simple: they want to make money from it. All the benefits would accrue to the developers, while all the costs in terms of loss of accessible green space, loss of visual amenity, loss of playing fields, traffic congestion, etc would be borne by local residents and pupils at the school. We local residents want to keep our green spaces; we do not want any more of them turned into housing developments.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 77\1

Respondent: Mr Peter Larkin

Representation (soundness): • The SHLAA is against views expressed by councillors - as I understand the matter. It also ignores the express wishes of local organised groups.

- Housing land targets have reduced since the idea was floated in 2007.
- It would seem inconsistent with the Government's current thinking on school playing fields.
- The school population has increased over time and I believe, the headmaster's view is that the playing fields are a necessary fabric of the school.
- There is arguably a proximity issue with the setting of the listed Devonshire Buildings and the current thinking on visual impacts relating to open spaces.
- The Beechen Cliff Playing Fields act as significant 'green wedge' and 'wildlife corridor', as well as providing a recreational space for local residents.
- I would imagine that there are other infrastructure and traffic issues that will at best be ill conceived, if indeed, considered at all.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 78\1

Respondent: Mr Robin McKie

Representation (soundness): 1. The field has two registered public footpaths running through it. If one person objects to any diversion to these footpaths you are required to hold a Public Enquiry into such diversions.
2. Having regard to the recent planning history of this field, why have you included this within the Core Study
3. Any development on this field will have a detrimental impact on listed Devonshire Buildings
4. The field is regularly used for informal recreation by local residents
5. No proper consultation has been carried out with local residents. Why was the Core Strategy document published a week before Christmas? This should have been delayed until after Christmas and full consultation carried out. The consultation period should be extended beyond 3rd February.
6. Any development of this field would create serious traffic issues to Greenway Lane

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 79\1

Respondent: Ms Tracey Lee

Representation (soundness): I have a young son and the fields are a valuable space for him to play. They are also a way for us to safely reach the local park, where he can ride his bike or scooter without having to worry about using paths where pedestrians need to safely walk, or face the danger of the roads. It is also a safer link for him to see his friends in the wider community. The ability to use this field as a play area has become more important in recent years as, due to deer on land at the back of our house, our garden and the local woods are infested with ticks, which means that these areas are not such a safe or relaxing environment.

The traffic on Greenway Lane is constant and causes many problems for residents currently as the road has been narrowed which has only encouraged people to go up onto the pavements. To add to the numbers of people needing to use this street would just create even more pressure on an unsuitable road.

With other schools closing in Bath I would have thought that those remaining would need their playing areas for their pupils more than ever, and indeed feel that physical activity is a very important part of education and should not be pushed aside to make some short-term money.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 80\1

Respondent: Mr and Mrs Brock

Representation (soundness): Firstly, we are extremely concerned about losing of a very significant green field area in a world heritage city and the importance to Bath and the residents of Greenway lane who are entitled to a green area for use for recreational purposes. Losing this piece of valuable land will also have a detrimental effect on the School and the children who attend there, in a time when they are looking to expand the pupil numbers needing significantly more space for recreational and sport development this would seem totally ludicrous. The impact of a development on this site would create a further bottle neck for traffic and congestion on Greenway lane when you are looking to deter drivers from using this as a "rat run" into City and also potentially significant problems for sewer and drainage from

that site, linking into an already an oversaturated network into the valley.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 82\1

Respondent: Mr and Mrs Hanna

Representation (soundness): When I was a Governor of the school I was involved with the hearing of parent appeals for additional admissions. In hearing the cases the school argued that additional admissions were not acceptable because it did not at that time meet DoE criteria for recreational space per pupil and was thus obliged to restrict the number of entries. OFSTED also commented that there was inadequate recreational and playing field space. In the light of current pupil numbers those reservations must still be applicable. The lower playing field is an important space for informal games, and as somewhere that pupils can use freely to gather together when out of the classroom; they would be disadvantaged if the space were no longer available or was restricted. The Headmaster's view is that the land is needed as a playing field. More generally, development would mean building over one of the green spaces of the city that should be preserved for its visual impact and as a green lung and a wildlife corridor. Development would also be contrary to Government policy on the disposal of playing fields.

It is not clear how the traffic issues would be dealt with. If one of the well used entries to the school is lost or restricted there will also be increased pupil delivery traffic in Beechen Cliff Road and the Avenues adding to the hazards that already exist for pedestrians including those taking young children to school in Widcombe and elsewhere.

In 2007 councillors rightly turned down sale and development proposals for the field. The current council has turned its back on that decision which has the support of residents of the area who are now obliged to go through the whole rigmarole of objection once again.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 83\1

Respondent: Ingham and Buffton

Representation (soundness): We believe this assessment in the SHLAA is too cursory and ignores council decisions in 2007. Our views have not been sought on this change. The assessment also ignores Policy BH15 on the importance of open space. This is an important open space used by local people for informal recreation and we would wish it to remain as such

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 88\1

Respondent: Ruth Gairns and Stuart Redman

Representation (soundness): A plan to develop part of Beechen Cliff School Playing Fields was rejected on several grounds only three years ago; it is difficult to see how circumstances can have changed to any significant degree in such a short time. In actual fact, the only difference that we have observed (as local residents and users of the area) is the increased use of this land both by the pupils of Beechen Cliff School and local residents.

We strongly oppose the development of this plot, as we feel it should be retained as a school playing field as well as an area for recreational use for local residents, especially outside of school hours. We are also very concerned about the loss of this piece of land as a green space and wildlife corridor.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 89\1

Respondent: Ms Suzy Granger

Representation (soundness): We have been living on Greenway Lane for 7 years and in that time the traffic has doubled. The number of children at Beechen Cliff school has massively grown in the past 7 years. So I cannot understand why you would even contemplate allowing building on the Beechen Cliff playing fields.

The school playing field is small for the size of the school. Even though there is a flat piece of land nearer to the school, this houses the main games pitches - cricket in summer and running track and two rugby grounds in winter. However, the lower field (where you are proposing to build) is much needed because the top field is often very muddy (as is churned up in matches) and the children are unable to play on it at lunch time so they use the bottom playing fields ALL THE TIME.

If anything Beechen Cliff needs MORE land not less. With the proposed closure of Culverhay school where does the council think these children will be going to school???? Not a difficult one - answer - loads of the children will be going to Beechen Cliff.

It is a well known fact, that boys need to run around to release energy otherwise they can get up to mischief. THESE PLAYING FIELDS ARE NEEDED MORE THAN EVER - especially with more boys arriving at the school.

In addition, to the overwhelming need from the school for the playing fields, the local residents use them all the time. I have a 13 year old boy and a 10 year old girl and they use the playing field at the weekends and in the holidays ALL THE TIME. It is a communal space which the residents in the area use as there is a public right of way through the fields.

BEAR FLAT is very built up and this (and Alexandra park) are vital green spaces needed for the local residents. PLEASE do not allow this playing field to be built on.

If you drive down Greenway Lane it has the feeling of a country lane (when the traffic is not piled up at rush hours) so please please do not change this asthetically. There are very few lovely lanes in Bath. If you allow building on the lower field this will change the whole look and feel of the lane. Nothing will be the same again.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 90\1

Respondent: Mr Geoffrey Lee

Representation (soundness): The number of pupils at the school has grown in the last couple of years so I imagine the playing fields are required even more than before and closure of other schools in Bath will not help or improve this. The Government has stressed the value of both formal and informal play and I understand the current Headmaster has said how valuable the playing fields are to the school. This would all seem to indicate an increased need to protect this open space rather than it being developed.

The SHLAA is, exactly contrary to the recently expressed views of our local councillors! Housing land targets have been reduced since 2007 in which case I do not understand what argument could be made for development in the lower field at Beechen Cliff School.

Government policy on playing fields is now tighter than when disposal consent was originally given. The school says that it has a real need for the playing fields and that the number of school pupils has increased, indeed is likely to increase further. The SHLAA would appear to completely ignore the impact not only on the setting of listed buildings, such as Devonshire Buildings, but to the conservation as a whole.

The same strategy completely ignores the lands' role as a green wedge, not forgetting a wild life area and ignores the current extensive permissive use of the land for informal recreation by local residents. No attention has been given to the increase in traffic indeed the Council have already agreed to traffic calming measures in Greenway Lane.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 93\7 S

Respondent: Highways Agency

Representation The Agency notes the proposed growth in employment floorspace and the provision of homes in Bath.

(soundness): The Agency supports the approach to locate this growth in the most sustainable locations.

Remainder Covered in 93\15.

The Council should state that major applications should be supported by a robust Transport Assessment to identify the impact of development on the highway network, in addition to any mitigation works that may be required to alleviate the impact. This concern will be removed if the Council makes changes as per the Agency's representations to 6G and Policy CP13

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 94\1

Respondent: Mr Peter Nobes

Representation The land was rightly removed from the draft local plan in 2007 and I can report (as I live right next door

(soundness): to it) that it is used daily during the school term by the lads playing football at lunchtimes / break and also often used for sports activities by the school - football lessons, cross country.... It is also a very well used local space out of school hours for dog walking, kite flying and so forth.

Protection of school playing fields is covered in PPG 17 - while this is planning guidance, it should be considered as relevant at this stage of the process:- I fail to see how this well used piece of land can be classed as 'surplus to requirement'.... Equally, I cannot see that the local community will support any proposals to develop the land as I am sure the weight of objection to the inclusion of this site in the SHLAA will demonstrate.

Maintaining An Adequate Supply Of Open Space And Sports And Recreational Facilities

10. Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements. For open space, 'surplus to requirements' should include consideration of all the functions that open space can perform. Not all open space, sport and recreational land and buildings are of equal merit and some may be available for alternative uses. In the absence of a robust

and up-to-date assessment by a local authority, an applicant for planning permission may seek to demonstrate through an independent assessment that the land or buildings are surplus to requirements. Developers will need to consult the local community and demonstrate that their proposals are widely supported by them. Paragraph 15 below applies in respect of any planning applications involving playing fields...

Playing Fields

15. In advance of an assessment of need, local authorities should give very careful consideration to any planning applications involving development on playing fields (see endnote 3). Where a robust assessment of need in accordance with this guidance has not been undertaken, planning permission for such developments should not be allowed unless:

- (i) the proposed development is ancillary to the use of the site as a playing field (eg new changing rooms) and does not adversely affect the quantity or quality of pitches and their use;
- (ii) the proposed development only affects land which is incapable of forming a playing pitch (or part of one);
- (iii) the playing fields that would be lost as a result of the proposed development would be replaced by a playing field or fields of equivalent or better quantity and quality and in a suitable location - or
- (iv) the proposed development is for an outdoor or indoor sports facility of sufficient benefit to the development of sport to outweigh the loss of the playing field.⁴

On this basis I do not think this land should be allowed to be proposed to ultimately be set aside for development. It is a well used and valuable green area.

Other reasons that inclusion in the SHLAA is inappropriate are: no clear indication from the school that they currently wish to dispose of this land. Constraints on disposal concerning where the raised monies could be spent being a major issue.

The SHLAA document alludes to the traffic problem being solved by severing Greenway lane. Why is this document proposing this? It has no direct relevance to whether this land is suitable for development.

The SHLAA report and inclusion of LYN 6 fails to take into account the impact that the loss or re-routing of footpaths through the school field would have on pupil's safe routes to school-a large number of them walk through the field to school at present. The SHLAA fails to take into account the contribution of this land as a visually important open space. The land is clearly visible from the Wellsway and clearly links through to Alexandra Park. The land used to be allotment land and it should remain for the use of local people and the school. This land is not necessary for BANES to fulfil their housing criteria of 6000 homes by 2026. 2500 homes are planned at Western Riverside (a brownfield site) whereas only 18 homes would be provided by development on this useful bit of green space. The council should seek to utilise all its brown field or less sensitive sites before it allocates such a historic piece of green land to development. It is not necessary to include this land in the SHLAA and it should not be included.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 97\1

Respondent: Pat Finnegan

Representation It is short-sighted and unnecessary to use children's playing fields to build houses. The SHLAA ignores
(soundness): many of the important uses of this land including informal recreational use over many years. Local residents have used these fields for many many years and I also believe the school was given this land when it was allotments.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 98\3

Respondent: Mr Mark O'Sullivan

Representation (soundness): However, there is one matter which although it is not formally part of the Strategy I regard as of even greater importance for my own community. I earnestly request the Council not to submit the draft to the Government for examination until an amendment has been made to remove site Lyn6 from the Strategic Housing Land Availability Assessment.

The Strategic Housing Land Availability Assessment Status and potential use of Strategic Housing Land Availability Assessment

I am very disturbed to see that the Strategic Housing Land Availability Assessment (SHLAA), which is part of the underpinning of the draft Core Strategy, assesses the Beechen Cliff School Lower Field as suitable for housing development within the next five years. This assessment flies in the face of the clear decisions of the full Council in October 2006 and March 2007. It appears to have been made in ignorance of the powerful arguments presented by the Council to the public inquiry on the Local Plan, and it puts at risk an area of open space whose maintenance is vital to the functioning of the school, the amenity of the local area, and the key interests of the World Heritage Site.

The SHLAA is not a formal part of the Development Plan. It is an evidential document justifying the practicability of the housing targets in the Core Strategy, and was prepared by officers without formal member endorsement. Yet it cannot be brushed aside. In assessing the "practicability" of housing development on individual sites, it must make a public judgement about the appropriateness of development, and in this case it does so in this case on the basis of partial and contentious arguments which have never been exposed to consultation or public challenge.

The DCLG Chief Planner in July 2010, when advising on the abolition of Regional Spatial Strategies, observed that the evidence bases underlying those strategies will still have the power to be material considerations in development control. There are close analogies here. It is likely, until such time as the Placemaking DPD is adopted in 2014, that developers will point to the SHLAA as an official document prepared by experienced Council planners, and argue that increasing weight should be given to the SHLAA as an "other material consideration" in development control decisions – notwithstanding that it has never been subject to independent examination, to a full consultation process, or even to formal Member approval. Faced with such an argument at a time of change and uncertainty in the planning system, it appears to us that the Council, or a planning inspector, would have great difficulty in rejecting an application for development of the land, and that this would be seriously contrary to the public interest.

The SHLAA is procedurally defective

The procedure to be followed in the SHLAA is set down in the B&NES SHLAA Methodology and Call for Sites Consultation of July 2008. §5.58 of that document states "A site will be considered as available for development, when on the best information available, there is confidence that there are no legal or ownership problems. This means that it is controlled by a housing developer with an expressed intention to develop or a landowner with an expressed intention to sell." However, it is clear that the Council's information on this is out of date. This land is not controlled by a housing developer (Beechcroft's option to purchase expired some years ago), and the school has made evident that is no longer in favour of selling (see eg Bath Chronicle 20 January 2011). Hence the land fails the first and most basic test of eligibility for inclusion.

However, this finding of the SHLAA is defective in other ways as well. The SHLAA's documented assessment of the land in question as suitable for development relies entirely on the report of the Planning Inspector who examined the Local Plan in draft. On page 347 of her Report, the Inspector listed the representations she had taken into account in considering the future of this land as 2310/B4 (Beechcroft Developments) and 2310/B17 (Beechcroft Developments).

She made no mention of the properly submitted representations by Greenway! (the Greenway Lane Area Residents' Forum), as well as by the Council itself, which specifically addressed the possibility of

development of the Lower Field, and raised a series of issues, such as the key role of visually important open space, which were not mentioned in the Inspector's arguments. Both the range and the weight of the arguments in question were affected. This was a procedural flaw which vitiated her conclusions, as was, I believe, recognised by the Council in October 2006 when it rejected this part of her Report.

The authors of the SHLAA have not only failed to obtain up to date information on the Council's fundamental ownership test. They have also uncritically rehearsed the Inspector's words and failed to appreciate that the Council's views, evidence to the Inquiry and final decisions were very different. They have failed to consult the local community on their work, and the fundamental planning principle of audi alteram partem has therefore been transgressed. The result is defective and, I think, Wednesday unreasonable. It must be set aside.

Remedial action required

This threat to the delivery of national and local policy can be met only one way. I ask the Council, before the Local Development Framework proceeds any further, to reaffirm its decisions of October 2006 and March 2007 on the Beechen Cliff School Lower Field, and to amend the SHLAA so as to delete site Lyn6 and to make very clear that development of the Beechen Cliff School Lower Field remains and will remain wholly unacceptable.

I note that this land was the only site recommended as an addition by the Inspector which the Council set aside, rejecting her recommendation. I therefore believe that the loss of 18 dwellings by the omission of this site from the SHLAA would not be a precedent indicating that other sites should be treated similarly, nor involve a material loss of sites from the SHLAA such as to cast into doubt the achievability of the housing target in the draft Core Strategy.

The strengthened case against development on the playing fields of Beechen Cliff School

The assessment of suitability for development is inconsistent with national policy on open space and greenfield development

Planning Policy Guidance 17: Planning for open space, sport and recreation stipulates: "10. Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to requirements..."; this was acknowledged in the B&NES SHLAA Methodology and Call for Sites Consultation of July 2008. The only such assessment is now obsolete. This was carried out by DFES in 2000-03. At that time local residents were able to set out in comprehensive detail, referring to a recent OFSTED inspection and independent research, how the proposals failed all three of the Secretary of State's then criteria, as a result of which the proposals were amended by the school in discussion with DFES officials and were apparently approved at the margin. Since then, however, circumstances have changed significantly. The government's education policy on disposal tightened in 2004, and the Coalition's policy is now tighter still. Other government policies in health and the DCMS field increasingly call for the retention of recreational open space. In addition, the number of pupils at the school has significantly risen since 2003, and with it the need for playing fields, including space for informal outdoor recreation – as is demonstrated by the increasingly intensive use of the land in question by the school. The school would risk serious harm if this land were now to be developed. It is clear that the earlier assessment is now out of date and that national policy demands the retention of the allocation as playing fields and open space.

PPG17 goes on, "Developers will need to consult the local community and demonstrate that their proposals are widely supported by them. 11. Open space and sports and recreational facilities that are of high quality, or of particular value to a local community, should be recognised and given protection by local authorities through appropriate policies in plans. Areas of particular quality may include...small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities". It is very clear that development of this land has no support in the local community, 70 of whom turned out to protest about this on the wet and windy night of 12 January 2011; and that the amenity and recreational value of this land is very high.

Moreover, Planning Policy Statement 3 (Housing)(9 June 2010), at §36, requires that previously developed sites should be developed before greenfield sites. Beechen Cliff School playing fields are greenfield, as defined in that PPS (Annex B page 26). Therefore other sites, including Western

Riverside, should be developed before they are considered. Even if it were acceptable to develop on the BCS Lower Field (which it is not), it would be wrong to aim to build on it within five years, as the SHLAA now declares to be practicable.

The SHLAA has ignored evidence which shows that there is a real need for the playing fields
The Secretary of State for Education and Skills gave consent on 17 September 2003 to disposal of the land. But:

- the previous OFSTED report stated that the playing field space was insufficient, and the decision took three years of renegotiation and resubmissions, so the Minister's decision must have been borderline;
- On 27 August 2004 the Minister's announced a change in his policy so that in future playing fields should only be disposed of as an "absolute last resort" (The Times, 28 August 2004);
- The new Coalition Government has a policy on the loss of playing fields which is even more restrictive;
- the land in question is still in daily use by the school's pupils, as local residents can testify;
- the number of pupils in the school has risen markedly since 2003, and with it the need for outdoor recreational space;
- the present headmaster of the school has indicated his view that the land is needed by pupils for recreation.

The 2003 consent does not enable the Council, in exercising its planning functions, to ignore the question of the need for recreational open space by the school. As evidence of need, the Minister's 2003 decision has now clearly been overtaken. All the evidence now points to the need for these playing fields continuing.

The SHLAA has ignored evidence which shows that there is still a real need for the open space for leisure and recreation

The SHLAA takes no account of the current extensive permissive use of the land for a full variety of informal recreation by local residents, and their need for it to continue, even though this was evidenced to the Local Plan inquiry by Greenway!

The SHLAA has ignored the impact of its proposals on the setting of a listed building

Following the inquiry into the draft Local Plan, the Inspector considered the impact of development on views from the listed terrace of Devonshire Buildings. However, she failed to consider the impact of development on the setting of this important listed Georgian terrace, the extensive views of which from the south would be closed off by development of the Lower Field. Officers compiling the SHLAA appear to have ignored both matters, though the second in particular is of considerable importance in terms of listed building conservation in this World Heritage city.

The SHLAA has given insufficient attention to the Council's allocation of the land for visually important open space and its impact on the World Heritage Site

Then known as "Home Field", the land now in question was part of land on Beechen Cliff purchased by public subscription in 1869 "with a view of preserving it as an ornamental appendage to the City", and "to be held in trust in perpetuity". The school was developed on part of the larger holding in 1932, and as a public body took ownership of its playing fields in 1989.

UNESCO's Statement of Significance for the Bath World Heritage Site remarks on how "Bath's urban and landscape spaces are created by the buildings that enclose them, providing a series of interlinked spaces that flow organically, and that visually (and at times physically) draw in the green surrounding countryside to create a distinctive garden city feel, looking forward to the principles of garden cities". In its recent report on the World Heritage Site, UNESCO highlighted the need to enhance the protection of the landscape surrounding the City, and the World Heritage Site Steering Group agreed that this should be one of the Group's four immediate priorities"; Though the land now under consideration is not as critical as the face of Beechen Cliff itself, it has great significance as part of the visually important open space highlighted by Local Plan Policy BH:15 and which plays a key role in the character of the World Heritage Site as described in the UNESCO report.

Referring to the importance of the site in delivering Policy BH:15 of the Local Plan, Council officers commented to the Inquiry on 16 January 2002, "Greenway Lane is a historic lane with a semi-rural character. Its character, with a long section of country-style hedging and open space, is a vestige of the

rural setting of this part of Bath” and went on to remark that development would – partly because it also affects the open views from Devonshire Place and interrupts the visual break between the school complex and its foreground – harm the character of this part of the Conservation Area. In our view equally important are the position of the Lower Field as a green wedge linking the important hilltop of Beechen Cliff and Alexandra Park, on the one hand, with Lyncombe Vale and the Cotswold Hills AONB, on the other; and the green and verdant tone it gives to the view of the city from the Fosse Way and Bloomfield Road, and even from the Georgian terrace at Bloomfield Crescent.

The new draft Core Strategy is threaded through with references to the importance of green infrastructure. It remarks “A well-designed, managed and integrated network of green infrastructure provides a wide range of direct and indirect benefits to people and wildlife. This includes a greater sense of community, improved health and well being and ... conserving or enhancing landscape character, historical and cultural features”. The strong emphasis on green infrastructure in the Core Strategy is entirely inconsistent with the assertion of the SHLAA that housing development would be “suitable” or “practicable” on the critically-sited greenfield land now in question.

The SHLAA has ignored wildlife issues

Although the Council did not in the Local Plan formally categorise the land in question as of wildlife importance, its role as a green wedge is significant here. Wildlife such as badgers and deer are often seen on Greenway Lane, and the reason is the link which the Beechen Cliff Lower Field provides between habitats in Beechen Cliff and Alexandra Park on the one hand, and in Lyncombe Vale and the Cotswold Hills AONB on the other. Development on this site would cut off an important wildlife corridor.

The SHLAA has given insufficient attention to the traffic issues

The SHLAA dismissed, on the grounds that they were soluble, the traffic issues raised by major development in Greenway Lane. Eighteen dwellings with visitors and tradesmen would generate a good deal of traffic, increasing the number of households in the Lane by around 30%. Traffic has increased markedly in recent years, as have its speeds, and this is currently the subject of study and discussions between Greenway! And the Council, in the context of general road safety and in particular the safety of the children attending the three schools in the vicinity. Many, including relevant professionals, believe that the Lane has already exceeded its safe capacity for traffic. There are already frequent accidents, which only good fortune has to date prevented from being serious. The site is situated well above the level of the road, and the consequent steep access would enter the Lane at a straight and broad point where speeds are high: this would be markedly unsafe. It is unacceptable for the SHLAA to assume that difficulties of this sort can be resolved by traffic engineering or the use of planning conditions: they strike at the root of whether the site is developable, and there would need to be a clear understanding of their solution before an entry in the SHLAA ought to be made.

Conclusion

The Council declared, in drawing up the draft Local Plan, in its evidence to the Local Plan Inquiry, in its October 2006 decision to reject the Inspector’s recommendation and in its March 2007 review of that decision, that development on the Beechen Cliff School Lower Field would be unacceptable. No new evidence has been adduced in the SHLAA; indeed, it is patent that much of the public evidence has been ignored in that assessment’s construction and that the other evidence which is now available (such as the tightening of open space policies or the increase in pupil numbers) only strengthens the case for the status quo. It is notable that this site is unique in being the only one where the Inspector was so far in error in her report that the Council was obliged to reject her recommendation; it cannot therefore be precedent for others, and it is therefore unreasonable for the SHLAA to have followed that rejected recommendation. I ask the Council, before the draft Core Strategy is submitted to the Government for examination, to amend the Strategic Housing Land Availability Assessment so as to delete from it Site Lyn6 and to make very clear that development of the Beechen Cliff School Lower Field remains and will remain wholly unacceptable.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 100\1

Respondent: Mr Leslie Redwood

Representation I wish to make the following points:

- (soundness):**
1. The BANES Visitor Accommodation Study, which has been used in Policy B1, section 8A and in Policy B2, section 4, should be adopted as a supplementary planning document to help inform current planning applications from 2007/2008 onwards.
 2. The Banes Destination Management Plan should also be adopted in this way to influence current planning applications.
 3. The VAS should be adopted in full into the Core Strategy, specifically acknowledging that the total of 500 to 750 rooms is a maximum to 2026, as recommended in the study.
 4. All hotel developments since 2006 should also be deducted from this total of 500 to 750 rooms as a maximum by 2026. For clarity these developments are - The Gainsborough at 114 rooms, and the Geren Parh House at 190 rooms. These 304 rooms should be deducted from this 750 maximum total to 2026.
 5. Any other developments approved after November of 2010 should also be deducted from this total. Again for clarity this should include the 190 beds at Kingsmead house, and the 100 bed Premier Inn at James St. West. These should also both be deducted from the 750 maximum if approved.
 6. A minimum amount of 1 parking space per every 3 rooms of development should be provided for all new hotel developments to allow an interim parking offer before all parking is removed from new developments. The current policy of not allowing a minimum amount of parking at all for new hotel developments is not working for the residents of the city centre. Independent studies show that up to 70% of visitors to Bath will still bring cars. Not providing any parking whatsoever only increases pressure on the city centre infrastructure and is a failure.
 7. 24 hour, 7 day a week park and ride should be provided and the Bath Transport Plan should be enacted as soon as possible. This will then allow a gradual reduction in car use to the centre. The 1 space for 3 rooms should be used until traffic volumes in the city centres are substantially reduced, by at least 50%.
 8. The timetable suggested for growth by the VAS must be adopted into Planning Policy.
 9. A coach parking strategy for the city centre must be agreed before the coach park is removed for development.
 10. The impact of removing the Manvers St. car park and the Avon St. car park must also be taken into consideration, especially with regard to alternative parking arrangements in the city centre.

Change sought to make sound: Adopt the above 10 points.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\9

Respondent: Federation of Bath Residents' Associations

Representation Section 8 should include leisure, and the provision of a new Leisure Centre (whether or not a new rugby stadium goes ahead).

Change sought to make sound: Section 8 should include leisure, and the provision of a new Leisure Centre (whether or not a new rugby stadium goes ahead).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\13

Respondent: Federation of Bath Residents' Associations

Representation Para 1.26 (p19), 2.28 and Policy B1(1d) (Scale and location of growth)

(soundness):

FoBRA welcomes the priority for growth to be steered towards brownfield land and away from use of green spaces in Bath (ie towards preferential preservation of green spaces, particularly playing fields, in accordance with Planning Policy Guidance 17: "Planning for open space, sport and recreation").

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\15

Respondent: Federation of Bath Residents' Associations

Representation Policy B1(8) (p35)(Bath Spatial Strategy) and Policy B2(4) (p40)(Central Area Strategic Policy)

(soundness): FoBRA supports "a new cultural/performance/arts venue within the Central Area". However, if we are looking to expand the creative arts and software industries in the city then a substantial conference centre with associated accommodation would be an excellent additional magnet, as the international reputation of Bath makes it potentially a highly desirable conference venue, and conference delegates would provide valuable high-end business to the local hotel, restaurant and entertainment industries even at relatively unpopular times of the year.

**Change sought to
make sound:** This part of the plan needs to be expanded and elaborated.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 103\1

Respondent: Ms Evelyn Cox

Representation I believe that those who have expressed environmental concerns and who are also in a strong financial

(soundness): position, such as the Prince of Wales, should be encouraged to invest in the re-development of Bath's most derelict and ugly sites such as Snow Hill and other modern buildings. It is nonsensical to argue that every Duchy developments must be financially profitable. With a portfolio of investments that include shops and an international food franchise and a huge buffer of assets, the Prince can afford a few altruistic developments that actually support his environmental stance. Therefore, to rephrase the Duchy letter sent in answer to a plea from the group for the scheme at Newton St Lowe to be abandoned – "If Bath has to grow, the Duchy's site is NOT the obvious choice."

I strongly support the Bath Council in defending our natural assets against greedy developers, including those in sheep's clothing.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 104\1

Respondent: Professor Donald Thomas

Representation There has been no further evidence that the school wishes to sell the land for development. Instead,

(soundness): the demand for land to be used as playing fields seems to have increased.

It would be foolish to deny that closing Greenway Lane to through traffic would have significant local support. The council first proposed this in 2005, when it attracted some 40% in favour as the best traffic solution, in a well-supported questionnaire. Even those favouring it knew that they would face some personal inconvenience as a result. Their support for the proposal therefore shows how desperate they were to get something done about the traffic problem. So far, existing traffic-calming is felt to be too little too late. The promise in the the SHLAA that something more in the way of traffic

reduction might accompany development, followed by an immediate assurance that there can be no guarantee of this, makes the development proposal a stone-cold loser in public opinion.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 105\1

Respondent: Mrs Merrill Nunn

Representation (soundness): Lower Field, Beechen Cliff School - Lyn 1

I wish to object to the possibility of the above area being sold and developed as has been proposed in the SHLAA. There are many reasons for this, but in particular I would like to make the following points:

1. The value of the lower field as a playing field and open space. The use of this area for sport and general play is immensely important to a school that is now short of outdoor space (I gather the number of pupils is increasing). My son attended Beechen Cliff School and was very involved in the sport, so we know this from experience. Living opposite the playing field we have seen the large number of boys who use this area for sport or leisure as do many local residents.
2. It would appear that little attention has been spent to the fact that the Council has spent considerable time and money recently on making the area next to the substation safer where the road is very narrow. This work has improved and made safer the access to the playing field which many pupils use as their main route to school.
3. It seems extraordinary that developers have been given so much say (through the SHLAA) in the Core Strategy. I had assumed that this is the work of the Planning Department, not private individuals or firms who are bound to have a vested interest. Powerful arguments were put forward in 2007 for a similar development to be turned down and were successful. How can it be that these arguments are apparently no longer relevant only 3 years later, especially as the amount of housing needed in Bath has been reduced considerably?

For the above reasons and those raised when the previous proposal was rejected, I would ask that the area referenced as Lyn 6 be removed from the SHLAA, and that the Council once and for all reject any proposal that this will be developed.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 107\1 S

Respondent: Emma Cox

Representation (soundness): I believe that those who have expressed environmental concerns and who are also in a strong financial position, such as the Prince of Wales, should be encouraged to invest in the re-development of Bath's most derelict and ugly sites such as Snow Hill and other modern buildings. It is nonsensical to argue that every Duchy development must be financially profitable. With a portfolio of investments that include shops and an international food franchise and a huge buffer of assets, the Prince can afford a few altruistic developments that actually support his environmental stance. Therefore, to rephrase the Duchy letter sent in answer to a plea from the group for the scheme at Newton St Lowe to be abandoned – "If Bath has to grow, the Duchy's site is NOT the obvious choice."

I strongly support the Bath Council in defending our natural assets against greedy developers, including those in sheep's clothing.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 108\1 S

Respondent: Ms Deborah Cox

Representation (soundness): It is not economically viable in the long term to exploit natural resources for the benefit of a small number of people.

I believe that those who have expressed environmental concerns and who are also in a strong financial position, such as the Prince of Wales, should be encouraged to invest in the re-development of Bath's most derelict and ugly sites. It is nonsensical to argue that every Duchy development must be financially profitable. With a portfolio of investments that include shops and an international food franchise and a huge buffer of assets, the Prince can afford a few altruistic developments that actually support his environmental stance. Therefore, to rephrase the Duchy letter sent in answer to a plea from the group for the scheme at Newton St Lowe to be abandoned – "If Bath has to grow, the Duchy's site is NOT the obvious choice."

I strongly support the Bath Council in defending our natural assets against the purely financial motivations of a few developers.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 109\1

Respondent: Mr David Cohen

Representation (soundness): I write as a former teacher at Beechen Cliff and at a number of other secondary schools in our local area. Compared to those other schools Beechen Cliff is not now especially well endowed with playing fields. To reduce the extent of its field would be a seriously retrograde step. Despite being smaller than other schools' fields I am sure that the amount of use made by that very sporting school is probably far more intensive than at other establishments.

For both formal and informal play activities the open spaces in front of the main school buildings were always extensively used while I was working at the school. With rising intake numbers that use must now be even greater. Inside, the school is cramped and, in my experience, claustrophobic. The need for the greatest amount of open play space is obvious.

Please don't proceed with any proposal that seeks to reduce the field space at Beechen Cliff as it would have a deleterious effect on the schooling of the children and students.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 116\1

Respondent: June and Alfred Leonard

Representation (soundness): we did not agree with the original building plan designated for this area (including Whitchurch). It was definitely not a viable proposition for the excessive amount of houses planned. We were therefore very pleased when the change of government stopped these plans and put forward a more sensible plan

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 118\2 S

Respondent: Mrs J. Tinworth

Representation (soundness): Prioritisation of previously developed land for new housing e.g. MoD sites and Western Riverside.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 119\1

Respondent: Jill Gray

Representation (soundness): With the numbers of pupils at Beechen Cliff School ever increasing, the field is used constantly for school sports activities and for local community leisure. There is a real need for this land, zoned in March 2007 as open space, to be kept exactly as that.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 120\1

Respondent: Mr William Gaskell

Representation (soundness):

Change sought to make sound: You would need to draw up plans for a large community for people like me. For example the Newton St Loe development could be a 200 house development rather than a 2000 house development as I think that is what is needed to grow Bath.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 121\1

Respondent: Mrs Ann Dolan

Representation (soundness): This is an important recreational area for the pupils of Beechen Cliff school, who are increasing in number, and who already have less playing field area than would normally be expected for a school of this size. The boys use the lower playing field for running about and informal games almost daily in term time, which is good to see in these days when there is such concern about children not getting enough fresh air and exercise. It also provides a relaxing and safe fresh air walk to school for many of the pupils. The Government has further stressed the importance of playing fields and open air recreation, since the previous consideration was given to the preservation of this site.

The site is a greenfield site in a conservation area. It provides a recreational space for local residents in a well-populated area, not only immediately adjacent in Poets' Corner and Greenway Lane, but from Wellsway, Englishcombe Lane, Entry Hill, Oldfield Park and Holloway and Lyncombe Hill areas. It is a good place to walk, jog, and exercise children and dogs without having to resort to the use of the car. It provides an open traffic-free route from Alexandra Park through the lyncombe valley wildlife preservation areas within walking distance of town will be even more important. Residents there may well find it their nearest access to the countryside.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 122\1

Respondent: Martin and Teresa Broadbent

Representation a) Beechen Cliff School needs this space for recreation. If Culverhay is closed then the demands on

(soundness): Beechen Cliff will only be greater, and the school does not have enough playing fields for its size at present

b) This field is used a lot by the local community

c) The decision to put this site in the SHLAA overrules decisions made by Councillors, all of whom seem to be opposed to development on the site, regardless of political affiliation.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 123\1

Respondent: Mr John Amos

Representation Ours sons attend the school and I have some knowledge of the school's need for this playing field area.

(soundness):

I am also a member of Greenway and I often walk along Greenway Lane. I note that it is narrow and winding and subject to through traffic It already has numbers of cars parked there and is dangerous for pedestrians.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 124\1

Respondent: Ms Lucy Amos

Representation Our children need more open space, not less, and this field (already part of the school grounds) is

(soundness): important not only for the health of the boys but also for the general public who can walk there freely, away from the ever-increasing traffic.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 125\1

Respondent: Mr Roger Nunn

Representation The playing field is still needed by the SCHOOL, mainly for informal games; since 2003 pupil numbers

(soundness): have risen; on any day up to 50 pupils can be seen playing on this area of the playing fields; and it is contrary to the governments plans to sell off any more playing fields. To sell off the field is contrary to the school's own wish, expressed by the headmaster and governors.

The lower field is extensively used by dog-walkers, local people for informal games with children, people walking across to Alexandra Park often with children, and for many other purposes. It is a valuable wild-life corridor.

The SHLAA has given insufficient attention to the TRAFFIC ISSUES raised, suggesting that the road might need to be closed in the centre. This would I believe be quite unacceptable to local residents,

particularly in the light of recent spells of severe weather, when snow on Lyncombe Hill meant that vehicle access for people in the area of the east of Greenway Lane could only be possible westbound along the whole of Greenway Lane. If the latter road was cut in the middle to accommodate the housing development, these people would effectively be cut off.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 126\4 S

Respondent: D.M. Phillips

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 127\3 S

Respondent: Lady Rosemary Thompson

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 129\1 S

Respondent:

Representation (soundness): I am pleased that the greenbelt areas around Bath are to be retained and that the plans for an Urban Extension have been dropped. However I am concerned that the Duchy of Cornwall still favours the land near Newton St Loe for housing development and plan to appeal against the Core Strategy. I hope that the Council remains strong in protecting the greenbelt and urge them to consider the countryside near Newton St Loe to be made an Area of Outstanding Beauty.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 129\1

Respondent: Mr R T Evans

Representation (soundness): I would like to comment on the new Core Strategy. I am pleased that the greenbelt areas around Bath are to be retained and that the plans for an urban extension have been dropped. However, I am concerned that the Duchy of Cornwall still favours the land near Newton St Loe for housing

development and plan to appeal against the Core Strategy. I hope that the Council remains strong in protecting the greenbelt and urge them to consider the countryside near Newton St Loe to be made an area of outstanding natural beauty.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 132\2 S

Respondent: The Southgate Limited Partnership

Representation (soundness): Our Client supports the principle of proposed policy B1 and encourages the emerging Shopping Strategy, particularly in respect of the following statement: "Ensure that the primary shopping area successfully absorbs Southgate into the trading patterns and character of the city centre by not making provision for a further large scale comparison retail project."

Our Client supports the inclusion of SouthGate within the primary shopping area, as identified in Appendix 3 of the Core Strategy. SouthGate has been successful but still needs to establish itself within Bath City Centre, and our Client therefore strongly supports no further provision for additional large scale comparison retail space in Bath. Any smaller scale retail development in the City must integrate into the existing area and not threaten the viability and vitality of the existing City Centre, including SouthGate.

Our client does not support edge of centre or out of centre retail developments if they have the potential to weaken the function and viability of the primary shopping areas. The strategy for shopping should ensure that the vitality and viability of the City Centre and key established centres are protected. We consider that policy B1 should make explicit reference to edge or out of centre comparison retail developments not being supported by the Council where this could have a detrimental impact upon the primary shopping areas.

Change sought to make sound: We consider that policy B1 should make explicit reference to edge or out of centre comparison retail developments not being supported by the Council where this could have a detrimental impact upon the primary shopping areas.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 133\1

Respondent:

Representation (soundness): I understand that the number of pupils at the school has grown since the last application and, given the rise in child obesity, it would be a great mistake to deprive future generations of this very precious facility in such close proximity to the school. I also understand that Government policy on playing fields is now tighter than it was when the previous application was made. Bath is a World Heritage Site and is unique in having green spaces within the city. These are the lungs of the city and provide havens for wildlife.

People in authority have a grave responsibility to preserve these important spaces for generations to come. They are part of what makes Bath an exceptional place and, once they are built on, they are gone forever. So much damage was done to Bath in the 1960s - we must not make the same mistakes again.

Please, in future, concentrate on giving permission to build on brownfield sites and preserve our valuable green spaces. Finally I feel that local residents views should be condiered above all others. They are the ones who would be affected by the change of use or this green space, which at present they are able to enjoy and use for informal recreation. They should take priority over developers.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 134\5 S

Respondent: Mr and Mrs May

Representation I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of
(soundness): Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 135\5 S

Respondent: John and Sheila Deuch

Representation I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of
(soundness): Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 136\5 S

Respondent: Mrs B. Hobbs

Representation I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of
(soundness): Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 137\1

Respondent: I.G.C. Stratton

Representation 1. The SHLAA is a subjective and one sided document supported by developers without proper
(soundness): consultation with other interested parties.
2. The SHLAA was published just prior to Christmas and responses have to be lodged by the 3rd February 2011. Accordingly there is totally insufficient time for proper consideration and preparation of responses to this document.
3. The SHLAA is ill thought out, too cursory and ignores the powerful arguments against the proposal stated by the council in its decision of 2007.
4. Throughout the United Kingdom local authorities are selling off land of one sort or another not for the benefit of the community but to raise money to pay for years of incompetent management. Is the proposed development yet another example of this policy?
5. The SHLAA is totally contrary to the recently expressed views of councillors
6. Government policy on playing fields has now been revised due to the overselling of these amenities to the detriment of the sporting activities of all children. As a result government policy now demands that school playing fields be preserved rather than sold off.

7. With specific reference to Beechen Cliff there is an increased demand for playing fields as the number of pupils has increased since 2003 and the present headmaster strongly supports the retention of the land in question for its present use as playing fields.
8. There has been a reduction in the councils housing land targets since 2007 which is even less. Furthermore the local plan published in 2007 zoned the land open space.
9. Bath is a World Heritage City and accordingly there is an important need to protect "green infrastructure" and its landscape setting. In addition the land in question is clearly open space and a habitat for wildlife.
10. The SHLAA completely fails to deal with and ignores the extremely dangerous traffic problems in Greenway Lane. During the rush hour Greenway Lane ceases to be a "lane" and becomes a "rat run" and main artery for traffic into the centre of the city resulting in traffic jams. Even at quiet times cars speed along Greenway Lane at speeds in excess of 50mph. Consequently there have been a number of serious accidents which have taken place in this road. Any development of the playing fields would increase the amount of traffic and exacerbate these problems and dangers. There would also be an increased danger to the pupils of Beechen Cliff School as they have ingress and access to the school.
11. Personally as the author of a legal textbook entitled "Building Land and Estates: Their Acquisition and Development" I can see no legal or other need for this land to be developed for housing or any other purpose,

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 138\3

Respondent: Mr Christopher Isaac

Representation Finally, at a more local level, I think it very unfortunate that the Council should appear to be accepting
(soundness): Beechen Cliff School's proposal to redevelop an area of their playing field alongside Greenway Lane for housing. Not only is this area important as a local amenity, but, with school numbers growing, informal play outdoors is an essential element of children's school life.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 140\1

Respondent: Ms Irene Macias

Representation As a regular user of the field, where I have the pleasure to walk my dog every day, I feel very strongly
(soundness): that building on this wonderful site would be very detrimental to the school, the community as a whole, and the beautiful landscape and wildlife that so many of us so cherish. I feel that Bath is very built up already and that there are not enough green open spaces like this one. I see families with children, people doing sports, other dog walkers, and in general, people who enjoy the outdoors. I don't think the site is big enough to build much on it, anyway.

These fields are a wonderful asset not just to those who live adjacent to them, but also to the neighbouring community as a whole. I would ask you to consider very carefully any plans for this site, as it would have a very wide impact for many of us.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 142\1

Respondent: Diana and Nicolas Francis

Representation Others will have expressed cogent reasons for opposing any plan to develop this area for housing; it
(soundness): suffices to say that the retention of open space in Bath at the present time is vital to quality of life of residents, and scholars at Beechen Cliff School (where numbers are expected to rise substantially over the next couple of years).

The issue of how to cope with increased traffic is also a serious matter along a narrow and congested road.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 144\1

Respondent: Ms Liz Dodgson

Representation The playing field is extensively used both by the school and local community; indeed the revised
(soundness): inclusion of this area is even more astonishing bearing in mind that Government guidance has become more emphatic on the preservation of school playing fields since the election of the Coalition last May.

This playing field forms part of a Conservation area and is an important green, open space on the south side of Bath. In an age where we have a far greater understanding of the value of preserving our green spaces we need to protect rather than threaten this area from ANY risk of future development. This area provides the setting both for Lyncombe Vale and, critically, the listed properties that form its backdrop; development would destroy this forever. Surely, our experiences of previous planning decisions in the 70s and 80s have taught us to value rather destroy this wonderful heritage city, which, after all we are only custodians of.

It is critical that this well used and appreciated green space is not eliminated for the sake of a few houses that will make little impact on Bath's housing requirement. Therefore, I believe that there are indisputable grounds for LYN 6 to be removed from the SHLAA.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 146\1 S

Respondent: Ms Alison Evans

Representation I am pleased that this Core Strategy has agreed to maintain the greenbelt around Bath and that the
(soundness): number of houses to be built has been agreed to a more sensible number following the abolition of the Regional Spatial Strategy.

I agree that the housing development should be on brownfield sites and that this will include the redundant MOD sites.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 146\3 S

Respondent: Ms Alison Evans

Representation My particular interest is in the countryside close to Newton St Loe and I am pleased that the idea of an
(soundness): Urban Extension to Bath has been firmly dropped from the new Core Strategy.

I feel that the village of Newton St Loe has a unique identity which must be retained. Its rural setting is very important. I am aware that the landowners - the Duchy of Cornwall - are still in favour on building on the fields near Newton St Loe and that they are to appeal against the Core Strategy. It is suggested that making this area an Area of Outstanding Natural Beauty would help to protect it and I ask that you support this idea.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\14

Respondent: Bath Green Party

Representation B1: Do you consider this to be a fair portrait of the city?

(soundness): Not completely. The portrait doesn't comment on the sustainability of the city, which needs to be the first element to consider.

B2: Are any elements missing or wrongly presented?

Yes.

A) The transport infrastructure section does not recognise the value of the current size and compactness of the city, which makes it eminently suitable for many of its journeys to be made by walking and cycling, nor of its hilliness, which means that it is particularly important to have a well-integrated and affordable public transport system.

B) Although para 3.18 mentions air pollution, there is no mention within the transport infrastructure section of the role that transport currently plays in CO2 emissions.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\17 S

Respondent: Bath Green Party

Representation We disagree with the concept of developing a new neighbourhood on the edge of Bath. The priority in

(soundness): providing for additional housing needs to be done through:

a) Tackling the legacy of empty housing, both publically and privately owned

b) Finding innovative ways of making better use of the existing housing stock to provide for more people than it currently holds

c) Ensuring all new development of housing is done within existing built-up areas or as small extensions where these will improve the sustainability of a community.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 148\3 S

Respondent: Bath Chamber of Commerce

Representation I am writing on behalf of Bath Chamber of Commerce to express our broad support for the latest Core

(soundness): Strategy Document. We have been appreciative of being fully informed of developments and grateful than many of our original observations on the original have been incorporated into the new version.

However, there are six points that I need to raise on behalf of our members, who form a significant part of the business community.

3. We believe there is adequate land in Bath to produce the number of high value jobs that are so necessary. In fact there may be an argument for some employment land coming out of the market in order to create a demand which would allow developers the opportunity to create modern office space.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 149\5 S

Respondent: Jean

Representation I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of
(soundness): Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 150\5 S

Respondent: Mr and Mrs Awebb

Representation I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of
(soundness): Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 152\1 S

Respondent: Corston Parish Council

Representation From discussions held with Parish Council colleagues at Newton St. Loe, we understand that the Duchy
(soundness): of Cornwall intend to make representation later this year to the Examination in Public of this draft Core Strategy with the intention of attempting to reintroduce the excluded Urban Extension of Bath at Newton St. Loe (Known as Option 3A in the previous Core Strategy Spatial Options).

Should this transpire, Corston Parish Council would make the point that the Urban Extension at Newton St. Loe was thoroughly addressed during the earlier consultation and was overwhelmingly rejected by an exceptionally large number of Unitary Authority residents. So much so, that understandably, the Urban Extension was removed from the current draft Core Strategy. To reintroduce this discredited proposal could be seen as an attempt to undermine a democratically established conclusion that reflects the wishes the people, including Unitary Authority Councillors; Parish Councils and environmental protection groups, All of the above did not wish to see building development on valuable agricultural land or any areas within the Green Belt. Corston Parish Council wishes to be represented at the Examination in Public of this current Core Strategy.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 158\1

Respondent: Margarida Dolan

Representation I can see the Lower Field from my house so I can let you know that it is used by the school all the time
(soundness): for sports lessons. In addition, every day the school children use the Lower Field during their lunch break to play games, run around or sit down chatting. The Lower Field is also used everyday, all day long by different communities. As early as 6 am there are people walking their dogs, running or exercising. At the weekend, many families who do not live in the area go for long walks that include the Lower Field, the steep steps off Greenway lane, Lyncombe Vale, Perrymead and Rosemount. Families with children use the field to run around and play games, and it is also frequent to see university students who live in the area practicing sports. The field is unusual as it is easily accessible from a number of points, it is flat, it has open views and there is no charge to use it. Local residents, visitors, school children and staff are all privileged to experience this amazing scenery and its wildlife. Building on the field would irreparably damage this beautiful, peaceful and unique area and its diverse communities. I believe the Council should focus on treasuring and preserving this open space, and ensuring that it is always here for the enjoyment of all.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 159\1

Respondent: Phil Turton

Representation The SHLAA's assessment is far too scant. It ignores completely the arguments against the development
(soundness): proposal as set out by BANES in its 2007 decisions. The views of the local community have not been sought. This has resulted in a clearly biased assessment which warrants revision. The SHLAA ignores the impact of the development proposal on the setting of the listed Devonshire Buildings. Although acknowledging the PRow crossing the site the SHLAA ignores the current extensive permissive use of the land for informal recreation by the local community. The SHLAA gives scant attention to traffic issues – assuming solutions will be forthcoming but without providing detail. Policy BH.15 on visually important open space (carried over from the local plan) is ignored together with the land's role as a green wedge and wildlife corridor. In addition to the above, I understand that the the school's current headmaster has expressed the view that the site is needed as playing fields; pupil numbers having risen and daily use of the site by the school's pupils having intensified. Development of the site when housing land targets have been reduced since 2007 and Government policy on playing fields having been tightened would make for an Olympic legacy with which BANES would not wish to be associated.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 160\1

Respondent: Mr Peter Dolan

Representation 1) Inclusion of the field in the SHLAA is contrary to the recent decision of the council not to designate
(soundness): this area for development.
2) The school needs the playing field. The ratio of playing field area to pupils was previously too low and school numbers have since increased. The area in question is regularly used.
3) The SHLAA ignores the extensive use of the field by local residents.
4) The SHLAA assumes the need to close Greenway Lane to through traffic. This would seriously inconvenience residents. During the recent spell of cold weather it was impossible to leave the lane to the east.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 161\1

Respondent: Greenway Residents forum

Representation The SHLAA is procedurally defective

(soundness): The procedure to be followed in the SHLAA is set down in the B&NES SHLAA Methodology and Call for Sites Consultation of July 2008. §5.58 of that document states "A site will be considered as available for development, when on the best information available, there is confidence that there are no legal or ownership problems. This means that it is controlled by a housing developer with an expressed intention to develop or a landowner with an expressed intention to sell." However, it appears to us that the Council's information on this is out of date. This land is not controlled by a housing developer (Beechcroft's option to purchase expired some years ago), and our information is that the school is no longer in favour of selling. Indeed, on 24 January 2011 the headmaster of the School wrote to the Council formally confirming that the current view of the Governors was that the land should not be disposed of. Hence the land fails the first and most basic test of eligibility for inclusion.

However, this finding of the SHLAA is defective in other ways as well. The SHLAA's documented assessment of the land in question as suitable for development relies entirely on the report of the Planning Inspector who examined the Local Plan in draft. On page 347 of her Report, the Inspector listed the representations she had taken into account in considering the future of this land as 2310/B4 (Beechcroft Developments) and 2310/B17 (Beechcroft Developments). She made no mention of the properly submitted representations by Greenway! (the Greenway Lane Area Residents' Forum), as well as by the Council itself, which specifically addressed the possibility of development of the Lower Field, and raised a series of issues, such as the key role of visually important open space, which were not mentioned in the Inspector's arguments. Both the range and the weight of the arguments in question were affected. This was a procedural flaw which vitiated her conclusions, as was, we believe, recognised by the Council in October 2006 when it rejected this part of her Report. The authors of the SHLAA have not only failed to obtain up to date information on the Council's fundamental ownership test. They have also uncritically rehearsed the Inspector's words and failed to appreciate that the Council's views, evidence to the Inquiry and final decisions were very different. They have failed to consult the local community on their work, and the fundamental planning principle of audi alteram partem has therefore been transgressed. The result is defective and, we think, Wednesday unreasonable. It must be set aside.

Remedial action required

This threat to the delivery of national and local policy can be met only one way. We call on the Council, before the Local Development Framework proceeds any further, to reaffirm its decisions of October 2006 and March 2007 on the Beechen Cliff School Lower Field, and to amend the SHLAA so as to delete site Lyn6 and to make very clear that development of the Beechen Cliff School Lower Field remains and will remain wholly unacceptable.

We note that this land was the only site recommended as an addition by the Inspector which the Council set aside, rejecting her recommendation. We therefore believe that the loss of 18 dwellings by the omission of this site from the SHLAA would not be a precedent indicating that other sites should be treated similarly, nor involve a material loss of sites from the SHLAA such as to cast into doubt the achievability of the housing target in the draft Core Strategy.

The strengthened case against development on the playing fields of Beechen Cliff School

The assessment of suitability for development is inconsistent with national policy on open space and greenfield development

Planning Policy Guidance 17: Planning for open space, sport and recreation stipulates: "10. Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has clearly shown the open space or the buildings and land to be surplus to

requirements..."; this was acknowledged in the B&NES SHLAA Methodology and Call for Sites Consultation of July 2008. The only such assessment is now obsolete. This was carried out by DFES in 2000-03. At that time local residents were able to set out in comprehensive detail, referring to a recent OFSTED inspection and independent research, how the proposals failed all three of the Secretary of State's then criteria, as a result of which the proposals were amended by the school in discussion with DFES officials and were apparently approved at the margin. Since then, however, circumstances have changed. The government's education policy on disposal tightened in 2004, and the Coalition's policy is now tighter still. Other government policies in health and the DCMS field increasingly call for the retention of recreational open space. In addition, the number of pupils at the school has significantly risen since 2003, and with it the need for playing fields, including space for informal outdoor recreation – as is demonstrated by the increasingly intensive use of the land in question by the school. The school would risk serious harm if this land were now to be developed. It is clear that the earlier assessment is now out of date and that national policy demands the retention of the allocation as playing fields and open space.

PPG17 goes on, "Developers will need to consult the local community and demonstrate that their proposals are widely supported by them. 11. Open space and sports and recreational facilities that are of high quality, or of particular value to a local community, should be recognised and given protection by local authorities through appropriate policies in plans. Areas of particular quality may include...small areas of open space in urban areas that provide an important local amenity and offer recreational and play opportunities". It is very clear that development of this land has no support in the local community, 70 of whom turned out to protest about this on the wet and windy night of 12 January 2011; and that the amenity and recreational value of this land is very high.

Moreover, Planning Policy Statement 3 (Housing)(9 June 2010), at §36, requires that previously developed sites should be developed before greenfield sites. Beechen Cliff School playing fields are greenfield, as defined in that PPS (Annex B page 26). Therefore other sites, including Western Riverside, should be developed before they are considered. Even if it were acceptable to develop on the BCS Lower Field (which it is not), it would be wrong to aim to build on it within five years, as the SHLAA now declares to be practicable.

The SHLAA has ignored evidence which shows that there is a real need for the playing fields
The Secretary of State for Education and Skills gave consent on 17 September 2003 to disposal of the land. But:

- the previous OFSTED report stated that the playing field space was insufficient, and the decision took three years of renegotiation and resubmissions, so the Minister's decision must have been borderline;
- On 27 August 2004 the Minister's announced a change in his policy so that in future playing fields should only be disposed of as an "absolute last resort" (The Times, 28 August 2004);
- The new Coalition Government has a policy on the loss of playing fields which is even more restrictive;
- the land in question is still in daily use by the school's pupils, as local residents can testify;
- the number of pupils in the school has risen markedly since 2003, and with it the need for outdoor recreational space;
- the present headmaster of the school has indicated his view that the land is needed by pupils for recreation.

The 2003 consent does not enable the Council, in exercising its planning functions, to ignore the question of the need for recreational open space by the school. As evidence of need, the Minister's 2003 decision has now clearly been overtaken. All the evidence now points to the need for these playing fields continuing.

The SHLAA has ignored evidence which shows that there is still a real need for the open space for leisure and recreation

The SHLAA takes no account of the current extensive permissive use of the land for a full variety of informal recreation by local residents, and their need for it to continue, even though this was evidenced to the Local Plan inquiry by Greenway!

The SHLAA has ignored the impact of its proposals on the setting of a listed building

Following the inquiry into the draft Local Plan, the Inspector considered the impact of development on

views from the listed terrace of Devonshire Buildings. However, she failed to consider the impact of development on the setting of this important listed Georgian terrace, the extensive views of which from the south would be closed off by development of the Lower Field. Officers compiling the SHLAA appear to have ignored both matters, though the second in particular is of considerable importance in terms of listed building conservation in this World Heritage city.

The SHLAA has given insufficient attention to the Council's allocation of the land for visually important open space and its impact on the World Heritage Site
Then known as "Home Field", the land now in question was part of land on Beechen Cliff purchased by public subscription in 1869 "with a view of preserving it as an ornamental appendage to the City", and "to be held in trust in perpetuity". The school was developed on part of the larger holding in 1932, and as a public body took ownership of its playing fields in 1989. UNESCO's Statement of Significance for the Bath World Heritage Site remarks on how "Bath's urban and landscape spaces are created by the buildings that enclose them, providing a series of interlinked spaces that flow organically, and that visually (and at times physically) draw in the green surrounding countryside to create a distinctive garden city feel, looking forward to the principles of garden cities". In its recent report on the World Heritage Site, UNESCO highlighted the need to enhance the protection of the landscape surrounding the City, and the World Heritage Site Steering Group agreed that this should be one of the Group's four immediate priorities"; Though the land now under consideration is not as critical as the face of Beechen Cliff itself, it has great significance as part of the visually important open space highlighted by Local Plan Policy BH:15 and which plays a key role in the character of the World Heritage Site as described in the UNESCO report.

Referring to the importance of the site in delivering Policy BH:15 of the Local Plan, Council officers commented to the Inquiry on 16 January 2002, "Greenway Lane is a historic lane with a semi-rural character. Its character, with a long section of country-style hedging and open space, is a vestige of the rural setting of this part of Bath" and went on to remark that development would – partly because it also affects the open views from Devonshire Place and interrupts the visual break between the school complex and its foreground – harm the character of this part of the Conservation Area. In our view equally important are the position of the Lower Field as a green wedge linking the important hilltop of Beechen Cliff and Alexandra Park, on the one hand, with Lyncombe Vale and the Cotswold Hills AONB, on the other; and the green and verdant tone it gives to the view of the city from the Fosse Way and Bloomfield Road, and even from the Georgian terrace at Bloomfield Crescent.

The new draft Core Strategy is threaded through with references to the importance of green infrastructure. It remarks "A well-designed, managed and integrated network of green infrastructure provides a wide range of direct and indirect benefits to people and wildlife. This includes a greater sense of community, improved health and well being and ... conserving or enhancing landscape character, historical and cultural features". The strong emphasis on green infrastructure in the Core Strategy is entirely inconsistent with the assertion of the SHLAA that housing development would be "suitable" or "practicable" on the critically-sited greenfield land now in question.
The SHLAA has ignored wildlife issues

Although the Council did not in the Local Plan formally categorise the land in question as of wildlife importance, its role as a green wedge is significant here. Wildlife such as badgers and deer are often seen on Greenway Lane, and the reason is the link which the Beechen Cliff Lower Field provides between habitats in Beechen Cliff and Alexandra Park on the one hand, and in Lyncombe Vale and the Cotswold Hills AONB on the other. Development on this site would cut off an important wildlife corridor.

The SHLAA has given insufficient attention to the traffic issues
The SHLAA dismissed, on the grounds that they were soluble, the traffic issues raised by major development in Greenway Lane. Eighteen dwellings with visitors and tradesmen would generate a good deal of traffic, increasing the number of households in the Lane by around 30%. Traffic has increased markedly in recent years, as have its speeds, and this is currently the subject of study and discussions between Greenway! and the Council, in the context of general road safety and in particular

the safety of the children attending the three schools in the vicinity. Many, including relevant professionals, believe that the Lane has already exceeded its safe capacity for traffic. There are already frequent accidents, which only good fortune has to date prevented from being serious. The site is situated well above the level of the road, and the consequent steep access would enter the Lane at a straight and broad point where speeds are high: this would be markedly unsafe. It is unacceptable for the SHLAA to assume that difficulties of this sort can be resolved by traffic engineering or the use of planning conditions: they strike at the root of whether the site is developable, and there would need to be a clear understanding of their solution before an entry in the SHLAA ought to be made.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 167\1

Respondent: Homebase Ltd

Representation (soundness): Our objections relate to the failure to identify any provision for existing retail businesses, and specifically the Homebase, to include any allowance for accommodating 'larger' comparison units within this 'Area' or to provide for the future relocation of existing retail businesses outside of the 'Central Area'. My clients do not object to the 'legal compliance' of this DPD with national policy and guidance, but with its 'soundness'. In terms of the latter, Policies B1 and B2 are in our view 'unsound' for the following reason:

- a) They do not show a firm or coherent strategy for achieving or delivering the regeneration proposals for WRE (including the Homebase) within the timescales of this DPD
- b) They made no provision for the future of existing retail businesses (including the Homebase store) or the 'option' of accommodating the Homebase within a modern and innovative development
- c) They provide no reasoning or explanation as to why 'larger' comparison retail development could not be accommodated (or retained) within the 'Central Area' to complement the City Centre
- d) There is no commercial or other 'evidence' to support or indicate that the regeneration of WRE can be delivered and who the Partners in delivering that development are likely to be
- e) There is no indication as to how and when the regeneration of WRE could happen or if it was not commercially viable or achievable what 'alternatives' have been considered

Overall, my clients consider that the mistakes and errors of earlier DPD's are being repeated and as the Inspector in relation to the Bath Local Plan also concluded, the future of existing businesses and how they will be accommodated or not within WRE is simply being ignored and overlooked. Whilst Policies B1 and B2 refer to the need to accommodate within the 'Central Area' a new rugby stadium, a new arts facility and to retain existing leisure facilities, there is no policy reference or guidance as to whether the Council will look to retain existing retail businesses within this 'Area' and if not to which other 'policy areas' or locations within Bath those businesses will be encouraged and assisted by the Council to relocate too.

Change sought to make sound: We would suggest the inclusion of the following wording within Policy B2 and at the end of Part 4:

" The retention and enhancement of existing retail businesses or their relocation to a suitable and viable site"

This change should also be reflected in amendments to the wording of Policy B1 part 6 'Shopping' and sub-criterion 'b'

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 168\1

Respondent: Alison and Kjeld Jensen

Representation We strenuously object to building on the Beechen Cliff playing fields. Our two sons attend the school
(soundness): and need all the exercise they can get and to let off steam. The loss of an essential open space for the boys comes at a time when they are being encouraged in active participation in all sports by the Olympics next year. Furthermore, we live in Maple Grove and value the fields as an essential green space for walks.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 171\1

Respondent: Sandra Blair

Representation I have read in almost all areas of the Core Strategy of the need for austerity measures in this “time of
(soundness): austerity” which is commendable and we must all learn to live with these measures. However, I have also read in the press that BANES is proposing to fund a new Leisure Centre in the centre of Bath to the tune of £10million. I am now not sure what the reasons are for the Core Strategy as I did not come across any mention of the Leisure Centre proposal anywhere in its pages. If £10million is to go on a new project does that mean there will be more austerity measures in other areas? Doesn’t make sense to me at all and seems rather unfair.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 176\1

Respondent: Mr Clive Pugh

Representation These green spaces are inherent to Bath’s character and status. I support fully the arguments of the
(soundness): Greenway Lane association

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 179\1

Respondent: Marius McKee

Representation Dear Sirs 2 February 2011

(soundness):

I am writing to object to the inclusion of Beechen Cliff Playing fields as part of the SHLAA.

It is a very well used field by Beechen Cliff School pupils every day of the school term. It is used by local residents and walkers from further afield every day of the year.

I can vouch for this because I live opposite the gated entrance, at South Hill Villa, 18 Greenway Lane.

Please see attached a copy of a map from the early 1800s when a few houses were built in the area, most noticeably Devonshire Buildings. The field in question was in use then, had a public pathway across it (which still exists today), and presumably the ancient hedgerow that borders the field was in existence then.

I would therefore urge you to remove this area from the SHLAA, as not appropriate for development. Any development would not be in keeping with Bath’s justified status as a World Heritage Site - which

includes not just the buildings but also the historic spaces in between.

Yours

Marius McKee

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 181\1

Respondent: Simon Banks

Representation A requirement of the DPD is that it should provide evidence of a justification for recommendations.

(soundness): In the matter of ODN.3 , Land to the rear of 93-123 Englishcombe Lane, this test fails on both counts.

Evidence – in previous submissions by residents , considerable evidence of the unsuitability of this land for development has been submitted both for access and drainage. This has not been included or referred to in the assessment. In particular the statement that this land could be available in 5 years is entirely without foundation given the level of opposition and legal challenges likely at all stages of development

Justification - Previous strategic plans have been vigorously and unanimously opposed by residents and developers. There is no reference to any evidence of participation of the local community in this document nor attempts to secure any such participation. Alternative uses of the land such as Allotment use or sustainable CHP use have not been considered as reasonable alternatives, despite the considerable requirement in the community for both.

In previous plans, officers have removed this land from development use, only to re-instate it when pressured to deliver central government house building targets, now removed. There is clearly no need for this land to be included in the DPD .

**Change sought to
make sound:** ODN.3 should be removed from the SHLAA and community consultations held to determine the best use of the land for sustainable community use. In doing so, the authority can further reinforce its sustainability objectives and fulfil the wishes of the local and wider community to use green land for housing only as a last resort when other re-usable sites have been exhausted. If maintained within the plan this should only be done with a full and fair assessment of costs and timescales (including legal costs and land preparation costs) to bring this land to development so that this is transparent to all.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 190\1

Respondent: Newton St Loe Parish Council

Representation Dear Sir,

(soundness):

Draft Core Strategy

We write to endorse the Draft Core Strategy. As you know there has been an enormous amount of research, consultation and heart-searching that has gone in to this strategy. We support the housing target, although would prefer to see more social housing and fewer market-priced houses, as that is the need locally. We support the Council's approach to allocating those houses. We also support the policy of building on brown field sites rather than destroying green fields in green belt that represents an essential part of our heritage.

In particular we strongly resist any arguments to include an Urban Extension to the South West of Bath.

-It is green belt and serves to separate Bath from Saltford, Kaynsham and Bristol.

- It is an important habitat, not least for Horseshoe Bats which are supposed to enjoy European protection.
- It is productive farmland which supplies high quality beef to local school children with almost zero carbon footprint.
- It is a vital part of the setting for the UNESCO World Heritage Site.
- It is an important amenity for City residents in Bath.
- We are in the process of being designated AONB. All of the relevant bodies have shown strong approval for the proposal. It would be wrong to ignore the merit of the land due to timing.
- If greenbelt is built on then urban regeneration on brownfield sites will be delayed a generation at least, as demand is satisfied by despoiling the countryside rather than redeveloping and renewing.

The people of Newton St Loe feel very small and powerless in making our representations: the forces marshalled against the countryside we love are the most powerful in the land with enormous wealth, influence and professional advice to support them. We have to believe in the Rule of Law and that Justice will Prevail in this matter.

Yours Truly,

Jane Giddins
Chairman, Newton St Loe Parish Council

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 191\1

Respondent: Christopher Starling

Representation (soundness): Dear Sir/ Madam

I feel the need to write to you to express my disappointment that you are considering redeveloping the playing fields at Beechen Cliff School. As a local resident I think it is of the utmost importance to sustain as much open green space as possible so that the local community, be it school children, walkers and residents can continue to enjoy the Lower Field by the school.

I very much hope you will reconsider this redevelopment and consider alternative ideas away from Beechen Cliff, so that the local community can continue to make use of its beautiful open spaces.

Please do not hesitate to contact me, I very much hope you change your decision,

Yours Faithfully,

Christopher Starling

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 192\1

Respondent: Mrs. A Chapman

Representation (soundness): Dear Sir/Madam

Re: Proposed Development of Beechen Cliff School Playing Fields.

I am writing to complain about the proposed development of Beechen Cliff School Playing fields. I feel strongly that SHLAA ignores the importance of this land as a wildlife area and all an essential playing field and recreation space for pupils at Beechen Cliff School.

I am also concerned about traffic issues and how building on this site will increase the volume of traffic on what can be a congested rat run during peak hours. This poses a safety risk for the many pupils who walk to school.

Building on this land will also have a negative impact on local residents and the listed Devonshire Buildings.

I ask you to keep to the 2007 Councillors' agreement to keep the land as open space.

Please protect the playing fields and do not allow this development.

Yours Faithfully,

Mrs. A. Chapman

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 193\1

Respondent: John Dolan

Representation (soundness): To whom it may concern

Re: Core Strategy (Beechen Cliff Lower Fields.)

I am writing to object to the potential re-zoning or re-classification of the lower Field adjacent to the Greenway Lane, for any form of housing development.

My reasons for opposition are as follows:

-The field is used extensively by the school itself. Both for informal play in recreation time and for taught sports training. The school is growing in numbers and does not have extensive sports areas.

-The field forms a green corridor between the Wells Road/ Entry Hill area and the areas around Alexandra Park.

-The field is heavily used on a daily basis both by walkers of all ages and for keep fit activities, and is of benefit to local residents and as a wider amenity.

-Housing development in this field would cause major additional traffic around the Greenway Lane and Entry Hill areas and significantly worsen congestion which is already heavy at peak hours,

Yours Sincerely,

John Dolan

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 194\1

Respondent: The Inland Waterways Association

Representation The Avon and Wilts Branch of the Inland Waterways Association and the Bath and Bristol Branch of the
(soundness): Kennet and Avon Trust, both of who I represent, have over the last 9 years campaigned for Bath, via its Council, to do something about its under utilised and neglected river corridor. This situation has been recognised by The Council in both its World Heritage Site Management Plan and its Public Realm Consultations.

Whilst the acceptance of what can only be described as a glaring deficiency is a step forward what has not been forthcoming, and what should be made into a firm commitment, is the inclusion in the Councils Policy for the Future of Bath to remedy this situation.

What better place to deal with this than the Councils Core Strategy. Surely bath's River Corridor is of sufficient importance to warrant a specific section in the Core Strategy. Please treat this as a formal request on behalf of the two organisations which I represent for such an inclusion.

My address and contact details are: St Christopher, Belmont Road, Combe Down. Bath BA2 5JR- Tel 01225 836133 - email jes.webb@btinternet.com I would formally request that I am kept informed of and involved with the on-going consultation process in respect of this matter.

Yours Sincerely,

John Webb.
The Inland Waterways Association - Avon and Wilts Branch.
The Kennet and Avon Canal Trust - Bath and Bristol Branch.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 195\1

Respondent: Mrs. M. E. Braem

Representation I am a resident in Bath and North East Somerset and I am writing to register and represent my support
(soundness): for the revised Cor Strategy under the current consultation.

In particular I support and find Sound

- A) the protection of the green belt surrounding Bath.
- B) the prioritisation of Brownfield sites for new housing development.
- C) the development of MOD sites
- D) the commitment to the environment and to protect local wildlife and habitats.
- E) reducing the housing number to represent a realistic need and affordable level of development and growth in the region.
- F) the eradication of 'planning by numbers'
- G) the development of western riverside.
- H) small scale infilling of new houses within existing neighbourhoods.
- I) support of local farming and food production
- J) the protection of the World Heritage Site and setting.

I am particularly satisfied to see that you have removed the proposed 'urban extension' on the SW of Bath from the draft Core Strategy and I support all efforts by the Council to protect this land from unwanted development and to afford it AONB status.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 196\4 S

Respondent: Christopher Hughes

Representation I am a resident of BANES and am writing in support of the revised Core Strategy.

(soundness):

In particular I support and find sound:

4. Development of western riverside.

6. Development of MOD sites for housing.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 199\1

Respondent: Beatrice Godwin

Representation Beechen Cliff School Lower Field was zoned as an open space in the local plan which was approved in

(soundness): March 2007. The New Strategy housing land availability assessment is attempting to overrule that zoning without consulting local residents or Councillors. Rezoning would have an adverse impact on visually important open space: on the setting of Devonshire Buildings; on the use of the open space as a wildlife corridor; and on the use of the land for informal recreation by local residents. Traffic During rush hours has already reached saturation point on Wellsway and Greenway Lane - more housing would worsen an intolerable situation.

Change sought to Continuing the current policy of zoning Beechen Cliff School Lower field as an open space, as approved
make sound: in the local plan in March 2007.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 204\1

Respondent: Geoffrey Hunt

Representation Re: Beechen Cliff School Playing Fields

(soundness):

Dear Sirs

I have taken an interest in the matter of the possible selling of the 'Lower Field' part of the playing fields to building developers since the latter part of 2001, and have made representations to various bodies since that time. I have been given the Respondent No.2141, and have received answers to my letters from the Council.

I understand that the Council has now published a draft replacement of the Core Strategy Local Plan (SHLAA) which is partly based on the suggestion put forward by housing developers that the Lower Field is a suitable site for new housing, and should be so regarded.

In a letter I wrote to Cllr. Paul Crossley dated 29 August 2006, (a copy is attached), I set out a number of factors which in my view are against such a contention. Cllr. Crossley informed me that the points I raised in my letter would be added to the body of evidence forwarded to the Local Plan Team. I have also been provided with a copy of the 'Council's Response to Representations on the Deposit Draft 2002'.

The points I raised in my letter are still particularly relevant, and probably more so now that it well recognised and generally accepted that there should be more provision for outdoor sports and

informal games, and it seems likely that school pupil numbers will increase.

I trust that the views I earlier expressed will again be taken into account.

Yours truly

Geoffrey Hunt

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 205\1

Respondent: Jack Goodfriend

Representation To whom it may concern,
(soundness):

I am writing in regards to the proposal to create a new housing development on the fields opposite to Greenway Lane.

This open area is used by many local residents and school pupils as a great place for outdoor activities of all kinds. As well as being an important outdoor playing area for residents it is an integral part of the Bath scenery and it's loss would be a great blow to the city of Bath

Sincerely,

Jack Goodfriend

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 206\1

Respondent: Paul Hayward

Representation Beechen Cliff playing Fields
(soundness):

Dear Sir,

I am very concerned to see that once again the issue of housing development of Beechen Cliff playing fields has been raised, how many more times are people supposed to object. These playing fields have been used by my children, and grandchildren and generations of children before them.

The fields are used on a daily basis by the children for both informal play and also supervised sports. Evidence has been produced that the school has insufficient recreational space for the number of children that are in the school. Both Labour and Conservative governments have stressed the value of outdoor recreational facilities. Once these playing fields are used for building they are lost forever which would be a tragedy both for the pupils of the school and the local residents who also use the facilities.

This is a World Heritage City and to use this field would detract from the green infrastructure. It would also greatly increase the amount of traffic onto the Greenway Lane which at peak traffic times is used as a "rat run" already, there are plenty of brown field sites within the city which are more centrally located, and to develop this field for profit would not be in the best interests of the school pupils or the local residents and would be detrimental to the city's World Heritage Status.

Yours Faithfully,

Paul Hayward

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 207\1

Respondent: Susan Hayward

Representation Beechen Cliff Playing Fields

(soundness):

Dear Sir,

I read with concern that once again the field by Beechen Cliff School is under threat of housing development.

In my opinion the loss of the playing field to the school is even more serious than it was nearly ten years ago when this was first considered. The number of pupils in this school has increased, not decreased since then, and the closure of Culverhay School is going to make matters worse.

The government has stressed the value of informal sport and play facilities, and of outdoor as well as indoor recreation. I have watched the children playing on this field most days, both in lesson times and at play time. The Headmaster of the school himself wants to keep this field for the children.

Yours Faithfully,

Susan Hayward

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 208\4 S

Respondent: Brian C Tanner

Representation Both my wife and I are resident in Bath and North East Somerset and we are writing to register out

(soundness): joint support for the revised Draft Core Strategy which is currently under discussion.

This is Indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:

4.0 The Development of MOD Sites.

I trust that these comments are helpful in your deliberations.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 208\9 S

Respondent: Brian C Tanner

Representation (soundness): Both my wife and I are resident in Bath and North East Somerset and we are writing to register out joint support for the revised Draft Core Strategy which is currently under discussion.

This is Indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:

9.0 The reduction in housing numbers to represent a more realistic need and at an affordable level for the development and growth in the region.

I was pleased to note that you have removed from the Draft Core Strategy document (December 2010 version) the proposed Urban Extension on the South side of Bath.

I support all the efforts by BANES Council to protect this land from unwanted development and to afford it an 'Area of Natural Beauty' Status.

I trust that these comments are helpful in your deliberations.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 209\1

Respondent: Elona Cooper

Representation (soundness): Dear Council Planners,

I am writing to express my concern that the Lower Field at Beechen Cliff School could be released for housing development.

This open space gives public access to wonderful panoramic views over Bath, and is well used for recreational pursuits by people of all ages. Beechen Cliff School is already short of space and due to expand in the next few years with the closure of Culverhay School. It would be detrimental to the health and well-being of pupils to reduce the playing fields available by building on the Lower Field.

I hope you will consider the case for preserving this area of open space very carefully as it would be a very sad day for Bath if the Lower Field was sold for development.

Yours Faithfully,

Elona Cooper

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 210\1

Respondent: Cristina Lopez Garcia

Representation To whom it may concern:
(soundness):

I am writing about the possibility of housing development on the school's field next to Greenway Lane.

This is a wonderful open space which is used both by the school pupils and also by many people of all ages for walking and playing during weekdays and at the weekends. It forms a beautiful way through between Wells Road and Alexandra Park and it is an irreplaceable piece of open green space free for everybody to enjoy.

I feel Bath would be 'poorer' for the possible loss of this field.

Yours sincerely,

Critina Lopez Garcia

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 211\1

Respondent: Elizabeth J. Glasbey

Representation Objection to SHLAA: Beechen Cliff Playing Fields

(soundness):

Dear Sirs,

I object to the development or any development on Beechen Cliff School Playing Fields due to any additional traffic resulting in a restricted closure on the lane, forcing west and east end traffic to go only in one direction ie. From whence they came, not being able to travel the whole road.

I travel all the way down Lyncombe Hill, left along the Lower Bristol Road, to the left opposite Reault garage, wiggling through Oldfield Park to my work in Crandale Road purely to avoid being frightened, hurt or worse by going the much shorter route to work by getting onto the wellsway road during the (school) rush hour - I will not put my life at risk and as I understand if any development goes ahead, the road will be blocked ie. Greenway Lane, I can only say again... I object Sir; Thank you for listening.

Yours Faithfully,

Ms. Elizabeth J. Glasbey

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 212\1

Respondent: Daniel Pepper

Representation To the planning department

(soundness):

Re: Development of Beechen Cliff Playing Fields.

I wish to stress my opposition to this development. I have spoken with many friends and they are all in agreement that this is grossly detrimental to the city,

Yours,

Daniel Pepper

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 217\1

Respondent: National Grid Property Holdings Ltd

Representation 2) Effective

(soundness): National Grid are of the view that Policy B1 as currently drafted is unsound because it is not effective in terms of deliverability and flexibility. PPS12 sets out that in order to be effective, DPDs must be deliverable, flexible and able to be monitored.

Deliverability

National Grid and Wales and Western Utilities (NG) previously made representations to the Core Strategy Spatial Options Consultation in 2009. The Strategy indicated that the River Corridor area should be identified as a 'Strategic Site', and, with reference to the adopted Masterplan SPD for the Western Riverside explained that '... the Core Strategy will not vary the principles that have already been established for this area'. NG's representations at that time generally supported this approach, but highlighted that the document should refer to the constraints associated with Bath's contaminated industrial land, and the need to maximise the use of brownfield sites.

National Grid (NG) are committed to working with the Council, other landowners and stakeholders to deliver the redevelopment of the Midland Road / Windsor Bridge Road site, which offers a highly sustainable location for development which would contribute to the wider regeneration of the Western Riverside Area.

Saved Policy GDS.1/B1 of the Bath and North East Somerset Local Plan allocates the wider Western Riverside area for comprehensive mixed use development, including significant provision for business development (Class B1), and approximately 450 new dwellings to be delivered by 2011. The Bath Western Riverside SPD (Adopted 2008) provides a masterplan for this area, and identifies the NG site for residential led mixed use including community and local retail. Clearly, the current economic climate is very different to that which set the backdrop to the preparation and adoption of the Western Riverside SPD. Increasingly challenging and difficult economic circumstances - combined with the significant cost associated with the decommissioning and removal of the existing gas holders and the subsequent remediation works required to bring the site forward for development – mean that it is now clear that the form and quantum of development currently proposed under the Western Riverside SPD for the NG and Wales and Western land at Windsor Bridge Road will not provide a viable development opportunity. Higher value uses such as retail, as well as residential development, will be required to overcome the prohibitive costs of redeveloping this site. Accordingly, the current allocation of the site will compromise the ability of NG to provide a viable development, in turn thereby prejudicing the regeneration of the site. As such, Policy B1 of the draft Core Strategy (at Part 6D under the heading 'Shopping') should be amended to include reference to the potential for new retail floorspace to be located in sustainable out-of-centre locations where such development will bring wider regeneration benefits and help enable brownfield sites to be brought forward for development.

Flexibility

At Part 5B under the heading 'Previously Developed Land' the document states that the Council will

seek to transform the Western Riverside into a contemporary residential neighbourhood. This does not offer sufficient flexibility in terms of proposed uses at the Western Riverside site, where solely residential development is unlikely to be viable. There needs to be flexibility to enable the NG sites to be brought forward for development. The effectiveness of the DPD as a means of enabling the NG land – a prominent, sustainably-located brownfield site – to be brought forward for redevelopment needs to be carefully considered. Whilst NG supported the general policy approach for the site in the Spatial Options consultation in 2009, current economic circumstances now dictate that - as detailed above - higher value uses, including retail, as well as residential, is required, given current economic conditions and the high abnormal costs which will be associated with the decommissioning and removal of the existing gas holders, and the subsequent remediation of the land.

3) Consistent with National Policy

The rehabilitation of contaminated sites is supported by PPS1 entitled 'Delivering Sustainable Development' which seeks to promote the re-use of brownfield sites for development in conjunction with the goal of making suitable land available for development, in line with economic, social and environmental objectives. There are benefits in terms of meeting sustainable development objectives and reducing the threat posed to health and the environment by remediating contaminated brownfield sites. However, the substantial costs associated with decontamination can lead to a situation whereby the costs are so prohibitive that it is not financially viable to bring a site forward for development.

The NG land at Windsor Bridge Road lends itself not only to residential uses, but also retail development. However, the high costs of decommissioning the gas holders, removing them, and remediating the land will not be viable in current economic circumstances.

Paragraph 26 of PPS1 states in regard to development plans that they should:-

“(iii) Not impose disproportionate costs, in terms of environmental and social impacts. Or by unnecessarily constraining otherwise beneficial economic or social development.”

Furthermore, DETR Circular 01/2006, entitled 'Contaminated Land', sets out objectives for such land:

- To identify and remove unacceptable risks to human health and the environment;
- To seek to bring damaged land back to beneficial use; and
- To seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable. DETR Circular 02/2000, 'Contaminated Land' (now superseded by DETR Circular 01/2006, Contaminated Land) provided the policy framework behind PPS23, Planning and Pollution Control. It may not be feasible for a developer to pay the substantial remediation costs required, in addition to the often heavy financial burden of S106 contributions. Such a sum may be deemed disproportionate and in those circumstances may not be in compliance with either PPS1 or DETR Circular 01/2006. If sites are not developed they cannot contribute to 'the maintenance of high and stable levels of economic growth and employment'. In its current form, by requiring a form of development which is not viable, the draft policy is contrary to the economic principles of PPS1.

The issue of whether remediation costs should be taken account of when assessing viability was considered by the Planning Inspectorate in an appeal (ref: APP/C4615/A/08/2066072) at the Former Gas Works, Constitution Hill, Dudley (allowed 13th August 2008). The appeal related to the redevelopment of the site for 162 residential units. The Inspector outlined the main issue when he stated in paragraph 12:- 'A major consideration within the viability reports undertaken is the expenditure involved in remediating the site, and there is significant allowance for the abnormal costs which would arise because of the particular characteristics of the site'. He went on to state:- 'An issue of major significance in assessing the validity of the viability studies is whether the costs of this remediation, amounting to £2.85m, should be deducted for the potential value of the completed development in assessing the residual land value, and thus the economic viability of the alternative developments under construction'.

It was the Council's position that the "polluter pays" principle should be applied, on the basis that the

appellant or its predecessors had benefited from the profits that arose from the pollution of the site:- ‘ It should thus meet the cost of remediation from its current assets to which these profits have contributed. The Council considers that the “polluter pays” principle is supported by the EPA.’ After considering the evidence the Inspector concluded in paragraph 17 of his report that:- ‘... it is appropriate for the costs of the voluntary remediation of the site to be taken into account in assessing the viability of different forms of development on the site. It further seems to be reasonable and correct that, by extension, the costs of further remediation and abnormal works, arising from the nature of the land and its past use but relevant to the particular form of development being assessed, should be taken into account in the same way.’

This appeal decision establishes a precedent that it is appropriate for planning decisions to take account of the abnormal costs of remediation works. Likewise, it is fair and reasonable that the emerging policies should take into account the high costs of remediation in designating land uses. In addition, and in the context of the above, it is also important to consider such abnormal costs in considering affordable housing requirements. Whether this is in the Core Strategy, or another DPD, the policy wording must ensure that specific mention is made of the fact that affordable housing will be sought, having regard to economic viability and site specific circumstances. This is to ensure that the policy is sufficiently flexible to be responsive to matters such as abnormal costs which will arise in bringing sites forward for development, and to ensure accordance with the requirements of PPS3. Where open book viability assessments are required, provision should be made for those circumstances. Where an open book assessment cannot be made publicly available this information may need to be treated on a confidential basis.

Change sought to make sound: The current policy states that the Strategy for Bath is to:
 • At Part 5B, “Transform the Western Riverside area into a contemporary residential neighbourhood”.
 • At Part 6D, “Focus additional convenience retail floorspace (beyond existing commitments) within and on the edge of existing centres before considering out-of-centre sites that might improve the spatial pattern of provision across the city”.

In order to make the policy sound, Part 5B should be changed to read:

- “Transform the Western Riverside area into a mixed-use, residential/retailed location”

In addition, the following wording should be added to Part 6D:

- “Notwithstanding this, the land including and around the existing gas holders at Bath Western Riverside, owned by National Grid and Wales and Western Utilities, is contaminated and requires remediation. The high abnormal costs associated with redevelopment, combined with the sustainable location of the site, justifies residential and retail development.”

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\3

Respondent: Duchy of Cornwall

Representation (soundness): We note the objective to provide 5,700 jobs and 6,000 homes in Bath and whilst the Duchy of Cornwall supports the principle of providing a consistent number of jobs and new homes in Bath to deliver sustainable communities, the key to this is to provide employment close to where people live and to provide sustainable transport.

In order to achieve the Council’s corporate strategy smart growth objectives of attracting blue chip companies to invest in Bath and provide affordable homes to retain high calibre graduates, there is a need to provide for more homes and jobs in and around Bath.

The Core Strategy Spatial Options proposed between 7,000 and 8,000 homes and 10,450 to 12,250 jobs. The Submission Draft Core Strategy now proposes 6,000 homes and 5,700 jobs. The Duchy of Cornwall would support an increased provision in homes and jobs at Bath in order to better meet the Council’s objectives.

The level of planned growth to be met at Bath is significantly below forecasts considered at the RSS EiP and appears to ignore the importance of the Bath TTWA.

For the reasons set out in our separate but related representations, including in relation to Policy DW1, we object to the constrained approach to housing delivery proposed for Bath.

In addition to the above, whilst the Duchy fully supports the development of Brownfield land in a timely manner, concern is raised about the actual availability of the MOD sites that the SHLAA identified as being available from 2012/2013.

As to the planned approach to the brownfield first principle, we note the EiP Panel's conclusion's (including at sections 0 and 4 of their Report) that greenfield and brownfield development can be regarded as complementary and the contribution of both will be required to meet projected demand. It is further concluded that there is no need for any phasing of the greenfield supply, which should be encouraged to come forward during the early part of the plan period in order to ensure completions commensurate with need and demand. However, the Duchy also supports the early release of previously developed land where it can be shown that such sites are deliverable and can contribute to a sustainable pattern of development.

In accordance with the Panel's findings, we are of the view that the release of greenfield sites for development, including by means of an urban extension to the west of Twerton can provide commensurate levels of supporting infrastructure such as education, health care, open space, community facilities and employment opportunities. These essential elements can be provided as integral parts of strategic site releases, planned for at the Masterplan stage.

The above approach could help provide an appropriate mix of housing types to meet identified needs, including that for affordable. Such proposals can also bring forward a range of supporting infrastructure to sustain and encourage sustainable communities. This enables densities to be maximised on previously developed sites within the urban area.

The Duchy of Cornwall commissioned the Prince's Foundation for the Built Environment (PFBE) to conduct an internal Enquiry by Design in December 2010. The purpose of the EbD was to pull together the various environmental studies undertaken on behalf of the Duchy and to formulate a masterplan that identifies the capacity of the site.

The Bath Urban Extension report, produced by PFBE, is appended to this representation and is relevant to all the representations submitted by the Duchy of Cornwall to the Submission Draft Core Strategy.

Change sought to make sound: An urban extension should be identified on land to the west of Twerton.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\11

Respondent: Bath Preservation Trust

Representation (soundness): Policy B1 is the key policy for protecting the WHS. Policy B4, important though it is, cannot override the overall spatial strategy for the city but must work in harmony with it. While we broadly support Policy B1, we are concerned about the evidence base for some elements, and we consider that some strengthening and/or changes of emphasis are required to make the policy effective.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\12

Respondent: Bath Preservation Trust

Representation In relation to evidence, we support the objective of diversifying Bath's economy while retaining and
(soundness): enhancing its status as a visitor destination, but remain unconvinced that the case for the very significant increase on city centre office space has been fully made. We are aware of at least two significant new office developments which have been granted planning permission but are currently on hold because no occupier has been identified.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\13

Respondent: Bath Preservation Trust

Representation We note the proposal to retain industrial land but question whether sufficient consideration has been
(soundness): given to the need for small-scale affordable start-ups and artisan workshop/studio space.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\14

Respondent: Bath Preservation Trust

Representation While we understand the desire for a high-quality cultural/performance arts venue within the central
(soundness): area, we have seen no evidence that the business case for such a venue is robust.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\15

Respondent: Bath Preservation Trust

Representation Given the significance of the Central Area as the heart of the World Heritage Site, the physical and
(soundness): topographical constraints, and the fragility of the historic environment, we believe that there is a real risk that over-ambitious commercial development might ruin the very qualities which make the city such an attractive place to live, work and visit. We support the need for development, but we believe strongly that the CS and associated DPDs and SPDs must provide the necessary levers to refuse permission for speculative proposals which may not be sustainable.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\16

Respondent: Bath Preservation Trust

Representation The specific amendments we would like to see are listed in Section 7. However we would ask the
(soundness):

Inspector to consider very carefully whether the level of growth proposed, particularly in and adjacent to the Central Area, is compatible with the Council's duty to protect the WHS.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\17

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to Paragraph 1 a needs to refer to the protection of the Outstanding Universal Value of the World
make sound: Heritage Site and its setting. The reference to the Cotswolds AONB seems unnecessary – the need for protection extends to the whole of the WHS setting.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\18

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to Paragraph 8 should refer to Tourism, Culture and Sport (not just Rugby). There should be a reference
make sound: to the need to maintain sporting and leisure facilities for local residents within the Central Area. In relation to Culture, there should be reference to the need to enable the provision of enhanced facilities for interpretation of the WHS and for the City's Archives.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\19

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to Paragraph 10 should include explicit mention of the need to discourage unnecessary vehicle
make sound: movements within the city.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\20

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to Paragraph 11 should put the need to improve energy efficiency of the built environment ahead of the
make sound: enablement of renewable energy. We question why district heating networks are highlighted in 11a (see also our comments on CP3).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\13

Respondent: London Road Area Residents Association

Representation Para 8b “ A new stadium for Bath RFC within the Central Area”
(soundness):

- i) Bath’s Recreation Ground is within the Flood Plain. Presumably any further development on the Recreation Ground will require Compensatory Flood Works as required in PPS25
- ii) Has this amount been quantified and where will it be?
- iii) This will be in addition to the 345,000 cubic metres referred to in the Flood Risk Management Strategy (C5)

Change sought to make sound: Further clarification and calculations are needed and should be publicised and any changes to the figures included in the Core Strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 245\3 S

Respondent: Environment Agency

Representation Policies B1, B2 and B3

(soundness): As highlighted by the Sustainability Appraisal a number of the policy areas identified for redevelopment along the river corridor in Bath are at risk of flooding. We raised this as a key concern with the LPA at an early stage in the development of the Core Strategy, given the guidance of PPS25 seeking in the first instance to avoid development in flood risk areas. We highlighted to the LPA the need to provide clear justification if development areas were to be located at flood risk.

Following this BANES have produced a Sequential and Exception Tests report to inform the Core Strategy using the information provided in the Strategic Flood Risk Assessment. This has provided justification regarding directing development to the river corridor. In summary, the need to direct development into flood risk areas has been principally justified by BANES because of the level of development required, the need to develop brownfield as opposed to greenfield sites, the lack of brownfield sites wholly in Flood Zone 1, and the other sustainable requirements of the Core Strategy that cannot be met by developing elsewhere. The Environment Agency considers that with this report, due process in relation to the Sequential and Exception Tests has been followed. However, we are not able to comment on the relative weight BANES have applied to other sustainable considerations compared to flood risk, such as the benefits of brownfield versus greenfield development, as these considerations fall outside our remit. Given this the inspector should ensure that they are satisfied that BANES have applied appropriate weight to these other sustainability considerations compared to flood risk, and therefore that this justifies locating new development in flood risk areas.

If the inspector considers development within flood risk areas to be justified we are pleased to see that BANES have made it clear in the report that sequential test work will still need to be done at the site allocation and development management phase. This is important given that many of the development areas shown in the Core Strategy transcend a number of flood zones and different development uses will vary in their vulnerability to flood risk. To be consistent with national policy it is therefore key that the least vulnerable uses are directed to areas at least flood risk through the site allocation process.

We are pleased to see that policies B1, B2 and B3 make reference to the need for habitat enhancement along the river corridor. We would agree with the findings of the Sustainability Appraisal in that there is a need to ensure that the competing demands on the river corridor are reconciled and that improvements are not to the detriment of wildlife. The Core Strategy outlines significant aspirations for the river corridor in terms of improving access, habitat enhancement and flood risk management. These competing demands on the river corridor will need to be carefully balanced if they are all to be successfully delivered. There is a degree of uncertainty regarding how the growth proposed next to the river corridor will occur without compromising the function of the river as a route for wildlife and as a recreational resource. These competing demands will need to be given consideration in subsequent development plan documents and the green infrastructure strategy.

Infrastructure and Delivery

We are pleased to see the recommendations of the Flood Risk Management Strategy for Bath have been taken forward in the Core Strategy, in terms of provision on flood defences on sites and the delivery of a strategic flood compensation area to ensure new development does not increase flood risk. The infrastructure delivery plan correctly identifies these requirements, the fact that they will need to be in place prior to development, and be funded by developer contributions. We are pleased to see that uncertainty in relation to delivery of a strategic compensation area (in terms of feasibility and availability of forward funding) has also been identified. In such a situation the need to deliver flood plain compensation on a site by site basis may impact the viability of some development sites along the river corridor.

Change sought to make sound: N/A

Representation (legal compliance):

Change sought to make legally compliant: N/A

Reference: 249\2

Respondent: Royal Mail Group Ltd

Representation B1 (2d Economic Development)

(soundness): Royal Mail Group Supports the element of the strategy for Bath that seeks to focus new office development within and adjoining Bath city centre

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\2

Respondent: Royal Mail Group Ltd.

Representation Policy B1 – Bath Spatial Strategy, paragraph 2d (Economic Development)

(soundness): Royal Mail Group supports the element of the strategy for Bath that seeks to focus new office development within and adjoining Bath City centre.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\3

Respondent: Royal Mail Group Ltd.

Representation Policy B1 – Bath Spatial Strategy, paragraph 5a (Previously developed land)

(soundness): Royal Mail Group supports the strategy to “regenerate and repair a number of areas within the Central Area to create new areas of attractive and productive townscape and a much improved relationship between the city and its river.” The Bath DO site falls within one such area and presents BANES with an opportunity to assist with delivering this strategy.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\4

Respondent: Royal Mail Group Ltd.

Representation Policy B1 – Bath Spatial Strategy, paragraph 6a (Shopping)

(soundness): It is noted that part of the strategy is not to make provision for a further large scale comparison retail

development in addition to Southgate. Royal Mail Group takes the view that there may not enough provision in the Core Strategy for new retail development in Bath. Paragraph 6.92 of the consultation document indicates that a re-assessment of the need for new retail floorspace is being undertaken, so the soundness of this strategy remains to be proven.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\5

Respondent: Royal Mail Group Ltd.

Representation Policy B1 – Bath Spatial Strategy, paragraph 10a (Transportation, Car Parking and other infrastructure)

(soundness): As it provides an essential public service, the Royal Mail DO in Bath should be considered to be part of ‘other infrastructure’ for the purposes of the Core Strategy.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 256\8

Respondent: Councillor Andrew Furse

Representation •2g; BRT is identified with funding of BTP of £54m - this needs to be corrected.

(soundness):

Councillor Andrew Furse
Liberal Democrat,

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 261\1

Respondent: RUH NHS Trust

Representation Policy B1

(soundness): This objective should be supported in Policy B1 by adding point 7b: Healthcare - Enable development at existing healthcare facilities to support the infrastructure needs of the population.

Change sought to Policy B1

make sound: This objective should be supported in Policy B1 by adding point 7b: Healthcare - Enable development at existing healthcare facilities to support the infrastructure needs of the population.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\43

Respondent: Bath Heritage Watchdog

Representation Page 34 Policy B1 Bath Spatial Strategy:

(soundness): 1 Natural and Built Environment: Apart from noting the omission of reference to the Green Belt, we would not disagree with a-e, but it all conflicts with what we see around us on a day to day basis. The words are fine but proof that they are taken seriously is short on the ground, leaving a huge credibility gap.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\44

Respondent: Bath Heritage Watchdog

Representation 2 Economic Development Item c: Increase of office space. The claim that there over 15,000 m2 of
(soundness): unsuitable space is difficult to believe, particularly when some of this space was occupied and in use
(by BBC Books) and they only vacated the premises (and took their jobs out of Bath!) when the council
told them their building was scheduled for demolition. Consequently, all the evidence points to
reference to the release of unsuitable space as just an engineered reason to
free up land for the holy grail of “modern offices”. In sustainability terms this is totally unsupportable.

D Focusing office development with the city centre. Most offices by nature are not aesthetically
pleasing buildings and usually carry large areas of glass this will produce conflict with the aim to protect
the historic character of the central area and to reduce light pollution.

Change sought to Rethink the housing and office policies, because they are seriously flawed as proposed. Place greater
make sound: emphasis on mixed developments rather than housing and offices.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\45

Respondent: Bath Heritage Watchdog

Representation 3 Housing. This looks like a “cram it tight” policy, when the character of Bath is to have green sight
(soundness): lines, even in areas of dense housing like Oldfield Park. There is no guarantee MOD land will become
available (and the Ensleigh site cannot because of the terms of the wartime lease) so this aspect must
be considered a windfall if it happens rather than a strategic goal.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\46

Respondent: Bath Heritage Watchdog

Representation There is no mention of trying to release the stock we have currently taken by HMOs for students, but
(soundness): this is important because about a quarter of Bath’s family homes could be returned to family use if
sufficient rooms in purpose built student accommodation were available.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\47

Respondent: Bath Heritage Watchdog

Representation 4 Population, Labour and Employment. There is no hope of labour imported from neighbouring
(soundness): locations being reduced while it is cheaper to live in the neighbouring locations and commute than to
live in Bath. The housing schemes planned are for a predominance of flats, when families generally
prefer houses to flats (Estate Agents claim that the market for houses in Bath is healthy but the market
for flats is very depressed), so the drive for the maximum number of housing units could be counter-
productive. If the MOD vacate their Bath offices, then the despite the objective to reduce it, the level of

out-commuting will escalate. Also incoming businesses often bring most of their senior staff but recruit at the junior levels, who because they are lowly paid will choose housing in the cheaper outlying areas and in-commute. This part of the policy has been badly thought out.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\48

Respondent: Bath Heritage Watchdog

Representation 5 Previously Developed Land There is no objection to what is proposed in a-c, only to its interpretation.

(soundness): Most would disagree that the things proposed thus far are an attraction. The Western Riverside was, and still is, condemned for its poor architectural approach. It is also being promoted as a residential neighbourhood when UNESCO clearly called for a greater mix of uses and facilities, and the Core Strategy aims to reduce dependence on car transport, which would be best achieved by having jobs, recreation and retail within easy walking distance of any homes built. There is no guarantee MOD land will become available (and the Ensleigh site cannot because of the terms of the wartime lease) so this aspect must be considered a windfall if it happens rather than a strategic goal.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\49

Respondent: Bath Heritage Watchdog

Representation 6 Shopping: a Southgate as not absorbed well. It should have been the other way round Southgate

(soundness): should have fitted around the shopping area. Although the previous appearance (of the now demolished Southgate Mall) was less than welcoming its mix of shops and services was better and residents used it regularly. Southgate is almost exclusively a fashion mall with a couple of convenience stores, and is rarely used by the over 30s except as a short cut from Stall Street to the Bus Station. What Southgate has done though is to drag shops from other parts of the city centre leaving empty premises behind, which gives the rest of Bath a run-down look. It is noted most of the stores about to occupy the vacated units due to these relocations are by and large standard high street units, damaging Bath's reputation for Independent and Niche shops even further.

Change sought to With a demographic of an increasingly elderly population it is important that Southgate, being the
make sound: nearest shopping to the bus station, caters for their shopping needs.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\50

Respondent: Bath Heritage Watchdog

Representation b Milson Place is an example of this, being a high end fashion and restaurant area it is a moot point as

(soundness): to if it improves the "shopping offer" for the majority. The recently announced Waitrose proposals for the Podium removes mixes of shops in favour of a large single unit. It also raises the spectre of behind-the-scenes engineering, possibly with the aim of forcing the small businesses currently there to relocate enabling a wider stock line for Waitrose. This can only result in upsetting the balance and spread of retailers.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\51

Respondent: Bath Heritage Watchdog

Representation (soundness): c Most local residents are concerned by the influx of small supermarkets into local centres because they impact on the profitability of the local independents, but don't carry the range of stock to be an acceptable replacement for the independents that they force to close.

Change sought to make sound: Introduce a saturation policy for convenience stores and retail types such as coffee shops and phone shops.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\52

Respondent: Bath Heritage Watchdog

Representation (soundness): 8 Tourism, Culture and Rugby

a This target would appear to have been reached if current proposals and planning applications come to fruition. Having a strategy for the next twenty years or so that has virtually been met while in draft seems rather pointless. However there is little evidence that this sort of facilities are desperately required and some proposals put forward already have stalled, one leaving internal walls of a listed building exposed to the elements for over two years; others are in locations not compatible with the markets they seem to be promoting. We have our doubts about whether focusing on hotels actually meets the tourist needs. Rarely do we hear of all hotels being full, but "No Vacancies" signs on guest houses are a common sight and there is a real shortage of self-catering accommodation.

Change sought to make sound: Change "hotel bedrooms" to visitor accommodation.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\53

Respondent: Bath Heritage Watchdog

Representation (soundness):

Change sought to make sound:

Representation (legal compliance): 8 Tourism, Culture and Rugby

b Bath Rugby is a private commercial company, one that is technically bankrupt with debts of over £1 Million and only the owner's personal fortune is keeping it afloat. As a private company, it cannot be promoted by a Local Planning Authority more than other private companies in the same sector such as Bath City Football Club. Change the names and imagine the Core Strategy promoting Sainsbury's at the expense of Tesco, and you can see that this policy is tantamount to pre-determination and bias, and leaves the council open to accusations of corruption. The fact that the council has been actively investigating land swap arrangements to undermine the covenants on the Rec suggests that perhaps the corruption has already taken place. It is made worse by identifying the central area as the chosen location. This, as any sequential test would show, narrows the possibilities down to the only possible location in the Central Area, and it is the one the club currently occupies. That is of course on land provided as an open space for the benefit of the city and its residents and held in trust in that form. The fact that the current Trustees are all councillors and the Core Policy proposes development there could leave the Trustees open to allegations of corruption unless they too violently oppose this part of the strategy. A private sports company is free to put forward a proposal for a stadium anywhere it chooses, but this must then be determined strictly in accordance with planning law (and in the case of the Rec, in accordance with its covenants), with no Core Strategy presumption of success.

Change sought to make legally compliant: Delete in its entirety - and publicly withdraw support for any land swap arrangement, and for development of the Sports Centre which is also on the Covenanted land.

Reference: 265\54

Respondent: Bath Heritage Watchdog

Representation 8 Tourism, Culture and Rugby

(soundness): c No objection to the idea of this but it needs to be more specific. Bath needs a concert hall. Bath needs a Museum of Bath and increased interpretation of the WHS as requested by UNESCO. The city archives cry out for a adequate location. These are not ideally suited to a common venue, and the central area is not the ideal location for a large venue. The reader is left wondering why this limitation is stated when there is no ideal location in the central area that springs to mind Is the Rec being considered, in which case is not acceptable and the council cannot be seen to be considering a policy of developing land held in trust as an open space. Sir Richard McCormack (URP) and English Heritage in a recent seminar advised against following the example of Liverpool and their area in a World Heritage Site. The background for theirs is the Anglican Cathedral ours is the Abbey. Were they sounding a warning about plans already in hand?

Change sought to make sound: Make “venue” plural and delete reference to the central area.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\55

Respondent: Bath Heritage Watchdog

Representation 9 Public Realm This seems to be well advanced, and as stated previously, although we agree with its **(soundness):** broad concept it should be city-wide not restricted to the central area. The proposals lack a distinctive Bath style (we were promised a public consultation on a pattern book yet the designs are largely set and in styles largely copied from elsewhere and somewhat alien to Bath) The sums spent in a period of economic austerity will be considered by many as wasteful. Existing “improvements” are bland and sterile and the materials and/or workmanship are not up to the task.

10 Transport a. The blind allegiance to a transport plan that is universally unloved has no significant benefit (established from the council’s own documentation in the planning applications), is based on unsuitable buses negotiating narrow streets to end up at a location nobody wants to go to is bewildering. Desperate solutions are now being advocated to finance it and even sections of it (the few that had public acceptance) scrapped. It will prove a monumental blunder.

B. The solution to parking seems to 'remove all existing multi-storey car parks to make way for regeneration into offices'. Given the demographics of an aging population, many of whom are likely to have “Disabled” parking permits, the reduction of in-city parking is likely to make traffic problems worse not better, yet decimate trade for Independent shops. The local shops would benefit enormously from “The first 30 minutes free” on-street parking which would bring those who consider the buses too expensive and who shop elsewhere because parking is cheaper than in Bath back into the centre for quickly conducted business. It is ironic the picture right next to this section shows the best (un-built through lack of demand but with planning permission) office space in Bath with extensive on-site parking! A commuter railway station lies a few hundred yards away. There is no mention of using the railways or the river as part of an integrated plan, a major flaw in the current transport strategy.

C. Some sets of traffic lights seem to be deliberately designed to cause congestion, and the evidence of this is that traffic flow improves when they fail. Some bus lanes have created more congestion for buses, not relieved it. The replacement of a roundabout by traffic lights has more than doubled the traffic queues for most of the day. Traffic lights on at least two roundabouts leave traffic waiting at red lights when the roundabout is empty of all other traffic. The traffic control systems seem to have been designed to deter traffic by impeding its progress, and reduced air quality caused by traffic congestion is the inevitable result. If the traffic system was re-examined with the aim of enabling traffic progress, air quality improvements would automatically follow.

Change sought to make sound: Abandon the current Transport Package, it is doomed to failure. Extend the scope of transport policies to include rail and river as well as road. Rethink the parking strategy – it will decimate the trade of

small independent shops and is therefore in direct conflict with the shopping policy. Improve air quality by rethinking the traffic management arrangements.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\7

Respondent: The Bath Society

Representation Policy B1 Bath Spatial Strategy (pp. 34-35) We are pleased to see the World Heritage Site first on the
(soundness): list within the very first of the 11 policy areas.

**Change sought to
make sound:**

Representation (legal compliance): We are pleased to see the World Heritage Site first on the list within the very first of the 11 'policy areas'

Change sought to make legally compliant:

Reference: 266\8

Respondent: The Bath Society

Representation We seriously question whether the new housing completion figure of 6,000 for Bath will be achieved
(soundness): within the timeframe of the Strategy.

B1 (3) Housing See earlier reference to a lack of realism about new housing completions.

**Change sought to
make sound:** Some kind of contingency plan to deal with lower than expected new housing completions.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\9

Respondent: The Bath Society

Representation The Bath Recreation Ground is a highly important open space in the World Heritage Site. Building a
(soundness): 25000 capacity stadium (probably two tiers of seating) would be seriously detrimental to the character and appearance. The Ground forms part of a flood plain. Building in it would increase the risk of flooding elsewhere. The Ground has flooded periodically in the past.

B1 (8) Tourism, Culture and Rugby Does the statement in 8b imply that a decision has already been made to develop a new stadium on the Recreation Ground, which is included within the 'central area' in Diagrams 6 and 7 (pages 37 and 38) ?

**Change sought to
make sound:** Omission of building on the land. Inclusion of a policy designating Bath Western Riverside land as a possible location for a stadium, not just for rugby.

Representation (legal compliance): It is proposed that a new stadium for Bath RFC is sited on the Bath Recreation Ground, part of the Central Area. On 1 February 1956 the Ground was conveyed to the Mayor, Aldermen And Citizens of Bath in Trust, subject to the protective conditions that the land is used only as an open space and that there should be no undue preference for any one use. Both these conditions would be breached should a proposed 25 000 capacity stadium be built.

Change sought to make legally compliant: Omission of building on the land.

Reference: 266\10

Respondent: The Bath Society

Representation Does the statement in 8b (page 35) imply that a decision has already been made to develop a new
(soundness): stadium on the Recreation Ground, which is included within the 'central area' as defined in Diagrams 6 & 7 (pp. 37 & 38) ?

Change sought to make sound: Nature of any change would be dependent on outcome of the above.

Representation (legal compliance): The current legal position with the Trust for the Recreation Ground could make the policy in relation to 'rugby' unsound.

Change sought to make legally compliant: There should be no statutory policy commitment to develop a new stadium on the Bath Recreation Ground unless, or until, the legality issue is resolved.

Reference: 266\11

Respondent: The Bath Society

Representation (soundness): Public Realm

Just as important, if not more so, as new information systems etc, to enhancement of the public realm in Bath City centre, is better attention to street cleaning and proper maintenance of pavement surfaces etc.

Policy B2 Central Area Strategic Policy (page 39) notes that one of the 'key risks to the central area' is the 'poor quality of the public realm', which is said to have 'a negative impact on the experience of the city centre'. We very much agree with this assessment.

B1 (9) Public Realm Just as important, if not more so, as new information systems etc, to the enhancement of the public realm, is better attention to street cleaning and the proper maintenance of pavement surfaces etc. It is noted that in Policy B2 Central Area Strategic Policy (page 39) that one of the 'key risks to the central area' is the 'poor quality of the public realm' which is said to have ' a negative impact on the experience of the city centre'

Change sought to make sound: Needs implicit corporate action 'back up' terms of effective maintenance of the Bath City centre public realm.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\13

Respondent: The Bath Society

Representation (soundness): Residential led development is acceptable, the published design is not. The regimented blocks of flats and the layout are reminiscent of failed 1960 housing schemes. Heights of 7,8 and 9 stories are excessive.

B1 (3) Housing See earlier reference to a lack of realism about new housing completions.

Change sought to make sound: A complete redesign.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 271\1

Respondent: Amie Smirthwaite

Representation (soundness): I am writing to object to the proposed designation in the draft Strategy of the Lower Field as suitable for housing development. Development of this site would have a number of negative consequences for the area, including:

- negative impact on the local environment, as resulting loss of wildlife corridor
- negative impact on traffic, with increase in through-roads and resulting increase in traffic, with consequent risks for local residents and the local environment
- negative impact on Beechen Cliff students, with inadequate outdoor recreation space
- loss of green space much enjoyed by local residents

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 276\9

Respondent: Hignett Family Trust

**Representation
(soundness):**

**Change sought to
make sound:** A New Neighbourhood at Odd Down, Bath

Summary

The Hignett Family Trust are proposing a new policy to be included within the Core Strategy, to provide for a New Neighbourhood at Odd Down, Bath. This development will provide a low carbon mixed- use scheme capable of accommodating upto 1500 new homes and stimulate upto 1600 new jobs on the edge of Bath. The Council have considered the need for a new neighbourhood on the edge of Bath at Odd Down and have rejected this option. HFT will demonstrate that this decision is not sound and that a New Neighbourhood at Odd down represents a key part of the CS, in order to deliver the Councils Vision and strategic objectives.

Introduction

The representations made in respect of this new policy will necessarily include supporting text and diagrams, as would be expected in such a strategic allocation in a CS. Therefore this representation offers such text and diagrams in support of the policy, as part of the reasoned justification and to demonstrate soundness. The Council is invited to engage in a dialogue over the content of the strategic allocation, including policy wording, and to invite wider consultation in order to receive views from other stakeholders and the public.

These representations will include as background, the representations that were made by the HFT in respect of earlier development plans, where these are relevant to this proposed allocation and to the policy wording. In particular, these representations will draw upon the evidence and proposals as submitted in the Core Strategy Spatial Options Consultation 2009 (CSSO), as these still remain valid today.

New Neighbourhood at Odd Down: extract from Core Strategy Spatial Options Consultation 2009

The representations in support of this strategic allocation should also be read alongside the representations and the evidence made in respect of the remainder of the CS by HFT, as they support the need for a new policy for a New Neighbourhood at Odd Down, are part of the reasoned justification and are evidence of soundness of this new policy.

A list of the evidence base and background information, can be found on the Council's website, together with the links from that website to other sources of public information, ie West of England Partnership. HFT will draw from this evidence base now and in preparation for the public inquiry but will provide as attachments to these representations, copies of all other evidence, whether previously submitted or not, so that the Council, the public and the Inspector have a complete record of this information.

The evidence base includes an assessment of the New Neighbourhood under the Habitats Regulations in consultation with Council, following their interim assessment, this is discussed below.

The Council indicated that if there were to be a New Neighbourhood at Bath, their preferred choice would be a location at West Twerton/ Newton St Loe, (CSSO). HFT have therefore provided evidence, from Baker Associates, in support of this new policy, to demonstrate that Odd Down performs significantly better than the West Twerton /Newton St Loe alternative, namely: 1. A Comparative Accessibility Appraisal and 2. A Comparative Sustainability Appraisal (App1 CSSO Reps). This evidence

will be used to support the soundness of the new policy and will be reviewed to bring it up to date, having regard to the new Policies in the CS, other stakeholder representatives and development on the ground. HFT will draw upon this evidence base where alternative, competing schemes are proposed, which do not form part of the CS.

A New Neighbourhood

Chapter 3 of the CSSO provides ample reasoned justification for the development of the Vision for the New Neighbourhood at Bath including stakeholder engagement. HFT has fully participated in this process and will rely upon the evidence in Chapter 3 of the CSSO, together with the CSSO Repts Part 2:

- 3.6 New Neighbourhood in an Urban Extension in Bath
- 4.0 Green Belt
- 5.0 Area of Outstanding Natural Beauty
- Proposed Recommendations in support of the proposed new vision, strategic objectives and policy for a New Neighbourhood at Odd Down.

Together with Appendices

App 4 Odd Down Plateau SWB2: proposed extensions SWB2.1-4

App 5 A Provisional Employment Strategy

App 6 Landscape Report Novell Tullet 2006

App 7 Landscape Report A Novell 2009

App 8 Health Impact Assessment (extract from 2009 study)

App 9 Former Fullers Earth Works, Fosse Way, Bath (B12) extract from Draft Joint Waste Core Strategy 2010

The New Neighbourhood at Odd Down

Proposed Spatial Vision for a New Neighbourhood

The following vision is proposed for the New Neighbourhood and takes account of the comments made in the CSSO Repts 3.6.1. It is proposed that this vision is included in the CS. (Insert the following vision in the CS)

The Vision for a New Neighbourhood at Odd Down

The new neighbourhood at Odd Down will be a mixed use extension to the urban edge of the city. It will be an attractive and vibrant new part of the city which exemplifies sustainable living. Buildings will be zero carbon, and opportunities for using local energy resources and local food production will be a core part of the development.

The new neighbourhood will be part of the city and will be well linked to the city centre and other areas using sustainable methods of transport, including public transport, cycling and on foot. With the highest quality urban design, the new area will provide a range of housing and will encourage safe and healthy lifestyles.

This neighbourhood will play an important role in the growth of Bath, supporting regeneration of relatively deprived areas in the south of Bath and will complementing the redevelopment of the river corridor and the renewal of the city centre.

The development will be located and designed in a way that respects the World Heritage Site status and that minimises the potential harm to the setting of Bath. Opportunities to increase access to green space and the countryside and enhance ecology will be realized so as to protect and enhance the recreational opportunities within the Cotswold Area of Outstanding Natural Beauty. The neighbourhood will reflect the form and character of Bath.

Spatial Objectives

A number of spatial objectives have also been developed and these may form the basis of future development principles, which will help shape the look and feel of the area. The following objectives are recommended for inclusion alongside and in support of the new policy (see CSSO Repts 3.6.1)

Spatial Objectives of the New Neighbourhood

The New Neighbourhood at Odd Down will:

1. Be an exemplar of low carbon development, exceeding government targets
2. Have a mix of uses which will make sure that there is vibrancy and activity, while also offering easy, safe and affordable access to local employment, and educational opportunities.
3. Offer access to a wide range of services and facilities and will support the needs of the new and existing communities
4. Provide a mix of housing types, tenures and sizes, including affordable housing to meet the identified needs of all sectors of the community
5. Contribute to the sustainable economic vitality of the area and the city as a whole by the provision of a variety of employment types
6. Be well linked into Bath and work as a new neighbourhood in the city
7. Minimise the impact on the integrity of the villages close to the city including maintaining the general extent of the Bristol-Bath Green Belt subject to boundary changes to accommodate the New Neighbourhood
8. Be located and designed in a way that minimises any negative impact on environmental assets and the views of, and from, them including the World Heritage Site and its setting and the Wansdyke
9. Be designed and developed in a way that makes sure that measures are taken to enhance and otherwise mitigate and compensate for harm to the landscape of the Cotswold Area of Outstanding Natural Beauty including improving recreational opportunities and to protect and enhance nature conservation interests and their habitats
10. Include a network of connected high quality accessible green infrastructure providing local recreation and biodiversity opportunities and visual benefits
11. Be a high quality place with its form and appearance responding to the character and context provided of the site and the wider area, but at the same time encouraging the efficient use of land
12. Be a place that is easy access and move around with excellent walking, cycling and public transport links both within the community and with the surrounding urban area and surrounding countryside
13. Have good access, via a range of transport modes including walking, cycling, public transport and car to Bath and the wider area
14. Be designed and developed in a way that results in a more sustainable use of resources and minimising impact on flooding, heat gain, water resources and water quality and maximizing the use local building materials
15. Be designed to meet the needs of a varied community and provide a safe, playful and healthy environment
16. Provide an integrated waste management infrastructure. Any scope for integrating waste management and heat generation should be exploited where practicable.

Odd Down Plateau

In developing the policy for the New Neighbourhood at Odd Down in the context of the Vision and Spatial Objectives, HFT carried studies of the potential area of the New Neighbourhood on the Odd Down Plateau. Full details of those studies of the Plateau Area and the Southstoke Valley alongside, together with the conclusions, are attached as separate documents, that originally formed part of the CSSO submissions, which should be read in support of the policy and reasoned justification to these representations. These submissions are CSSO Part 1 with Appendices 1,2,3 and CSSO Part 2 with Appendices 4-9.

In addition studies in support of Habitat Regulations Assessment and Land Stability are described below together with their recommendations. In response to Policy CP 3 Renewable Energy, there is additional information relating to the New Neighbourhood.

Habitat Regulations

The proposed New Neighbourhood at Odd Down lies in proximity to the Bath/Bradford on Avon SAC, which is situated to the east, in the community of Combe Down. The importance of this mine location for certain species of bat is well recognised both in terms of species and population numbers to the extent that it is registered under the Habitats Directive as a Natura 2000 Site (SAC) and consequently must be taken into account when proposing planning policies in an LDF document or determining a planning application.

HFT have engaged in detailed discussions with the Council and with Natural England to support site monitoring of bats as part of an Appropriate Assessment carried out by the Council in the Interim Habitat Regulations Assessment of the CSSO. Details of the Council's interim assessment are set out in CSSO Part 2 3.6.9. HFT commissioned further studies to address the potential indirect impact upon the SAC and to identify appropriate safeguards and mitigation that would assist its long term integrity. Details of those studies and recommendations were included in two CSSO Representations :

1. Response to the Interim HRA for the B&NES Core Strategy - Assessment of likely impacts and mitigation options for bats at Combe Down Mines SAC due to the proposed New Neighbourhood at Odd Down Option SWB 2. A report prepared by Mrs Lyn Jenkins & Dr. Laurent Duvergé Kestrel Wildlife Consultants Ltd, and
2. Addendum to the response to the Interim HRA for the B&NES Core Strategy Spatial Options - Assessment of likely impacts and mitigation options for bats at Combe Down Mines SAC due to the proposed New Neighbourhood at Odd Down Option SWB 2.

Details of the overall conclusions and recommendations are set out below: (reference to Option SWB2 is the proposed new policy area at Odd Down)

Executive Summary

The proposed New Neighbourhood at Odd Down Option SWB 2:

- Has no direct impacts on the bat roost at the Combe Down Mines, part of the Bath and Bradford-on-Avon SAC.
 - Lies outside the 1km sustenance zone for young bats, but within the 4km roost sustenance zone for adult bats.
 - Bats use the southern boundary of Option SWB 2 as a flight corridor and also occasionally for foraging. Horseshoe bats have not been recorded over the rest of the site.
 - There are a total of 1.66 km of good quality hedgerow (located to the south-east of the current Park and Ride, and at the eastern end of Option SWB 2) which would be affected by the proposed development. These could potentially be useful as a flight/foraging corridors, but there is little/no evidence that they are being used by horseshoe bats.
 - The potential impacts identified in the Interim HRA can be mitigated for by:
 - 1) Master planning on SWB 2 to minimise the impact of lighting and disturbance on foraging areas
 - 2) Increasing the area and quality of bat foraging habitat in the Southstoke valley to the south of Option SWB 2, which is also in the ownership of the promoters of the scheme; to include both improvements to existing habitats, and the conversion of arable land to cattle grazed pasture with optimal management for bats
 - 3) Developing strategic flight lines along Southstoke valley to allow bats safe passage around Option SWB 2 and providing a link to foraging areas in Englishcombe Valley to the north-west
 - The poor performance of the maternity roost is not associated with the proposed development. However, the creation of a Bat Conservation Zone in Horsecombe Vale could assist in the long term conservation of the SAC and therefore could be supported by contributions from promoters of the Option SWB 2 scheme.
 - There is one record (from Billington's 2000 report) of a bat night roost, at the Fullers Earth Mine Processing Plant. The actual roost site was not determined at the time. It may be possible to retain this in situ, or to provide alternative roosts within improved foraging areas in the valley to the south
 - The potential in combination effects of other plans, including the proposals for a residual waste treatment plant at the Fullers Earth site, will be considered in a separate Addendum to this report. Given the low level of bat use on Option SWB 2, and the potential for effective mitigation, we suggest that the HRA should conclude there is no likely adverse effect on the SAC. The inclusion of appropriate policy wording covering the need for effective mitigation and enhancement of the SAC would ensure that the Combe Down mines bat roost and associated foraging areas are safeguarded in the long term.
- Prepared by Mrs Lyn Jenkins & Dr. Laurent Duvergé Kestrel Wildlife Consultants Ltd 2009

The proposed Strategic Policy for the New Neighbourhood set out below includes appropriate safeguards for the SAC.

Land Stability

The area of the Odd Down Plateau has been subjected to mining in the past both for Fuller's Earth and for Bath Limestones. The remnants of this historic mining that goes back to perhaps Roman times, is most evident in the former processing works to the western end of the plateau, now allocated for residual waste treatment (JWCS). Consequently the western parts of the New Neighbourhood, nearby Combe Hay Lane and to the north and south of the A367, have been undermined and suffered historic subsidence. Recent development at the park and ride has also taken place on undermined ground, following treatment.

The Council commissioned Arup & Partners to carry out an investigation into land stability at Odd Down, together with the alternative site at West Twerton/Newton St Loe. A copy of the report dated March 2010 is attached to these representations. The report identified the presence of land instability beyond those areas intended for residential development, i.e. to the west of Sulis Meadows. The report recommended either the use of piled foundations or cement grouting to stabilise these areas, in the event that residential development were to take place. This form of ground remediation is standard engineering practice and the evidence supports a viable scheme being capable of being delivered on these areas if required. (Arup & Partners: Slope, Geological Instability and Undermining Study: March 2010)

Renewable Energy at the New Neighbourhood

The Policy CP3 states that "Development should contribute to achieving the following minimum level of Renewable Energy and Heat generation by 2026:

110 Mwe (Megawatt Electricity)

165 MWth (Megawatt Thermal)".

Whilst the CS proposes development at a number of locations, it does not make clear how such substantial targets for Renewable Energy are to be delivered in practice over the coming 15 years.

In the case of the proposed New Neighbourhood at Odd Down, the site already contains the appropriate electrical infrastructure namely a 33Kv cable bringing power into the City from the south. Photovoltaic generation, whether from roof fixed cells on commercial and residential premises, or from ground mounted equipment (producing approximately 120Kw per acre) may thus be fed into the grid with minimal inconvenience, thereby assisting both in achieving the Council's CP3 target and also ensuring that the New Neighbourhood as a whole is carbon neutral or positive. Initial estimates suggest that photovoltaic generation could amount to as much as 1-2 MW at Odd Down.

Policy B6 Strategic Policy for the New Neighbourhood at Odd Down

The strategy for the New Neighbourhood is to:

- Natural and Built Environment

- Protect, conserve, and where possible, enhance:

a. The World Heritage Site and its setting including that part which is designated as Cotswolds Area of Outstanding Natural Beauty.

B. The conservation area and its setting.

C. Archaeology, including the Fosse Way and the Wansdyke scheduled ancient monument.

D. The network of green spaces and wildlife corridors alongside the plateau, Local Nature Reserves, informal parks and recreational areas, trees and woodlands.

E. The biodiversity resource including species and habitats of European importance, including effective mitigation and enhancement of the SAC to ensure that the Combe Down mines bat roost and associated foraging areas are safeguarded in the long term by:

- Ensuring Masterplanning will minimise the impact of lighting and disturbance on foraging areas

- Increasing the area and quality of bat foraging habitat in the Southstoke valley to the south to include both improvements to existing habitats, and the conversion of arable land to cattle grazed pasture with optimal management for bats

- Developing strategic flight lines along Southstoke valley to allow bats safe passage and providing a link to foraging areas in Englishcombe Valley to the north-west

Public Realm and Access to the Countryside

Facilitate enhancement of the public realm and access of the plateau area and countryside alongside

by :

- a. Improvement in interpretation of local historical and natural features together with a Movement Strategy; and
- b. the provision of Green Infrastructure

Energy Conservation and Generation

- a. Enable renewable energy generation including energy from residual waste treatment , biomass and on-site photovoltaics
- b. The development of a district heating network to include Sulis Meadows and nearby community facilities
- c. Enable new development to feature low/zero carbon energy efficiency in both residential and non residential development
- d. Minimise waste and maximise recycling during the construction phase utilising local, including on-site materials where possible

Economic Development

Plan for an overall increase of upto 1600 jobs at or near the New Neighbourhood between 2006-2026 including the following:

- a. Continuing expansion of Manor Farm Buildings to accommodate 250 new jobs aimed at SME knowledge economy.
- B. Redevelop the P&R Site to form a Science/Business Park with exceptional transport links capable of accommodating small industrial/manufacturing and office infrastructure.
- C. Provision of live/work units to provide for increasing self employed workers
- d. The provision of Community facilities to serve the New Neighbourhood, including a new or extended primary School, local shops, GP surgery .
- E. Provision of good links to nearby centres and employment on foot, bicycle or public transport, providing greater choice. The objective will be to provide a variety of employment types which are easily accessible to the whole community.

Housing

Plan for the development of upto 1500 new homes including:

- a. A range of homes that contributes to providing choice in tenure and housing type having regard to the character and accessibility of the area
- b. Both market and affordable housing to accommodate a range of different households as evidenced by local needs
- c. A range of specialist housing that meets the needs of older or disabled people, including supported housing projects, as well as live/work units.
- D. Proposals that deliver high quality designs in harmony with nature and natural materials, with the surrounding landscape, with the local vernacular as seen in the best of buildings constructed over the past 500 years and more

Retail and Community Facilities

Plans for the New Neighbourhood will include:

- a. Strong pedestrian and cycle links to the District Centre on Frome Rd
- b. Public transport links within walking distance of all homes, that provide frequent services to the City Centre, RUH, Bath University and the Railway Station along showcase bus routes with enhanced frequencies
- c. Access to local schools within walking distance and on safe routes
- d. Existing On-site GP Surgery (enlarged)
- e. Provision of allotments with capacity to serve new and existing homes
- f. Provision for Green Infrastructure to include a local interpretation centre to enhance recreational activities within the countryside (AONB)
- g. Community based energy strategy which supports existing and new residents to reduce energy consumption and to use renewable sources on-site.
- H. Support for the new 'sport hub' and facilities at Odd Down Playing Fields

Transport and Access

Plans for the New Neighbourhood will include:

- a. Enhancement of existing public transport services to provide greater frequency and ease of access from the New Neighbourhood to City Centre
- b. Excellent walking and cycling links
- c. Further bus priority measures in the Bath Package
- D. Arrangements for a car club and local Travel Plan

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 276\10

Respondent: Hignett Family Trust

**Representation
(soundness):**

**Change sought to
make sound:** A New Neighbourhood at Odd Down, Bath

Summary

The Hignett Family Trust are proposing a new policy to be included within the Core Strategy, to provide for a New Neighbourhood at Odd Down, Bath. This development will provide a low carbon mixed-use scheme capable of accommodating up to 1500 new homes and stimulate up to 1600 new jobs on the edge of Bath. The Council have considered the need for a new neighbourhood on the edge of Bath at Odd Down and have rejected this option. HFT will demonstrate that this decision is not sound and that a New Neighbourhood at Odd Down represents a key part of the CS, in order to deliver the Council's Vision and strategic objectives.

Introduction

The representations made in respect of this new policy will necessarily include supporting text and diagrams, as would be expected in such a strategic allocation in a CS. Therefore this representation offers such text and diagrams in support of the policy, as part of the reasoned justification and to demonstrate soundness. The Council is invited to engage in a dialogue over the content of the strategic allocation, including policy wording, and to invite wider consultation in order to receive views from other stakeholders and the public.

These representations will include as background, the representations that were made by the HFT in respect of earlier development plans, where these are relevant to this proposed allocation and to the policy wording. In particular, these representations will draw upon the evidence and proposals as submitted in the Core Strategy Spatial Options Consultation 2009 (CSSO), as these still remain valid today.

New Neighbourhood at Odd Down: extract from Core Strategy Spatial Options Consultation 2009

The representations in support of this strategic allocation should also be read alongside the representations and the evidence made in respect of the remainder of the CS by HFT, as they support the need for a new policy for a New Neighbourhood at Odd Down, are part of the reasoned justification and are evidence of soundness of this new policy.

A list of the evidence base and background information, can be found on the Council's website, together with the links from that website to other sources of public information, ie West of England Partnership. HFT will draw from this evidence base now and in preparation for the public inquiry but will provide as attachments to these representations, copies of all other evidence, whether previously submitted or not, so that the Council, the public and the Inspector have a complete record of this information.

The evidence base includes an assessment of the New Neighbourhood under the Habitats Regulations in consultation with Council, following their interim assessment, this is discussed below.

The Council indicated that if there were to be a New Neighbourhood at Bath, their preferred choice would be a location at West Twerton/ Newton St Loe, (CSSO). HFT have therefore provided evidence, from Baker Associates, in support of this new policy, to demonstrate that Odd Down performs significantly better than the West Twerton /Newton St Loe alternative, namely: 1. A Comparative Accessibility Appraisal and 2. A Comparative Sustainability Appraisal (App1 CSSO Reps). This evidence will be used to support the soundness of the new policy and will be reviewed to bring it up to date, having regard to the new Policies in the CS, other stakeholder representatives and development on the ground. HFT will draw upon this evidence base where alternative, competing schemes are proposed, which do not form part of the CS.

A New Neighbourhood

Chapter 3 of the CSSO provides ample reasoned justification for the development of the Vision for the New Neighbourhood at Bath including stakeholder engagement. HFT has fully participated in this process and will rely upon the evidence in Chapter 3 of the CSSO, together with the CSSO Reps Part 2:

- 3.6 New Neighbourhood in an Urban Extension in Bath
- 4.0 Green Belt
- 5.0 Area of Outstanding Natural Beauty
- Proposed Recommendations in support of the proposed new vision, strategic objectives and policy for a New Neighbourhood at Odd Down.

Together with Appendices

App 4 Odd Down Plateau SWB2: proposed extensions SWB2.1-4

App 5 A Provisional Employment Strategy

App 6 Landscape Report Novell Tullet 2006

App 7 Landscape Report A Novell 2009

App 8 Health Impact Assessment (extract from 2009 study)

App 9 Former Fullers Earth Works, Fosse Way, Bath (B12) extract from Draft Joint Waste Core Strategy 2010

The New Neighbourhood at Odd Down

Proposed Spatial Vision for a New Neighbourhood

The following vision is proposed for the New Neighbourhood and takes account of the comments made in the CSSO Reps 3.6.1. It is proposed that this vision is included in the CS. (Insert the following vision in the CS)

The Vision for a New Neighbourhood at Odd Down

The new neighbourhood at Odd Down will be a mixed use extension to the urban edge of the city. It will be an attractive and vibrant new part of the city which exemplifies sustainable living. Buildings will be zero carbon, and opportunities for using local energy resources and local food production will be a core part of the development.

The new neighbourhood will be part of the city and will be well linked to the city centre and other areas using sustainable methods of transport, including public transport, cycling and on foot. With the highest quality urban design, the new area will provide a range of housing and will encourage safe and healthy lifestyles.

This neighbourhood will play an important role in the growth of Bath, supporting regeneration of relatively deprived areas in the south of Bath and will complementing the redevelopment of the river corridor and the renewal of the city centre.

The development will be located and designed in a way that respects the World Heritage Site status and that minimises the potential harm to the setting of Bath. Opportunities to increase access to green space and the countryside and enhance ecology will be realized so as to protect and enhance the recreational opportunities within the Cotswold Area of Outstanding Natural Beauty. The neighbourhood will reflect the form and character of Bath.

Spatial Objectives

A number of spatial objectives have also been developed and these may form the basis of future development principles, which will help shape the look and feel of the area. The following objectives are recommended for inclusion alongside and in support of the new policy (see CSSO Repts 3.6.1)

Spatial Objectives of the New Neighbourhood

The New Neighbourhood at Odd Down will:

1. Be an exemplar of low carbon development, exceeding government targets
2. Have a mix of uses which will make sure that there is vibrancy and activity, while also offering easy, safe and affordable access to local employment, and educational opportunities.
3. Offer access to a wide range of services and facilities and will support the needs of the new and existing communities
4. Provide a mix of housing types, tenures and sizes, including affordable housing to meet the identified needs of all sectors of the community
5. Contribute to the sustainable economic vitality of the area and the city as a whole by the provision of a variety of employment types
6. Be well linked into Bath and work as a new neighbourhood in the city
7. Minimise the impact on the integrity of the villages close to the city including maintaining the general extent of the Bristol-Bath Green Belt subject to boundary changes to accommodate the New Neighbourhood
8. Be located and designed in a way that minimises any negative impact on environmental assets and the views of, and from, them including the World Heritage Site and its setting and the Wansdyke
9. Be designed and developed in a way that makes sure that measures are taken to enhance and otherwise mitigate and compensate for harm to the landscape of the Cotswold Area of Outstanding Natural Beauty including improving recreational opportunities and to protect and enhance nature conservation interests and their habitats
10. Include a network of connected high quality accessible green infrastructure providing local recreation and biodiversity opportunities and visual benefits
11. Be a high quality place with its form and appearance responding to the character and context provided of the site and the wider area, but at the same time encouraging the efficient use of land
12. Be a place that is easy access and move around with excellent walking, cycling and public transport links both within the community and with the surrounding urban area and surrounding countryside
13. Have good access, via a range of transport modes including walking, cycling, public transport and car to Bath and the wider area
14. Be designed and developed in a way that results in a more sustainable use of resources and minimising impact on flooding, heat gain, water resources and water quality and maximizing the use local building materials
15. Be designed to meet the needs of a varied community and provide a safe, playful and healthy environment
16. Provide an integrated waste management infrastructure. Any scope for integrating waste management and heat generation should be exploited where practicable.

Odd Down Plateau

In developing the policy for the New Neighbourhood at Odd Down in the context of the Vision and Spatial Objectives, HFT carried studies of the potential area of the New Neighbourhood on the Odd Down Plateau. Full details of those studies of the Plateau Area and the Southstoke Valley alongside, together with the conclusions, are attached as separate documents, that originally formed part of the CSSO submissions, which should be read in support of the policy and reasoned justification to these representations. These submissions are CSSO Part 1 with Appendices 1,2,3 and CSSO Part 2 with Appendices 4-9. In addition studies in support of Habitat Regulations Assessment and Land Stability are described below together with their recommendations. In response to Policy CP 3 Renewable Energy, there is additional information relating to the New Neighbourhood.

Habitat Regulations

The proposed New Neighbourhood at Odd Down lies in proximity to the Bath/Bradford on Avon SAC, which is situated to the east, in the community of Combe Down. The importance of this mine location

for certain species of bat is well recognised both in terms of species and population numbers to the extent that it is registered under the Habitats Directive as a Natura 2000 Site (SAC) and consequently must be taken into account when proposing planning policies in an LDF document or determining a planning application.

HFT have engaged in detailed discussions with the Council and with Natural England to support site monitoring of bats as part of an Appropriate Assessment carried out by the Council in the Interim Habitat Regulations Assessment of the CSSO. Details of the Councils interim assessment are set out in CSSO Part 2 3.6.9. HFT commissioned further studies to address the potential indirect impact upon the SAC and to identify appropriate safeguards and mitigation that would assist its long term integrity. Details of those studies and recommendations were included in two CSSO Representations :

1. Response to the Interim HRA for the B&NES Core Strategy - Assessment of likely impacts and mitigation options for bats at Combe Down Mines SAC due to the proposed New Neighbourhood at Odd Down Option SWB 2. A report prepared by Mrs Lyn Jenkins & Dr. Laurent Duvergé Kestrel Wildlife Consultants Ltd, and
2. Addendum to the response to the Interim HRA for the B&NES Core Strategy Spatial Options - Assessment of likely impacts and mitigation options for bats at Combe Down Mines SAC due to the proposed New Neighbourhood at Odd Down Option SWB 2.

Details of the overall conclusions and recommendations are set out below: (reference to Option SWB2 is the proposed new policy area at Odd Down)

Executive Summary

The proposed New Neighbourhood at Odd Down Option SWB 2:

- Has no direct impacts on the bat roost at the Combe Down Mines, part of the Bath and Bradford-on-Avon SAC.
- Lies outside the 1km sustenance zone for young bats, but within the 4km roost sustenance zone for adult bats.
- Bats use the southern boundary of Option SWB 2 as a flight corridor and also occasionally for foraging. Horseshoe bats have not been recorded over the rest of the site.
- There are a total of 1.66 km of good quality hedgerow (located to the south-east of the current Park and Ride, and at the eastern end of Option SWB 2) which would be affected by the proposed development. These could potentially be useful as a flight/foraging corridors, but there is little/no evidence that they are being used by horseshoe bats.
- The potential impacts identified in the Interim HRA can be mitigated for by:
 - 1) Master planning on SWB 2 to minimise the impact of lighting and disturbance on foraging areas
 - 2) Increasing the area and quality of bat foraging habitat in the Southstoke valley to the south of Option SWB 2, which is also in the ownership of the promoters of the scheme; to include both improvements to existing habitats, and the conversion of arable land to cattle grazed pasture with optimal management for bats
 - 3) Developing strategic flight lines along Southstoke valley to allow bats safe passage around Option SWB 2 and providing a link to foraging areas in Englishcombe Valley to the north-west
- The poor performance of the maternity roost is not associated with the proposed development. However, the creation of a Bat Conservation Zone in Horsecombe Vale could assist in the long term conservation of the SAC and therefore could be supported by contributions from promoters of the Option SWB 2 scheme.
- There is one record (from Billington's 2000 report) of a bat night roost, at the Fullers Earth Mine Processing Plant. The actual roost site was not determined at the time. It may be possible to retain this in situ, or to provide alternative roosts within improved foraging areas in the valley to the south
- The potential in combination effects of other plans, including the proposals for a residual waste treatment plant at the Fullers Earth site, will be considered in a separate Addendum to this report .

Given the low level of bat use on Option SWB 2, and the potential for effective mitigation, we suggest that the HRA should conclude there is no likely adverse effect on the SAC. The inclusion of appropriate policy wording covering the need for effective mitigation and enhancement of the SAC would ensure that the Combe Down mines bat roost and associate foraging areas are safeguarded in the long term. Prepared by Mrs Lyn Jenkins & Dr. Laurent Duvergé Kestrel Wildlife Consultants Ltd 2009

The proposed Strategic Policy for the New Neighbourhood set out below includes appropriate safeguards for the SAC.

Land Stability

The area of the Odd Down Plateau has been subjected to mining in the past both for Fuller's Earth and for Bath Limestones. The remnants of this historic mining that goes back to perhaps Roman times, is most evident in the former processing works to the western end of the plateau, now allocated for residual waste treatment (JWCS). Consequently the western parts of the New Neighbourhood, nearby Combe Hay Lane and to the north and south of the A367, have been undermined and suffered historic subsidence. Recent development at the park and ride has also taken place on undermined ground, following treatment.

The Council commissioned Arup & Partners to carry out an investigation into land stability at Odd Down, together with the alternative site at West Twerton/Newton St Loe. A copy of the report dated March 2010 is attached to these representations. The report identified the presence of land instability beyond those areas intended for residential development, i.e. to the west of Sulis Meadows. The report recommended either the use of piled foundations or cement grouting to stabilise these areas, in the event that residential development were to take place. This form of ground remediation is standard engineering practice and the evidence supports a viable scheme being capable of being delivered on these areas if required. (Arup & Partners: Slope, Geological Instability and Undermining Study: March 2010)

Renewable Energy at the New Neighbourhood

The Policy CP3 states that "Development should contribute to achieving the following minimum level of Renewable Energy and Heat generation by 2026:

110 Mwe (Megawatt Electricity)

165 MWth (Megawatt Thermal)".

Whilst the CS proposes development at a number of locations, it does not make clear how such substantial targets for Renewable Energy are to be delivered in practice over the coming 15 years. In the case of the proposed New Neighbourhood at Odd Down, the site already contains the appropriate electrical infrastructure namely a 33Kv cable bringing power into the City from the south. Photovoltaic generation, whether from roof fixed cells on commercial and residential premises, or from ground mounted equipment (producing approximately 120Kw per acre) may thus be fed into the grid with minimal inconvenience, thereby assisting both in achieving the Council's CP3 target and also ensuring that the New Neighbourhood as a whole is carbon neutral or positive. Initial estimates suggest that photovoltaic generation could amount to as much as 1-2 MW at Odd Down.

Policy B6 Strategic Policy for the New Neighbourhood at Odd Down

The strategy for the New Neighbourhood is to:

Natural and Built Environment

Protect, conserve, and where possible, enhance:

A The World Heritage Site and its setting including that part which is designated as Cotswolds Area of Outstanding Natural Beauty.

B the conservation area and its setting.

C Archaeology, including the Fosse Way and the Wansdyke scheduled ancient monument.

D The network of green spaces and wildlife corridors alongside the plateau, Local Nature Reserves, informal parks and recreational areas, trees and woodlands.

E The biodiversity resource including species and habitats of European importance, including effective mitigation and enhancement of the SAC to ensure that the Combe Down mines bat roost and associated foraging areas are safeguarded in the long term by:

- Ensuring Masterplanning will minimise the impact of lighting and disturbance on foraging areas
- Increasing the area and quality of bat foraging habitat in the Southstoke valley to the south to include both improvements to existing habitats, and the conversion of arable land to cattle grazed pasture with optimal management for bats

- Developing strategic flight lines along Southstoke valley to allow bats safe passage and providing a link to foraging areas in Englishcombe Valley to the north-west

Public Realm and Access to the Countryside

Facilitate enhancement of the public realm and access of the plateau area and countryside alongside by :

- Improvement in interpretation of local historical and natural features together with a Movement Strategy and
- The provision of Green Infrastructure

Energy Conservation and Generation

- Enable renewable energy generation including energy from residual waste treatment , biomass and on-site photovoltaics
- The development of a district heating network to include Sulis Meadows and nearby community facilities
- Enable new development to feature low/zero carbon energy efficiency in both residential and non residential development
- Minimise waste and maximise recycling during the construction phase utilising local, including on-site materials where possible

Economic Development

Plan for an overall increase of upto 1600 jobs at or near the New Neighbourhood between 2006-2026 including the following:

- Continuing expansion of Manor Farm Buildings to accommodate 250 new jobs aimed at SME knowledge economy.
- Redevelop the P&R Site to form a Science/Business Park with exceptional transport links capable of accommodating small industrial/manufacturing and office infrastructure.
- Provision of live/work units to provide for increasing self employed workers
- The provision of Community facilities to serve the New Neighbourhood, including a new or extended primary School, local shops, GP surgery .
- Provision of good links to nearby centres and employment on foot, bicycle or public transport, providing greater choice

The objective will be to provide a variety of employment types which are easily accessible to the whole community.

Housing

Plan for the development of upto 1500 new homes including:

- A range of homes that contributes to providing choice in tenure and housing type having regard to the character and accessibility of the area
- Both market and affordable housing to accommodate a range of different households as evidenced by local needs
- A range of specialist housing that meets the needs of older or disabled people, including supported housing projects, as well as live/work units.
- Proposals that deliver high quality designs in harmony with nature and natural materials, with the surrounding landscape, with the local vernacular as seen in the best of buildings constructed over the past 500 years and more

Retail and Community Facilities

Plans for the New Neighbourhood will include:

- Strong pedestrian and cycle links to the District Centre on Frome Rd
- Public transport links within walking distance of all homes, that provide frequent services to the City Centre, RUH, Bath University and the Railway Station along showcase bus routes with enhanced frequencies
- Access to local schools within walking distance and on safe routes
- Existing On-site GP Surgery (enlarged)
- Provision of allotments with capacity to serve new and existing homes

- f. Provision for Green Infrastructure to include a local interpretation centre to enhance recreational activities within the countryside (AONB)
- g. Community based energy strategy which supports existing and new residents to reduce energy consumption and to use renewable sources on-site.
- H. Support for the new 'sport hub' and facilities at Odd Down Playing Fields

Transport and Access

Plans for the New Neighbourhood will include:

- a. Enhancement of existing public transport services to provide greater frequency and ease of access from the New Neighbourhood to City Centre
- b. Excellent walking and cycling links
- c. Further bus priority measures in the Bath Package
- d. Arrangements for a car club and local Travel Plan

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 277\2

Respondent: Ashtenne Industrial Fund Limited Partnership

Representation (soundness): Policy B1 – Bath Spatial Strategy

Ashtenne notes the Council's housing strategy to direct 3,500 dwellings to the Central Area and Western Corridor, with around 2,500 homes to come forward within Bath's neighbourhoods. It is identified that surplus Ministry of Defence land will play a major role in these areas. Ashtenne is concerned that this text will restrict the role of other brownfield, sequentially preferable sites, such as Wansdyke. Ashtenne therefore requests that text is inserted at 3(a) to state "Ministry of Defence land and redevelopment of other brownfield sites will play a major role".

Strategic Issues – Bath

Ashtenne notes strategic issue 8 which identifies that there are considerable areas of derelict and underperforming land and a number of prominent sites in need of redevelopment in order to enhance the World Heritage Site and protect its setting and the Green Belt from incursion. Ashtenne believes that redevelopment of Wansdyke would help to achieve this.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 278\4

Respondent: Cotswolds Conservation Board

Representation (soundness):

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 279\2

Respondent: English Heritage

Representation (soundness): Policy B1 should be adjusted to replace where possible with where appropriate as the distinction lies in an expectation that development makes a positive contribution where the circumstances demonstrate it would be appropriate to do so. Policy B1 should be updated to reflect PPS5 and an appreciation of

non designated heritage assets.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 280\4

Respondent: Scott Brownrigg

Representation Policy B1 - Bath Spatial Strategy, page 34

(soundness): We support the provision of new housing within Bath's neighbourhoods and better use of previously developed land through the regeneration and repair of parts of the Central Area. We further support the provision of new hotel bedrooms to widen the accommodation offer of the city, increase overnight stays and the competitiveness of the City as a visitor destination, but we do not support the inclusion of an identified upper limit in terms of bed spaces to be provided (500-750). Hotel use is a suitable use in a city centre location in line with national planning guidance, and it is for the market to decide on the number of bedspaces to be provided.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 281\5

Respondent: Natural England

Representation While we do not consider it necessary to return any completed representation forms there is one

(soundness): further aspect of the Publication Version that we suggest could be improved and others we believe that are particularly worthy of praise. In hopes that this will be of interest to the authority we would, therefore, like to offer the following informal observations:

Policy B1 – Bath Spatial Strategy

We welcome the recognition that the natural environment is part of Bath's heritage and contributes to its status as a World Heritage Site, and to its setting. We particularly welcome the identification of networks and corridors as being essential for multi-functional Green Infrastructure.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 283\5

Respondent: Prior Park College and Paragon School

Representation Policy B1 – Bath Spatial Strategy

(soundness): Strategy point 7 of the Bath Spatial Strategy sets the framework for Higher Education. The College and Paragon School believes that this should go further to include all education stages – primary, higher education and further education. A further criterion should be included to allow for further re-investment into existing facilities to cater for growing needs.

Change sought to Summary

make sound: Prior Park College and Paragon School are very keen to protect its ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council needs to recognise the key role of the establishment and to plan for its enhancement by continuing the College's designation as a major site within the Green Belt. If this designation is lost then the College will experience significant barriers to continue the ongoing programme of investment.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 284\1

Respondent: Sara Keane

Representation Dear Sirs,

(soundness):

I write to register my objection to the inclusion of the Beechen Cliff School Lower Field in the SHLAA which I understand is a key document in the Council's draft Core Strategy.

The Lower Field is part of Beechen Cliff School's playing fields, and should remain as such given the current size of the school and the likely effect the proposed closure of Culverhay School will have on pupil numbers. Pupils use the field on a daily basis for a number of activities, and it also gives them vital space for recreation during lunch hours and after school. The field was gifted to the school for use as a playing field and it is simply morally wrong to allow it to fall into the hands of speculators for short-term gain. It would be extremely ironic if the Council were to allow this playing field to be sold off just as the Olympic Games are being staged in the UK and when we are confronted by an obesity epidemic, and I'm sure this fact would not be lost on thousands of voters. Rather than designating it as suitable for housing development, the Lower Field should be robustly protected by the Council and left as a legacy for the benefit of future generations of schoolchildren.

Furthermore, the Lower Field is a public space used by large numbers of local people for jogging, dog walking etc. and constitutes an important green space and wildlife corridor, in particular the ancient hedgerow that runs along its border with Greenway Lane. It is also used by many Beechen Cliff pupils as a way in and out of the school, thereby relieving pressure of both motor and pedestrian traffic on the narrow roads in Poets' Corner. Recently, the pavements in Greenway Lane were improved as part of the government's Safe Routes to School initiative, in recognition of the fact that this is a route used by hundreds of pupils every day.

The Lower Field is also part of the historic setting for the Grade II listed Devonshire Buildings, and as such is worthy to be kept as it is for the enjoyment of future generations. As front line guardians of our World Heritage City, I urge you to give as much thought to protecting the green spaces that enhance our historic buildings as you do to the conservation of the buildings themselves. Once a field has gone, it is gone forever.

I therefore urge you to remove the Beechen Cliff School Lower Field from the SHLAA immediately.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 290\1

Respondent: William Wilson

Representation Dear Sirs

(soundness):

As a close neighbour of Beechen Cliff School, I wish to object to the proposal to take over and develop part of the playing fields at the school.

The school is an excellent and successful school, but as such is oversubscribed and crowded into old buildings. Its numerous pupils need all the playing fields and grounds they have for recreation. Ofsted reported that their playing fields were already too small. Taking away more of them is unfair and retrograde.

The school has great plans for the future, such as opening its new music school this summer, and it

needs more not less opportunities - this development would reduce options for the future.

The current development is opposed by the school's headteacher, and his views should command respect in the council, and carry great weight.

The school is an excellent neighbour, and like many people round here we have open access to the grounds and use them regularly for recreation and amenity, which will be impacted by the proposed development.

The development would be contrary to the recently agreed Local Plan of 2007, and there has been no consultation or explanation for the proposed reversal of its designation of this land as open space.

The development would be contrary to current government policy against the disposal of school playing fields, which was subsequently recognised by the Thatcher government as a big mistake.

Yours faithfully

William Wilson

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\1

Respondent: Stubbs Rich LLP

Representation Many of the policies also reflect a welcome sea-change since the putative demise of the RSS and I am
(soundness): delighted that the prospect of the Urban extension has been dropped.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\10

Respondent: Stubbs Rich LLP

Representation 2.07. agree that policy should "deflect ill-conceived proposals that might be rejected within a
(soundness): generation..."
B1/8C & B2/43.

Object to the emphasis on a new venue. Study after study has demonstrated that the economics of such a proposal would be disastrous, whereas the reuse and improvement of the city's existing stock (Guildhall, Assembly Rooms, Komedia, Theatre Royal, Forum, Hayesfield School, Rondo, etc) would engage visitors with the City as well as make the most of current assets.

2.15. The Placemaking Plan will indeed identify contentious issues for key policy areas which is why it's publication for consultation must be soon.

Diagram 6. The status of the designation on the map varies crucially. The central area of Bath is mostly built, but with a few important opportunities: BWR is almost completely vacant; and Twerton is occupied but, potentially, under-developed.

Diagram 7. A new stadium on the Rec is mentioned in the text but not shown on the plan.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 292\3

Respondent: Bath Avon River Corridor Group

Representation Policy B1 p34 - Lack of Spatio-temporal economic model at this point to give a hierarchy to competing
(soundness): land uses around economic growth points. Lack of recognition between impact accountability between urban and rural economies and environments.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 293\1

Respondent: Paul Smirthwaite

Representation I am writing to object to the proposed designation in the draft Strategy of the Lower Field as suitable
(soundness): for housing development. Development of this site would have a number of negative consequences for the area, including:
- negative impact on the local environment, as resulting loss of wildlife corridor
- negative impact on traffic, with increase in through-roads and resulting increase in traffic, with consequent risks for local residents and the local environment
- negative impact on Beechen Cliff students, with inadequate outdoor recreation space
- loss of green space much enjoyed by local residents

Yours sincerely
Paul Smirthwaite

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 297\5

Respondent: Bath Rugby Club

Representation Page 35, Policy B1 Bath Spatial Strategy
(soundness):
Clause 8

We support the inclusion of (b). We consider that "larger" should be inserted in front of "new". Also insert "and complementary uses" after "stadium".

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\5

Respondent: Liberal Democrat Group

Representation Policy B1, 6d
(soundness): This paragraph is inconsistent with strategic policies in the Sustainable Community Strategy on climate change, economic development and investment in city, town and local centres.

Policy B1, 7a

The previous wording is unsound because it would be ineffective. A significant shift in student accommodation would be needed to have a beneficial effect on the housing supply

Policy B1, 8a

See comments above to Objective 3, third bullet point.

In order to avoid distortion in the visitor accommodation sector, hotel developments already approved, but as yet incomplete, should be counted towards this target.

Policy B1, 8d new

Omission. The Council should take account of the value of other sports.

Policy B1, 9a

Omission. Sections on the public realm should include reference to pedestrianisation to underpin key policies on climate change, investment in city, town and local centres and the strategic policy B2 on the central area.

Change sought to make sound: "Limit additional convenience retail floorspace (beyond existing commitments) within and on the edge of existing centres.

"Enable the provision for substantial additional on-campus student bed spaces at both universities, facilitating growth in the overall number of students and significant shrinkage of the private lettings market".

"Enable and manage the provision of 500-750 new hotel bedrooms during the period 2006-2026 to widen the accommodation offer of the city, increase overnight stays and the competitiveness of the city as a visitor destination".

"Enable development of new facilities to underpin viability of other sports including at Bath Racecourse and Twerton Park".

"Facilitate enhancement of the public realm of the Central Area (including more pedestrianisation and shared space) and delivery of a Wayfinding and City Information System in line with the Public Realm and Movement Strategy".

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 300\10

Respondent: Somer Housing

Representation Economic Development

(soundness): 4.1 With regard to the area based policies, we only have one recommendation which applies to all the Economic Development Policies in each area. This is that the Council inserts the policy wording as below which means that it will consider releasing lower quality employment land for affordable housing development. The quality of land should be measured against a set of criteria before it is released, but the Council should set a priority of releasing it for a significant proportion of affordable housing within the policy. Given the lack of supply of affordable housing likely to come forward over the plan period and the difficulties housing associations face competing for sites with general market housing developers without public subsidy, this could be an important source of affordable housing. 'The Council will consider releasing lower quality employment land for schemes which deliver a significant community benefit, such as the delivery of affordable housing.'

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 308\1

Respondent: Andrew Guilor

Representation I understand that there is the possibility of a review for a proposed housing development on the above
(soundness): playing fields. As a local resident, parent of a pupil at the school and dog walker I want to state my strong objection to any prospective development on this lane for all the reasons when The Council reached their decision on 2007 to deny permission - nothing has changed.

Please provide reassurance that this land will not be released for development.

"Agrees to maintain the position agreed at Council on 12th October 2006 that the land at Beechen Cliff School lower field, bordering Greenway Lane, remain unallocated for development, and the existing recreational open space designation (Policy SR.1A) is retained, because the harm caused by development in this location to the World Heritage site, the Conservation area and local character is considered unacceptable"

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 310\3 S

Respondent: The Initiative

Representation I am writing on behalf of the Initiative in Bath and North East Somerset to express our broad support
(soundness): for the latest Core Strategy Document. We have been appreciative of being fully informed of developments and grateful that many of our original observations on the original have been incorporated into the new version.

However, there are seven points that I need to raise on behalf of our members, who form a significant part of the business community.

3. We believe there is adequate land in Bath to produce the number of high value jobs that are so necessary. In fact there may be an argument for some employment land coming out of the market in order to create a demand which would allow developers the opportunity to create modern office space.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 312\1

Respondent: Doris Bechstein

Representation As a local Entry Hill resident and parent of a Beechen Cliff student I am dismayed at the prospect of the
(soundness): Beechen Cliff School playing fields being sold off for development. The fields are used extensively for recreation, exercise and accessing the school. Losing them would not only take away vital amenities but also increase the already unbearable levels of traffic in the area. With student numbers at BC likely to go up as a result of the Culverhay school closure this land is more need than ever!

Here are some further points for my objection:

- Housing land targets have been reduced since 2007: there is even less of a case for developing the Lower Field now than then.
- The assessment in the SHLAA is too cursory: it ignores the powerful arguments against the proposal set out by the Council in its decisions in 2007, nor sought views from the local community: the effect is one of bias, which urgently demands revision.

- Government policy on playing fields is now tighter than when disposal consent was given.
- The school has a real need for the playing fields: since 2003 pupil numbers have risen, the daily use of the land by the school's pupils has intensified, and the current headmaster's view is that the land is needed as playing fields.
- The SHLAA ignores the impact on the setting of the listed Devonshire Buildings.
- The SHLAA ignores Policy BH.15 (saved from the Local Plan) on visually important open space.
- The SHLAA ignores the land's role as a green wedge and wildlife corridor.
- The SHLAA ignores the current extensive permissive use of the land for informal recreation by local residents
- The SHLAA has given insufficient attention to the traffic issues: it assumes they can be simply solved, and this is far from clear.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 318\2

Respondent: MOD

Representation (soundness): MOD generally supports the references to its landholdings in Bath (Foxhill, Warminster Road and Enleigh).

Since these sites are currently in one public ownership, there exists the opportunity to develop a composite arrangement of land use allocations across all 3 sites, to ensure maximum social and economic benefits are derived from the whole landholding, rather than a fragmented approach to each site as and when redevelopment takes place. This approach will enable particularly, appropriate levels of employment uses, public open space, and affordable housing are provided in the most suitable locations across the city.

MOD would therefore counsel the removal of the target provision for housing, recommending that this is undertaken in the Placemaking Plan when more detailed evaluations of the sites to include ground conditions, landscape, ecological, heritage, traffic, utilities, and visual assessments, can provide a more persuasive and realistic foundation for future development options, including the density of housing development.

Regardless of the above, paragraph 2.22 identifies Foxhill and Warminster Road as being suitable to accommodate "about 850 homes" but the figures derived from the evaluations conducted for the SHLAA, suggest these 2 sites could accommodate at least 890, even if the suggested density factors are accepted.

As a secondary issue, 850 from an overall target of 2500 leaves a challenging target of around 1650 units to be provided by infill, which may be both optimistic and impracticable.

There also remain prospects of Enleigh being vacated within the plan period, albeit maybe only partially, which would give further opportunities for additional housing units to be provided on MOD land.

Change sought to make sound: Delete from Chapter 2d, paragraph 2.22 (page 48), in its entirety, the sentence beginning "The Strategic Housing Land Availability Assessment suggests..."

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 321\1

Respondent: Northern Racing

Representation (soundness): Northern Racing consider that the Core Strategy is unsound as it is not consistent with national policy in that; it does not support sustainable tourism and leisure development in rural areas as required by PPS4; nor, is it flexible enough to allow for hotel development in the countryside in support of outdoor recreation at Bath Racecourse as required by the Good Practice Guide on Planning for Tourism; nor does it support the provision of this sport and recreation facility as required by PPG17.

Bath Racecourse is entering its 200th year anniversary. It is a fundamental part of the city's cultural and sporting heritage, in a city that is one of the oldest, if not the oldest, established leisure destinations in the UK. However, this longstanding association with the city cannot insulate the racecourse from structural and cultural changes in the horse racing industry where income from betting is in decline and all UK racecourses have to adapt to attract other sources of leisure spending to survive. Around the country, competing racecourses are adapting their facilities to enable them to provide a higher quality experience to racegoers, to provide other sports and leisure facilities outside racedays, and to provide better corporate hospitality facilities for local and visiting businesses.

Bath Racecourse is integral to the sporting and leisure offer of Bath and the surrounding area, its attraction as a major tourist destination, and, its attraction as a location to do business. Its redevelopment and improvement to adapt to market trends and survive as a viable business itself is therefore a strategic issue of paramount importance to the local economy. Unfortunately, the Core Strategy does not recognise this strategic role and makes no reference to the racecourse whatsoever. This does not accord with national policy. It is therefore unsound.

National Policy EC7 of PPS4 states that local planning authorities (LPAs) should support sustainable tourism and leisure developments that benefit rural communities and visitors and which utilise and enrich, rather than harm, the character of the countryside. LPAs should, through their LDFs, support the provision and expansion of tourist and visitor facilities in appropriate locations, and wherever possible, locate tourist and visitor facilities in existing or replacement buildings. The incorporation of additional tourist accommodation and leisure facilities through the replacement of existing grandstands and other buildings at Bath Racecourse would conform to this national policy to support business in rural areas.

Paragraph 1.2 of the Good Practice Guide on Planning for Tourism states that LPA's should have regard to the Guide in preparing local development documents. Annex A deals with tourist accommodation and states that LPAs should engage constructively with the tourist industry to identify suitable locations in plans for hotel accommodation to meet current and future needs, particularly, for those with business, conference and banqueting facilities, where the preference is to identify town centre sites. However, it goes on to state that in allocating sites in plans, LPAs need to recognise the nature of the particular market being met by the accommodation will influence the location chosen. The Guide cites the example of accommodation for those seeking to enjoy the natural environment through walking and outdoor recreation that may be better located in a rural area than in a major town centre some distance away from the attractions it serves. Hotel accommodation and facilities to serve visitors seeking to enjoy the outdoor recreations of horse racing and golf, and/or simply the countryside environment, aligns with this guidance.

Paragraph 25 of PPG17 states that in the countryside around towns LPAs should encourage the creation of sports and recreation facilities and ensure that they are accessible by alternative modes of transport to the car. Bath Racecourse has good accessibility being in close proximity to Landsdown Park & Ride, with the potential to add further Park & Ride and Coach Parking facilities supported by a bus shuttle service to the city centre. Paragraph 26 states that in rural areas these sports and recreational activities which are likely to attract significant numbers of participants or spectators should be located in, or on the edge of country towns. Clearly, the planners of 200 years ago also thought this a good idea, as Bath Racecourse is located close to the northern edge of Bath, a short coach drive from the city centre.

The provision of new or replacement grandstand facilities incorporating a hotel and improve visitor facilities in support of the outdoor recreational uses of horse racing and golf would accord with national Green Belt policy in PPG2. It would also accord with national policy in PPS7 and PPG17 which do not preclude acceptable tourism and leisure development within the AONB provided it does no harm to the purposes of that designation. Provided sustainable means of transport can be provided to the racecourse through a bus service to and from the city centre, potentially in relation to an expanded Park & Ride service for the city centre, then any such development will accord with national transport policy in PPG13.

Part of the LDF Evidence Base includes the Council's Destination Management Plan (DMP). This makes it clear that tourism plays an important role in terms of the Bath economy, generating employment, underpinning other economic sectors and supporting a more varied range of facilities than the local population could afford alone. However, it cites a number of weaknesses which may threaten the city's future viability as a visitor destination. These include:-

- Tourism is static and may be contracting
- It is over dependent on holiday tourism
- A lack of accommodation capacity constrains and inhibits growth
- It is expensive and losing ground in terms of value for money
- Planning constraints mean the product is difficult to change and refresh

In consideration of these and other factors the DMP therefore takes as its aim:-

'To develop a viable and sustainable visitor economy which continues to make an important contributions to the economic vitality of Bath and the surrounding area, enhances its image and standing, is in harmony with its unique environment, and adds to the quality of life for its residents'.

I underline the words 'and the surrounding area' as it is important note that the DMP does not restrict the development of a viable and sustainable visitor economy strictly to within the central area of the city of Bath alone, but rather it recognises that existing contribution and further opportunities of the area surrounding Bath, that includes the Racecourse, to contribute to the development necessary to address the weaknesses identified in the report.

Indeed, the vision 'Where we want to be' goes on to state that it is envisaged that the city will become a place with 'access to beautiful countryside', while listed as a 'Key principle' is the initiative to 'Link Bath to its hinterland to add depth'. Clearly, encouraging improved sporting, leisure and visitor facilities at Bath Racecourse which lies in the rural hinterland just to the north of the built-up area of the city alongside improving links between the Racecourse and the city centre through a Park & Ride and/or bus shuttle services, accords strongly with the aims and principles of the DMP. And yet this emphasis on developing the city and its surrounding rural hinterland as a visitor destination as a whole has not been translated into the Core Strategy.

(continued over)

(Humberts Leisure response to Policy B1 Question 6b continued)

In considering the Tourism Product, the DMP includes a number of priority areas including 'increasing accommodation capacity and choice' and 'strengthening the rural product to add to the range of things to do around Bath and spread the benefits of tourism more widely'. Northern Racing are seeking to spread the benefit of sporting, leisure and business tourism to Bath Racecourse, however, the Core Strategy as currently presented does not support this ambition (which accords with the DMP) and may in fact frustrate it as there is no flexibility built into the document in the face of rigid Green Belt, countryside and town centric policies.

In considering Infrastructure, the DMP has, as its first priority, to make it easier to get in and out of Bath. The provision of an improved Park & Ride service from Bath Racecourse would assist this priority.

The LDF Evidence Base also includes the Council's Visitor Accommodation Study (VAS). This states that Bath is expected to accommodate significant growth in terms of jobs and people over the next twenty years (as now proposed in the Core Strategy) and that this will generate a demand for additional visitor accommodation in the area. It states that in general accommodation enterprises are doing well and performing at levels above the national average. The VAS includes a benchmarking study which suggests that Bath has less hotel accommodation than other historic cities of a comparable size and status and that this may reflect on the difficulty and cost of redevelopment in Bath.

As hotel consultants ourselves, Humberts Leisure would concur with this analysis. Bath is one of the most important destinations for national and international visitors. The DMP estimates that it receives

3/4 million staying visitors which is a large amount for such a relatively small city. It is renowned for the high price and difficulty of booking its visitor accommodation. These are all signs of a significant undersupply of visitor accommodation. However, with an extremely sensitive historic centre it is difficult to accommodate major new hotel development within the city centre. Moreover, the city is surrounded by Green Belt and AONB designations making it difficult to expand the city and meaning that any available land within the city will have a high price with many competing uses for development.

The VAS suggests that there is scope for adding 256-376 rooms by 2016 and 444-761 rooms by 2026. We have not yet been able to undertake our own hotel accommodation need assessment to review these figures, but we would suspect that simply given the information contained within the VAS that the higher figures are the more likely and it is possible that even these may be low. The VAS itself points out that the amount of visitor accommodation in other comparable cities grew faster during the last decade than at Bath. We believe that this is due to the difficulty of developing hotel accommodation in the city in the face of conservation constraints and competing higher value uses. It is notable that only in the last few years, during a recession when normal residential and office land prices have been suppressed, that a number of hotel proposals have come forward. However, this is a Core Strategy for the next 15 years and those market pressures that kept out hotels during the last decade will return. Indeed, the VAS warns that although there are a number of sites likely to come on stream in and around the city centre which could be used for hotel development, there are opportunity costs to consider which could constrain the growth of leisure tourism.

A hotel incorporated into the development of new, or redevelopment of existing, grandstands and supporting facilities at Bath Racecourse, linked to the town centre by a sustainable Park & Ride facility, could address this priority and help to alleviate some of this visitor demand pressure.

Objective 3 of the draft Core Strategy seeks to promote the tourism potential of other parts of the District by facilitating the provision of visitor accommodation. Northern Racing supports this objective, but feel that the Core Strategy policies that follow restrict any such hotel development outside of the city centre. The Core Strategy assumes that all the city's hotel accommodation needs can be accommodated within the city centre as indicated by policy B2. Even if the city centre were able to accommodate the quantitative need identified for up to 750 new hotel bedrooms by 2026, which we doubt, this does not mean it could address the qualitative need for a variety of types of hotels including those that provide an attractive countryside setting and are more convenient for those participating in countryside sports.

Objective 6 seeks to promote health and well being including encouraging social interaction and the timely provision of recreational and leisure facilities. Northern Racing supports this objective, but do not feel that the Core Strategy policies which follow provide adequate support and encouragement to improve existing social interaction, recreation and leisure facilities such as Bath Racecourse. Certainly, there is no reference in proposed Policy CP13.

In terms of sporting recreational facilities that encourage social interaction and support the city's visitor economy. The strategically two most important sports which the city has to offer are Rugby and Horse Racing. We have scoured the Core Strategy for any policy to guide, or even mention the role of, Bath Racecourse, but there is none. There is, however, support in policy B1.8 for the development of a new Rugby Stadium for Bath RFC within the central area. On the basis that this is where the Council considers it appropriate to deal with strategic sporting tourism needs, then we feel that this is most appropriate location in the Core Strategy to prioritise and support the development of sporting tourism at Bath Racecourse.

Allowing the racecourse to adapt its product to the changing market and competition through the sensitive redevelopment of the site to provide improved grandstands incorporating hotel accommodation and improved visitor facilities would not conflict with the purposes of including the land in the Green Belt. It would not lead to any sprawl of Bath or Bristol or contribute to the merging of settlements. The countryside would remain safeguarded from encroachment, and the setting and

special character of Bath would be preserved. On the other hand, improving facilities at the racecourse would support objectives for the use of the Green Belt by improving opportunities for access to the open countryside for the neighbouring urban populations and improving opportunities for outdoor sport and recreation.

The incorporation of a hotel and improved facilities including Park & Ride within a redevelopment of Bath Racecourse would support sporting, leisure and business tourism in Bath and its surrounding hinterland and should be a strategic priority of the Core Strategy following from the aim, vision, key principles and priorities of the Destination Management Plan and address the substantial shortage of visitor accommodation identified by the Council's Visitor Accommodation Study. As that study explains, this shortage can only get worse with the proposed growth of population and business set out in the Core Strategy. Policy B1 identifies the magnitude of that problem, but the Core Strategy places an over-reliance on a heavily constrained and competitive central area to address it.

Change sought to Section 8 of Policy B1 should be re-titled and amended as follows:-

make sound: 8 Tourism, Culture and Sport

- a Enable the provision of 500-750 new hotel bedrooms to widen the accommodation offer of the city and its surrounding area, increase overnight stays and the competitiveness of the city as a visitor and business destination.
- b Enable the development of a new stadium for Bath RFC within the Central Area.
- c Enable the provision for a new cultural/performance/arts venue within the Central Area.
- d Support the improvement of sport, leisure and hotel facilities at Bath Racecourse without compromising the openness of the Green Belt or harming the attractiveness of the AONB.

The additional wording to make the Core Strategy sound is underlined. This wording would support rural tourism and leisure development through the improvement of facilities at Bath Racecourse and therefore accord with national policy EC7 of PPS4. It would also provide flexibility in accordance with PPS12 to allow for some hotel development outside of the central area of Bath in accordance with the national Good Practice Guide on Planning for Tourism. The proposed wording would also accord with national policy in PPG2, PPS7, PPG13 and PPG17.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 384\2

Respondent: Wiltshire Council

Representation Paragraph 1.26 states that "The strategy is to locate new development in the most sustainable (soundness): locations and therefore the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements of Somer Valley.

While the aim to focus on regeneration sites is recognised in an environmentally constrained city such as Bath, there is a reliance on complex regeneration sites which could constrain the ability of Bath to bring forward housing at the right time. A significant proportion of Bath's future housing (some 2,500) will come forward within Bath's neighbourhoods where surplus MoD land will play a major role. (Policy B1(a)), as well as the western corridor.

There is concern that if the delivery is not achieved in accordance with the principle of prioritising urban 'brownfield' sites, with no greenfield contingency (Policy DW1 proposes no strategic change to the boundaries of Bath), it may have significant implications on the wider sub-area and put pressure on the towns of Wiltshire in terms of housing demand and also further exacerbate current unsustainable commuting patterns. There is therefore particular concern regarding the over reliance of brownfield / regenerations sites to deliver the development strategy for Bath. This concern is compounded by paragraph 1.36 'Contingency' which suggests that contingency sites will maintain the strategy of "a priority on urban focussed brownfield opportunities."

While the overall emphasis on delivering growth through brownfield land is reasonable, consideration

also needs to be given to contingency. It is noted that the Spatial Options document did identify a greenfield urban extension which at that time was considered suitable for development. With appropriate policy controls to protect the strategic landscape there appears to be no reason why suitable greenfield sites could not be identified as potential development areas over the plan period.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 397\2

Respondent: Stokefield Trust

Representation The Council has provided little evidence to support its revised housing figure for Bath and, instead, has
(soundness): based its requirement on the assessed capacity of a number of brownfield sites within the Central Area and Bath's neighbourhoods. In particular, reliance is made on the redevelopment of surplus Ministry of Defence land at Foxhill, Warminster Road and, potentially, Endsleigh, the timescale for closure of which is currently unknown.

Change sought to make sound: The Council should increase the provision of housing for Bath in line with the Secretary of State's Proposed Modifications, and place less reliance on the delivery of housing from the Ministry of Defence sites. It should plan for an urban extension on the south side of the City, adjacent and to the east of the Odd Down Park and Ride to meet the needs of the City in the period to 2026, and beyond.

Representation (legal compliance): The Core Strategy fails to take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS (July 2008) which, unless/until revoked by the Localism Bill, remain a material consideration in the preparation of the LDF.

Change sought to make legally compliant: Take due account of the growth figures set out in the Secretary of State's Proposed Modifications to the RSS.

Reference: 820\1

Respondent: St James's Investments and Tesco UK Stores

Representation Our clients welcome the Core Strategy's focus towards development in the main urban areas and in
(soundness): particular the desire to:

- Regenerate and repair a number of areas within the Central Area and Western Corridor
- Plan for the expansion of knowledge intensive and creative employment
- Achieve additional stock of office premises
- Provide new homes within the city
- Transform the Western Riverside area into a contemporary residential neighbourhood
- Support the development strategy for Bath with the implementation of necessary transport and other infrastructure to improve movement, accessibility to employment and community facilities

The spatial strategy needs to focus on the positive development of redundant or underused brownfield land in order to achieve the desired economic and social regeneration of the city.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.10

Reference: 265\56

Respondent: Bath Heritage Watchdog

Representation 2C The Central Area and Western Corridor Neither of these names can be found on any map of Bath, so
(soundness):

used in isolation they are meaningless.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\150

Respondent: Bath Heritage Watchdog

Representation Page 44 Western Riverside

(soundness): Another reference to Stothert and Pitt, and this time for a different location, reminds of the folly of referring to the Newark Works by that former company name. The continued opposition to the specific proposals for the Western Riverside as defined in the outline planning permission is a prime example of the hindrances to progress of inappropriate vision led developments in Bath and an indicator that the 2026 target is probably wildly inaccurate. It is also the best example of the local authority not listening to the will of the people. Thus it is not unexpected that all with a true commitment to the city will do there level best to ensure that any development is compatible with Bath rather than Soviet Era Eastern Europe. Despite the words of the Seville meeting of the World Heritage Committee, little has changed; we see no change of attitude regarded as significant, and yet that Committee has the power to remove World Heritage status from a defiant local authority, as it did for Dresden.

Extent of the Western Riverside

It is interesting to note how the city can be divided up into parcels given new titles, merged, unmerged, renamed something different, so the man in the street does not know which area is being referred to. The city has its identity places, and areas have longstanding names that everybody knows. Use them. Confusing the public seems to have become a plaything for the strategists.

Western Riverside Policy Approach

There are also reams of supplementary planning documents which are designed to ensure that what ever is composed is compatible with Bath: documents that on a weekly bases are ignored, overturned or overruled in pursuit of the greater vision. Unless failure to heed the guidelines when reaching a planning decision becomes a disciplinary matter, no amount of accompanying SPD is going to make a scrap of difference to what is delivered. It is particularly ironic that the picture shows a unique Grade II* listed bridge owned by the local authority that has been allowed to fall into such a complete state of disrepair that it is even too dangerous to walk across, in a Conservation Area of a World Heritage Site. It now falls to a private developer to ensure its survival. It says it all really about the true commitment to the public realm and to our heritage.

Change sought to Scrap the current plans for the Western Riverside because they do not comply with the SPD and should
make sound: never have been granted outline permission if planning legislation had been properly adhered to. Then rewrite the SPD because it does not comply with the Outstanding Universal Value of the City of Bath. Only then can there be any progress in meeting the strategy of developing the Western Riverside. The revised plans should include provision for jobs and leisure activities rather than just housing, to comply with other objectives of the Core Strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.11

Reference: 265\57

Respondent: Bath Heritage Watchdog

Representation 2.11 The term 'headline development location' would not survive a "clear English" assessment. This is

(soundness): the most visible part of the city when viewed from the hills, and any unsympathetic development will impact on the setting. We agree Conservation is needed, but the paragraph should also recognise the

importance of views of and over this location, a heritage asset.

Change sought to Amplify 2.11

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.12

Reference: 265\58

Respondent: Bath Heritage Watchdog

Representation 2.12 This is word play, largely gobbledegook, yet reading between the lines it means potentially wreak

(soundness): havoc on the current natural habitat in order to facilitate the kind of developments that failed the first time around.

Change sought to improve 2.12

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.13

Reference: 256\4

Respondent: Councillor Andrew Furse

Representation •2c, para 2.13; redevelopment of South Qays will have a significant impact upon car and coach parking

(soundness): in the city. Details need to be set out if this parking is to be displaced.

Councillor Andrew Furse
Liberal Democrat,

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\59

Respondent: Bath Heritage Watchdog

Representation 2.13 This is Zoning in all but name. It is a tried and found disastrous policy that has had a detrimental

(soundness): effect on every town that has implemented it. Introducing it to Bath is folly.

Change sought to delete all reference to zoning, stated or implied, from 2.13 and everywhere else in the document.

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.14

Reference: 265\60

Respondent: Bath Heritage Watchdog

Representation 2.14 Given the amount of criticism we have already raised on the first 36 pages of the document, this

(soundness): paragraph is demonstrably untrue.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.15

Reference: 93\13

Respondent: Highways Agency

Representation The Agency would like to see reference made at paragraph 2.15 for the need to consider reducing the
(soundness): impact of development on the highway network, so that this can be built upon in the emerging 'Place Making Plan'

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\61

Respondent: Bath Heritage Watchdog

Representation 2.15 The best way of resolving contentious issues is to listen when people say you are getting it wrong.
(soundness): The bullet points are all admirable and worthy aims but count for little if the voice of the residents of all the city are ignored. Past experience indicates that pre-determined and probably faulty solutions will be pursued regardless of any advice received.

Change sought to Reword to show a commitment to public consultation beyond that which is statutorily unavoidable
make sound: and actually heeding the replies.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 6: The Central Area and Western Corridor

Reference: 256\6

Respondent: Councillor Andrew Furse

Representation •Western Riverside East I have requested details of the development concepts for this area and they
(soundness): have not been forthcoming. This document says the area is now 'conceptualised'. I ask again for these details.

Councillor Andrew Furse
Liberal Democrat,

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\62

Respondent: Bath Heritage Watchdog

Representation Diagram 6 This shows the zoning but we note the shading of the central area does not match that in
(soundness): the previous map.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.16

Reference: 102\11

Respondent: Federation of Bath Residents' Associations

Representation It appears that the central area has been extended north as far as Alfred Street (from a present limit of (soundness): George Street?) and East as far as Johnstone Street (from a present limit of Pulteney Bridge?). This might have the benefit of preventing the conversion of retail premises to pubs and bars. However, the document's vision for 2026 (diagram 8, p42) shows the Central Area expanding to include (for example) the whole of the Rec. More information is needed on the implications of this, because, if rezoned from residential/green-open-space to city centre/commercial in terms of planning and licensing of any new buildings along the river, residents could thereby lose rights to question these developments.

Change sought to make sound: More information required.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\6

Respondent: Royal Mail Group Ltd.

Representation Bath 2c – Central Area and Western Corridor, paragraph 2.16 (Central Area) and Diagram 7 (soundness): Royal Mail agrees with the inclusion of the Bath DO site within the Central Area and indicative Key Development hotspot to the north of Bath Spa Station.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\63

Respondent: Bath Heritage Watchdog

Representation 2.16 The Central Area

(soundness): Whilst we have no desire to totally oppose any development of this area it must be sensitively managed, and there needs to be a commitment to do so included here. The wording refers to "the heart of the World Heritage Site" and this two-tier approach is totally unacceptable. The whole city is the World Heritage Site and should be promoted and recognised as such.

The boundary of the central area on this map does not match that shown as the boundary on other maps in the Core Strategy document, leading to ambiguity of the definition. The map does not show the proper extent of the entrusted land that is the Recreation Ground, and from other references in the Core Strategy there is a hidden agenda to include this as a hot spot but the map carefully avoids show it as so. It is potentially the one spot that will have the greatest impact. South Quays is not a recognised location name for an area officially named "The Riverside Business Park" and we note some of the supporting documents showed the listed Newark Works removed entirely to make way for new developments which would be unacceptable: the Heritage Ministry of the Canadian Government regards this as the most important historic building in Bath. This would be the ideal site for a Museum of Bath.

Change sought to make sound: Remove any references implying a two-tier World Heritage Site.
make sound: Add a commitment to sensitive development.
Discontinue the use of "South Quays" because this area has never been known by that name.
Redraw the map so that consistent boundaries are used throughout the strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 7: General Extent of the Central Area

Reference: 297\6

Respondent: Bath Rugby Club

Representation Page 38, Diagram 7

(soundness):

We consider the recreation ground should be Included on part of the City Centre not as a site adjoining it.

Policy B1 supports the creatjon of a new stadium on the recreation ground. Through this Initiative the opportunity exists to enhance the river frontage Introducing activating land uses arising the river frontage, Improve the connectivity of the recreation ground to other parts of the City centre and increase the flow of pedestrians and activity. The site will function as part of the City Centre not as a separate location adjoining it. Such a modification would bring diagram 7 into line with policy B1 8(b)

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy B2: Central Area Strategic Policy

Reference: 34\1

Respondent: Bath Independent Guest House Association

Representation 5. We would also ask that the Core Strategy consultation, call for the figures being used in Sections B1

(soundness): and B2 of the draft Core Strategy be amended to include both approved, current and future hotel planning applications. This is one of the key points contained in the VAS suggested figures, the point being that any extra hotel rooms approved by planning should be deducted from the total of 500 to 750 new rooms by 2026.This should apply to the city as a whole, not just the central area.

6. This would mean deducting 100 rooms approved at The Gainsborough development, deducting 190 rooms approved at Green Park House, and deducting 12 rooms approved at King Edwards. 302 rooms in total to be deducted as already approved by planning.

7. The 2 other major planning applications at Kingsmead House (190 beds) and at James Street West (100 beds) would also need to be deducted, if successful, plus any other developments approved before publication of The Core Strategy. We would again ask that these points be submitted to the Core Strategy consultation.

Change sought to make sound: Reduce hotel bed space requirement of Polices B1 and B2 to take account of existitng permissions.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 75\2

Respondent: Bath Independent Guest Houses Association

Representation What the Draft Core Strategy Document does not make clear is the base line from which these
(soundness): additional rooms are calculated and that the VAS calls for steady growth in the number off rooms.

There needs to be statement that makes it clear 750 is the maximum number. This makes the statements for the requirement of "500 – 750 additional hotel rooms" in policy B1 and B2 UNSOUND.

Change sought to Policy B2 for the Central areas again refers to the requirement for an additional "500-750 hotel

make sound: bedrooms to widen the accommodation offer in the city, increase the overnight stays and the competitiveness of the city"

Some clarity needs to be brought to this broad statement to show what is really intended.

We refer again to the recommendations of the VAS. In order of priority it recommends:-

1 The need for a 3 or preferably 4star "brand" hotel with conference facilities to improve the midweek trade by increasing business visitors – currently only 4%(Bath Visitor Survey 2008)

2 Attracting 2 or more boutique hotels

3 Some modest expansion of the budget offer on peripheral sites to diversify the existing budget offer.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 101\1

Respondent: Mr Robin Sales

Representation 2b says "enable the development of a new stadium for Bath RFC within the central area" Bath RFC are

(soundness): unwilling to build the stadium at Western Riverside or at Lambridge and want to demolish the leisure centre for their stadium. The leisure centre provides exercise for far more citizens, 7 days a week that the players participating in a number of home matches. A greatly enlarged stadium on the Rec would also bring congestion and parking problems.

Change sought to In 2b delete the words "in the central area"

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\10

Respondent: Federation of Bath Residents' Associations

Representation it is noted that a new stadium is to be accommodated in the Central Area (para 3f). While it might be

(soundness): possible to justify extension of the central area to include a new rugby stadium and related facilities on the Rec, this should not be allowed to mean that the Rec is generally 'open' for development.

Change sought to Make clear that any development of a new rugby stadium and related facilities on the Rec would be a '

make sound: one-off', because the club is already there, and that there is no intention to apply the land-swap concept to other developments.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\16

Respondent: Federation of Bath Residents' Associations

Representation Policy B2 (p38)(Central area strategic policy)

(soundness): FoBRA agrees with most of this, though some would see point 3f as provocative (Leisure Centre and Recreation Ground identified as "Key Development Opportunities"), but we should particularly welcome point 2m under the Placemaking Principles ("lived-in feel"). This does not happen just because people happen to live there. It is because they actively care for their premises and make an effort to resist undesirable changes nearby. Visitors like to see a place well maintained. Further, in para 2h there is a missed opportunity for the Council to have a comprehensive plan for the riverside in Bath. Coordinating a long term master plan for the riverside is a role the Council is uniquely able to play. It needs Council commitment and priority in this document.

Change sought to make sound: Solutions: (a) encourage city residents to maintain and invest in their properties, and (b) develop a comprehensive plan for the riverside in Bath.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 132\3 S

Respondent: The Southgate Limited Partnership

Representation (soundness): Our client supports strategic policy B2 for the central area that seeks to ensure the central area is an attractive centre for shopping, leisure and recreation. SouthGate has contributed significantly towards this aim being modern, attractive, accessible, sustainable as well as sensitive to the historic qualities of Bath's World Heritage Site status, and as such acts as a benchmark for future development to aspire to. The identified Placemaking principle which notes the compactness and continuity of the primary shopping area, the high representation of independent, specialist and multiple retailers and high incidence of historic shop fronts as key strengths is supported. The policy proposes further retail space within the centre to address overtrading and this is supported in principle, and at an appropriate scale, as it will further enhance the central shopping areas and avoid the need for edge or out of centre retail development. Further development within the City Centre including new housing, office space, public realm improvements and hotel bedrooms is supported which will further strengthen Bath as a sustainable City and reduce the need to travel.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 132\5 S

Respondent: The Southgate Limited Partnership

Representation (soundness): In summary, The SLP is largely supportive of the objectives and policies within the emerging Core Strategy, particularly the Council's statement that further large scale comparison retail development will not be permitted in the plan period. The opportunities and improvements that SouthGate has provided for Bath are recognised by the Council and the scheme has been a major success for the City which has significantly strengthened its role as a major shopping destination. As the development is completed and further established, emerging policies within the Core Strategy should be carefully worded to ensure it can build on this success and is protected from development which may harm its viability and that of the wider city centre.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\18 S

Respondent: Bath Green Party

Representation (soundness): We agree with the rationale for a river corridor concept, but it needs to give greater priority to public open space including safe walking and cycling routes to the city centre.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\19

Respondent: Bath Green Party

Representation B11: What are your views on options 1a and 1b and 2a and 2b?

(soundness): There is a need for some retail space to be provided away from the city centre, as envisaged by 1b and 2b, but only as small local shops, not large-scale stores, supermarkets or bulky goods as listed in 1b and 2b. Office space needs to be accessible to major public transport and safe walking and cycling routes. This will largely mean city centre provision, but small-scale provision elsewhere in the city is also important where it meets this criteria.

B12: To what extent should the Core Strategy seek to accommodate office space and comparison within the central area?

These should both be located where accessible to the largest number of residents by foot, cycle and public transport. To that extent, the city centre should have the bulk of the provision, but not exclusively.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 152\5

Respondent: Corston Parish Council

Representation Urgent consideration should be given to permanently increase pedestrian areas in Bath city centre.

(soundness): Milsom Street and Stall Street are considered to be prime candidates.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 156\1

Respondent: Pulteney Estates Residents Association

Representation PERA are concerned that Diagram 8, page 42, appears to propose that the current Central area be

(soundness): extended, by 2026, to include the Recreation Ground from the present limit of Argyle Street.

PERA are concerned at the implications of this rezoning from residential/public open space to city centre commercial with regard to planning consents and licensing applications for any new buildings in this area. This rezoning pre-empts the decision on use of the Recreation Ground by the Charity Commissioners and could be prejudicial to existing covenants on the Recreation Ground.

Change sought to make sound: Central Area zoning to remain as currently delineated.

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA area as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

As you know it is the 1956 conveyance that appears to govern how the Trust should be run. This conveyance refers to the Conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance"

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific premises (the current Rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground.

Reference: 163\1 S

Respondent: The Theatres Trust

Representation It is with reluctance that we find the document to be Sound because it fails to provide any protection
(soundness): or enhancement to its existing cultural venues but unfortunately the provision of cultural services is not a statutory duty for local authorities. Nevertheless, the Council should value its performance spaces as major contributors to the urban landscape of the city centre and to its evening economy. The city centre is the proper location for the area's main entertainment and tourist venues and there should therefore be either a separate item in Policy B2 to deal with the city's cultural offer particularly the protection and promotion of established cultural venues (as opposed to new developments).

The Vision says that Bath has 'a vivacious cultural scene' and Policy B2 says that Bath is 'an important cultural asset for the world' but the document doesn't explain why and there is no mention of existing cultural facilities, only new development. A new performance arts venue is mentioned on page 35 but there is no explanation in the text as to what deficiencies require this new cultural facility. Policy B2 should state that existing cultural assets will be protected and if necessary supported for adaptation to new challenges. Without a policy to protect such facilities it could become difficult to retain an essential community asset particularly where land values become higher for an alternative use.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 166\1 S

Respondent: Sainsbury's Supermarkets Ltd

Representation The policy for the Central Area of Bath is considered sound. The extent of the Central Area has been
(soundness): correctly identified, along with neighbouring areas identified as key development opportunities. The scale and scope of development envisaged in and neighbouring the Central Area is considered appropriate, realistic, and capable of being delivered in accordance with the principles of PPS4 Planning for Sustainable Economic Development.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 185\1

Respondent: Rachael Hushon

Representation I am concerned that diagram 8 page 42 appears to propose that the current central area be extended
(soundness): by 2026 to include the recreation ground and Johnstone Street as part of a city centre extension.

I am concerned that the correct legal and planning justification for this has not been complied with. Rezoning land to benefit BANES Coropate requires more probity and planning/legal justification than has been provided.

This rezoning if allowed to happen could have far reaching implications on any future licensing and planning applications for an area which is currently residential only and green open space. The financial gain of rezoning brings into question the impartiality of BANES in their motives rushing this through.

This rezoning pre-empts the public consultation on uses of the Rec, it ignores the existing covenants which deny commercial development. It also pre-empts the Charity Commision decision regarding the Trusts' uses of the rec.

It also suggests that Johnstone street is an exiting access to the Rec. This is not the case the street has existed as a cul de sac with no access to the Recreation Ground for 200 years.

Change sought to make sound: Central area zoning to remain as currently delineated.

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA areas as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

AS you know it is the 1956 conveyance that appears to govern how the Trust should run. This conveyance refers to the conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance."

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific premises (the current rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

BANES have not provided adequate justification for the rezoning of either the recreation ground a green space or Johnstone Street a residential street.

They have presented misleading documents at various consultation events regarding the status of Johnstone Street which is currently a residential cul de sac.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground. Maintain current status of the Recreational Ground and Johnstone street as residential.

Reference: 208\6 S

Respondent: Brian C Tanner

Representation (soundness): Both my wife and I are resident in Bath and North East Somerset and we are writing to register out joint support for the revised Draft Core Strategy which is currently under discussion.

This is indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:
6.0 The proposed development of the Central area and Western Corridor is much welcomed.

I trust that these comments are helpful in your deliberations.

Yours sincerely,

Brian C. Tanner.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\4

Respondent: Duchy of Cornwall

Representation (soundness): The Central Area comprises the City Centre, South Quays and Western Riverside East, within which the CS relies upon the delivery of a material amount of housing to come forward during the plan period.

Whilst we acknowledge the benefits that could arise from providing for mixed use developments in the broad location, large parts of the area are defined in the Level 2 SFRA as being located within Bath, large parts of this area lie within flood zones 2 and 3.

In accordance with the sequential approach set out in PPS25 (see paragraph 16), LPAs allocating land in LDDs for development should apply the Sequential test to demonstrate that there are no reasonably

available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. It is added at paragraph D5 of the PPS that only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of sites in Flood Zone 3.

Change sought to make sound: In accordance with the requirements set out in PPS25, we consider that the CS fails to demonstrate that the approach to providing for development in Flood Zone 3 is the most appropriate option having regard to the reasonable alternatives.

The LPA need to demonstrate that they have undertaken a comprehensive assessment of the sustainability merits and suitability of land outwith areas liable to flood prior to identifying land for development within the Central Area that is within Flood Zone 3.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\21

Respondent: Bath Preservation Trust

Representation (soundness): We broadly support Policy B2 but consider that it needs to be clarified and/or strengthened in a number of respects in order to make it an effective development management tool.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\22

Respondent: Bath Preservation Trust

Representation (soundness): The definition of the Central Area in the CS needs to be identical with the definition used in the Public Realm and Movement Strategy so as to ensure consistent treatment. In particular, the Royal Crescent and the Circus, the two greatest set-pieces of Georgian architecture in Bath, must be included within the Central Area.

We welcome the Placemaking principles, subject to the detailed drafting comments set out at section 7 below. We are however concerned that the development of the placemaking plan for the Central Area is a very large task, on which work has not yet begun, and we urge the Council to work very closely with the local community in its development (see also our separate comment on placemaking plans).

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\23

Respondent: Bath Preservation Trust

Representation (soundness):

Change sought to make sound: The introduction to part 2 on Placemaking Principles should refer to the need to reinforce and contribute to the Outstanding Universal Value of the WHS and to enhance the Conservation Area.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\24

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to make sound: The list of assets of the Central Area should include the high proportion of listed buildings. Point i needs to be clarified to refer to the variety of the retail offering and the need to retain the unusually high proportion of independent and specialist retailers as well as the multiples. Point k is also unclear. Should it say that the compact nature of the Central Area and the centrally located bus and train stations enables easy and convenient pedestrian access?

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\25

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to make sound: Under Risks, point w is a very sweeping statement. Better to say 'The importance of preserving the built environment with its high proportion of listed and other historic buildings restricts the scope to use some methods of improving the energy efficiency of the building stock.'

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\26

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to make sound: In part 3, the list of key development opportunities should note that some of the sites include listed buildings (Cornmarket, Green Park Station) and that the Recreation Ground is subject to a Charitable Trust which imposes strict constraints on what can be done there.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\27

Respondent: Bath Preservation Trust

**Representation
(soundness):**

Change sought to make sound: Part 4 needs to include World Heritage Site interpretation facilities and facilities for the City Archives as key activities to be accommodated within the Central Area.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 228\1

Respondent: Pulteney Estate Residents' Association

Representation (soundness): PERA are concerned that Diagram 8, page 42, appears to propose that the current Central area be extended, by 2026, to include the Recreation Ground from the present limit of Argyle Street. PERA are concerned at the implications of this rezoning from residential/public open space to city centre commercial with regard to planning consents and licensing applications for any new buildings in this area. This rezoning pre-empts the decision on use of the Recreation Ground by the Charity Commissioners and could be prejudicial to existing covenants on the Recreation Ground.

Change sought to make sound: Central Area zoning to remain as currently delineated.

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA area as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

As you know it is the 1956 conveyance that appears to govern how the Trust should be run. This conveyance refers to the Conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance"

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific premises (the current Rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground.

Reference: 249\1

Respondent: Royal Mail Group Ltd.

Representation Bath DO – Royal Mail Group position on potential for alternative use
(soundness):

Royal Mail Group's Bath DO site is prime real estate within central Bath with river frontage. It forms part of one of the last sections of Bath City centre that has yet to be redeveloped / regenerated. If the Delivery Office could be relocated, the site would present a development opportunity of considerable significance either in isolation or together with neighbouring land ownerships, notably Avon and Somerset Police's Bath Police Station and BANES Council's Manvers Street Car Park. In view of the riverside location, high density residential redevelopment could be expected to maximise the value of the site, but mixed use development with active ground floor frontages, possibly including some retail and employment floor space and even an hotel.

The ability to redevelop the Bath DO site is predicated on Royal Mail Group's ability to relocate the DO to another site or sites in an operationally acceptable location in Bath. The issue of viability of relocation is a key issue in this regard – Royal Mail Group's position is that it would only relocate from the existing Bath DO site if the value of the existing site were to substantially exceed the total cost of re-provision. Because of this, Royal Mail Group is seeking a policy context within the emerging Core Strategy that is permissive of high density mixed use redevelopment of the Bath DO site either in isolation or in conjunction with adjoining land ownerships.

It is relevant to note that over the past 18 months through BNP Paribas Royal Mail Group has been actively seeking to work with Officers from BANES Planning, Major Projects and Estates Departments to jointly promote the Manvers Street Car Park site, Police Station site and Bath DO site for comprehensive redevelopment. There has been no tangible progress with this joint promotion, but some initial feedback was received from BANES Planning and Major Projects teams in relation to potential relocation sites. Royal Mail Group remains keen to pursue the opportunity to relocate the DO to an operationally satisfactory new site/s, if this can be achieved whilst delivering an acceptable capital release for Royal Mail Group.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\7

Respondent: Royal Mail Group Ltd.

Representation Policy B2 – Central Area Strategic Policy, paragraph 3b

(soundness): Royal Mail notes and supports the inclusion of the 'Royal Mail Depot area' within the potential mixed use development proposal site also comprising Manvers Street Car Park and the Avon and Somerset Police Station.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\8

Respondent: Royal Mail Group Ltd.

Representation Policy B2 – Central Area Strategic Policy, paragraph 4 sub paragraphs a and c

(soundness): Royal Mail's view is that there is insufficient provision for new retail development for Bath in the Core Strategy and that these targets for comparison and convenience floorspace should be increased.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\9

Respondent: Royal Mail Group Ltd.

Representation Bath 2g – Infrastructure and delivery

(soundness): Given that the Bath DO site is identified as being part of a potential redevelopment site for mixed uses, the continuing provision or appropriate re-provision of the Royal Mail Bath DO should be included as part of the package of infrastructure that is required for Bath. Even in the age of e-commerce, Bath's local economy would suffer greatly without a local mail collection, distribution and delivery service and therefore it would be un-sound not to safeguard the continuance of this important public service through including reference to it within this chapter of the draft Core Strategy.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\10

Respondent: Royal Mail Group Ltd.

Representation Urban Design led review of Bath City Centre sites – Evidence Base Document

(soundness): It is noted that the Bath DO site is included within this review alongside the Avon and Somerset Police Bath Police Station and the Manvers Street Car Park. Royal Mail supports this inclusion, but is not satisfied with the storey height allocation and indicative floor space calculations. It is considered that the combined sites have potential to sustain a more dense level of development than is evident from this study. In addition, the review sets a direction of travel for the sites to be developed together on a comprehensive basis when they have may potential to be developed separately, one by one. Development density should be tested through preparation of a detailed site redevelopment feasibility study prepared by an architect jointly on behalf of the three main landowners.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 256\5

Respondent: Councillor Andrew Furse

Representation •B2; removal of specific reference to Rosewell Court -individuals homes should not be referenced the

(soundness): document should ref to locations only.

•B2; Widen the new sports stadium location from the central areas to include 'western approaches' and Keynsham.

•B2; identifies the Recreatio Ground as part of the city development area. The document needs to be recognised that the Rec is designated as green open space.

Councillor Andrew Furse
Liberal Democrat,

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\64

Respondent: Bath Heritage Watchdog

Representation Item 2u. The flood mitigation measures are inadequate to satisfy PPS25
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\65

Respondent: Bath Heritage Watchdog

Representation Policy B2 Central Area Strategic Policy

(soundness): There should be no promotion of a policy that deals with a specific area as a cultural asset; it has to cover the whole WHS.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\66

Respondent: Bath Heritage Watchdog

Representation 1 The Role of the Central Area

(soundness): There is no particular objection to any of the policies in a - h only that they should be city-wide. The lead-in paragraph should identify the central area as part of all the categories that follow.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\67

Respondent: Bath Heritage Watchdog

Representation 2 Placemaking Principles

(soundness): a-c The descriptions are accurate but the key words are height, scale, massing and architectural treatment and harmonious. Most modern developments and proposals do not adhere to these principles and that is the main reason they are so contentious. Even when the classical language is used, if these are not correct the project fails; Southgate is a monumental example of this. The policy must therefore include specific regulation relating to height, scale and massing. In particular there should be a specific policy on tall buildings (we understand the research has been Bath and North East Somerset's Core Strategy – Publication Stage Representation Form done) There should be particular emphasis on individual storey heights. Distorted storey heights (such as seen in

Southgate) show that what is classed as a three story structure is in fact the height of a nearby building of six stories. Ideally the design codes should limit the overall height of a building as measured from the nearest pedestrian surface.

There should not be closet design codes advocating a particular design style. We have seen a number of Council sponsored events that show structures with certain repetitive design codes (based on Western Riverside), and some recent planning applications have made reference to council input into the design process. Such presumption in favour of a particular architectural style is not supported by Policy PPS1, which also advises against undue council influence.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\68

Respondent: Bath Heritage Watchdog

Representation d The palette of materials is important but more importance should be attached to the word limited.

(soundness): This should prevent ceramic or black zinc used for walls of for promotion of aluminium over timber.

The Bath palette as recognised in the Outstanding Universal Value a restricted one, yet it is being eroded to appease developers or to massage the egos of architects. Approval of materials should be based on local Bath context, not that it has been used in Bristol! A number of recent decisions have been made by officers against the advice of their colleagues with specialist knowledge in the field, suggesting either a lack of training and knowledge preventing them from understanding the advice received, or behind-the-scenes pressure to reach a particular decision. Other decisions have been made by the DCC who have been heard to make statements along the lines of "it's the Lower Bristol Road you can get away with it down there", and this two-tier approach to the World Heritage Site needs to be stamped on. Authenticity of construction means it is built to last. This means a return to more traditional construction methods, not (for example) Bath stone sent to Italy to be cut into thin slices and stuck to a concrete backing where it cannot breathe and will therefore crumble too soon, or the oft used steel frame with cladding panels. A prime example is a recently built kit house which stands out like a sore thumb assembled by pre-built sections in the environs of a Grade 1 listed structure. High quality does not mean swathes of plastic, aluminium, etc, and contemporary should not mean temporary. An authentic construction should have a fully functional life of at least a century and a half.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\69

Respondent: Bath Heritage Watchdog

Representation e Adaptability does not seem to include offices, where the preference seems to be for demolition. Past

(soundness): policy does not give much cause for optimism here. Churchill House could have been adapted; so could the Newark Works, which were in use until the council decided to evict all the tenants. This is now a good chance to show that more could be made of the current Bath Press Building.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\70

Respondent: Bath Heritage Watchdog

Representation f Again the words are not at fault but the past experience brings fear of the interpretation. The western
(soundness): end is to be littered with soviet inspired housing blocks, the central green lung is to have a 25,000 seat stadium on it, ancient water meadows and a Site of Special Scientific Interest both transformed into car parks if the council's current ideas come to fruition.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\71

Respondent: Bath Heritage Watchdog

Representation g It is a moot point whether the riverbank through the central area can be considered high quality. It is
(soundness): certainly not wide enough to avoid occasional conflict between walkers and cyclists.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\72

Respondent: Bath Heritage Watchdog

Representation h The river is Baths greatest unused asset more a glorified litter-strewn drainage channel in most
(soundness): places. Despite lots of fine words their appears little resolve to actually do anything meaningful with it. The Transport Plan ignores its potential, and the tourist plans do not even consider the possibilities of floating holiday accommodation. Large sections are inaccessible; most is of poor quality. Even though the new bus station was built right next to it, there is no ready access from one to the other. There is little that is natural in the central area apart from a few ducks and swans.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\73

Respondent: Bath Heritage Watchdog

Representation I Yes the area is compact but we would disagree that there is a high representation of independent or
(soundness): specialist retailers. It is a clone of just about every other city centre. There is an over dependence on café/eateries which cannot be sustained long term. Bath's historic shop front are a key strength yet you would not know it, because almost on a daily basis historic shop fronts are repainted gaudy colours, have tacky plastic signs of lettering fixed to them Bath and North East Somerset's Core Strategy – Publication Stage Representation Form or are festooned with strings of lights. This is not helped by an almost powerless and understaffed Enforcement Team and a Historic Environment Team spread too thin on the ground. Above all there is a genuine reluctance to care. Shopping or the retail experience is not what it was and is far from what it should be. See our recommendation for Page 16 Objective 4 for suggestions for improvement.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\74

Respondent: Bath Heritage Watchdog

Representation j This wording is all out of the public realm manual. It equates to large amounts of glazing, open doors
(soundness): with tables and chairs spilling out onto the street. The point it misses is that if you display it all there is little worth going inside for, which reduces sales, and if pavements are too cluttered people will take another route. At the other extreme would be the recent Debenhams planning application, when the shop was quite bizarrely granted approval to blank out the windows of one whole elevation. Clearly those who make the decisions know nothing about shopping from a retailer's perspective.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\75

Respondent: Bath Heritage Watchdog

Representation k It is not specified what these are, and the statement is worthless without some examples being
(soundness): quoted. And what is walkable for one person might be a distance impossible to contemplate for another. In that respect the location of the premises providing mobility aids for shoppers is too distant from the buses to be of any practical use to many, but where in the strategy has anybody given any thought to a "Disabled Only" car park with Motability facilities to cater for an aging population forecast?

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\76

Respondent: Bath Heritage Watchdog

Representation l This would be comparable to imposing giant photo-panels at key points largely sponsored by
(soundness): corporate organisations that impinge pedestrian movement, spoil tourist photos, are visually unattractive after a period of familiarity and would appear to be of little benefit to the city. Most stay too long and are past their sell-by date. Events which attract those from outside the city, like the Christmas Market, need to be considered in the context of where the incoming cars and coaches will park. The promotion of such events without a suitable transport and parking strategy creates adverse opinions of the city, yet the current transport approach is one of "thou shalt not park" which over time will be hugely detrimental.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\77

Respondent: Bath Heritage Watchdog

Representation m There still remains an awful lot of empty property in the city centre above shops and offices, and
(soundness): there doesn't seem to be any coherent policy to bring these into residential use. Yet doing so must be cheaper than building new.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\78

Respondent: Bath Heritage Watchdog

Representation Risks to the Central Area

(soundness): n Most of the areas of poor quality post war development were council created in the first place and the great fear is that there is a desire to repeat the whole sorry exercise again. The tendency to favour large development projects is likely to result in "lowest specification for the lowest price" outcomes unless there are robust design codes in place and enforced. Central Bath evolved in relatively small developments but to a common set of proportions and materials, and anything other than this in the future will affect its character. A further area of riverbank was annexed by the construction of the bus station.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\79

Respondent: Bath Heritage Watchdog

Representation o More words out of the public realm document to get more bridges. This idea could be good or bad,
(soundness): depending on location and design.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\80

Respondent: Bath Heritage Watchdog

Representation p No argument about the statement made but it must be noted that we cannot maintain or keep clean
(soundness): what we already have. There is also a culture of lack of civic pride shown by many. Most of the public realm is littered with eyesores and excessive advertising, ranging from ugly timber photo frames to "A" boards to people with placards. Many tourist photos must be ruined by unwanted additions to the view. These issues need strong action before spending money on new signs and street furniture.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\81

Respondent: Bath Heritage Watchdog

Representation q Some of the volume of traffic is directly attributable to the council's traffic management methods.
(soundness): When it is quicker to drive right through the shopping areas, down Milsom Street and up Walcot Street, than it is to take the shorter direct route along The Paragon, something is very wrong.
Recommendations for transport improvements are in the comments to B1

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\82

Respondent: Bath Heritage Watchdog

Representation r We believe the decline is more rapid than admitted. However the growth of internet and online
(soundness): shopping has greatly increased this. This has to be factored in and the retail sector adapted to find its own niche. There are things that can be done to preserve Independent shops, it needs a will to do so, and the end of trying to attract “big names” that can be found in plenty of other shopping centres.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\83

Respondent: Bath Heritage Watchdog

Representation s Apart from roads where the traffic system seems to be deliberately engineered to create congestion
(soundness): (London Road and Lower Bristol Road), there is adequate road capacity outside peak times. The difference in traffic volumes between school days and school holidays indicates that investment in attractively priced home to school transport would have a significant impact on traffic patterns.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\84

Respondent: Bath Heritage Watchdog

Representation t At present it appears it is the public transport, in particular the debacle that is the traffic scheme for
(soundness): Dorchester street and a (badly positioned and undersized) bus station largely unfit for purpose that is the main contributory factor. Articulated buses are particularly obstructive to other buses.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\85

Respondent: Bath Heritage Watchdog

Representation u A great fear is that this equates to extremely controversial measures (some based on fanciful ideas
(soundness): that would not survive scientific scrutiny) being taken elsewhere to provide mitigation to allow these developments to proceed. The assumptions that flooding will be caused by river levels rising overlook the cause of the major flood events outside Bath (Lynmouth and Betws-Ycoed for example) which were caused by water run-off from the hills, and out of city mitigation measures have no benefit in those circumstances, whereas developments in flood risk areas justified on the grounds that there are mitigation measures elsewhere will make flood events worse.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\86

Respondent: Bath Heritage Watchdog

Representation v More wording to engineer the ground for modern office development for which there is no proven
(soundness): need. You can work perfectly well from a Georgian Building (indeed some companies prefer them for the image they present) provided it has all modes of communication and other services available. Downplaying cannot be used to promote vast square footages of floor space.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\87

Respondent: Bath Heritage Watchdog

Representation w Another phase designed to facilitate demolition and regeneration. There are studies and workshops
(soundness): currently preparing recommendations for improving the energy efficiency of existing buildings, so this statement is likely to be obsolete in the near future. It is always cheaper, and in sustainability terms more carbon friendly, to adapt an existing building than to build a new one.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\88

Respondent: Bath Heritage Watchdog

**Representation
(soundness):**

**Change sought to
make sound:**

Representation (legal compliance): Item 4h. The plans for a new sports stadium are not legally compliant, see the comments on Page 35, Policy B1, 8b

Change sought to make legally compliant:

Reference: 265\89

Respondent: Bath Heritage Watchdog

Representation 3 Key Development Opportunities

(soundness): There is no disagreement that these areas are in need of redevelopment, more a fear of a indiscriminate swing of the wrecking ball taking the good with the bad. It has to evolve more slowly and organically, rather than the gung ho approach that can be read between the lines: "if we can knock it down lets do it, and never mind the consequences. It's only history and shiny and modern is bound to be better."

Change sought to Add a commitment to prepare as soon as possible design codes compatible with the Outstanding
make sound: Universal Value (and have it approved by ICOMOS-UK as a correct interpretation), and then enforce this set of design code on every development within the World Heritage boundary. Bath Heritage Watchdog will assist in the preparation of the draft, if asked.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\90

Respondent: Bath Heritage Watchdog

Representation a- e Ongoing involvement of the residents and specialist groups is essential and there must be a
(soundness): genuine commitment to listen and adopt other ideas, not token gestures. There never has been a location of Bath Quays (whether North or South) and the majority in B&NES will not know what is meant. The use of this description must be discontinued.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\90

Respondent: Bath Heritage Watchdog

Representation f The Recreation Ground and the Leisure Centre are located on the land given in trust to the residents
(soundness): of Bath as a recreational open space, and it is definitely not a development opportunity.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\92

Respondent: Bath Heritage Watchdog

Representation g Creates further loss of existing businesses and employment, contrary to the commitment to retain
(soundness): industrial land, and the requirement to create jobs. There must be a guaranteed commitment to retain the listed Newark Works in it entirety: in a World Heritage Site it has direct links to New York, Antigua and Canada because of its architect (more famous overseas than in Britain).

There never has been a location of Bath Quays (whether North or South) and the majority in B&NES will not know what is meant. The use of this description must be discontinued. The description of Stothert and Pitt is misleading, because Stothert and Pitt operated from sites along the Lower Bristol Road from Churchill Bridge to Weston Island, a distance of nearly 2 miles. The correct description of the intended location is the Newark Works to Sydenham Road.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\93

Respondent: Bath Heritage Watchdog

Representation h&l Further evidence of tacit support for interfering with the businesses of successful private
(soundness): companies in order to achieve expansion plans. Such interference will have an adverse impact on the various business sectors and jobs, much to the delight of the competitors of such companies. Retaining existing businesses must take priority over attracting new ones, and the Core Strategy should commit to that.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\94

Respondent: Bath Heritage Watchdog

Representation 4 Scope and Scale of Change

(soundness): a At present we see no convenient location for this and fear should it take place it would be a mini-Southgate full of the same retailers; because unless the council owns it and chooses its tenants, it will have only a very coarse control over usage through Use Classes. What is meant by "comparison" is not clear, and an unambiguous word should be used.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\95

Respondent: Bath Heritage Watchdog

Representation b We still question this need for modern office space and there is no evidence that this level of **(soundness):** provision is required when most business models aim to reduce used floor space (witness the council's move to Lewis House, occupying a far smaller floor space than previously). It appears more of a figure assumed than a known requirement. As a very minimum the Core Strategy should aim for up to a floorspace figure so that there is not a commitment to build more than actually proves necessary. There are already large amounts of brand new office floorspace granted planning permission but not being built because no occupier can be found, including "the best office building in Bath" (see photo on Page 34) which got planning permission two years ago but has failed to attract an occupant. We wonder if modern offices in Bristol are being looked at with envy, ignoring the fact that most of their modern office space lies empty in lifeless environments.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\96

Respondent: Bath Heritage Watchdog

Representation c Is this amount of floorspace already taken up? There seems to be a surfeit of convenience stores **(soundness):** already, almost entirely taken up by only two trading names; and overtrading would seem to be addressed by the recently proposed Waitrose expansion which has been announced after the draft Core Strategy was released.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\97

Respondent: Bath Heritage Watchdog

Representation d A large bulk of this would be addressed if current proposals come to fruition but with one **(soundness):** development stalled for a couple of years and another showing no signs of movement we wonder if this is more of a desire than a genuine need. As stated elsewhere, other types of guest accommodation have been overlooked, as has the potential impact on the Independent visitor accommodation market.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\98

Respondent: Bath Heritage Watchdog

Representation e Is this number on the low side? Surely a city centre location would be an attractive proposition for **(soundness):** work/ transport, possibly even for students for local access to leisure activities and yet with transport to the universities. Some of the hotel/office schemes should be mixed use to give life to what have the potential to be dead spaces.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\99

Respondent: Bath Heritage Watchdog

Representation F The bus station is generally derided for its lack of information facilities and for scattering alighting
(soundness): points all around it because it wasn't designed for competing operators to share. None of the travelling public consider the changes to the railway station to be improvements. At a considerable loss of unique and irreplaceable historic material there are plans to provide another sterile plaza linking a railway station made worse for cyclists and the disabled to a bus station not fit for purpose in a traffic system that is chaos, and further from the trains than the previous now demolished bus station. It is far from the integrated wonder we were promised. Improvements are only improvements if they offer considerable benefits over the loss; and progress is not progress if the outcome is to make matters worse. Nothing seen in this location thus far convinces, and we recommend that this item is removed from the strategy to give the option of rethinking and/or not proceeding.

Change sought to Delete all reference to the Recreation Ground area being a development opportunity (and replace the
make sound: current Trustees because as councillors they clearly have a conflict of interest).

Representation (legal compliance): Delete all reference to a sports stadium, and all references to the Recreation Ground as a potential development site.

Change sought to make legally compliant:

Reference: 265\100

Respondent: Bath Heritage Watchdog

Representation g Considerable improvements are needed but we question the consultation process. The design, the
(soundness): cost and above all the lack of resources to clean and maintain what we already have mitigate against "enhancements" that will place greater demands on the already scarce resources.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\101

Respondent: Bath Heritage Watchdog

Representation I Not acceptable in the central area, because the only sufficiently large space is the Recreation Ground
(soundness): which must not be built on.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\102

Respondent: Bath Heritage Watchdog

Representation j Enhancement in the current location breaks existing covenants, so the proposal is not acceptable as a
(soundness): trade-off for other facilities

Change sought to Delete all reference to the Recreation Ground area being a development opportunity (and replace the
make sound: current Trustees because as councillors they clearly have a conflict of interest).

Representation (legal compliance): Delete all reference to a sports stadium, and all references to the Recreation Ground as a potential development site.

Change sought to make legally compliant:

Reference: 265\103 S

Respondent: Bath Heritage Watchdog

Representation (soundness): k Supported. But likely to be bottom of the list and possibly in conflict with other proposals

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\12

Respondent: The Bath Society

Representation (soundness):

Change sought to make sound:

Representation (legal compliance): We agree that the poor quality of the public realm is a problem for Bath city centre, but expenditure on adequate maintenance is probably more important than capital works 'improvements' . See our comments on B1 (9) Public Realm .

Change sought to make legally compliant:

Reference: 276\6

Respondent: Hignett Family Trust

Representation (soundness): Policy B2 sets out elements that are intended to form strategic policy for the Central Area.in the CS.

This area is also intended to be covered by numerous Saved Policies (Appendix 2 CS) for example policy ET2 Bath City Centre Core Office Employment Area, as well as by amended Saved Policies Bath City Centre Boundary Proposal Map change(Appendix 3). In such circumstances it is vital to ensure that policies support one another, are clear , succinct and easily understood. This cannot be said about Policy B2 and therefore it is unsound.

Firstly the Central Area covers two distinct areas as shown on Diagram 7. The key economic development strategy is to accommodate upto 100,000m2 of modern office space and creative workspace, 500 new homes , 500-750 hotel bedrooms as well as retail development, sports stadium , a cultural arts venue etc etc. There is no credible evidence presented that such scale of economic development is capable of being physically delivered within those areas of the Central Area,.They are in multiple ownership and in many cases occupied by businesses that provide employment. The Council must show by reasoned justification and through evidence, capable of being tested at Inquiry that the sites are available and deliverable.

The high flood risk associated with many of the named regeneration opportunities is discussed in detail in HLT3 and should be taken into account in Policy B2. The assumption that flood risk management is overcome thereby releasing land in the Central Area for development, housing or otherwise, is unsound.(see HLT3).

The concentration of economic development in such a small area is not sound, it contradicts the advice given specifically in the Economic Strategy(see HLT3) and will lead to a strategy of large scale office blocks in the Central Area with littte realistic market potential, in order to achieve the floorspace targets set in this policy and in B1. The policy approach should be about

Change sought to make sound: See Reps in HLT 3

Representation (legal compliance): B2 is entitled Central Area Strategic Policy with the whole of the content of pages 39 and 40 to be included as policy. This is not sound as the text of most of the 'policy is either background information or descriptions of the location or of issues. There is little by the way of proper policy structure as set out in PPS12 and therefore the section B2 should be rewritten making clear what is policy and what is not and include clear reasoned justification. Below is guidance which sets out some of the key principals of policies contained in LDDs (extract from PPS12):
The format of local development documents should be clear, succinct and easily understood by all, with the strategy and associated policies expressed in terms which emphasise the means and timescale by which the objectives derived from the spatial vision will be met. A comprehensive and

credible evidence base should underpin the policies in local development documents.
PPS12.
The policy should be written using those elements from sections 3 and 4 only, subject to the test of soundness, see below

Change sought to make legally compliant: Delete policy B2 and rewrite in the form of a policy that will be compliant with PPS12 and the 2004 Act.

Reference: 280\5

Respondent: Scott Brownrigg

Representation Policy 2B Central Area Strategic Policy & Key Development Opportunities, page 39

(soundness): We support the identification of Key Development Opportunities for mixed use development proposals, including Kingsmead House, and support policy allowing for additional hotel bedrooms to be located within the Central Area.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\11

Respondent: Stubbs Rich LLP

Representation B2/2b. Fine "and characteristic" grain

(soundness):

B2/2p. As I have commented on the Public Realm Strategy, the spend on the public realm is principally directed at the retail core rather than the world heritage settings.

B2/4. Retail space must be restricted to existing retail areas or this policy will be used to expand into other areas.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 292\4

Respondent: Bath Avon River Corridor Group

Representation Policy B2 p39 - Lack of emphasis on the kind of economic, social and cultural life a very compact mixed

(soundness): use high quality urban environment can foster to best contribute to the economy of the district as a whole.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 297\7

Respondent: Bath Rugby Club

Representation Page 9 Policy B2

(soundness): Clause 2s of Policy B2 States that there is limited capacity on the highway network to absorb increased motorised travel, This may serve to limit development rather than allow development which is able to mitigate or improve the highway network.

To ensure that the core Strategy is flexible and therefore accords with the principles of being effective, bullet 2s should incorporate wording that recognises that development may improve the impact on the highway network. This will ensure that development is not limited due to this clause.

Page 40 , Policy B2, Central Area strategic Policy

Subhaeding 3- key Development Opportunities

In accordance with our representation to diagram 7, we consider Appendix 3 should be re-drawn to include the recreation ground, We consider that (f) should be removed from the list , ' Nelghbouing the City Centre- and added to the list 'Clty centre' ; This would also reflect the description of the Central Area In 2026 as given On page 42.

Sub- heading 4 -scale of change

We consider (h) should be modified by the Insertion of " larger" before "sports".
We consider additional activities should be Included In the list including "activating ground floor uses" and "conferencing and banqueting facilities."

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\6

Respondent: Liberal Democrat Group

Representation Policy B2, 1h

(soundness): Omission. Various car parks are included as key development opportunities

Policy B2, 1h

Omission. Reference to pedestrianisation should be included to underpin key policies on climate change, investment in city, town and local centres and the vision of the central area in 2026.

Policy B2, 4d

See comments above to Objective 3, third bullet point.

In order to avoid distortion in the visitor accommodation sector, hotel developments already approved, but as yet incomplete, should be counted towards this target.

Policy B2, 4g

Omission. Reference to pedestrianisation should be included to underpin key policies on climate change, investment in city, town and local centres and the vision of the central area in 2026.

Change sought to make sound: "A place to, and in which people increasingly travel by walking, cycling, or by using public transport and in which city centre car parking has been reduced or moved underground".

Add new paragraph n under "Assets of the Central Area" and renumber accordingly:
"City centre streets provide high quality pedestrianised and shared space".

"500-750 hotel bedrooms (above a base line figure from 2006) to widen the accommodation offer of the city, increase overnight stays and the competitiveness of the city as a popular visitor destination".

"A comprehensive programme for public realm enhancement (including more pedestrianisation and shared space) and implementation of a Wayfinding and City Information System".

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 299\2 S

Respondent: Avon & Somerset Constabulary

Representation This policy sets out Manvers Street Car Park, the Police Station and Mail Depot as a key development
(soundness): opportunity. The Avon and Somerset Constabulary have previously expressed their support in principle to the Council's aspiration for the comprehensive redevelopment of the Manvers Street site, this will be subject to the necessary funding and relocating the existing police station elsewhere. Although the Core Strategy is sound with regard to PPS12, the A&SC are concerned that the strategy may not be effective without the recognition that for redevelopment to happen in one place, other development needs to happen elsewhere.

Change sought to make sound: Consideration should be given to the relocation of existing facilities being encompassed within the key risks to the Strategy. For the Council's aspiration to be met, third party actions are required.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 302\1

Respondent: Paul Karakusevic

Representation I am concerned that diagram 8 page 42 appears to propose that the current central area be extended
(soundness): by 2026 to include the Recreation Ground and Johnstone Street as part of a city centre extension.

I am concerned that the correct legal and planning justification for this has not been complied with. Rezoning land to benefit B&NES corporate requires more probity and planning/legal justification than has been provided

This rezoning if allowed to happen could have far reaching implications on any future licensing and planning applications for an area which is currently residential only and green open space. The financial gain of rezoning brings into question the impartiality of B&NES in their motives for rushing this through

This rezoning pre-empts the public consultation on uses of the Rec, it ignores the existing covenants which deny commercial development. It also pre-empts the Charity Commission decision regarding the Trusts' uses of the Rec.

It also suggests that Johnstone street is an existing access to the Rec. This is not the case the street has existed as a cul de sac with no access to the Recreation Ground for 200 years

Change sought to make sound:

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA area as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

As you know it is the 1956 conveyance that appears to govern how the Trust should be run. This conveyance refers to the Conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance"

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific premises (the current Rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

B&NES have not provided adequate justification for the rezoning of either the recreation ground a green space or Johnstone Street a residential street.

The document is not labelled correctly, the Recreation Ground is a green open space which has been used as such for 200 years. The inspectorate should not be misled about the nature of the space which the Council is currently seeking to rezone. The space is green, open, recreation ground space.

Earlier drafts of the strategy have not sought to rezone this area, the current proposal has just

appeared in the core strategy without any background justification or local consultation.

They have presented misleading documents at various consultation events regarding the status of Johnstone Street which is currently a residential cul de sac.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground.
Maintain current status of the Recreation Ground, and Johnstone Street as residential

Reference: 309\1

Respondent: Rachael Hushon

Representation (soundness): I am concerned that diagram 8 page 42 appears to propose that the current central area be extended by 2026 to include the Recreation Ground and Johnstone Street as part of a city centre extension.

I am concerned that the correct legal and planning justification for this has not been complied with. Rezoning land to benefit B&NES corporate requires more probity and planning/legal justification than has been provided

This rezoning if allowed to happen could have far reaching implications on any future licensing and planning applications for an area which is currently residential only and green open space. The financial gain of rezoning brings into question the impartiality of B&NES in their motives for rushing this through

This rezoning pre-empts the public consultation on uses of the Rec, it ignores the existing covenants which deny commercial development. It also pre-empts the Charity Commission decision regarding the Trusts' uses of the Rec.

It also suggests that Johnstone street is an existing access to the Rec. This is not the case the street has existed as a cul de sac with no access to the Recreation Ground for 200 years

Change sought to make sound: Central Area zoning to remain as currently delineated.

Representation (legal compliance): BANES Council have sought to regard the Rec and certain residential streets within the PERA area as "commercial" in the latest version of its Core Strategy, thereby giving further credence to the development of commercial activities on the Rec, and in neighbouring residential areas.

As you know it is the 1956 conveyance that appears to govern how the Trust should be run. This conveyance refers to the Conveyance dated April 1922 which imposes on the parties to the 1956 conveyance an obligation "to observe and perform the covenants and conditions contained in the April 1922 conveyance"

The April 1922 conveyance contains a covenant binding on ANY future owner of these specific premises (the current Rec land) that "there will be no buildings for the purposes of trade or business which may be a nuisance, annoyance or disturbance or otherwise prejudicially affect the adjoining premises or neighbourhood." This seems to be clear that whoever owns the land, and regardless of any land-swap, that these conditions should be upheld.

B&NES have not provided adequate justification for the rezoning of either the recreation ground a green space or Johnstone Street a residential street.

They have presented misleading documents at various consultation events regarding the status of Johnstone Street which is currently a residential cul de sac.

Change sought to make legally compliant: Compliance with existing covenants pursuant to the Recreation Ground.
Maintain current status of the Recreation Ground, and Johnstone Street as residential

Reference: 820\2

Respondent: St James's Investments and Tesco UK Stores

Representation (soundness): Our clients question the specific reference to the amount of convenience shopping floorspace required in this policy, given the council's acknowledged need to update their retail evidence base (paragraph 6.92).

Change sought to make sound: The policy should adopt a more flexible approach ahead of an updated retail strategy, which would enable the existing overtrading issues to be met in a number of ways.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 8: The Central Area in 2026

Reference: 265\104

Respondent: Bath Heritage Watchdog

Representation Diagram 8

(soundness): This shows an expanded area encompassing the Recreation Ground that as previously stated is not a development location. The text states it is perceived as a total composition but as yet there is no cohesive masterplan on the table. It is difficult to reconcile the description of “lively streets” with the expectation of large numbers of vacant and deteriorating “modern” office blocks. It also seems hard to understand how totality will be achieved in an entirely uncomplimentary architectural style (at least the Abercrombie plan for all its faults understood this). There is then more trendy word play with terms such as stepping stones showing this is all the work of consultants rather than being imbued with true understanding of the character of Bath. Zoning and the inevitable disadvantages it brings lurks beneath the surface.

The next set of ideals of a car free centre might be harder to achieve. It will be difficult to prize people away from their cars especially when its newest shopping centre is replete with 1000 parking spaces! The Public Realm and Transport proposals are not universal cure alls. Given the demographic forecast of a large increase in the over-65s, a significant part of the population will regard car free areas as no go locations and either shop elsewhere or opt for home deliveries. A growing number of Disabled badge holders will be excluded unless they are properly provided for, and will go elsewhere unless they can park within their limited walking distances to their destinations. Either way the impact on the city centre shops will be considerable. The availability of expanded pedestrian circuits does not guarantee that they will be used. Most pedestrians have a destination in mind and go there. Anybody doing proper justice to a cultural attraction is not going to have the time or inclination to go on to another unless they are tourists on a short visit.

Thus far we have seen little new development that meets the expectation of High Quality. The River Corridor is indeed important yet the trade off could see an upstream compromised to facilitate development in the central core which in turn could put added pressure on areas downstream, none of which are appropriate for the risk of run-off from the hills. We note the map still contains a bridge between North Parade and Pulteney Bridges which previous consultations promised to delete, and a never before seen bridge at the station.

Change sought to make sound: Replace wishful thinking with proper thought about the consequences of the sum total of all the policy elements.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 297\8

Respondent: Bath Rugby Club

Representation Page 42, The Central Area in 2026

(soundness):

We consider it would be helpful to include an additional sentence that confirms the Core Strategy's objective of securing a new, larger, stadium for Bath Rugby and other complementary uses at the Recreation Ground.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Bath: Western Riverside

Reference: 224\28

Respondent: Bath Preservation Trust

Representation We do not oppose the decision to treat Western Riverside East as part of the Central Area. However
(soundness): we are not convinced that saving Local Plan Policy GDS1/B1 and the associated SPD for the residential-led development of the western part of this complex site provides a robust enough planning framework, particularly given the extensive changes which the developers have already made, or are intending to make, to the plans covered by the approved outline planning application.

The SPD places great emphasis on the need to look holistically at the whole of the original Western Riverside site, which was clearly identified as a mixed use development. Now that the site is to be split, the SPD needs to be revisited in order to ensure that it provides a suitable framework for a residential development.

Change sought to make sound: Section 2c should refer to the need to consider, in consultation with local amenity groups, whether the Western Riverside SPD needs to be updated to reflect the change in the primary aim of the development.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 9: Twerton and Newbridge Riversides

Reference: 265\135

Respondent: Bath Heritage Watchdog

Representation Page 46 Twerton and Newbridge Riversides. Diagram 9

(soundness): This shows the development hotspot but makes no mention of the BRT route which effectively cuts the area in two, means the loss of businesses and jobs to the area, sees a green corridor and peoples back gardens destroyed. Examined closely this can be seen as more ground preparation in order to facilitate the regeneration on specific terms.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\136

Respondent: Bath Heritage Watchdog

Representation 1 The role of Twerton and Newbridge Riversides

(soundness): Having effectively isolated the two areas you can then assign them differing characteristics or zones. Point b should not be advocating or arranging the loss of industrial activity just because it is in the way of other schemes. If it is there and it is trading successfully, the location is a contributory factor to that success and must be respected.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\137

Respondent: Bath Heritage Watchdog

Representation The history of Bath is one of continuous evolution, and the character of any place has evolved because
(soundness): that is what is appropriate. Replacing it with what can only be described as social engineering is likely to do more harm than good, particularly when the Core Strategy bears all the signs of being prepared by those who do not come from Bath and do not understand its character.

2 Placemaking Principles

The wording places added emphasis on Newbridge at the expense of Twerton and makes no mention of the colossal impact of driving a dedicated roadway, effectively a barrier to north-south journeys except at specific crossing points, though all of it.

Change sought to make sound: Include a presumption that the continuation of a successful existing business takes precedence over any development plans to replace it. If there really is a need to reduce industrial floorspace, this will become evident from failed businesses, and should not be specifically planned. This will remove the incompatibility between the objective to preserve industrial premises to achieve a proper mix of employment and this section (amongst others) which identifies industrial locations for redevelopment.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy B3: Twerton and Newbridge Riverside Strategic Policy

Reference: 154\3 S

Respondent: British Waterways

Representation We welcome the acknowledgement that the river I underutilised in the past and that it can provide an
(soundness): improved connectivity for walkers and cyclists into the town centre via the river corridor.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\5

Respondent: Duchy of Cornwall

Representation The Western Riverside comprises Twerton and Newbridge Riverside Areas. Again, it is proposed to
(soundness): provide for a material amount of housing in this broad location in order to help deliver the 6,000 dwelling allocation to be met within the Bath urban area.

1.4. The CS, accompanied by the findings of the SHLAA, suggests that this area could accommodate around 2,500 dwellings during the plan period. This includes the reliance on dwelling completions from the Local Plan Allocation. As set out in the SHLAA, it was assumed at the Local Plan Inquiry in May 2006 that the site would deliver up to 650 dwellings by 2011. We are now in the 2010/11 monitoring year and the site is yet to deliver any completions.

1.5. As identified in the SHLAA, there are a number of constraints to releasing the site for development. The revised estimate is for development to commence at the end of 2010/11 and for 380 dwellings to be completed within the following five years. This appears somewhat optimistic given the fact that outline planning permission for the entire site (including the erection of 2,281 dwellings) was only granted at the end of December 2010 (LPA Ref: 06/04013/EFUL). The decision notice states that the development must be commenced within a 10 year period. Moreover, scale, appearance and landscaping are reserved for future determination. This could serve to delay implementation of the scheme. However, it is acknowledged that full planning permission has been granted for the first phase of development (Phase 1A). This provides for the construction of some 299 dwellings. Accordingly, whilst we have no objection in principle to the anticipated delivery of all 299 dwellings in the period to 2016 from Phase 1A we do not accept the optimistic delivery rates assumed for the outline permission which is identified in the SHLAA for delivery in 2014/15.

1.6. The draft CS fails to provide the necessary flexibility to ensure a contingency in the event that the Western Corridor fails to produce sufficient completions at the rate envisaged by the LPA as set out in the SHLAA.

Change sought to make sound: The LPA need to demonstrate that they have undertaken a comprehensive assessment of the sustainability merits and suitability of land outwith areas liable to flood prior to identifying land for development within the Central Area that is within Flood Zone 3.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\29

Respondent: Bath Preservation Trust

Representation We welcome the inclusion of a specific policy for this important area of the city and broadly support (soundness): the content. We are however concerned that paragraph 4 may not be sufficiently flexible. For example our comments on policy B1 refer to the need to provide for workshop space for small artisan businesses, but this policy would appear to rule out the conversion of redundant or unsuitable offices into such workspaces. Is this really what is intended?

Change sought to make sound: The last sentence of the second paragraph of part 4 should be deleted or modified as suggested above.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\30

Respondent: Bath Preservation Trust

Representation There are some important omissions from the Placemaking Principles – see section 7. (soundness):

Change sought to make sound: In paragraph 2, second point c, there should be specific reference to Brunel's Great Western Railway. The proximity of Oldfield Park Railway Station should be listed among the assets. In the Risks section, there should be specific reference to the narrowness of the existing walking/cycling route and the resulting problems for both cyclists and pedestrians.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 253\1

Respondent: Surinder Malhotra and Brian Greenham

Representation 1.1 GL Hearn act on behalf of Surinder Malhotra and Brian Greenham the landowners at Astra House (soundness): and Twerton Mill located on the Lower Bristol Road, Bath. The vacant sites are currently being marketed by Group West.

1.2 The sites are located in the Twerton and Newbridge Riversides area under Policy B3 of the emerging Core Strategy. The landowners are concerned that the emerging policy regime is too prescriptive, and may prevent these vacant and prominent sites from being brought back into beneficial use.

2.0 Development Context

2.1 The combined subject sites are located directly adjacent to the Lower Bristol Road (A36) to the south of Bath City Centre. Approximately 200m from the centre of Twerton. The site is bound by Lower Bristol to the south, Astra Garage to the west, Weirside Works to the east and the River Avon to the North.

2.2 The site comprises of two commercial properties, Astra House occupies the central element of the site and comprises a three storey building with a single storey separate workshop to the rear. Twerton Mill occupies the eastern part of the site and comprises a three storey building reducing to two storeys

at the rear. The combined sites extend to approximately 0.28ha (0.7acres) refer to Appendix A.

2.3 The site is located within 'Twerton and Newbridge Riversides' strategic policy area, and has been assessed in the BANES SHLAA under site reference TWT2.

Planning History

2.4 The sites were included in planning application proposal that also included the adjacent Avalon Garage site to the west that was refused by the Council in 2008. Details of this decision are set out below:

Type	Planning Application Description	Decision	Date
Erection of a mixed used development consisting of 106 residential units, commercial offices and associated car parking and landscaping including flood alleviation measures.	Change of use to C3 and A2	Refusal	16/05/2008
Delegated Conservation	Demolition of existing buildings	Withdrawn	24/06/2008

Site Constraints

2.5 The site is situated within the Bath conservation area and World Heritage Site, and is shown as lying within part of the B12 General Development Site designation in the adopted Local Plan.

2.6 The site is also subject to flood risk constraints, and appears to lie within FRZs 2 and 3. However, hydrologists have advised that technical solutions are available to mitigate against flood risk.

2.7 The Lower Bristol Road frontage lies on a strategic transport route for road widening that was first identified in the mid 1980s. Transport consultants have advised that this safeguarded route is unlikely to be required in the foreseeable future.

Policy B3 Twerton and Newbridge Riverside Strategic Policy

3.2 The lack of current and foreseeable future demand for new build employment floor space in Bath, in the context of an over-supply situation, suggests that aspiration for the Twerton and Newbridge Riversides to function as an economic development area is not based on a realistic assessment of the commercial market. We are concerned that this policy approach for the Twerton and Newbridge Riverside area could sterilise potential development sites, which have potential to support other viable uses such as retail, housing and student housing.

3.3 Under current and foreseeable future market conditions the delivery of new employment space may only be possible as part of a 'residential led' approach rather than the 'employment led' approach advocated in Policy B3 (4). It is therefore essential that the policy is flexible enough to allow either an employment or residential led solution to be progressed.

Change sought to make sound: Revise the housing target for the district to reflect more realistic growth and inward migration assumptions.

Representation (legal compliance):

- 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the viability of employment led development in the Policy B3 area, Newbridge and Twerton Riverside.
- 2: Not Effective in terms of strategy: delivery of housing and employment under Policies DW1 and B3.
3. Not Consistent with National Policy? PPS3, PPS4, and PPS12 (deliverability and flexibility)

Change sought to make legally compliant:

Reference: 265\105

Respondent: Bath Heritage Watchdog

Representation (soundness): 2E The World Heritage Site and its Setting This subject is inadequately covered and needs more than two pages: What makes Bath a World Heritage site is the history reflected in its street plans building designs and materials, its open spaces and its geological setting. Therefore the World Heritage Site and its Setting is the key to its very existence. Two pages balanced against around a hundred other pages promoting the biggest upheaval the city will have seen in its lifetime! Does the photograph on page 52 give an indicator as to what the council and a number of others consider to be the WHS: a few buildings designed and built by John Wood? Bath is the only WHS in Britain which embraces the entire city, and it shares that with only a very few other cities in the world, yet the Core Strategy does not effectively promote that.

Change sought to make sound: Much more emphasis on preserving the Outstanding Universal Value of the World Heritage Site. A policy of consulting ICOMOS-UK on all major developments (the same criteria used for English Heritage consultations should be used) and allowing ICOMOS-UK a veto on planning permission being granted where they consider the Outstanding Universal Value would be damaged. (This because a World Heritage Site is held in trust for the current and future generations throughout the world, and past experience has shown that the decision makers on the council do not consider what the world wants in a World Heritage Site).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\138

Respondent: Bath Heritage Watchdog

Representation (soundness): c Mentions the area's heritage assets most of which are not English Heritage listed. There is no statutory protection because parts of it are outside a Conservation Area and there is no Locally Important Buildings Policy so most structures are open to Permitted Development, including demolition, and therefore at risk. Identifying them here when the council has steadfastly refused to implement a Locally Important Buildings Policy is hypocritical at best. No mention is made of the once valued route of the railway line as an important wildlife asset, which it is.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\139

Respondent: Bath Heritage Watchdog

Representation (soundness): d Views are important yet little consideration was given about the impact of the Western Riverside, the largest single development in the history of the city. These are precisely the two areas which the appearance of the Western Riverside will have the greatest impact on.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\140

Respondent: Bath Heritage Watchdog

Representation (soundness): e Agreed. However the Newbridge Park and Ride on the banks of the river is due to expand across a Site of Special Scientific Interest, and no mention is made of that.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\141

Respondent: Bath Heritage Watchdog

Representation (soundness): f Generally agreed but we would encourage the use of the river as a means of transport to and from this location. Park and Float is very successful in Falmouth, and could be in Bath.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\142

Respondent: Bath Heritage Watchdog

Representation Risk to Twerton and Newbridge Riversides

(soundness): a This is contradictory to 1b in this same section, and the expectation is that the council will allow gradual decline in order to prepare the ground for pet schemes.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\143

Respondent: Bath Heritage Watchdog

Representation b Possibly true. All proposals should be based on a thorough understanding of the urban grain. Scale

(soundness): height and mass as well as materials are of equal importance here as in more high profile areas.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\144

Respondent: Bath Heritage Watchdog

Representation d-e While the wording is acceptable as written it fails to mention that the BRT route will fragment and

(soundness): disconnect the whole area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\145

Respondent: Bath Heritage Watchdog

Representation f Again the words are not the problem only the probable interpretation. This statement can be used as

(soundness): a prelude for a whole host of so called 'landmark' or 'gateway' buildings. Failure to observe planning guidance relating to height, scale and materials combined with the too often used phrase "its only car showrooms down there" means things are unlikely to improve.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\146

Respondent: Bath Heritage Watchdog

Representation g In peak times it does, but there is considerable evidence that this congestion is in someway

(soundness): engineered by poor road layout (including newly constructed build-outs) and traffic light timings to give the illusion that the BRT would be an improvement. There is a pending planning application for the Tesco Bath Press proposal which can further impact on this if it is approved despite the advice of the council's Highways Officer to refuse it.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\147

Respondent: Bath Heritage Watchdog

Representation h True but the Twerton barrage has somewhat reduced this. Most likely the problem will come from
(soundness): surface water run off from large areas of impenetrable surfaces arriving at inadequate drainage.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\148

Respondent: Bath Heritage Watchdog

Representation 3 Key Development Opportunities

(soundness): Bath Press. The building is sound and could be reused, but the current plans are that most of it is to be demolished. Such a demolition represents the loss of approximately 5 acres of industrial premises, which makes unnecessary other reductions of industrial land proposed in the Core Strategy. Even if a change of use is permitted, there seems little justification for destroying the existing structure.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\149

Respondent: Bath Heritage Watchdog

Representation Roseberry Place. This is one of the few current industrial areas that is sufficiently far from residences

(soundness): that it can accommodate virtually any kind of industrial business. Any proposals for this area needs careful consideration because potentially they could cause the export of jobs from Bath. It should not be a key development opportunity for that reason.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 281\6

Respondent: Natural England

Representation While we do not consider it necessary to return any completed representation forms there is one

(soundness): further aspect of the Publication Version that we suggest could be improved and others we believe that are particularly worthy of praise. In hopes that this will be of interest to the authority we would, therefore, like to offer the following informal observations:

Policy B3 – Twerton and Newbridge Riverside Strategic Policy

We welcome the recognition of the importance of the river corridor as a wildlife resource. Taken together with policy B2 – which provides for major riverside access and habitat enhancements, the conflict between public access to the river corridor and its importance as a wildlife corridor can be successfully resolved.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\12

Respondent: Stubbs Rich LLP

Representation (soundness): B3/4. Support the extension of uses to non-economic development for BWR and Twerton.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 292\5

Respondent: Bath Avon River Corridor Group

Representation (soundness): Policy B3 - This is not the appropriate strategy, over emphasis on land use – no recognition of how these areas might need to feature within the growth models of the city and districts' optimum economic renewal strands necessary to balance demands of competing uses. Under recognition of the potential role of Twerton as a district centre growth point – and for Newbridge in relation to the facility needs of University roll-out activity.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 820\3

Respondent: St James's Investments and Tesco UK Stores

Representation (soundness): Our clients support the recognition of their site as one of two 'key regeneration opportunities' in the Twerton and Newbridge Riverside area and the desire to promote employment-led mixed-use development. The policy acknowledges the industrial past of these areas and the need to provide new employment space suitable for modern needs. New development in this area can also help the council to achieve its objectives to improve the appearance of the Lower Bristol Road, connect the riverside, reduce congestion and improve the pedestrian environment.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.19

Reference: 265\151

Respondent: Bath Heritage Watchdog

Representation (soundness): 2d Bath's Neighbourhoods

(soundness): Given Bath is such a small compact city we are at a loss to see how some of these areas are classified as neighbourhoods.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\152

Respondent: Bath Heritage Watchdog

Representation 2.19 “Headline delivery location” is a meaningless catchphrase.
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.20

Reference: 265\153

Respondent: Bath Heritage Watchdog

Representation 2.20 The is little to disagree with in the words used, but the reality is somewhat different. Although the
(soundness): Northern slopes and the significant proportion of heritage assets are more secure but not without problems in specific areas, the southern slopes have fared less well. Our remit is heritage but we have to point out where demographics impact on heritage or local appearance and characteristics. The biggest impact has come from the student population and HMOs. Large swathes are now unrecognisable from just 20 years ago: streets of many unkempt houses, hard surfaced and poorly maintained gardens and driveways; gardens replaced by car hard standings often with the loss of distinctive gate piers; timber sash windows replaced by UPVC or aluminium; roofs peppered with oversized dormers, skylights and solar panels.

To remove the Permitted Development rights that permit this destruction of the character of an area, the Conservation Area needs extending to the WHS site boundary. Another possibility is the imposition of a city-wide Article 4 directive. As in all other previous comments the actions seen do not fit the words written.

Change sought to Add commitments to bring HMOs under proper planning control
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.22

Reference: 102\17

Respondent: Federation of Bath Residents' Associations

Representation Para 2.22 (p48)(MoD sites)

(soundness): FoBRA welcomes early redevelopment of Foxhill and Warminster Road. However,
• The entry talks only about housing (850 homes). Although suitable for housing, could these sites not be used for high tech industry offices too (no noise, lots of computers, close links to City Centre, good travel links) thereby helping to reduce commuting?
• This is one of the few mentions of the important SHLAA, which indicates where housing might be able to be built in B&NES.

Change sought to Solutions: (a) Change MoD sites to mixed development and (b) refer to the SHLAA wherever
make sound: appropriate – for example Objective 5, Policy DW1, Table 3(5) and Policy B1(3).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\6

Respondent: Duchy of Cornwall

Representation The Policy suggests that suburban Bath (comprising the neighbourhoods) could yield “about” 2,500
(soundness): dwellings. This strategy relies on the delivery of 850 dwellings from the MoD sites.

The MoD occupies three sites comprising Foxhill to the south of the City, Warminster Road to the east and Ensleigh to the north.

The Council’s expectation is that the Foxhill and Warminster Road sites will become surplus to requirements in the period to 2016. It is anticipated that operations will then be consolidated onto the Ensleigh site.

Although the SHLAA suggests the delivery of some 700 dwellings from the Ensleigh site in the period to 2026, with housing delivery anticipated post 2016, the site assessment work suggests the actual dwelling yield could result in fewer dwellings, with a figure of 560 mooted.

It is unclear when the Council received timeframes for relocation from the MOD that are relied upon within the SHLAA and how the MOD’s relocation strategy will be affected by the Coalition Spending Review. An updated position should be made clear prior to the formal submission of the Core Strategy to the Secretary of State.

Until there is a firm commitment to vacate the sites, they cannot be relied upon to be developable within the plan period as it is not known when they might become available for development.

The draft CS fails to provide the necessary flexibility to ensure a contingency in the event that the MoD sites fail to come forward for development at the point envisaged by the LPA.

Change sought to make sound: The delivery assumptions should be based upon an up to date assessment and anticipated site delivery.

The number of completions relied upon to come forward within Bath’s neighbourhoods should be revised to reflect a more realistic and likely rate of delivery.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\31

Respondent: Bath Preservation Trust

Representation We welcome the explicit inclusion of the MoD sites at Foxhill and Warminster Road within the next five
(soundness): years. However, Ensleigh should also be included in order to defend the fact that there is sufficient scope for housing development within Bath within the lifetime of the Core Strategy. Even if the MOD retain Ensleigh and consolidate their functions there, its use of space is inefficient and the Placemaking Plan should therefore also consider Ensleigh for redevelopment, including mixed employment/housing usage, even if the MOD retain a presence there. If no placemaking plan is developed for Ensleigh there risks either inappropriate development on that site or legal challenge on the deliverability of housing numbers. We appreciate that B&NES is dependent on progress with the MOD but a willingness to engage in mixed use redevelopment would reduce the risk.

Change sought to make sound: Insert in Para 2.2 – ‘the Placemaking Plan will also consider the capacity and prospects for developing Ensleigh as a mixed use housing/employment site during the life of the plan, possibly in partnership with the MOD’.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\32

Respondent: Bath Preservation Trust

Representation In light of the importance of these neighbourhoods to housing development, we are surprised that
(soundness): there is not an explicit strategic policy in this section to support their inclusion during the life of the plan.

Change sought to Addition of a policy B3a – to include

- make sound:**
- Role of Bath's Neighbourhoods (primarily residential with scope for mixed use)
 - Placemaking principles to include recognition of visibility, development 'within the bowl', height sensitivities, retention of 'village' feel
 - Risks – insufficient place planning of MOD sites give rise to ill-thought through and unsustainable housing development
 - Key development opportunities
 - MOD sites (Foxhill/Warminster Road within 5 years) Ensleigh to be planned for within life of CS
 - Scope and scale – housing/mixed use.
 - Bath RUH site as part of an agreed masterplan

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 264\6

Respondent: Englishcombe Parish Council

Representation The MOD land, especially Foxhill, is essential to Bath in achieving the housing targets set, within the
(soundness): time scales planned. This is a Brownfield site close to areas of proposed employment with essential infrastructure in place. Locating housing and additional integrated employment areas on this site goes a long way to ensuring the Greenfield land is not unnecessarily and irresponsibly designated for building.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\154

Respondent: Bath Heritage Watchdog

Representation 2.22 MOD Land A look at the Ensleigh site with the permanent buildings already supplemented by
(soundness): temporary offices is a clear indication that Ensleigh does not have the capacity to absorb the staff at Foxhill and Warminster Road. If the MOD vacate those sites the most likely destination for the staff is Abbey Wood, a net loss of almost 2,000 jobs in Bath and the transfer of a significant proportion of their spending power to Bristol. Furthermore, if two out of the three sites are moved, the probability of Ensleigh also being closed and the staff moved is high because for business purposes, the co-location would improve efficiency even though the site is rented at a peppercorn rent. This loses another 2,000 jobs. It is very doubtful whether the land for 850 homes is adequate compensation for the loss of 4,000 jobs in Bath and the wages they spend in the city.

It is worth noting that when the first tranche of MOD staff went from Bath to Abbey Wood after Abbey Wood was built, nearly all the shops in the Foxhill area closed down through lack of trade. This despite all the homes in the area. Trading recovered later when the MOD transferred staff from Portland to Foxhill to occupy the vacated offices, proving that it is jobs, not homes that keeps the local economy afloat.

It is also worth noting that MOD moved staff from a modern open plan office block in Pinesgate to the wartime buildings in Warminster Road, after discovering that the drive for a reasonable return on investment by the developer makes newly built modern offices too expensive when faced with budget cuts, and refurbishing old existing buildings is far cheaper. This is another reason to question the wisdom of the Core Strategy's emphasis on building new offices. Finally, there is a lot of vital infrastructure just below the surface on the Foxhill site, which is why the buildings are placed on concrete rafts rather than having conventional foundations. To develop the site will require all this

infrastructure to be rerouted, which will make any development there abnormally costly, and this will have to be reflected in the cost of the homes built. The Core Strategy is wrong to be anticipating the benefits of MOD land; instead it should advocate persuading the MOD to stay to retain the jobs locally. [This information was provided by an ex-MOD employee and is believed to be authentic]

Change sought to make sound: commitments to retain MOD jobs

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.23

Reference: 265\155

Respondent: Bath Heritage Watchdog

Representation 2.23 District and Local centres. There is complete agreement with what is written. However, a **(soundness):** successful local shopping centre appears to be a magnet for non retail businesses who see advantages in the local footfall. As a result, Moorland Road is being gradually eroded as a shopping centre by the take-over of vacant premises by non-retail, in particular there is a surfeit of estate agents and property rental businesses. The core strategy needs to introduce a presumption that there will be no permission granted for change of use in local and district shopping centres from retail on the ground floor unless the proposed new use would be unique to the centre and therefore fill a gap in the set of available businesses.

Change sought to make sound: if possible, commitments to protect local and district shopping centres from non-retail expansion

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 277\3

Respondent: Ashtenne Industrial Fund Limited Partnership

Representation 2d – Baths Neighbourhoods
(soundness):

Ashtenne supports the identification of Bath's neighbourhoods for 2,500 dwellings over the plan period, and acknowledge that 'The Placemaking Plan' will consider specific sites in more detail. Ashtenne notes the proximity of their site at Wansdyke to the local centre of Oldfield Park and Bear Flat (Local Centre 13) and the sustainability benefits that co-location of housing to local centres brings.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.26

Reference: 102\2

Respondent: Federation of Bath Residents' Associations

Representation Lack of reference to public transport options and impact of off-street parking on residential streets in **(soundness):** para 2.26 (RUH)

Change sought to make sound: Lay down requirements for public transport, and discourage staff and visitors from parking in nearby streets.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 261\2

Respondent: RUH NHS Trust

Representation General
(soundness):

The Trust has recently completed the preparation of an Estate Strategy that comprises its detailed proposals for the development of its site in Bath. The Strategy sets out proposals for the development of its estate over the next 6 years. The proposals have been developed with outline costs, a programme for delivering them and arrangements for funding them.

The Core Strategy correctly identifies the need for healthcare infrastructure within the Council's area to support the anticipated growth in population.

Paragraph 2.26

The Trust has now developed an Estate Strategy for the development of its site and this document takes into account the need for new healthcare infrastructure that is identified elsewhere in the Strategy (the Strategy will be issued to the Council under separate cover). The objectives of the Strategy include the need to improve the built environment to provide first class facilities for the delivery of healthcare for the benefit of patients, staff and visitors and to maximise clinical adjacencies to deliver environments that promote efficient pathways of care. One example of this is the Trust's proposal to bring cancer services into a single building on the site.

Paragraph 2.26 should be amended to refer to the Estate Strategy rather than a "masterplan" and should read:

2.26 The Royal United Hospital is a major sub-regional hospital serving 500,000 people within the district and beyond. The Trust has prepared an Estate Strategy that sets out its proposals for future investment in the site. The Strategy seeks to secure first class facilities for the delivery of healthcare at the hospital.

2.27 The Council will support investment in the development of the hospital to meet the need for health care infrastructure that is identified elsewhere in the Strategy. The Council also acknowledges that part of the site may become surplus to the Trust's requirements and available for other development before 2026.

Change sought to make sound: Paragraph 2.26 should be amended to read:

2.26 The Royal United Hospital is a major sub-regional hospital serving 500,000 people within the district and beyond. The Trust has prepared an Estate Strategy that sets out its proposals for future investment in the site. The Strategy seeks to secure first class facilities for the delivery of healthcare at the hospital.

2.27 The Council will support investment in the development of the hospital to meet the need for health care infrastructure that is identified elsewhere in the Strategy. The Council also acknowledges that part of the site may become surplus to the Trust's requirements and available for other development before 2026.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 10: Bath's Neighbourhoods

Reference: 264\17

Respondent: Englishcombe Parish Council

Representation The diagrams appear to extend the urban boundary of Bath southwards down the A367, showing a **(soundness):** small “blister” around the site of the Combe Down Park & Ride. This area and the land around it and to the west of the A367 are within the Parishes of Combe Hay and Englishcombe and are in the Green Belt.

Change sought to make sound:

Representation (legal compliance): The diagrams appear to extend the urban boundary of Bath southwards down the A367, showing a small “blister” around the site of the Combe Down Park & Ride. This area and the land around it and to the west of the A367 are within the Parishes of Combe Hay and Englishcombe and are in the Green Belt.

Change sought to make legally compliant: This “blister” should be removed.

Reference: 265\156

Respondent: Bath Heritage Watchdog

Representation Diagram 10 This graphically indicates that the core area depicted on other maps is too small. It also **(soundness):** seems to cover a different area on this map using the railway as the southern boundary as opposed to the river. The two tunnels route not properly shown. A broader more cohesive strategy and master plan is needed, and it should cover local centres 1, 9, 10, 11, 12 and 18.

Change sought to make sound: There needs to be a masterplan providing a context for the whole of Bath, not just small sections.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 397\3

Respondent: Stokefield Trust

Representation The designation of land to the south of Bath as a Special Area of Conservation (SAC) Focus on Diagram **(soundness):** 10 has not been justified by the Council in the Core Strategy, and has no meaning without such justification, and without supporting Policy Statements.

Change sought to make sound: Delete reference to SAC on diagram 10.

Representation (legal compliance): It fails to take account of the RSS which, unless/until revoked by the Localism Bill, remains a material consideration.

Change sought to make legally compliant: Take due account of RSS.

Plan Reference: Paragraph 2.27

Reference: 265\157

Respondent: Bath Heritage Watchdog

Representation 2.27 School Places There is an apparent discrepancy between the housing targets bringing more **(soundness):** residents (and therefore more school age children) into Bath, and the decision to close an entire school in a densely populated area because of the temporary inconvenience of a few empty desks in secondary schools. The Western Riverside plans include a primary but not a secondary school and the transport plans for the Western Riverside do not include convenient bus routes to secondary schools, so there will inevitably be a big hole blown in the hopes of reducing car use.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 283\6

Respondent: Prior Park College and Paragon School

Representation Paragraph 2.27

(soundness): This paragraph is within section 2d (Bath's neighbourhoods) and refers to school places. It is identified that there will be a growing need for secondary school places. It is identified that the Infrastructure Delivery Programme provides more information on this. The document does not make and specific reference to numbers or educational facilities.

Change sought to Summary

make sound: Prior Park College and Paragon School are very keen to protect its ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council needs to recognise the key role of the establishment and to plan for it's enhancement by continuing the College's designation as a major site within the Green Belt. If this designation is lost then the College will experience significant barriers to continue the ongoing programme of investment.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.28

Reference: 265\158

Respondent: Bath Heritage Watchdog

Representation 2.28 Open Spaces and green corridors The two tunnels route will have a surface suitable for cycles, so

(soundness): cannot be classes as an addition to a green corridor, particularly when the route already exists and is not currently surfaced for cyclists. A number of current proposals threaten green corridors so do not equate to the desired aims. Open spaces should also include the Green Belt around Bath

Change sought to commitments to protect locally important hillsides and views.

make sound: Expand the Conservation Area boundary to match the WHS boundary

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.29

Reference: 265\159

Respondent: Bath Heritage Watchdog

Representation Nature Conservation

(soundness): 2.29 Just one site is marked, and it is not the Site for Special Scientific Interest. Bearing in mind all the visually important hillsides and valleys, the parks and gardens, this has to be considered poor. This has to be improved, or else their absence in the Core Strategy might make them vulnerable to unsuitable development. Too many planning appeals are allowed despite the dreadful visual damage they cause, because someone hadn't been careful enough in wording the planning policies.

Change sought to

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.30

Reference: 93\11 S

Respondent: Highways Agency

Representation The Agency supports the aim to increase sustainable transport choices identified at paragraph 2.30

(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 273\2

Respondent: Transition Bath

Representation As to sustainable transport modes, we agree that the priorities are 1st Walking, 2nd Cycling, 3rd Public
(soundness): Transport, all of which fulfil so many of the stated aims of the Core Strategy, climate change, improving health and tackling obesity, well being and community cohesion. Yet this document lacks detail or any sense of real commitment to these priorities.

We are still seriously disappointed that the Strategy focuses only on the city centre, rather than the city as a whole. Though the local centres are listed it is not possible to see how the local centres and neighbourhoods will benefit or contribute to much of the core strategy's objectives.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 273\5

Respondent: Transition Bath

Representation 'Improvements to transport infrastructure will be made to enhance links between the neighborhoods
(soundness): of Bath and the city center. These improvements will have an emphasis on pedestrian, cycling and public transport facilities'.

Both statements are very good though we would like to see real commitment, not just the façade of 'emphasis'.

We are concerned that the draft does not robustly address the primary need for transportation to make a significant contribution towards reducing CO2 emissions in the district and their environmental and social impact within the plan period.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\7

Respondent: Liberal Democrat Group

Representation Pedestrian links to Oldfield Park from the riverside development are important to reduce reliance on
(soundness): private car transport.

Change sought to "Improvements to transport infrastructure will be made to enhance links between the neighbourhoods
make sound: of Bath and the city centre and Riverside developments. These improvements will have an emphasis on pedestrian, cycling and public transport facilities including Oldfield Park station and its pedestrian access".

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.31

Reference: 153\3

Respondent: Claverton Parish Council

Representation (a). Paragraph 2.31 (page 52) identifies “the green setting of the City in a hollow in the hills” as being
(soundness): part of the OUV of the Bath WHS and paragraph 2.32 goes on to state that “The setting of the WHS, beyond its designated boundary, is also important as inappropriate development here can impact upon the site itself”

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\106

Respondent: Bath Heritage Watchdog

Representation 2.31 We totally disagree with this. It should be true, but it isn't, and judging from the aspirations
(soundness): elsewhere in the Core Strategy, there is no intention that it will be in the future. Almost without exception WHS status is well down the list of material considerations and is not even considered by most on the DCC who have been heard to scorn claims of damage to the setting The select set of values are correctly spelt out but few are willing to recognise them and even Bath and North East Somerset's Core Strategy – Publication Stage Representation Form fewer understand them. The Seville meeting of the World Heritage Committee made a set of recommendations over a year ago, and thus far nothing has apparently been done to meet any of them.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.32

Reference: 102\12

Respondent: Federation of Bath Residents' Associations

Representation Mention of the recently endorsed WHS Management Plan is strangely absent, as is the funding of it.
(soundness): Commitment to preserving, enhancing, celebrating and exploiting Bath's WHS status is weak, and conflicts with major developments (e.g. Western Riverside building heights) are not addressed, nor ensuring excellence in contemporary architecture (e.g. Western Riverside block design) or using WHS as part of the economic development plan. Further, FoBRA took part in the committee to draft the Building heights strategy and hence welcomes it, but the SPD should be framed now, and the Strategy should also apply to Bath Western Riverside.

Change sought to make sound: Strengthen commitment to and financing of the WHS, and frame the WHS SPD now (para 2.35).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 153\4

Respondent: Claverton Parish Council

Representation ©. The description of the landscape setting of the WHS, as set out on page 52 paragraph 2.32, is
(soundness): inadequate. It fails to highlight the fact that the WHS is surrounded by Green Belt and the Cotswolds AONB on its north, east and southern boundaries. Bath is unique in being the UK's only complete city to be designated a WHS but its landscape setting is also exceptional and key to the city's inscription as a WHS.

(d). Page 52, paragraph 2.32 states that “The WHS Setting Study provides the background information needed to assess any potential impacts and provides an impact assessment framework to form the basis for assessing the potential impact of a development on the OUVs. The Setting Study will be used to guide decision making affecting the WHS setting and may form the basis of a future Supplementary Planning Document (SPD)”.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 246\14

Respondent: Combe Hay Parish Council

Representation (soundness): The Core Strategy would be more sound if –

- a.it committed the World Heritage Site (WHS) Setting Study (modified as might be necessary) to becoming a Supplementary Planning Document (SPD).
- b.That SPD also addressed the issue of an appropriate “Buffer Zone” around the City of Bath WHS.

Change sought to a.In paragraph 2.32 for “may” read “will”.

make sound: b.In paragraph 2.35 for “can” read “will”

c.Indicate that the WHS SPD will also address the issue of an appropriate “Buffer Zone”.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\107

Respondent: Bath Heritage Watchdog

Representation (soundness): 2.32 The words are fine but day after day the reality is different. Proposals can be assessed against as

many policies as may exist, but equally whenever the wording is such that there is room for judgement, it is possible to judge to ignore them as frequently happens. How many times have we seen the public raise concerns about particular developments, and in a number of cases the council’s own specialist officers advise against them or state they are not unacceptable as they stand, only for this specialist judgement and local knowledge to be totally overridden? We note the Setting Study may form the basis of an SPD. It should and it should be now, not in the future.

The trouble with all policies currently and possibly those to be adopted is, if they stand in the way of development or regeneration, pet projects and architectural whims, they will be tossed aside or circumvented. Patrick Abercrombie had it right, unique Bath is. Unique because it is the only city in Britain that was not an administration centre but a leisure centre. Unique because it has 'Bathness' His vision may have been flawed in places but if in places the more acceptable elements had been completed we would have had a cohesive whole to match the planning of Edinburgh new town. Unfortunately the sack of Bath saw the end of any unity that remained so what exists is a puzzle with a number of pieces missing, though what the entire picture was is still evident. .The persistent fear is the remaining pieces will be reshaped to enable the new but the new will not fit with the old and gradually the original picture is lost. So too will be the Outstanding Universal Value that Justifies WHS status. Preserving a few of John Wood’s buildings and a Victorian interpretation of what a Roman Baths looked like is never going to be sufficient to satisfy UNESCO and is unlikely to attract a sufficient number of tourists.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\14

Respondent: The Bath Society

Representation 2.32 is concerned with the setting of the World Heritage Site (WHS) beyond the designated boundary.

(soundness): The UNESCO Report on Bath referring to the issue of protection of the landscape setting of the WHS states "the State Party should reinforce protection of the views to and from the City of Bath and of the attributes bearing the Outstanding Universal Value." It is not clear if the WHS Setting Study is concerned only within the designated boundary or whether it would be extended to include to area outside the boundary deemed to be necessary to protect the setting of the WHS.

Change sought to 2.32. To protect the WHS beyond the designated boundary a defined (mapped) protection zone, the **make sound:** buffer zone, completely surrounding the WHS should be established to form part of the Policy B4. The buffer zone should have an equal measure of protection of the WHS as within the designated boundary. If the Setting Study is eventually turned into a Supplementary Planning Document it should be as effective in its function as a protection to the WHS.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.33

Reference: 101\3

Respondent: Mr Robin Sales

Representation 2.33 proposes that buildings can be in the georgian style only in exceptional circumstances. This will

(soundness): lead planning officers to reject, out of hand, planning applications that are well designed and appropriate.

Change sought to 2.33 "New buildings should not necessarily be in the Georgian style"

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\18

Respondent: Federation of Bath Residents' Associations

Representation Para 2.33 (p53)(WHS Architecture styles)

(soundness): FoBRA supports this wording on architecture styles, though there is a delicate balance to be struck to avoid sins evident in (for example) central Birmingham and Bristol. Most important is to get the scale right – height and massing. Exact but modern copies can be the right approach to infill existing set-pieces.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\108

Respondent: Bath Heritage Watchdog

Representation 2.33 This is probably the most interesting set of words thus far as it sets out the underlying thinking in

(soundness): plain English. There is a two way approach of responding to this. We would agree that responding to context is correct but then point out how much that is recently proposed utterly fails to do this. It is important that examples of this are provided as style is the most contentious of the issues when it comes to new development. Design and aesthetics are subjective but the one view must not prevail over the other. Look at the planning permissions given:

- The Holburne. A ceramic box on a classically proportioned stone building.
- The Bus Station. A steel and glass drum replacing a perfectly sound Neo-classical structure.
- The Dyson Academy. A glass palace towering over an all-but-demolished Heritage asset.

- The Western Riverside. Still the biggest threat and one that provoked the UNESCO mission. Vast blocks of what are termed 'Bar Code Architecture'.
- Southgate. Overwhelming 'pastiche' which despite the architect's best efforts fails because it does not respond to context or proportions.
- Hayesfield School. In another location perhaps acceptable, but not conforming to the local context. The council's specialist officers opposed it.

These are some of the biggest offenders and we almost sound like a broken record repeating the list. But until it appears someone is listening and prepared to take notice, on the turntable it stays.

Recent proposals include the construction of a college building clad in black zinc. Paragraph 2.33 says the development should add a new layer to the earlier accumulations, but it should be pointed out that later periods built in a style of the past in order to present a appearance of unity. Even Abercrombie in the mid 1940s, with the exception of bus and rail stations, promoted neoclassical. We note the reference to the authentic Georgian Product, but even the UNESCO Mission commented on "Georgian" buildings that were in fact Victorian, so the definition is by no means as clear cut as the wording suggests. Let us also not forget that the council pulled down vast tracts of authentic Georgian artisan buildings justified (as the records of the time show) by the excuse that there were no authentic Georgian artisans to live in them. Most of the buildings that are currently unloved are from this period. Whilst we appreciate the aim to not preclude the restoration of set pieces we feel there is little real willingness to do this. There have been opportunities taken to do this, and more will no doubt come forward, but what we see is more of the repetitive architecture, uncharacteristic of Bath in scale and proportion, as prompted by the designs for the Western Riverside. Now the council has a weapon in the shape of the Vienna Memorandum they seem determined to use it or more particularly one phrase in it which does not advocate pseudo historical. It should be remembered "contemporary architecture" is over a 100 years old and some is now historical. The important bits of the memorandum about height, scale, massing, roofscape and respecting and reflecting the historical form are not mentioned; nor is the sage advice about materials and setting. If the Vienna Memorandum is to be mentioned in the Core Strategy, it is relevant in its entirety, and not selectively quoted (which is about as relevant as someone taking a test drive in a car and then only describing the comfort of the seat).

We noted at a recent seminar that in one of Europe's great classical cities no classicists were present, and how a large number of proposals and developments were being given to just one local firm.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\8

Respondent: Stubbs Rich LLP

Representation B2/2.33 I strongly support the endorsements of UNESCO'S Vienna Memorandum on the **(soundness):** appropriateness of high quality contemporary arachitecture as being the correct response to the excellence of the historic city.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.34

Reference: 227\12

Respondent: London Road Area Residents Association

Representation We are concerned that the Building Height Strategy may not include other matters which could have a
(soundness): detrimental effect on the Outstanding Universal Value of the World Heritage Site, if new buildings are not seen in the context of their location eg form, mass and scale.

Change sought to make sound: As outlined in 6b above - issues of form, mass and scale of developments as well as the context in which they are situated should be included in para 2.34-35 not just height.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\109

Respondent: Bath Heritage Watchdog

Representation 2.34 If a building heights strategy has been prepared it should be enshrined in the local plan and Core
(soundness): Strategy. The Seville meeting of the World Heritage Committee recommendations warned against the creation of new barriers, and exaggerated heights based on floor to ceiling heights designed to incorporate suspended ceilings and service runs or structures. Accommodating offices and shops are the prime cause of this. Massing and bulk should be of equal importance.
2.35 Decisions should not be made based on height alone. Scale, massing and bulk and roofline are all considerations. The Vienna Document (in its entirety) would make a good starting point. If a basic design code or strategy was commissioned and agreed with all parties and stakeholders (which must include UNESCO or its UK agent ICOMOS-UK) incorporating the aims of the memorandum a lot of future conflict could be avoided.

A common misconception is that everybody wants Georgian style buildings and nothing else. Above all we want buildings that belong in the scale and proportion of Bath and of such quality and materials that they are worthy additions to the city. Seven Dials is a good example: it is not a pastiche of anything else, it is not like any other building in Bath, but it blends in beautifully. If one architect can design something like that, it is not unreasonable to expect others to do so.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy B4: The World heritage Site and its Setting

Reference: 73\1 S

Respondent: Newton St Loe Conservation Group

Representation In relation to Policy B4 [World Heritage Site] it is not clear how HE1 of PPS5 would affect
(soundness): applications by developers to build on green field sites on the green belt SW of Bath, especially when they may be promoting sustainable living design with potential climate change mitigation.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 99\1

Respondent: Mr Robert Bargery

Representation The Georgian Group has reservations about the wording of paragraph 2.33, supporting Policy B4.
(soundness):

“2.33 New development, whilst responding to its context, should add a 21st Century layer to the accumulation of Medieval, Georgian, Victorian and 20th Century buildings that comprise today’s city. This will also ensure that the city’s Georgian architecture is the authentic product of its time and is not

confused with modern reproductions. In exceptional circumstances, new buildings may appropriately be designed in the Georgian style. This would principally be to reinstate a 18th Century Georgian set piece where part of the formal architectural ensemble has been destroyed. This approach is in accordance with UNESCO's Vienna Memorandum on 'World Heritage and Contemporary Architecture – Managing the Historic Urban Landscape' (May, 2005)."

There is a problem of tautology here. Twenty-first century development will ipso facto add a twenty-first century layer; as a product of the twenty-first century, it cannot do otherwise, by definition. It is in our view futile to agonise about whether it is 'of its time', or looks different from what has gone before. The draft refers to the 'Georgian style', but what is actually meant is the Classical style, a universal and trans-historical language of architecture that belongs no more to the Georgian era than to any other. It is authentic to every age that uses it and the twenty-first century is no less entitled than any other to borrow it from Antiquity and to add its own distinctive inflections. The twentieth century did exactly this in Bath: witness the Guildhall extension by John Brydon or the recently-listed 1920s Post Office in New Bond Street, by HM Office of Works, neither of which 'confuses the original with modern reproductions'.

Since Bath was very largely built in the Georgian period, Classicism is the predominant architectural language. As a result, the city has remarkable homogeneity and (not incidentally) elegance. This is its principal asset - one that needs protecting, assiduously. This homogeneity means that the city is in toto a formal architectural ensemble and that what is described in the draft as 'exceptional circumstances' in which the 'Georgian style' may be used are in fact the rule. The Royal Crescent and The Circus are exclamation marks within a composition (the unity of which is made evident by Bath's topography, which affords various vantage points from surrounding hills). It would be gratuitous, and destructive of Bath's special qualities, to encourage the introduction into this carefully-contrived composition of wilfully different architectural styles, just because they appear to be up to date. They will go out of date, and appear discordant, very quickly. The Southgate shopping centre is a case in point: modish when built in the 1970s but disastrous in its planning and aesthetic effect (especially when viewed from Beechen Cliff) and now demolished. Once we understand that the whole of Georgian Bath is a unified architectural ensemble, it follows that what the draft calls the 'Georgian style' is appropriate for use generally, throughout the city, and not just to plug holes in terraces. That is a defensible standpoint. What is not defensible, in our view, is to treat Bath as though it were a city with a tradition of architectural pluralism and actively to encourage discordant materials and treatments such as glazed facades, or any other architectural approach that might on a superficial analysis be deemed to belong to the twenty-first century.

This is true regardless of what may or may not be advocated by Unesco, an organisation that has no formal role or authority in the United Kingdom planning system. It is, however, instructive to note the negative view taken by Unesco when 'contemporary' architecture is actually built in the immediate context of a United Kingdom World Heritage Site. Very rightly, it has expressed dismay at the diminishing effect on the Tower of London of the glazed office blocks that now surround it and in 2006 it seriously considered placing the Tower on the Heritage in Danger list as a consequence. The fact that these blocks are designed by architects who would conventionally be regarded as contemporary masters - Lords Foster and Rogers - is in the final analysis neither here nor there. They still do huge violence to the setting of the Tower, partly because of the discordance they introduce by ignoring their context and partly because it is in their nature as glass buildings to reflect natural light during the day and bleed artificial light from dusk onwards, thus severely damaging the ambience of the World Heritage Site.

Change sought to There is a serious risk that Policy B4 will promote a similar state of affairs in Bath, we therefore
make sound: recommend very strongly that it is not adopted in its current form.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 128\4 S

Respondent: Ms Margaret Dunn

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 134\4 S

Respondent: Mr and Mrs May

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 135\4 S

Respondent: John and Sheila Deuch

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 136\4 S

Respondent: Mrs B. Hobbs

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 143\3

Respondent: Bathampton Parish Council

Representation (soundness): The reliance on a criterion-based policy with its operation as explained in paragraph 2.32 is unsatisfactory. In our view there is an over-riding need to preserve the character of the setting of the World Heritage Site. This is particularly so where it is in immediate proximity to open land of high quality in planning terms, notably east of Bath where the open undeveloped Avon valley bottom affords outstanding visual contrast and is largely in the Green Belt and/or Cotswold AONB. The unique visual characteristics of this area, both in its own right as a cherished landscape of high quality and in its function as part of the setting of the WHS merits geographical designation as a buffer zone which should extend from the edge of the built-up area to the arc of ridge lines at the summits of the rising land surrounding Bath on three sides. Such geographical expression, in diagrammatic form in Diagrams 4 and 5 and eventually in the WHS management Plan as an SPD, is essential and would acknowledge that the WHS and its open buffer are together an integral part of the local landscape.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 149\4 S

Respondent: Jean

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 150\4 S

Respondent: Mr and Mrs Awebb

Representation (soundness): In particular I support and find sound: The protection of the World Heritage Site and setting.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 153\2

Respondent: Claverton Parish Council

Representation (soundness): The Parish Council welcomes the Policy B4 statement that "Proposals which would harm the Outstanding Universal Values of the City of Bath World Heritage Site, including its authenticity and integrity, or which would harm the setting of the World Heritage Site will be refused"

However, the Parish Council does not consider that Policy B4 and its operation, as set out in paragraph 2.32, will protect the landscape setting of the World Heritage Site (WHS) against inappropriate development. The Parish Council considers that the Policy needs to be strengthened and has the following comments.

(a). Paragraph 2.31 (page 52) identifies "the green setting of the City in a hollow in the hills" as being part of the OUV of the Bath WHS and paragraph 2.32 goes on to state that "The setting of the WHS, beyond its designated boundary, is also important as inappropriate development here can impact upon the site itself"

"The green setting of the City in a hollow in the hills" does not just relate to those hills which look down on the city centre but to the whole landscape which surrounds the WHS. The Parish Council considers that this aspect is frequently misrepresented or misunderstood and the Policy should be amended accordingly.

(b). The evidence base for proposing Policy B4 as the preferred option for protecting the landscape setting is incomplete and misleading.

1. The Core Strategy Spatial Options Document - Consultation Report states only that there was "A large body of support for the preferred policy approach for protection of the WHS setting heralding it as a far more pragmatic and workable policy and more in line with the emerging national policy approach". The report omits the many comments and recommendations from Claverton Parish Council and a number of other parish councils and organisations, e.g. Bath Preservation Trust, that disagreed with B&NES's preferred criterion-based policy approach (Option 2) and recommended a buffer zone (Option 1).

Bath and North East Somerset's Core Strategy – Publication Stage Representation Form
6b continued

2. There is no mention of the recently endorsed Bath WHS Management Plan (2011-2016). This important document also identifies the buffer zone and landscape setting as a key priority (closely matching a recommendation from the 2008 UNESCO Bath Report) and the need to continue to explore ways to preserve the setting of the Site.

In the WHS Management Plan, under the objective - "Ensure that landscape & natural elements of the

Site & its setting, including heritage sites & their associated remains, are protected, acknowledged, understood & managed alongside the Site” the action - “Continue to monitor the effectiveness of existing setting protection & consider the necessity of applying a formal buffer zone” - has been identified.

There is, therefore, no consistency between the Core Strategy and the WHS Management Plan regarding a buffer zone and protection of the WHS landscape setting.

(c). The description of the landscape setting of the WHS, as set out on page 52 paragraph 2.32, is inadequate. It fails to highlight the fact that the WHS is surrounded by Green Belt and the Cotswolds AONB on its north, east and southern boundaries. Bath is unique in being the UK’s only complete city to be designated a WHS but its landscape setting is also exceptional and key to the city’s inscription as a WHS.

An additional concern is that, while the title of section 2e (pages 52 & 53) is “The World Heritage Site and its setting”, there is no depiction of the juxtaposition of the two, only an illustration of the cityscape. Recognition of the inextricable link between the WHS and its landscape setting needs to be enhanced.

(d). Page 52, paragraph 2.32 states that “The WHS Setting Study provides the background information needed to assess any potential impacts and provides an impact assessment framework to form the basis for assessing the potential impact of a development on the OUVs. The Setting Study will be used to guide decision making affecting the WHS setting and may form the basis of a future Supplementary Planning Document (SPD)”.

The Parish Council considers that the capacity of the WHS Setting Study to guide decision making affecting the WHS setting is overstated.

It is also concerned that, not only was this study published by B&NES without being put out for public consultation, but is now being considered as the basis of a future Supplementary Planning Document.

(e). WHS landscape setting considerations have also been brought into sharp focus in the June 2008 UNESCO Bath report and the July 2009 DCLG Circular on protection of World Heritage Sites.

The UNESCO report states that - “With regard to the protection of the property, the mission recommends that the State Party act on the reinforced protection of the surrounding landscape to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property”.

The DCLG Circular highlights that WHS landscape setting considerations are a “key material consideration” and the impact of a development should be afforded significant weight. It states - “The UNESCO Operational Guidelines (paragraph 104) suggest the designation of a buffer zone around the World Heritage Site wherever this may be necessary for its conservation. A buffer zone is defined in the guidelines as an area surrounding the World Heritage Site which has complementary legal restriction placed on its use and development to give an added layer of protection to the World Heritage Site...”

The message is clear; additional measures are required to reinforce protection of the WHS landscape setting. However, there is nothing in Policy B4 to address this concern.

Bath and North East Somerset’s Core Strategy – Publication Stage Representation Form
6b continued

(f). It is unclear why Policy B4 highlights PPS5 Policy HE1 (Heritage Assets and Climate Change) when it is evident that all PPS5 Policies are relevant to the WHS and its setting, e.g. Policy HE10, and are material considerations which must be taken into account in all development management decisions.

It is clear that these policy guidelines are open to a high degree of interpretation. Recognising that the City of Bath WHS and its high quality landscape setting is a unique heritage asset it is, therefore, imperative that Policy B4 attempt to remove any ambiguity in interpretation of PPS5 or other relevant guiding policies.

The Parish Council considers that a geographically defined buffer zone would alleviate this ambiguity and provide the higher level of protection which is needed to prevent inappropriate development in the landscape setting of the Bath WHS.

Change sought to make sound: The following changes are recommended, in order to make Policy B4 sound –
1. Paragraph 2.31 should be explicit and clarify the phrase - “the green setting of the City in a hollow in the hills” - along the lines described in 6b (a).
2. The Core Strategy Spatial Options Document - Consultation Report should be amended to provide a balanced summary of the consultation representations regarding the two options for protecting the

setting of the World Heritage Site.

3. Reference should be made to the Bath WHS Management Plan (2011-2016) and, in line with the action identified in this Plan; a statement should be added, setting out B&NES' commitment to studies which will assess the designation of a formal buffer zone around the WHS.

4. Reference should be made to the fact that all PPS5 Policies are (a) relevant to the WHS and its setting and (b) material considerations which must be taken into account in all development management decisions.

5. Paragraph 2.32, or a new paragraph, should be explicit about the important characteristics of the WHS landscape setting, i.e. Green Belt, Cotswolds AONB, Conservation Areas, Scheduled Ancient Monuments and Historic Parks and Gardens

6. Page 52 should include an illustration which depicts the extent of both the WHS and its Green Belt/AONB landscape setting.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 162\6

Respondent: Batheaston Parish Council

Representation We find the reliance on a criterion-based policy with its operation as explained in paragraph 2.32

(soundness): unsatisfactory. In our view there is a paramount need to preserve the character of the setting of the World Heritage Site. This is particularly so where it is in immediate proximity to open land of high quality in planning terms, notably east of Bath where the open undeveloped Avon valley bottom affords outstanding visual contrast and is largely in the Green Belt and/or Cotswold AONB. We consider the unique visual characteristics of this area, both in its own right as a cherished landscape of high quality and in its function as part of the setting of the WHS merits geographical designation as a buffer zone which should extend from the edge of the built-up area in the Avon valley bottom to the arc of ridge lines at the summits of the rising land surrounding Bath on three sides. Such geographical expression, in diagrammatic form in Diagrams 4 and 5 and eventually in the WHS management Plan as a DPD, is essential and would acknowledge that the WHS and its open buffer are an together integral and visually striking part of the local scene.

Change sought to (i)On Diagram 5 and Diagram 20 diagrammatically show a Buffer Zone around the World Heritage Site.

make sound: (ii)In paragraph 2.32 and paragraph 6.58 add text references to a geographically-defined Buffer Zone around the World Heritage Site.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 208\2 S

Respondent: Brian C Tanner

Representation Both my wife and I are resident in Bath and North East Somerset and we are writing to register out

(soundness): joint support for the revised Draft Core Strategy which is currently under discussion.

This is Indeed an important document and the forward confirms that this will enable the Council to shape the physical change within the Bath and North East Somerset Council. The Draft Core Strategy provides the strategic policy to guide the change for the development and the use of the available land for the next 15 years until the year 2026

In particular I commend the Strategic Document for the following proposals:

2.0 It is important that BANES Council ensure that the sovereignty of Bath as a World Heritage Site is protected for the benefit of Generations to come.

I trust that these comments are helpful in your deliberations.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\7

Respondent: Duchy of Cornwall

Representation (soundness): The Duchy of Cornwall is has significant concerns about the wording of paragraph 2.30, supporting Policy B4, which currently states that, “2.30 New development, whilst responding to its context, should add a 21st Century layer to the accumulation of Medieval, Georgian, Victorian and 20th Century buildings that comprise today’s city. This will also ensure that the city’s Georgian architecture is the authentic product of its time and is not confused with modern reproductions. In exceptional circumstances, new buildings may appropriately be designed in the Georgian style. This would principally be to reinstate a 18th Century Georgian set piece where part of the formal architectural ensemble has been destroyed. This approach is in accordance with UNESCO’s Vienna Memorandum on ‘ World Heritage and Contemporary Architecture –Managing the Historic Urban Landscape’ (May, 2005). ”

The above paragraph is tautologous: any twenty-first century development can only add a twenty-first century layer to the city: i.e. it is not a self-conscious decision to do so, or otherwise.

The Classical language of architecture, which was used during the Georgian period, is a design language, the origins of which come from Antiquity. From that time onwards it has shown itself capable of adaptation and change, enabling each generation and age to express itself within the overarching continuity of a living, evolving architectural tradition. It is not simply a method of design that was confined to one historical period.

Bath is a particularly fine showcase for this rich and evolving tradition with buildings not only from the Georgian age, but from many other periods too, including the twentieth century: for example John Brydon’s extension to the

Guildhall and his buildings around the Roman Baths and, more recently, the Southgate development by Robert Chitham of Chapman Taylor. Each addition to the fabric of the city is inescapably “the authentic product of its time” and is distinctive from buildings designed by other hands and at other times.

The predominant classical style of buildings within the city has given Bath a remarkable homogeneity. Furthermore, the consistency of application of this design language has resulted in a clear architectural hierarchy which has been reinforced by each generation of classical buildings: there is absolutely no reason today why this tradition, which has shown itself capable of adaptation and extension over two millennia, should not be as “authentic” today as it has been in any other period. Indeed, if Bath is to maintain its distinctive character, high quality, literate classical designs should be encouraged for the mainstream fabric of the expanding town with other styles used in exceptional circumstances – not the other way around. Encouraging new buildings designed in aggressively Modern styles and with materials that do not originate from the locality will result in discordant quarters of the town that will erode rather than reinforce the very special qualities of the city.

UNESCO has no formal role or authority in the United Kingdom planning system. We understand that the Vienna Memorandum referred to may have been given greater weight in Bath as its author was the UNESCO inspector who came to assess the state of Bath WHS. However the Vienna Memorandum itself has no status in the UK: furthermore, its shortcomings have been acknowledged by UNESCO which is presently working on the wording of a revised document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\33

Respondent: Bath Preservation Trust

Representation (soundness): Core Strategy is not legally compliant: We believe that B&NES as manager of a World Heritage Site responsible to the 'State Party' (Her Majesty's Government) do not have a choice about providing a buffer zone for the City. UNESCO guidance is quite clear: the text from the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO, 2008), states that 'Wherever necessary for the proper conservation of the property, an adequate buffer zone should be provided' (para 103). We would contend that since the Landscape Setting is part of the description of the Outstanding Universal Values, and that currently, as the Core Strategy notes, there is no specific protection to the landscape setting of the WHS in place, a buffer zone is required.

The Council's landscape setting work has identified and mapped the topographical, historical and visual aspects of the setting. Since these are mapped it should be possible to define a flexible boundary with sufficient character description to provide a framework which can be used practically.

The Core strategy document implies that the buffer zone is an area where measuring the impact on the WHS 'is considered'. However, the UNESCO Operational Guidelines are explicit in seeking planning restrictions in a buffer zone, as follows:

For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection. The area constituting the buffer zone should be determined in each case through appropriate mechanisms. Details on the size, characteristics and authorized uses of a buffer zone, as well as a map indicating the precise boundaries of the property and its buffer zone, should be provided. A clear explanation of how the buffer zone protects the property should also be provided. Where no buffer zone is proposed, the nomination should include a statement as to why a buffer zone is not required. Although buffer zones are not normally part of the nominated property, any modifications to the buffer zone subsequent to inscription of a property on the World Heritage List should be approved by the World Heritage Committee. [paras 104-8].

This concept of restriction, or added layer of enforceable protection, is confirmed by the WH Circular, which states that local planning authorities should aim to satisfy the following principles:

- protecting the World Heritage Site and its setting, including any buffer zone, from
- inappropriate development
- striking a balance between the needs of conservation, biodiversity, access, the
- interests of the local community and the sustainable economic use of the World
- Heritage Site in its setting
- protecting a World Heritage Site from the effect of changes which are relatively
- minor but which, on a cumulative basis, could have a significant effect
- enhancing the World Heritage Site where appropriate and possible through
- positive management
- protecting World Heritage Sites from climate change but ensuring that mitigation is not at the expense of authenticity or integrity.

The Circular adds that it will be necessary to enshrine the designation and its accompanying policies in LDF documents. We regard this as a matter of urgency

Change sought to make sound:

Representation (legal compliance): We believe that B&NES as manager of a World Heritage Site responsible to the 'State Party' (Her Majesty's Government) do not have a choice about providing a buffer zone for the City. UNESCO guidance is quite clear: the text from the Operational Guidelines for the Implementation of the World

Heritage Convention (UNESCO, 2008), states that 'Wherever necessary for the proper conservation of the property, an adequate buffer zone should be provided' (para 103). We would contend that since the Landscape Setting is part of the description of the Outstanding Universal Values, and that currently, as the Core Strategy notes, there is no specific protection to the landscape setting of the WHS in place, a buffer zone is required.

The Council's landscape setting work has identified and mapped the topographical, historical and visual aspects of the setting. Since these are mapped it should be possible to define a flexible boundary with sufficient character description to provide a framework which can be used practically.

The Core strategy document implies that the buffer zone is an area where measuring the impact on the WHS 'is considered'. However, the UNESCO Operational Guidelines are explicit in seeking planning restrictions in a buffer zone, as follows:

For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection. The area constituting the buffer zone should be determined in each case through appropriate mechanisms. Details on the size, characteristics and authorized uses of a buffer zone, as well as a map indicating the precise boundaries of the property and its buffer zone, should be provided. A clear explanation of how the buffer zone protects the property should also be provided. Where no buffer zone is proposed, the nomination should include a statement as to why a buffer zone is not required. Although buffer zones are not normally part of the nominated property, any modifications to the buffer zone subsequent to inscription of a property on the World Heritage List should be approved by the World Heritage Committee. [paras 104-8].

This concept of restriction, or added layer of enforceable protection, is confirmed by the WH Circular, which states that local planning authorities should aim to satisfy the following principles:

- protecting the World Heritage Site and its setting, including any buffer zone, from
- inappropriate development
- striking a balance between the needs of conservation, biodiversity, access, the
- interests of the local community and the sustainable economic use of the World
- Heritage Site in its setting
- protecting a World Heritage Site from the effect of changes which are relatively
- minor but which, on a cumulative basis, could have a significant effect
- enhancing the World Heritage Site where appropriate and possible through
- positive management
- protecting World Heritage Sites from climate change but ensuring that mitigation is not at the expense of authenticity or integrity.

The Circular adds that it will be necessary to enshrine the designation and its accompanying policies in LDF documents. We regard this as a matter of urgency

Change sought to make legally compliant:

Reference: 224\34

Respondent: Bath Preservation Trust

Representation In relation to the policy B4 itself:

(soundness):

The policy is contained in the first sentence and we support this. However the second sentence should be deleted for the following reasons.

- Core Strategies should not repeat national guidance. This is what this sentence does, to the extent of citing PPS5. This is potentially a 'soundness' issue.
- Climate Change is only one of many proposals which will impact upon the WHS. If practice with regard to climate change is to be cited, then so should the practice with regard to transport schemes, tall buildings, etc.
- Citing of PPS5 within a local policy is unwise, given the government's stated intention to potentially remove all PPS's at an early stage of the plan period.
- Unless there is a robust method of assessment of 'contribution to climate change' there risks being an inequity of treatment of proposals. What if a scheme includes many aspects including some aspects of climate change mitigation? Is it enough to 'promote' a proposal for its claimed mitigation to climate

change? The wording of this sentence potentially introduces ambiguity into the planning process and creates difficulties for development management and developers, instead of providing clarity and direction

Change sought to make sound: Delete second sentence of Policy B4 but insert 'usually' before 'be' at end of first sentence.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\35

Respondent: Bath Preservation Trust

Representation (soundness): Para 2.32 raises the issues relating to a buffer zone. We do not believe that B&NES has a choice in providing a buffer zone for the World Heritage Site: see compliance above.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant: Amend para 2.32 and Policy B4 to refer to the provision of a buffer zone, based on the WHS Setting Study, as required by UNESCO and to be adopted as SPD.

Reference: 224\36

Respondent: Bath Preservation Trust

Representation (soundness): Para 2.33 is a far too limiting and prescriptive design proposition. We understand that the Vienna Memorandum is being revised with a more considered document currently in draft that removes any reference to stylistic prescription. The Council's reliance upon the Vienna Memorandum as an accurate summary of UNESCO's position on this key issue is, therefore, possibly erroneous and is unlikely to last for the duration of the Core Strategy.

Change sought to make sound: Para 2.33: Remove last sentence. Add another sentence: New buildings may be designed in a variety of styles, but should take as their context a deep understanding of the Outstanding Universal Value of the WHS, its authenticity and its integrity. A guidance note may be produced in the context of the placemaking plans. [Note: Bath Preservation Trust has produced guidelines for new buildings in Bath which may be relevant].

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\37

Respondent: Bath Preservation Trust

Representation (soundness): Para 2.34/5; The Buildings Heights Strategy document will only be useful if it is developed into an SPD and publicised widely. Potential developers need to know that policy B4 and the Building Heights Strategy will be applied in practice.

Change sought to make sound: Para 2.3.5 last sentence delete 'has been compiled in such a way that it can be' and insert 'will'.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\38

Respondent: Bath Preservation Trust

Representation (soundness): The Council has the option of declaring an Article 4 Direction in relation to the World Heritage Site to manage developments that individually or collectively would harm Outstanding Universal Value. This should be included in the supporting text.

Change sought to make sound: Further paragraph added to refer to Article 4 Direction in the same way as 2.40.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\11

Respondent: London Road Area Residents Association

Representation i) We agree whole heartedly with the first sentence of Policy B4 where it states that "Proposals which (soundness): would harm the Outstanding Universal Values of the City of Bath World Heritage Site, including its authenticity and integrity, or which would harm the setting of the World Heritage Site, will be refused" . This is welcomed but we believe that para 2.32 is weak and requires stiffening. Specific reference should be made to the WHS Management Plan (2011 – 2016), together with a clearer intention to respect PPS5.
ii) UNESCO's recommendation in their Bath report (2008) that " ...reinforced protection of the surrounding landscape to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value" be provided, is as, or more, important as the UNESCO Vienna Memorandum reference quoted in para 2.33.
iii) The DCLG Circular on WHS protection (2009) clearly states that WHS landscape setting considerations are a key material consideration and quotes the UNESCO message that "A buffer zone is defined in the guidelines as an area surrounding the World Heritage Site which has complementary legal restriction placed on its use and development to give an added layer of protection..."
iv) Unfortunately the second sentence of B4 could encourage unsuitable and potentially damaging applications.

Change sought to make sound: i) Mention of the WHS Management plan (2011 – 2016) should be included, at least, in para 2.31 and preferably also in Policy B4.
ii) Para 2.31/2.32 make much of "the green setting of the City in a hollow in the hills" and the WHS Setting Study but the former is too ill defined and vague and the latter appears to have no teeth. It is probably even more important to mention that Bath's setting is in the Green Belt and the Cotswold's Area of Outstanding Natural Beauty and is visible from the Scheduled Ancient Monument sites of Solsbury Hill and Bathampton Down. Although some of these are Illustrated in Diagram 4, a small map including these features which form the setting of the WHS should be included at page 52.
iii) Just as important should be mention of views out of the city to the surrounding tree clad hillsides which are also a very important part of the setting. Include this in para 2.31 / 2.32
iv) Remove second sentence of B4

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 249\11

Respondent: Royal Mail Group Ltd.

Representation Bath Buildings Heights Study – Evidence Base Document
(soundness): In this supporting document the Bath DO site falls within character Zone 2 – Immediate Setting of The Georgian City for which "the overall (building) height should not be less than or exceed the overall prevailing height of nearby Georgian buildings". Royal Mail considers this to be overly restrictive and not consistent with the guidance on storey height included within the Urban Design led review of Bath City centre sites, which is another supporting evidence base document and therefore could be considered unsound. Qualification of this required in order to address this point.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 257\5

Respondent: Valley Parishes Alliance

Representation WHS buffer zone

(soundness): The reliance on a criterion-based policy as explained in paragraph 2.32 is unsatisfactory. There is a paramount need to preserve the character of the setting of the World Heritage Site. This is particularly so where it is in immediate proximity to open land of high quality, notably east of Bath where the open undeveloped Avon valley bottom affords outstanding visual contrast, is in the Green Belt, and adjoins the Cotswold AONB. The unique visual characteristics of this area, both in its own right as a cherished landscape and in its function as a foil to the WHS merits geographical designation as a buffer zone which should extend from the WHS boundary to the ridge line of the rising land which surrounds Bath on three sides. Such geographical expression in diagrammatic form in Diagrams 4 and 5 and eventually in a precise delineation in Supplementary Planning Guidance is essential.

Change sought to make sound: a. (i) On Diagram 5 and Diagram 20 show diagrammatically a Buffer Zone around the World Heritage Site.

(ii) In Policy B4 after the first sentence insert:

'To meet the requirements of ICOMOS (on behalf of UNESCO) a Buffer Zone where inappropriate development will not be permitted will be prescribed around the boundary of the World Heritage Site area and be incorporated in a Supplementary Planning Document affording guidance about safeguarding the character of the WHS'.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 264\7

Respondent: Englishcombe Parish Council

Representation The failure to include in the Policy proposals for a Buffer Zone around the World Heritage Site of Bath

(soundness): as specified by UNESCO.

Change sought to make sound: Provision within the Core Strategy for a Buffer Zone

make sound:

Representation (legal compliance): This Parish Council regrets the omission in Policy B4 for the proposal to include the Parishes of Combe Hay (part), Englishcombe & Newton St. Loe in the AONB.

Change sought to make legally compliant: Provision within the Core Strategy for a Buffer Zone

Reference: 265\110

Respondent: Bath Heritage Watchdog

Representation Policy B4 The WHS and its Setting In our comments on Section 2e were listed just a selection of recent

(soundness): proposals that the majority feel harm the Outstanding Universal Value of the World Heritage Site, its integrity and authenticity and setting, not necessarily individually but with a cumulative effect. UNESCO will not normally intervene until after the event, because until then there is always room for a change of mind. However they were concerned enough before Western Riverside and the Dyson Academy were built to send a Mission to Bath on the strength of local opinion, and if the problem persists they may do so again. We have repeated before that those with the power to refuse proposals seldom do so and totally ignore Policy As Policy B4 is worded we remain unconvinced the word "harm" will be interpreted in a way that will afford the level of protection it is reasonable to expect, so we propose a revised wording.

Change sought to make sound: Change the wording:

make sound: Proposals which would, in the judgement of ICOMOS-UK, harm the Outstanding Universal Value of the City of Bath World Heritage Site, including its authenticity and integrity, or which would harm the setting of the World Heritage Site will be refused. (Delete the remainder. The carbon footprint of preparing a site and manufacturing the materials subsequently assembled into a development will exceed any climate change benefits attributable to the development in use during its lifetime, so there does not need to be a clause allowing for this policy not to be applied.)

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\15

Respondent: The Bath Society

Representation Policy B4 The World Heritage Site and its setting (2e pp.52-53).

(soundness):

We very much welcome the specific identification of this subject and the policy B4. To us, the Patrick Abercrombie quotation (page 53) says it all!

However the status of the important 'setting study' should be clarified now, as should that of the 'building heights strategy'. Are these to be DPD's or SPD's?

The mass and form of buildings can be just as critical as their height in providing an appropriate 'setting'.

Change sought to make sound: status of setting study and building heights study should be clarified.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 278\5

Respondent: Cotswolds Conservation Board

Representation The Cotswolds Conservation Board supports the "World Heritage Site and its setting" policy as Policy B4

(soundness):

Change sought to make sound:

Representation (legal compliance): The Cotswolds Conservation Board supports the "World Heritage Site and its setting" policy as Policy B4

Change sought to make legally compliant:

Reference: 279\3

Respondent: English Heritage

Representation Policy B4 refers to Outstanding Universal Values in the plural. In UNESCO terminology, the Outstanding

(soundness): Universal Value of a World Heritage property is a unity and should therefore be referred to in the singular.

Bath World Heritage Site Management plan

The Core Strategy should highlight the key features of the management plan and how the Local Development Framework (Core Strategy and/or heritage strategy SPD) will help deliver it.

World Heritage Site buffer

The Core Strategy's response to Circular 07/2009 and the issue of a buffer zone is unclear. We would welcome a meeting to discuss this matter.

World Heritage Site Setting Study

This is an important piece of evidence and will be expected to inform development management decisions. Is there an intention to adopt it as SPD? If so when? It may be appropriate to review the setting study having regard to The setting of Heritage Assets: English Heritage Guidance, consultation draft, 2010.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 280\6

Respondent: Scott Brownrigg

Representation Policy B4 The World Heritage Site and its Setting, page 53

(soundness): We agree with supporting text to this policy (paragraph 2.33) which clarifies that 'New development, whilst responding to its context, should add a 21st Century layer to the accumulation of Medieval, Georgian, Victorian and 20th Century buildings that comprise today's city.'

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 291\13

Respondent: Stubbs Rich LLP

Representation B4/2.34 and policy CP1

(soundness): The Building Heights Strategy must be published for consultation and adapted as a key design criteria guide for the city and policy CP1

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 292\6

Respondent: Bath Avon River Corridor Group

Representation Policy B4 p53 - Insufficient emphasis on the role the qualities that merit WHS status can play in

(soundness): determining the kind of new economy the city and district can develop. It is important to assert this to raise the quality of development sufficiently.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 297\9

Respondent: Bath Rugby Club

Representation Page 53, Policy B4, The World Heritage and its Setting.

(soundness):

We consider the policy wording could be enhanced by the insertion of "overall" between "which" and "would" in the first sentence. This change would allow an overall view to be taken as to the acceptability of proposals. All proposals are likely to have some aspect of their design that may not be entirely acceptable for good reason but assessed as part of the overall approach may be considered acceptable. Recognising this reality in the wording of the policy would be beneficial.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.36

Reference: 265\111

Respondent: Bath Heritage Watchdog

Representation Baths Universities

(soundness): 2.36 to 2.38 Correctly lists and identifies the problems and concerns but in reality the problem has persisted unchecked for too long without taking decisive action, which leaves a difficult legacy to recover from.

Although this area is outwith our remit, some of the issues as mentioned previously do impact on character and setting. We believe a strong signal could be sent by the issuing of a city-wide Article 4 Directive removing Permitted Development rights to convert dwellings into HMOs, and that every effort should be made to tackle the existing problems, possibly by promoting better liaison between landlords and the local authority and university to ensure that appearance of property is maintained. Students should be reminded of the responsibilities to keep a premises tidy either by the university or landlord, as well as some programme of organised clear-up and maintenance work introduced.

Change sought to Include a commitment to introduce a city-wide Article 4 Directive removing Permitted Development
make sound: rights to convert dwellings into HMOs

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.41

Reference: 256\7

Respondent: Councillor Andrew Furse

Representation • 2f, 2.41; specifically states 'on campus', I maintain that purpose built accommodation does not mean
(soundness): it all has to be on campus.

Councillor Andrew Furse
Liberal Democrat,

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\9

Respondent: Liberal Democrat Group

Representation See comments above to Policy B1, 7a. The option for purpose built accommodation to be built off-
(soundness): campus should not be removed.

Change sought to "Growth beyond 2020 will require additional on and off campus capacity to be identified. No
make sound: alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period".

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy B5: Strategic Policy for Bath's Universities

Reference: 2\1

Respondent: Chris Beezley

Representation The Core Strategy Paper (para.2.38) refers to Information Paper 3 which states (at para.4.3) that
(soundness): current student numbers at Bath's two Universities account for the demand for approximately 2,150 Houses in Multiple Occupation (HMOs) across the city, i.e. in excess of university-managed accommodation on-campus and elsewhere. This represents one HMO for every 19 residential

properties across the entire city (para.4.3).

Further, at para 2.1, the Information Paper states that the historical average annual growth rate in student numbers at the University of Bath has been 4.82% over the past 15 years. Table 3, however, shows the total University of Bath student population to have increased by 5.9% (from 12,970 to 13,738) between 2008/9 and 2009/10 (the latest actual figures available). Para.2.10 of the Information Paper states that the emerging Masterplan for the University of Bath campus assumes a future student growth rate of up to 3% per annum.

The Information Paper goes on to argue (para.2.12) that only if the future average increase in student numbers at The University of Bath reduces to 2% per annum, and the University builds 2,358 new campus study bedrooms by 2020, will the existing demand for HMOs from University of Bath students (1,196 from Table 3) be likely to remain at current levels.

Para.2.13 of the Information Paper claims that calculations are presented at Appendix X to show the effects of a 3% and a 1% p.a. increase in University of Bath student numbers. These calculations cannot be found. However, my own calculations show that these two scenarios would result in a demand for approximately 300 more and 200 less HMOs respectively, relative to the 2008/9 level (Table 3). Hence it can be seen that the potential demand for HMOs is highly sensitive to small percentage changes in the student growth rate.

Para.4.8 of the Information Paper shows the effect on demand for HMOs of three scenarios for future student growth. These assume zero growth at Bath Spa University combined with zero, 1% and 2% growth at the University of Bath respectively. No figures are provided for a scenario with the University of Bath expanding at 3% per annum - which would be consistent with its draft Masterplan and significantly less than historical levels. Such a scenario would result in the need for 125 more HMOs than the current estimated total number of 2,150, even allowing for a reduction in demand of 175 from Bath Spa University students.

The estimates provided in Information Paper 3 and hence the draft Core Strategy Paper itself assume that the University of Bath will build 2,358 additional campus bedrooms by 2020/21 at a rate of approximately 240 per annum starting next year (2011/12). Yet no mechanism appears to be in place to link future student numbers to any actual building programme. Table 3 shows the number of University of Bath campus bedrooms to have remained static over the last three years while student numbers have increased by approximately 1,000. If this state of affairs is allowed to continue the Core Strategy aspiration that the 2010 level of HMOs (approximately 2,150 from para.4.3) "will represent the high watermark within the city" will be seriously at risk.

Change sought to make sound: 1. Core Strategy Policy B5 (Strategic Policy for Bath's Universities) should include a control mechanism to limit student recruitment to that which is sustainable taking account of the actual quantity of University-managed student bedrooms available at that time combined with a defined acceptable level of HMOs. The Core Strategy Paper should define clearly what that level is. Universities' aspirations to provide large numbers of student bedrooms in future years should not be relied on.

2. The table at para.4.8 of Information Paper 3 should include the scenario in which there is zero growth in student numbers at Bath Spa University and 3% p.a. growth at The University of Bath, in line with the Universities' Masterplans.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 2\2

Respondent: Chris Beezley

Representation (soundness): Core Strategy Policy B5 assumes the development of about 2,000 study bedrooms at the University of Bath and 45,000 sq.m of academic floorspace. However, the extant draft University of Bath Masterplan to 2020, currently seeking B&NES' endorsement, states (p.7) that the target for residential accommodation is 2,400 study bedrooms by 2020 plus 60,000 sq.m of non-residential space. Furthermore, the Masterplan (p.53) claims the need for 300 additional campus parking spaces on the

assumption that the student population will increase at an average rate of 1.55% per annum to 2020. This rate of increase would significantly exceed the assumed delivery of 2,400 campus study bedrooms. Only if a student growth rate of 1% per annum or below were achieved would the claimed “contraction of the student letting market” (Core Strategy para.2.39) materialise, in which case the draft Masterplan should be amended to reflect a very significant reduction in the claimed need for additional parking spaces.

Change sought to make sound: Policy B5 should state that “The strategic policy for Bath’s Universities will be consistent with the agreed Universities’ campus Masterplans, i.e. as formally endorsed by B&NES”.

A formal Student Housing Strategy, agreed between the Universities, B&NES and representatives of local residents, should be incorporated into the Core Strategy to take account of a range of possible future student numbers which are notoriously difficult to predict. Without such a strategy in place there will continue to be little, if any, control of the proliferation of Houses in Multiple Occupation (HMOs) discussed at Core Strategy para.2.37. This suggestion is consistent with the statement at para.2.37 that “The development of new academic space and student accommodation are matters that require policy direction in the Core Strategy”.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\8

Respondent: Federation of Bath Residents' Associations

Representation The Core Strategy Paper (para.2.38) refers to Information Paper 3 which states (at para.4.3) that

(soundness): current student numbers at Bath’s two Universities account for the demand for approximately 2,150 Houses in Multiple Occupation (HMOs) across the city, i.e. in excess of university-managed accommodation on-campus and elsewhere. This represents one HMO for every 19 residential properties across the entire city (para.4.3).

Further, at para 2.1, the Information Paper states that the historical average annual growth rate in student numbers at the University of Bath has been 4.82% over the past 15 years. Table 3, however, shows the total University of Bath student population to have increased by 5.9% (from 12,970 to 13,738) between 2008/9 and 2009/10 (the latest actual figures available). Para.2.10 of the Information Paper states that the emerging Masterplan for the University of Bath campus assumes a future student growth rate of up to 3% per annum.

The Information Paper goes on to argue (para.2.12) that only if the future average increase in student numbers at The University of Bath reduces to 2% per annum, and the University builds 2,358 new campus study bedrooms by 2020, will the existing demand for HMOs from University of Bath students (1,196 from Table 3) be likely to remain at current levels.

Para.2.13 of the Information Paper claims that calculations are presented at Appendix X to show the effects of a 3% and a 1% p.a. increase in University of Bath student numbers. These calculations cannot be found. However, my own calculations show that these two scenarios would result in a demand for approximately 300 more and 200 less HMOs respectively, relative to the 2008/9 level (Table 3). Hence it can be seen that the potential demand for HMOs is highly sensitive to small percentage changes in the student growth rate.

Para.4.8 of the Information Paper shows the effect on demand for HMOs of three scenarios for future student growth. These assume zero growth at Bath Spa University combined with zero, 1% and 2% growth at the University of Bath respectively. No figures are provided for a scenario with the University of Bath expanding at 3% per annum - which would be consistent with its draft Masterplan and significantly less than historical levels. Such a scenario would result in the need for 125 more HMOs than the current estimated total number of 2,150, even allowing for a reduction in demand of 175 from Bath Spa University students.

The estimates provided in Information Paper 3 and hence the draft Core Strategy Paper itself assume that the University of Bath will build 2,358 additional campus bedrooms by 2020/21 at a rate of approximately 240 per annum starting next year (2011/12). Yet no mechanism appears to be in place to link future student numbers to any actual building programme. Table 3 shows the number of University of Bath campus bedrooms to have remained static over the last three years while student numbers have increased by approximately 1,000. If this state of affairs is allowed to continue the Core

Strategy aspiration that the 2010 level of HMOs (approximately 2,150 from para.4.3) “will represent the high watermark within the city” will be seriously at risk.

- Change sought to make sound:**
1. Core Strategy Policy B5 (Strategic Policy for Bath’s Universities) should include a control mechanism to limit student recruitment to that which is sustainable taking account of the actual quantity of University-managed student bedrooms available at that time combined with a defined acceptable level of HMOs. The Core Strategy Paper should define clearly what that level is. Universities’ aspirations to provide large numbers of student bedrooms in future years should not be relied on.
 2. The table at para.4.8 of Information Paper 3 should include the scenario in which there is zero growth in student numbers at Bath Spa University and 3% p.a. growth at The University of Bath, in line with the Universities’ Masterplans.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 146\2 S

Respondent: Ms Alison Evans

Representation (soundness): I also agree that student accomodation should be created on university sites and that this will stop the loss of family homes being used for multiple occupation in areas such as Oldfield Park.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 164\1

Respondent: Peter Marsden

Representation (soundness): Core Strategy para 2.34 acknowledges that the increase in the student population has had an adverse effect on the city’s housing stock and, by inference, on the sense of community in several of the city’s wards. This is seen as a result of a mismatch between student numbers and the provision of dedicated on-campus and in-city accommodation. It is implied that some reduction, however modest, in the number of student HMOs is desirable.

In para 2.35 the Core Strategy is expected to deliver a better balance between the Universities’ aspirations and their interface with local communities and the wider city. Information Paper 3 sets the scene for this. Bath Spa University forecasts no increase in student numbers in the next 10 years, with no prediction beyond that. However, the University of Bath’s draft Masterplan forecasts growth in the number of full-time students of between 1% and 3% in the period to 2020, and it has been slightly in excess of 3% in the two years since the preparation of the Masterplan. Only a full delivery of the Masterplan’s 2358 bed spaces and growth at or below the lower end of forecast would see any reduction in the number of student HMOs. A mid-range increase in numbers would do no more than preserve the status quo. a situation which is seen by many, and by inference by the Council, as unacceptable. Therefore the Policy as currently drafted stands every chance of being ineffective.

Change sought to make sound: Policy B5 should be much clearer in its aims and more proactive in its intentions if it is to achieve the policy direction expressed in para 2.34. It should define an acceptable number of student HMOs, bearing in mind the need for affordable housing in the non-student market, and set out a framework agreed by all stakeholders, including local communities, to achieve this. To this end the number of student bedrooms to be developed on the Claverton Down campus (“about 2,000”) should more accurately reflect the draft Masterplan’s figure of 2,358. Policy GDS.1/B11 of the Local Plan should similarly be updated.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\39

Respondent: Bath Preservation Trust

Representation Both Universities in Bath have detailed campus development plans already in place and it is unclear
(soundness): whether the Core Strategy reflects or cuts against these plans.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 224\40

Respondent: Bath Preservation Trust

Representation The refusal of off campus student accommodation 'where it would adversely affect realisation of other
(soundness): aspects of the vision' is open to much interpretation and potential risks. We assume it relates to land use on the Upper and Lower Bristol Road's and the River corridor. However without any further detail here it leaves this entirely undefined and no certainty as to whether the Universities have any prospect of developing off campus student housing. Since both campuses are restricted in their internal capacity to develop outwards, due to Green Belt/AONB considerations, this may limit the scope of improving the HMO problem referred to in para 2.37. We do not believe that a policy couched in these terms is defensible.

**Change sought to
make sound:** Make more explicit the reference to off campus student accommodation strategic policy in order to identify how this might adversely affect the other aspects of the plan e.g.
'by use of land in the clearly defined western corridor/central area identified for other uses'

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 264\5

Respondent: Englishcombe Parish Council

Representation This Parish Council fully supports Policy B5. Currently one in twenty dwellings in Bath are classified as "
(soundness): Houses in Multiple Occupation", with the major proportion being occupied by students.

The result is that locations such as Oldfield Park virtually cease to be communities and houses which otherwise would be ideal for first time buyers are priced at a level way above that justified if the property were to be occupied by a single family, by virtue of the high rental income potential as student accommodation.

These houses were originally designed to be affordable single family housing and they should be returned to this use, by whatever means are necessary, in the shortest time possible.

We believe that the Universities have been negligent in expanding student places without providing sustainable accommodation and that it should be incumbent upon B&NES to insist on proper planning for student accommodation by the Universities.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\112

Respondent: Bath Heritage Watchdog

Representation Off Campus Student Accommodation This element sounds completely negative as written. There must
(soundness): be a preference for purpose build accommodation over the continued erosion of housing stock to make HMOs. Therefore a revised wording is proposed.

Change sought to Suggested rewording:

make sound: Proposals for purpose built student accommodation will be permitted where it meets a need for such accommodation and is in a location that does not conflict with other strategic policies and is in a style and scale that does not harm the Outstanding Universal Value of the City of Bath. Proposals to convert existing residential accommodation into student accommodation will be refused unless it can be shown that the benefits outweigh the loss of general housing stock.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 266\16

Respondent: The Bath Society

Representation We are pleased to note that the Draft Core Strategy recognises the growing issue of student

(soundness): accommodation, especially that off-campus within the City, We support Policy B5 in relation to the Bath Spa Newton Park Campus and the Green Belt.

However, should a similar reference to no further incursions into the Green Belt not also be included in the University of Bath Claverton Down Campus statement ?

2g Infrastructure & delivery (pp.56-57)

Whilst we welcome the City-specific detail about these matters contained in this little sub-section, we are concerned that what little is said about transportation in the document overall, is more or less limited to just three paragraphs, plus Table 5, here (page 57). We note that all the main elements of the £54million 'Bath Transport Package' are listed here, but remain unconvinced that all are needed in order to 'enable the programme of development set out in the spatial strategy...' (para 2.45) and, in particular, the segregated bus route in Newbridge. We also have serious concerns about the siting of the new eastern park and ride on Bathampton Meadows.

The 'lonely' four lines of text on rail transport (para 2.46) indicate that opportunities for further fixed rail contributions to public transport in BANES in general, and Bath in particular, have been side-lined. We would fully support the Authority in pressing any case for further investment in rail infrastructure and services.

See our detailed representations on transport policy

It is of some concern that certain documents, said to supplement or relate to the Draft Core Strategy itself, and being large and requiring time to study, have only been published at the start of what is a relatively short consultation period. Eg. Flood risk assessment material. See our detailed representations on this subject.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 279\4

Respondent: English Heritage

Representation Policy B5 relating to Bath Spa University should include a caveat as follows "...should seek to optimise

(soundness): opportunities...and having regard to sites environmental capacity and the significance of the heritage assets".

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 292\7

Respondent: Bath Avon River Corridor Group

Representation Policy B5 p54 - No recognition at all that as a key driver of a future district economy there will be space, **(soundness):** facilities and workspace management needs for new economy and research roll-outs from the Universities that the Strategy needs to recognise whose optimum location will be crucial to achieving the ambitions of the Strategy. The ability to prioritise such sites against a Spatio-temporal economic model is crucial to resist competing claims in a high value location.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\8

Respondent: Liberal Democrat Group

Representation Policy B5

(soundness): See comments above to Policy B1, 7a.

Change sought to make sound: "University of Bath – Claverton Down Campus

make sound: "The strategy seeks the development of at least 2,000 study bedrooms at the Claverton Down campus alongside about 45,000 sq.m of academic floorspace. Policy GDS.1/B11 of the B&NES Local Plan has been saved as part of the LDF".

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 304\1

Respondent: Bath University

Representation UNIVERSITY OF BATH: CORE STRATEGY REPRESENTATION

(soundness): Policy B5

General Comments

1. The University of Bath (the University) welcomes the good progress Bath & North East Somerset Council (the Council) is making with the preparation of the Draft Core Strategy (DCS). This document is critical in terms of setting out the long term spatial vision for the area, and will play a key role in guiding future development in and around the City.

2. The process that the Council has been through in the preparation of the draft DCS appears robust, and the draft DCS's provisions generally reflect the objectives and policies of national planning policy statements (PSS). In particular, we welcome the recognition of the importance of the University to the city and wider area. We consider the DCS to be sound in that its provisions are generally justified, effective, and conform with national policy.

3. The University does have some specific concerns with Policy B5 of the DCS. However, those concerns do not go to the heart of the DCS, and can be relatively easily addressed through minor amendments as highlighted below. The University is of course very willing to assist the Council in taking the DCS forward, including the provision of data to inform the evidence base that underpins it.

The University

4. The University has been located in Bath since 1965, and has grown from being a small institution with around 5,000 students to a world class university with over 14,000 students and around 2,600 staff. Today the University plays a significant role in the city and wider area in terms of its academic offering and contribution to economic development and social well-being. 5. The University ranks highly in the league tables of UK universities published by a number of national newspapers. It is a research-intensive university with a reputation for academic excellence in both research and teaching and has a track record of working in partnership with business, the public services, and the voluntary sector. It

specialises in the STEM subjects, science, technology, engineering and mathematics, supporting the UK's knowledge-based economy. It is also recognised as a sector leader in technology transfer.

5. Consequently, the University attracts the most able staff, researchers and students from the global Higher Education recruitment market who interact with the business community in a mutually sustaining manner, encouraging innovation and enterprise. This assists the area's economic development through the creation and growth of knowledge-based, high value-added companies

6. Moreover, the University brings many wider economic benefits to the area. Not only is it a major employer in itself with around 2,600 staff, it is estimated that each full-time student spends over £4,000 per annum, amounting to some £48 million for approximately 12,000 full-time equivalent students. The University of Bath has estimated its current economic impact on the City of Bath to be approximately £150 million per annum. The University of Bath has a turnover in excess of £185 million at 2011.

7. The University also provides access for the local community to world-class sports, social and recreational facilities on the campus, and interacts further with the community through outreach activities, including mentoring schemes with local schools, and students' fundraising and volunteering activities.

The Future

8. The Government's policy on Higher Education provision is rapidly evolving, notably in respect of student funding and social mobility. The implications for the University, and the Higher Education sector more generally, will become clear over the next few years. In the first instance, the University is awaiting sight of the new White Paper on Higher Education which is due to be published in the next couple of months. What is apparent, however, is that the University needs to continue to strive for teaching and research excellence in an increasingly competitive market, whilst also ensuring long term financial sustainability. To this end, it will have to continue to meet the expectations of its students, which are likely to rise as tuition fees increase.

9. Central to that is the continued effective management and development of the University's estate, through continued investment in refurbishing some of the ageing buildings on the campus and in the creation of new facilities. To that end the University has prepared a Masterplan that demonstrates how further campus development can be achieved whilst enhancing the environment for students, staff and visitors.

10. The Council has a critical role to play in supporting the University to realise these aims and aspirations for the benefit of the area as a whole. Most notably, in terms of the University's estate through the provision of a positive planning policy context that allows the expedient determination of future planning applications for key investments planned and highlighted in the University's Masterplan.

The Core Strategy

11. The University, therefore, welcomes and supports the recognition in DCS Objective 3, Policy B1: Bath Spatial Strategy, and Policy B5: Strategic Policy for Bath's Universities that the spatial strategy should seek to enable the provision of additional teaching and research space and student bed spaces to facilitate the growth of the University, and in doing so encourage economic development.

12. The University also welcomes the saving of adopted Local Plan Policy GDS1/B11, which establishes key development principles for the campus. The policy recognises the need to address the sensitive environmental context without unduly hindering the further development of the University's estate.

13. Policy B5 could sit comfortably together with Policy GDS1/B11 to provide an appropriate policy context for the determination of future planning applications for development on the campus. It is suggested, however, that in order to properly reflect Objective 3 and Policy B1, Policy B5 should be

more positively framed to effectively facilitate the development required to meet the University's needs. That is, it should include an explicit statement of support for the development and expansion of the University as illustrated in the Masterplan, and promotion of links with other key stakeholders in the city.

14. It is suggested that Policy B5 and its supporting text in Section 2f is currently too heavily focussed on the issue of the provision of student bed spaces and the implications for Houses in Multiple Occupation. Whilst the Council's concern in this respect is appreciated, and it is accepted that further provision of student bed spaces is required, this is only one of many development issues the University will need to address through the plan period. As stated above, the University needs to provide additional academic and related floorspace, as well as student bedrooms to accommodate anticipated growth over the next 10-15 years.

15. The case for further development on the campus is clear. The historic growth in student numbers has resulted in a 50% reduction in the area available per student since 1990. Moreover, whilst it is not expected that the University will continue to grow at historic rates, further development is necessary if the University is to contribute towards the national priorities for higher education provision, retain its current status as a top 15 University, and continue to perform its critical social and economic development role within the city and wider area. In an increasingly competitive recruitment market, and with student expectations raised by higher tuition fee levels, it is essential for the University to ensure that the teaching and research environment provided is of the highest quality, and befitting of a leading University. .

The Adopted Local Plan

16. The requirement for the University to maximise the development potential of its land holdings in order to meet the needs arising from its continued development is acknowledged in the Local Plan that was adopted in October 2007. Indeed, the Public Inquiry into the Local Plan resulted in the removal of parts of the campus from the Green Belt to allow further development. Policy GDS.1/B11 identifies the campus as a "General Development Site" and requires the preparation of a comprehensive Masterplan to guide the anticipated development in the plan period to 2011. The policy requires that the Masterplan provides for the comprehensive development of its estate to provide 43,250m² of university related development and 40,000m² of student residential accommodation, whilst protecting environmentally sensitive features and areas, ensuring high quality design and the implementation of an integrated transport solution.

The University Masterplan

17. Following the adoption of the Local Plan the University prepared the required Masterplan for the University estate that addressed the matters highlighted in the policy. The Masterplan is underpinned by an extensive evidence base that investigated the development potential of various sites within the campus. Following an extensive stakeholder and public consultation exercise, it was submitted to the Council for their consideration in 2009.

18. The preparation of the University's Masterplan highlighted that the principal challenge is one of accommodating the scale of development required, whilst not adversely affecting the inherent qualities of the existing campus or inappropriately impacting upon the surrounding area. Evidence presented to the Local Plan Inquiry by the University included an analysis of the development capacity of the campus, highlighting appropriate locations for future development. The Inspector largely agreed with its conclusions, but also identified additional areas where he thought there was capacity for further built development. The Inspector also identified areas that he thought should be protected, and they are specifically referred to in the Local Plan policy. The Masterplan has directly responded to these conclusions. Consequently it seeks to focus development into areas of lesser environmental quality, so that new development can realise improvements in the amenity of the campus environment.

19. Since the submission of the Masterplan in 2009, the University has continued to engage with key stakeholders in the area. The University now proposes to make some relatively minor amendments to

the Masterplan to address the specific concerns raised. However, it recognises that it may have to revise its priorities in response to the evolving HE market and new Government initiatives.

Future Growth & Development

20. The quantum of development required to accommodate the anticipated growth of the University was considered in great detail at the Public Inquiry into the Local Plan that resulted in the removal of parts of the campus from the Green Belt to allow further development. The Local Plan, however, could only plan for development within its plan period to 2011, and that is reflected in the provisions of Policy GDS1/B11. A similar level of development is referred to DCS Policy B5 for the period to 2026, and some explanation is provided in the "Student Numbers & Accommodation Information Paper", which seems to rely on the draft Masterplan submitted to the Council in 2009. The University does indeed need to take a long term view to ensure effective site and financial planning in response to the anticipated development requirements. The submitted Masterplan, therefore, looks to 2020 and includes provision for a greater amount of development.

21. There is, therefore, some disparity between the various documents that needs to be clarified in the revised Masterplan. However, accurately predicting future growth and development needs over such a long period of time is of course very difficult, particularly in light of the changing policy and economic context within which Higher Education is provided in the UK. In the absence of clarity about the new methodology that the Government is developing to control full-time Home/EU undergraduate numbers, and the likely impact of new visa regulations on international recruitment, it is considered that the figures included in DCS Policy B5 are appropriate for the foreseeable future, and are provided for in the University's revised Masterplan which will shortly be resubmitted to the Council.

22. Given the current uncertainty there does, however, need to be flexibility in how the Masterplan is implemented, i.e. the phasing and timing of the delivery of the required academic floorspace and student bed spaces.

23. Paragraph 2.38 of the DCS refers to the need to identify additional capacity on the campus to accommodate growth beyond 2020 on the campus, and the intention to retain the existing Green Belt boundaries. Whilst that is understood, and the University supports the apparent focus on on-site campus development, when considering potential needs over such a long timescale the University would not rule out the potential to extend the campus for compatible related uses in order to facilitate future growth within the existing campus boundaries.

Policy B5

24. As stated, above The University would like to see Policy B5 be more positively expressed to facilitate the development required to meet the University's needs. That is, in order to properly reflect Objective 3 and Policy B1, it should include an explicit statement of support for the development and expansion of the University and promotion of its links with other key stakeholders in the city.

25. In doing so the policy should clearly refer to the University's Masterplan, which has taken considerable time and resources to prepare and has been the subject of extensive stakeholder and public consultation. The Masterplan is a critical planning tool in providing an appropriate framework for the future development of the University, and should be acknowledged as such in the policy.

26. In that way Policy B5, in tandem with Policy GDS.1/B1, will ensure that the Masterplan can be effectively implemented through the expedient determination of future planning applications, allowing the constituent elements of proposed development to be delivered as and when necessary.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 322\2 S

Respondent: Bath Spa University

Representation We act on behalf of Bath Spa University and hereby make a formal representation in support of Policy (soundness): B5 - Strategic Policy for Bath's Universities. It is anticipated that Policy B5 will enable the delivery of redevelopment and intensification of the Newton Park Campus.

This will enable the provision for additional on campus student bed spaces and the renewal and improvement of academic space on site, enabling growth in the overall number of students living at Newton Park Campus and the shrinkage of the private lettings market in Bath.

Overall, there are overwhelming reasons for the provision for additional on-campus bed spaces / academic space as evidenced in the Bath Spa University Strategic Framework submitted as part of the Phase 1 planning application and we therefore concur with this policy.

The proposals for new student residential accommodation and academic facilities can be found in the Bath Spa University Strategic Framework 2010 and Newton Park Campus Masterplan - Rev 1 - 2011 which have been submitted to Bath and North East Somerset Council in support of Phase 1 academic development planning application, November 2010.

However, it should be noted that the Newton Park Masterplan analysed in detail options for the spatial provision of additional student accommodation and academic facilities within the substantial environmental constraints on the campus. The conclusion of this extensive analysis is that previously developed land outside of the Major Existing Development Site (MEDS) must be utilised if the new accommodation is to be provided.

We therefore contend that although there should be no change to the boundary of the Green Belt, the Local Planning Authority have adequate justification within the Masterplan for Newton Park Campus, PPS2 and the emerging Core Strategy Policies to extend the MEDS as identified in Figure 1 attached

We would therefore ask that this boundary change to the MEDS is incorporated as part of the Core Strategy.

Change sought to make sound: Revision of MEDS as evidence in Newton Park Campus Masterplan, Bath Spa University Strategic Framework, PPS2 and emerging Core Strategy as identified in Figure 1 attached.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.42

Reference: 93\15

Respondent: Highways Agency

Representation Whilst the Agency does not consider this makes the Core Strategy unsound, the Council should state (soundness): that major applications should be supported by a robust Transport Assessment to identify the impact of development on the highway network. The Agency is concerned about how any improvements to the SRN would be delivered when there is no reference to the SRN within the IOP. Such concerns will be removed if the Council makes changes as per the Agency's representations to 6G and Policy CP13.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\113

Respondent: Bath Heritage Watchdog

Representation 2G Infrastructure and Delivery

(soundness): 2.42 When the reference to Table 5 is followed, included in the Key Infrastructure are the showcase bus corridors that has recently been abandoned to save money according to the local press. Also the bus operator has wrecked any pretence that at least three of the routes can be considered “showcase” by timetable and route changes. Elsewhere in our comments on the Core Strategy we have identified why the Rapid Transit proposals are unjustified and are unlikely to be delivered.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\114

Respondent: Bath Heritage Watchdog

Representation Table 5 indicates enhanced frequencies to Bristol but not in the other direction. This is not necessarily

(soundness): beneficial: it would enable easier out-commuting to Bristol, thus supporting the move of the MOD and making Bath more of a dormitory location than a place of employment. Elsewhere in our comments on the Core Strategy we have recommended including rail and river transport be added to ideas for road schemes, and such additions should be also reflected in this section.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.43

Reference: 265\115

Respondent: Bath Heritage Watchdog

Representation 2.43 This notes the key to development potential is the transport package. This claim undermines the

(soundness): credibility of this entire section because the future of the city cannot be based on what most regard as a flawed scheme offering little benefit. If it does not proceed (and many believe it will be halted by a legal challenge), then every policy claimed to depend on it also falls and it is the height of folly to put a future strategy at risk for a hobby-horse that everyone except the council knows is broken. Effectively this requires the link between the Infrastructure strategy and the Infrastructure Delivery Programme to be removed, along with Table 5. Every building proposed for the Western Riverside is within a short walk of existing bus routes, so any claim for an interdependence between that development and transportation plans cannot be justified.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.44

Reference: 4\1

Respondent: Mr Francis King

Representation The BRT plans laid out in section 2.44 are technically inept. There are always at least two ways of doing

(soundness): anything, and yet we were told that the council’s approach was the only one possible or plausible.

The BRT scheme would have taken land from gardens, which I understand, were enlarged by the

council in the first place at the expense of land from the route, in order that the gardens should be on an acceptable size. Further, my understanding is that the current position is that the council does not have funding (which has also stopped a lot of worthwhile improvements being brought forwards) and so the statement at the start of section 2.44 is untrue or misleading.

The BRT policy is unnecessary. If the council decided to work with the local communities, alternative strategies could be devised, which are more thoughtful, better considered, and which would reflect better on everyone involved. For example, there is nothing to prevent a bus route being completed via Brassmill Lane and the bus depot, which would be cheaper and better than the proposed BRT scheme.

Even if the BRT scheme had been completed, it could have been reduced to alternative running over part of the route, which would have reduced the land-take substantially, as well as the cost. Instead the council tried to pass a scheme with two running lanes AND a shared walking/cycling facility. In fact, all that was ever required was to properly illuminate the existing towpath.

Change sought to Delete references to the BRT scheme from the Core Strategy.

make sound: Consult with the public. Take the obligatory consultation seriously; it should be there to help the council, and not to hinder. The public can often spot problems and alternatives that council staff cannot see, because they are too close to the work. A proper consultation on the BRT scheme should now take place, with the council being prepared to abandon the BRT scheme entirely. Respect the views of the public. I am a qualified and experienced transport planner, and I would expect my views to be treated with courtesy and respect.

I am not convinced that the council has dropped their BRT scheme, and the repetition in this core strategy suggests that the council has learnt nothing from the process to date, and has taken nothing from the abortive consultation that was held.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 101\2

Respondent: Mr Robin Sales

Representation 2.44 supports the 54m major scheme of transport proposals. The scheme offers little benefit relative to
(soundness): its cost and should not be undertaken at a time when beneficial expenditure is being cut.

Change sought to The Core Strategy should simply state that the 54m transport proposals remains to be approved.

make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\5

Respondent: Federation of Bath Residents' Associations

Representation None of the 'Key strategies and plans' cited here include plans actually to reduce existing traffic
(soundness): volumes.

A master plan for traffic in Bath is required. While the Public Realm and Movement Programme (PRMP) does include measures to reduce traffic in the commercial centre of Bath, it does not cover the bulk of Georgian Bath.

Change sought to (a) Task the Transport Commission for Bath to negotiate a Master Plan for Traffic, including measures

make sound: to reduce its volume, and

(b) extend the PRMP to the whole of the central area between the Holburne Museum and Royal Crescent..

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 102\19

Respondent: Federation of Bath Residents' Associations

Representation Para 2.44 (p56)(Transportation)

(soundness): Good, but commitment to addressing Bath's transport and congestion problem needs strengthening. This should be a fundamental priority as it profoundly impacts residents' quality of life, economic development, conservation, and the environment. As FoBRA policy states, this needs to be radical, comprehensive and urgent.

Change sought to make sound: The prevailing priority of the car over public transport, pedestrians and cyclists needs explicitly to be removed before anything can change.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 153\6

Respondent: Claverton Parish Council

Representation Paragraph 2.44, page 56 refers to a proposal for a new Park and Ride to the east of the City. This

(soundness): proposal scheme is located on the ancient water meadows of Bathampton.

This highly contentious proposal is not founded on a robust evidence base, will not meet its stated objectives, is not sustainable and does not reflect long standing and valid environmental objections expressed by the local Bath/wider community and in number of government and B&NES reports. It is also in direct conflict with many local and national policies. Rigorous evaluation of all potential Park and Ride options has not been carried out.

Further detailed comments:

(a). B&NES' own papers show that the Park & Ride would have little or no impact on traffic congestion or air pollution levels (NO2 and PM10) and therefore fails to achieve stated primary objectives. Along London Road, west of the A4/A46 roundabout, NO2 levels would remain well above the objective level and congestion would not be alleviated.

The B&NES papers also show that the whole Bath Transportation Package (of which the Park and Ride is a key element) would have little or no impact on traffic related air pollution across Bath.

(b). The proposed Park and Ride would be the largest in Bath and would not be sustainable. The planned provision of 1400 spaces falls short of B&NES' estimate of the need for 1800 spaces. However, the site is not capable of extension because it immediately abuts the River Avon flood plain.

This lack of expansion capability is contrary to specific advice from the Department of the Environment that, sites should preferably be "surrounded by sufficient adjacent land to allow expansion should levels of demand warrant this.

Bath and North East Somerset's Core Strategy – Publication Stage Representation Form

6b continued

(c). The proposed Park and Ride site lies in an extremely sensitive valley floor location, in Green Belt and surrounded by the Cotswolds AONB and within 200 metres of the City of Bath World Heritage Site. It fails to satisfy the requisite tests in PPG2 (by the council's own admission).

The site, which would be floodlit for many hours during the winter months, would be widely visible from viewpoints in neighbouring communities, including the eastern area of the WHS, the closely-neighbouring Cotswolds AONB and scheduled ancient monuments. It is in a location which would clearly form part of any geographically-defined green buffer zone around the City of Bath World Heritage Site.

(d). The Park & Ride would do irreversible environmental damage and seriously degrade the character, openness and visual amenity of the WHS Green Belt/Cotswolds AONB landscape setting, and "green valley approach" to the City of Bath.

(e). Public consultation on the Park and Ride was untimely and perfunctory. B&NES evaluation of the scheme was carried out in secrecy and it was presented as a "fait accompli" on 31st July 2008. The only public opportunity to comment on the Park and Ride was at a B&NES exhibition of the four main Bath Transportation Package proposals on 6th/8th November 2008. Claims of public support for the scheme are misleading and do not truly reflect the fact that, following the November exhibition/consultation, the Park and Ride had a 78% rejection rate and following the submission of the planning application some 550 objection letters were submitted while less than 20 supporting letters were received. (f).

B&NES carried out perfunctory evaluations of other Park and Ride options and did not consider any in Wiltshire, where a considerable percentage of the estimated Park and Ride patronage is generated. A related concern is that B&NES' current figures show that the highest percentage (46%) of predicted Park & Ride demand is from the north via the A46. This provides a significantly different perspective on the location of the proposed Park and Ride, when compared to the 34% figure originally indicated by B&NES. This revised demand figure alone indicates the need for a review of Park and Ride options.

(g). A number of government and B&NES reports, over the preceding decade, consistently and explicitly rejected use of the site for Park and Ride and associated development, on the grounds of serious adverse environmental impact.

These previous rejections, coupled with the many planning policy conflicts and widespread community concern, are evidence of a well documented and almost universal objection to the use of the proposed Bathampton Meadows site for Park and Ride development.

Change sought to The Bathampton Meadows Park and Ride should be removed from the Bath Transportation Package
make sound: and all references to it in the Core Strategy, particularly those on pages 33 - Diagram 5; 56 - paragraph 2.44 and 57 - Table 5, should be deleted.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 180\16

Respondent: J S Bloor Ltd

Representation The Core Strategy is considered unsound in respect of its deliverability – the Strategy is predicated on
(soundness): the deliverability of large areas of brownfield land. To be sound the Core Strategy must be justified, effective and consistent with national policy. To be effective the document must be deliverable, flexible and able to be monitored (paragraph 4.52 of PPS 12).

Flood risk is identified as one of the major constraints to the regeneration of Bath and other market towns within the District (paragraph 3.5 of the Flood Risk: Sequential and Exception Tests Core Strategy Paper November 2010).

In Bath a number of the potential development locations fall within Flood Zone 3a and 2. The Core Strategy states that a Flood Risk Management Strategy has concluded that there is no comprehensive strategic solution for reducing peak flow through Bath which is technically and economically viable. The Flood Risk Sequential /Exception Test states that the SHLAA indicates that there is capacity for 6,213 homes to be delivered within the city of which 3,672 are within the river corridor and 2,541 are within the outer neighbourhoods. Whilst it is noted that the majority of the Outer Neighbourhood areas are within Flood Zone 1 or are not subject to the sequential test as they are already built or have gained planning permission. The issue is that 230 dwellings are within Flood Zone 2 and 1,096 dwellings are in Flood Zone 3a. That is 20% of the housing provision in Bath is within Flood Zone 2 and Flood Zone 3a and relies on substantial investment as set out in paragraph 2.48 of £27.6M of public sector investment.

The Central Area and Western Riverside (referred to as Bath City Riverside) is not only important to the deliverability of the BANES Core Strategy but also the aspirations for the West of England. This area is reliant on the investment of £27.6 million of public investment to ensure that matters of infrastructure, flood alleviation, land assembly, remediation and affordable housing. Given the current position in the public sector it must be questioned whether this investment will be available in the timescale set out in the Core Strategy. The deliverability of the strategy is therefore questioned.

Even if all the sites with planning permission in Bath and all the Flood Zone 1 sites were developed this does not meet the identified need for housing of about 6,000 according to BANES reduced housing provision, the Council have included some sites within the river corridor. The Core Strategy Information paper on page 13 states that there are no alternative areas elsewhere within Flood Zone 1 in the district which could facilitate the level and type of development required in the policy areas to support regeneration of the city centre and wider sustainable development principles. This is not entirely true as there are alternative sites within Flood Zone 1 elsewhere in the district which could facilitate

development to meet housing needs of the district and support regeneration. Given the constraints affecting Bath the Panel recommended an area of search around Keynsham. Land to the south west Keynsham is well placed to meet housing needs and supporting local regeneration.

Change sought to make sound: In addition to objections made about the overall housing figure being inadequate to meeting housing needs and being inconsistent with the latest 2008 based household projections, there are also concerns about the overall deliverability of the strategy in BANES, in particular at Bath. Therefore the housing figure for the district should be increased in order to provide some flexibility and also in recognition of the need to meet the needs set out in the 2008 based household projections. See representations on Policy DW01 and Policy KE1 for proposed wording.)

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 197\4

Respondent: Railfuture Severnside

Representation (soundness): Para. 2.44 refers to a "segregated park and ride bus route". This is understood to be the proposed bus way along a section of the former Midland Railway line. There is no mention in this paragraph about investment in rail transport.

Railfuture considers that a purely bus-based local transport system which reduces the scope for development of the local rail system, is unsuitable for a city of such international importance as Bath. Because the city is a World Heritage Site, it generates more national and foreign travel into it than do most towns of similar size.

It therefore needs to safeguard and develop longer distance transport routes without increasing congestion on main roads. Buses and busways essentially cater for local travel whereas railways can bring in commuters and visitors from much further afield as well as make a contribution to local transport (eg. Keynsham or Freshford to Bath).

Given the scale of railway reopenings in Scotland and Wales, it is not inconceivable that all or part of the Somerset and Dorset and Bath- Magotsfield-Bristol lines could be reinstated. If these routes are not safeguarded, people may well ask in 20-30 years time, and when petrol will probably be less abundant, why they were not.

Change sought to make sound: Amend para. 2.44 to include development of the existing rail network in view of possible electrification of the Great Western main line via Bath Spa; and safeguarding of disused routes for possible reinstatement.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\2

Respondent: London Road Area Residents Association

Representation (soundness): Paras 244 – 246 Transportation

- i) No mention of possible use of rail infrastructure to relieve road congestion and other local transport problems into, across and out of the World Heritage Site.
- ii) Para 2.46 The Greater Bristol Metro Project is currently unfunded

Change sought to make sound: Trains are Rapid Transit. Therefore, lobby for the rail signalling upgrade via West of England Partnership PLUS Wiltshire, to use existing Rail Infrastructure a) more and b) more efficiently by increasing links to local stations east and west of Bath as well as south to Frome. Including making the reopening of Corsham station a priority.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\3

Respondent: London Road Area Residents Association

Representation Para 2.44 states “create a segregated park and ride bus route for 1.4km of the journey from Newbridge
(soundness): Park and Ride to the city centre”. The segregated route does NOT go all the way to the city centre.

Has the location for the Compensatory Flood Works that will be necessary if this proposal goes ahead been identified and if so where will it be ? We do not think it will have been included in the original calculation of 345,000 cubic metres referred to in para 2.48 and in the Flood Risk Management Strategy (CP5)

Change sought to make sound: Para 2.44 remove “the city centre” and replace with “ Windsor Bridge” as this more accurate and truthful.

Clarification is required and relevant information or corrections to calculations included in para 2.48 and the Flood Risk Management Strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\16

Respondent: London Road Area Residents Association

Representation Rapid Transit Routes” - perhaps wisely no maps of such routes are shown in the Core Strategy

(soundness): document – perhaps because it is (hopefully) finally accepted by B&NES that it is an impossibility !

Central Bath, Dorchester St, Manvers St, Walcot St and London Rd are all far too narrow and tortuous to allow dedicated bus lanes, unless an ‘overhead’ transit scheme is envisaged . The Flood Plain ramifications would not allow an underground Metro !

li)The cancellation of the Regional Spatial Strategy plan for extra housing at Newton St Looe removes the pressure to enlarge Newbridge Park and Ride and further weakens the case for a dedicated Rapid Transit Bus route and the associated Compulsory Purchase Orders.

lii)The proposal to site a new Park and Ride on the ancient water meadows of Bathampton is contentious, unsound and in conflict with PPS 25 and various other policies. It will achieve none of the hoped for improvements to congestion and air quality locally or in Bath (as agreed by B&NES officers at the time of the planning applications) and will be a blot on the beautiful surrounding landscape as agreed by the Inspector at the 1990 Public Inquiry and other reports since.

lv) After the removal of the unsuitable Lambridge site from the BTP, there was inadequate public consultation (in fact none!) on the selection of a more suitable alternative. Bathampton Meadows was announced as a fait accompli. However this site is overlooked by thousands of residents, is also far too small and incapable of expansion as required by PPS25 because of the River Avon flood plain nearby.

v) Sites in Wiltshire and South Gloucestershire were not considered and Charmy Down airfield was discounted without proper examination. Considering that a large number of P & R customers come from neighbouring authorities these possibilities should have been more seriously investigated.

vi)The beautiful landscape entry to Bath by road and rail (whether from east or west) is too important to be damaged by inappropriate developments and should be protected not only by Green Belt and Cotswold AONB designations but by World Heritage status and local policy protection. Future citizens will wonder how a scheme, flood lit for 15 hours a day in winter months, was allowed to spoil a dark, green valley with its Nature Reserve close by.

vii)The supporting document for CP5 – Flood Risk Management actually suggests the possibility of using Bathampton Meadows as one possible site for Compensatory Flood Water Storage – presumably by lowering the land height of the car park. Alternatively will a reservoir be built deep below ground and then roofed over by a car park for 1400 cars? Flood compensation plans have already been rejected as intrusive and environmentally damaging by the council in the past and other consultants studies since have agreed that the harm done to this green valley could not be justified.

Change sought to make sound: i)Drop the existing Bath Transport Package which is flawed, out dated and unacceptably expensive (however it is to be funded). It should be thoroughly re-examined and the unsound elements (eg BRT) within it should be dropped with the same rigour that the Coalition Government has grounded Harriers, cancelled Nimrods and withdrawn HMS Ark Royal ! Many of Bath’s transport needs could be met by more and more efficient use of the existing Rail Infrastructure – upgrading the signalling

between Keynsham and Bathampton would be a valuable start.

ii)As most P & R customers will have travelled from or through Wiltshire or South Gloucestershire, it would seem more appropriate for plans for new Park & Rides to be over the boundary within the area of those local authorities. This should be included as an aim and pursued vigorously.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 257\1

Respondent: Valley Parishes Alliance

Representation A46/A36 link

(soundness):

Paragraph 6.94 expresses the need for further studies assessing the possible development of an A46/A36 link road yet no such development is proposed in the LDF period to 2026 and reference to it should be deleted. The maintenance as open countryside of the Avon valley bottom in the Green Belt should be an immutable principle and recognised by its inclusion in a WHS Buffer Zone as recommended in our representation on Policy B4. The detailed fuller representation on this subject by Claverton and Bathampton Parish Councils is wholeheartedly supported by the Alliance.

Proposed Bathampton Meadows Park-and –Ride

We support the principle of a park-and-ride site east of Bath but consider the proposed site at Bathampton meadows should be deleted for the following reasons:

- The scheme is admitted by BNES's consultants to afford no significant relief from traffic congestion or traffic-generated air pollution;
- It offers no contribution to the relief from the deleterious effect of heavy goods vehicle traffic;
- Traffic diverted from London Road to other routes by current delays would return;
- The existing bus lane in London Road is already shared by several stage-carriage bus routes with stopping places and by motor cycles, cycles, and taxis;
- The site would encroach on the Green Belt and be widely visible from public viewpoints in the AONB in a location which should part of a geographically-defined green open buffer zone around the City of Bath WHS. The 2 elements together form an outstanding local scene of international importance.

The planned provision of 1400 spaces falls far short of the LPA's estimate of demand for 1800 spaces but the physical constraints on neighbouring land prevent any future expansion. The claimed public support for the scheme does not truly reflect the results of such public participation as was undertaken following its publication. If the site be deleted the solution to the problem of the provision of an alternative location east of Bath may be feasible in the area of another LPA.

Change sought to make sound: (i) In paragraph 6.94 delete 'and an A46/A36 link'

(ii) On diagram 5 delete 'East of Bath Park and Ride (NEW)' and show diagrammatic representation of a Buffer Zone extending round the World Heritage Site.

Representation (legal compliance): The claimed public support for the Bathampton Meadows park-and-ride does not truly reflect the results of such public participation as was carried out in the devising of it. From the abandonment of the proposal to establish a park-and-ride site at Lambridge, on land currently the training ground of Bath Rugby, the preparation of the highly controversial Bathampton Meadows scheme was pursued in secrecy until the publication of the planning application. This was wholly contrary to the LPA's Statement of Community Involvement.

Change sought to make legally compliant: While the failure to observe the requirements of the B&NES Statement of Community Involvement is irreparable at this stage the deletion of the unsound Bathampton Meadows park-and-ride site would reflect the wide-ranging community response to an ill-founded proposal after its publication following its gestation in secrecy and the narrow local political majority of support.

Reference: 265\116

Respondent: Bath Heritage Watchdog

Representation 2.44 Point 1 Gives basic details of the scheme highlighting the increase in spaces but not the impact of

(soundness): these extra car journeys on the countryside and environs of the city, mostly Green belt or ANOB, plus

the destruction of an ancient water meadow!

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\117

Respondent: Bath Heritage Watchdog

Representation Point 2 Mentions 1.4km in the context of a segregated route from the Newbridge site to the city centre
(soundness): which is a statement deliberately designed to mislead! It of course is not segregated in the true sense of the word because legally it will be a bus lane for the dedicated part and a shared road for the remaining 2.8km or so to the city centre; with yet another 3km still to go before reaching the other terminus at Bathampton Meadows. Effectively the park and ride bus route just shares road space for its journey, so it is of no value mentioning it here.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\118

Respondent: Bath Heritage Watchdog

Representation Point 3 This is no longer true. Most if not all of the "showcase" facilities have been deleted from the
(soundness): scheme to save money, so Point 3 itself should be deleted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\119

Respondent: Bath Heritage Watchdog

Representation Point 4 This is very curiously worded. Providing "access changes on a number of streets" between
(soundness): pedestrian cyclists could mean anything between mounting platforms to assist pedestrians to become cyclists, and cycle racks at the point where cyclists become pedestrians. What is supposed to happen on streets no so provided? Plain English instead of consultant-speak would help.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 287\1

Respondent: Alan Briggs

Representation 1. The scheme is not justified because it is not based on a robust and credible evidence since the vague
(soundness): 'benefits' suggested ("The proposals will help to enable the programme of development set out in the spatial strategy in conjunction with further measures to enable convenient and sustainable circulation and access within the city.") aer not based on detailed research and fact finding, indeed the latest research shows that the scheme will not provide any benefits.

2. The scheme is not justified because the evidence shows that the local community is very opposed to the scheme. No other alternatives to reducing traffic congestion have been put forward or seem to have been seriously considered.

3. The Scheme is not justified or sound because it completely contradicts the principles set out in the Core Strategy, whose executive summary states: "Underpinning principles for the preparation of the Core Strategy have been to : prioritise brownfield land as far as possible..." "The Core Strategy retains the Green Belt and no changes are proposed to the general extent of the Green belt, either extensions or deletions." "Green Belt: The Green Belt will be maintained and its openness protected from inappropriate development."The proposal to create a new Park and Ride on Bathampton Meadows contradicts these statements.

4. The scheme is not justified or sound because it envisages spending a very large amount of the Council's funds on a scheme that has no discernible or proven benefit and the money could be used to support more effective actions to combat congestion.

Effective

1. The scheme is not effective because the infrastructure delivery planning is unsound, the effectiveness is unproven and not even articulated anywhere.
2. The scheme is not effective because the Council has failed to provide a convincing business case that shows any credible evidence of the benefits to be achieved.
3. The scheme is not effective because it is opposed by the community and does not have community support or involvement. The need is for an effective strategy to reduce traffic congestion in the city and any strategy needs to have credible and deliverable objectives, and to be supported by the community. This has none of these.

Change sought to make sound: Remove the proposal for the Bath Transportation Package.

Look for other alternatives for reducing traffic which are supported by facts and research, since the BTP is not sufficiently supported by facts and research and there is no evidence that the traffic congestion will be reduced- in fact it seems more likely that the BTP will increase congestion.

Representation (legal compliance): The process of community involvement has not taken into account the huge number of objections to the proposals for the park and ride site on the East and the extension of the Park and Ride site in the West linked to a 'rapid transit' route. There are very serious questions about sustainability and effectiveness of the proposed schemes.

The process for approval of the transportation package by the Council was seriously flawed - resulting in complaints raised even by councillors, as well as many other interested parties and organizations who concluded that the scheme had not been subjected to proper scrutiny and approval. Please see this link:

www.thisisbath.co.uk/exclusive-tories-foul-crunch-transport-vote/article-1065843-detail/article.html

Recent proposed changes have been announced without any community consultations - so that the overall proposal has now lost some elements, whilst retaining the most controversial elements - the eastern Park and Ride and the BRT in Newbridge. The amount of taxpayers money that the Council wishes to spend on the scheme has also increased with no community approval. The scheme is very unpopular and the Council seems to have no evidence that it will provide any benefit at all.

Change sought to make legally compliant: Remove the proposal for the Bath Transportation Package.

Reference: 289\1

Respondent: BANES Council

Representation (soundness): Transport around and through Bath can be achieved without the BRT - other options need to be explored and could be cheaper to the Council.

Change sought to make sound: The Park and Ride Newbridge Buses can continue to use the Upper Bristol Rd and even the Lower Bristol Road without a 1 mile road being laid on the railway line (linear track) behind the Newbridge Rd. This would save the Council several million pounds.

Representation (legal compliance): The BTP/BRT Element is not required and not wanted by 1000's at least Local Residents. The Cost is not Justified when other services could be well served.

Change sought to make legally compliant: The transportation around and through Bath can still be improved without the BRT and Element's of the BTP. The council should extend the Newbridge Park and Ride onto the

Reference: 298\10

Respondent: Liberal Democrat Group

Representation (soundness): Factual amendment – the wording is inaccurate

Change sought to make sound: “The Council has secured inclusion into the ‘development pool’ of projects for a major scheme of Transport Proposals for Bath and is currently working towards a full and final offer to Government. The current Transport Proposals

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.45

Reference: 93\12 S

Respondent: Highways Agency

Representation (soundness): The Agency welcomes reference to requirement for Travel Plans at paragraph 2.45.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\120

Respondent: Bath Heritage Watchdog

Representation (soundness): 2.45 More about how it will unlock the potential and reduction in car journeys most of which in peak periods is created by the school run and we have already commented on possible solutions to that. Other car journeys for the collection of bulky goods, shopping, etc are essential for many, but especially for the infirm, for whom walking or cycling (and in many cases public transport) is not an option; and this is the category which the demographic forecast says will increase.

The economic benefits of using the Bath car club compared with running a “cheap old banger” only favour the car club where infrequent short journeys are the norm. So whilst it is valid to mention the existence of the car clubs, it should not be made to sound like a panacea. For low paid workers car club membership (along with the buses) could be too expensive.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.46

Reference: 265\121

Respondent: Bath Heritage Watchdog

Representation (soundness): 2.46 It is not obvious why this should be dependent on the Greater Bristol Metro Project when this is a route already served by scheduled services, and the service operator could increase frequency to meet demand. It sounds like more of an attempt to justify the existence of the project than a genuine strategic need.

Notably, this is about the only mention thus far of the railway. Again there is a reliance on another

limited scope project but no infrastructure such as a station in the east Box, Corsham or a halt at Bathampton to negate or reduce the size of the eastern park and ride. No mention of a halt at Newbridge or the possible extension of the old Midland line at least as far as the park and ride; and no mention of improved services to Melksham and Trowbridge where a significant number of MOD personnel live and in-commute by car.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.48

Reference: 102\6

Respondent: Federation of Bath Residents' Associations

Representation The quoted figure (345,000 m³) is equivalent to a staggering 96 football pitches or 3 Royal Victoria
(soundness): Parks at an average water depth of 0.5 m, and correspondingly more if the water was shallower.

Change sought to make sound: Refuse permission for any development until matching storage area is identified and made ready for use.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 227\5

Respondent: London Road Area Residents Association

Representation Para 2.44 states "create a segregated park and ride bus route for 1.4km of the journey from Newbridge
(soundness): Park and Ride to the city centre". The segregated route does NOT go all the way to the city centre.

Has the location for the Compensatory Flood Works that will be necessary if this proposal goes ahead been identified and if so where will it be? We do not think it will have been included in the original calculation of 345,000 cubic metres referred to in para 2.48 and in the Flood Risk Management Strategy (CP5)

Change sought to make sound: Para 2.44 remove "the city centre" and replace with " Windsor Bridge" as this more accurate and truthful.

Clarification is required and relevant information or corrections to calculations included in para 2.48 and the Flood Risk Management Strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 265\122

Respondent: Bath Heritage Watchdog

Representation 2.48 Again we refer to previous concern regarding flood compensation and possible measures that
(soundness): could impact on areas upstream. It makes mention of a masterplan except there is in real terms one that the public are aware of but haven't had access to within the consultation timescale. Most of the tinkering is designed to facilitate development regardless of potential impact, and it won't actually reduce the flood risk. Insurance for buildings in these locations is likely to be problematical.

No mention is made of the risk of surface run-off and the impact of all the new largely impervious hard landscaping at the bottom of the valley, or the fact that in some areas the drains are already unable to cope with the run-off of normal heavy rain, so abnormal quantities of rainfall pose a particular risk even without additional developments on the flood plain.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.51

Reference: 265\123

Respondent: Bath Heritage Watchdog

Representation 2.51 This section again shows the fragile reliance on other bodies and non-council funding. Things are
(soundness): currently unstable in many areas and basing a strategy on such a fragile future could bring large gaps
in what can realistically be achieved.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 2.53

Reference: 265\124

Respondent: Bath Heritage Watchdog

Representation 2.53 Yet another contradiction to the objective of conserving industrial floorspace, this time to meet an
(soundness): undershoot of housing targets. It also casts doubts on the will to deliver the Newbridge Riverside
proposals if at the same time the strategy uses it as a contingency.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Table 5: Summary of key Infrastructure in Bath

Reference: 298\11

Respondent: Liberal Democrat Group

Representation Table 5, IDP Ref BI.1

(soundness): Factual amendment – the wording is inaccurate.

Change sought to Under “Cost”, delete £54m and insert “Not quantified”.
make sound:

Representation (legal compliance):

Change sought to make legally compliant: