

Bath and North East Somerset Council Draft Core Strategy

REPRESENTATIONS BY RESPONDENT

Bath and North East Somerset Council - Draft Core Strategy - Representations by Respondent (Numbers 1 to 100)

Respondent Number: 1 Respondent: BCUS Homes

RepresentationReference: 1\15

Plan Reference: Whole Document

Representation (soundness): Supportive of the whole document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 2 Respondent: Chris Beezley

RepresentationReference: 2\1

Plan Reference: Policy B5: Strategic Policy for Bath's Universities

Representation (soundness): The Core Strategy Paper (para.2.38) refers to Information Paper 3 which states (at para.4.3) that 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:

RepresentationReference: 2\2

Plan Reference: Policy B5: Strategic Policy for Bath's Universities

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:

Respondent Number: 3 **Respondent:** Mr Sebastian Greene

RepresentationReference: 3\1

Plan Reference: Policy CP8: Green Belt

Representation I am not suggesting that the Core strategy is unsound but it does not maximise the potential of land
(soundness): available in certain locations where Green belt boundaries have been deviated into peoples gardens instead of following the previous line.

An example of this and why I am writing is to request that the plot of land situated above Mulburry house, Golf course road, Bathwick, Bath, BA2 6JG is removed from greenbelt. I am aware that this is just one site and a small consideration compared to the whole core strategy. We have however developed a very environmentally friendly designed house that we believe would be perfectly within keeping of the surrounding area. Currently my grandmother lives in this house and she is now 87 years of age – she needs to have her own independence but also needs to have her family very close by for continued support. My grandmother has owned this land long before the green belt law came into effect and was not personally made aware of these changes to her land. What is also frustrating is that the green belt line does not follow the same line as it enters my grandmother’s land but instead cuts straight into her garden for a reason that we have not been able to have explained to us. We therefore are requesting that the land be removed from the greenbelt and that the boundary is diverted to the same line as it follows before reaching my grand mothers’ land. In the future we would then look to build the environmentally friendly dwelling that was put forward for planning permission back in December 2007. Application number:07/00124/Ful. This land and proposed dwelling would not be used to profiteer (and this can be seen by the design of the house which does not maximise the land available) but literally would enable us to live near to my grandmother as her needs become ever greater as she grows older. I hope that you are able to take this rather unique situation into consideration when looking at the current changes within the Bath core strategy.

I also submitted this to the Core strategy spatial consultation in Dec 2009 but did not receive a response. I am aware that this is just one site and a small consideration compared to the core strategy as a whole but would appreciate if you could take my request into consideration due to the rather unique circumstances of this proposal.

I would be very happy to show you the site in question if you are able to look into this further.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 4 Respondent: Mr Francis King

RepresentationReference: 4\1

Plan Reference: Paragraph 2.44

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:

Respondent Number: 5 Respondent: Barclays Bank PLC

Representation Reference: 5\1

Plan Reference: Policy CP12: Centres and Retailing

Representation (soundness): The current Core Strategy document notes the District's strengths but recognises the need for change to tackle economic and social challenges. It acknowledges the need for changes in employment and work practices and shifts in work / life balance, together with the recognition that an evolving economy will mean considerable changes over the coming years. It states that the economy will have to be more diverse, productive and resilient to meet the needs of the 21st Century and be able to attract inward investment (Section 1) Objective 3 sets out to encourage economic development, diversification and prosperity and Objective 4 has a clear intention to invest in city, town and local centres. These are laudable aims but words and phrases like "change", "diverse", "evolving", and "meeting 21st Century needs" ring rather hollow in the face of an apparent dogged determination to retain some prescriptive and inflexible planning policies. Under "Strategic Issues" the document states that "Bath's prosperity depends on enabling the growth of existing business, attracting high value employers and jobs [and] it will have to compete with other cities and large towns also wishing to attract growing sectors" It then lists several requirements thought necessary to achieve this but in the Bank's view there is a glaring omission from that list; namely the need to change outdated and outmoded planning policies. Policy B1 seeks to enhance the reputation of the City Centre and Policy B2 sets out the apparent means of doing so. "Change" is the key to the aim of creating "a more dynamic place for business, enterprise, creativity and innovation" (1c). One of the "Placemaking Principles" is "The prevalence of active street frontages" (2j) and the "Risks to the Central Area" identifies a decline in the presence of independent and local retailers (2r) and concern about impeding economic growth and diversification (2v). Such concerns suggest that the Council's planning policies relating to the town centre are part of the problem. Section 6 of the Core Strategy states that its policies "will guide the content of other policies in the Local Development Framework such as the Placemaking Plan" (6.01). Under the title "A Prosperous Economy" there is a recognised need for "a more diverse, productive and resilient economy" (6.83) and a "need for change" (6.84) yet the Council is apparently persisting with an out-of-date approach by retaining Local Plan Policy S5 that arbitrarily restricts non-A1 uses in primary frontages (6.91). Core Policy CP12 refers to the Council's intention to review retail frontages in the "Placemaking Plan" but there is apparently no intention to examine the effects of, or review the policy that pertains to them. On the matter of policy formulation PPS12 is clear that all DPDs must be:

- “founded on a robust and credible evidence base”;
- “the most appropriate strategy when considered against the reasonable alternatives”; and must be
- “consistent with national policy”. In our previous representations we noted that keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council’s strategic objectives and is inconsistent with national policy.

We urged the Council to recognise the positive impact that financial service retailers such as the Bank have upon vitality and viability. The production of the LDF provides an opportunity to examine new evidence and to revise out-of-date policy, particularly if it is not consistent with national policy. Limiting certain Part A uses in the primary frontage undermines the Council’s intention to attract private sector investment in the town centre. The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are “shopping area uses” and are acceptable without any need for restriction or qualification. This is particularly the case for the financial services sector. ODPM Circular 03/2005 “Changes of Use of Buildings And Land” which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses “serving the public, from other office uses not directly serving the public” - paragraph 32), that the Class is also “designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying”. The uses within Class A2 are noted as being those “which the public now expects to find in shopping areas” (paragraph 38). The wider role played by town centres than a pure shopping function is recognised throughout Government policy on town centres.

Government Policy in PPS4 “Planning for Sustainable Economic Growth” continues the thrust of policy in PPS6 relating to town centres but particularly emphasises the importance of economic growth. Policy EC3.1c states that Planning Authorities should: “at the local level, define the extent of the centre and the primary shopping area in their Adopted Proposals Map”, following consideration of whether there is evidence of a need to designate “realistically defined primary and secondary frontages in designated centres”. The strong emphasis upon the promotion of town centre vitality and viability remains in the current PPS and the Government is clear that there should be a positive attitude towards all development

which generates wealth and creates employment. The “over-arching objective is sustainable economic growth” (paragraph 9). The Government wants economic growth to be focused in town centres offering “a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities”.

There should be “enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres” (paragraph 10). Policy EC10.1 states that: “Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably”. There is nothing in Government policy that recommends or supports imposing restrictions upon acceptable town centre uses at all and indeed Policy EC3.1 states that local planning authorities should “set flexible policies for their centres which are able to respond to changing economic circumstances ...”. It is therefore essential that DPD policies should facilitate the positive approach required by PPS4.

Promoting vitality and viability in town centres are objectives of the Government and the Council. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. Indeed, Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. The Bank has undertaken a number of comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies are attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known

national multiple Class A1 traders. Banks also have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly retail in its presentation and has introduced an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms as "a retail focused experience". The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and in operation to retail shops. This is an example of the "enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" that PPS4 expects and to which the Core Strategy (and other DPDs) must also positively respond. Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that over 70% of the internal space at ground floor is accessible to customers. The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. It is therefore important that planning policy recognises the benefit of bank uses in fostering footfall and pedestrian activity and that it should not resist much-needed investment by financial service retailers.

The Bank's footfall surveys have been a key element in helping to change attitudes towards the presence of banks in core shopping areas and primary frontages. Even planning authorities that once strongly resisted Class A2 uses in their primary areas have granted permission for Barclays 'flagship' outlets. Examples of authorities that have recognised the wider benefits of the 'flagship' design (following receipt of applications which have been supported by evidence of high footfall), include Southampton, Reading, Manchester, Milton Keynes, Romford, Southend, Leicester, Plymouth, Sheffield, Kensington & Chelsea and Cambridge. Follow up surveys were carried out in 2010 at Milton Keynes, Southend, Reading and Southampton (copies are attached). In every case the new 'flagship' branch significantly increased footfall, confirming the Bank's beneficial effect on vitality and viability.

The Core Strategy's objectives will require major commitment and substantial investment by the private sector. Pursuing restrictive policies to keep significant generators of footfall such as the Bank out of primary shopping frontages will actively work against the achievement of those objectives and is an outdated and discredited approach. The Bank therefore considers that the omission of any intention to review such policies renders Policy CP12 'unsound' as it is neither consistent with National Policy nor Justified. The Council has provided no robust and credible evidence to justify the arbitrary restriction of financial service retailers in shopping frontages and furthermore has not given consideration to reasonable alternative strategies.

3. Closing Comments

The Council recognises the need for significant private sector investment in the town centre so the opportunity provided by the preparation of the main elements of the LDF should be used to give greater encouragement to appropriate Part A uses to invest and to improve the quality of their representation. The Bank's evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in and maintenance of their premises, resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration and investment. Pursuing restrictive policies to keep significant generators of footfall out of primary shopping areas will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy. In fact there is nothing in Government policy that recommends or supports imposing constraints upon acceptable town centre uses at all. Any continuation of historic primary frontage policy is unjustified by robust and credible evidence and the Council has provided no explanation for the decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives.

The Council's documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have even been considered at all. The Council's present attitude to A2 retail uses in designated shopping frontages is neither Justified nor Consistent with National Policy so the Bank therefore objects to the omission from Core Strategy CP12 of any intention to review Local Plan Policy on Primary Shopping Frontages as this is unsound. This Policy should be rewritten to make clear that financial services retailers such as the Bank are appropriate in all designated shopping frontages, without restriction and that this will be reflected in the subsequent "Placemaking Plan" DPD.

In view of the requirement for improved provision of banking services in Bath and North East Somerset the Bank would like to confirm its continued interest in the LDF process and in that regard we shall be grateful if the Council will continue to notify us of the progress of the submitted document as well as details of any other emerging LDDs.

Change sought to make sound: The Core Strategy is setting the direction for subsequent DPDs such as the "Placemaking Plan" so Policy CP12 should set out a clear intention to review Local Plan Policy S5 as it is unjustified, and is unsupported by any evidence.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 6 Respondent: Lady Christine Eldon

RepresentationReference: 6\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): 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:

Respondent Number: 7 Respondent: Office of the Traffic Commissioner

RepresentationReference: 7\1 S

Plan Reference: Whole Document

Representation I have nothing to add to the consultation at this stage.

(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 8 **Respondent:** Trevor and Sheila Davis

RepresentationReference: 8\1 5

Plan Reference: Whole Document

Representation Thank you for sending us the forms for the Draft Core Strategy. As we have now been told that the land

(soundness): behind our back garden is staying as Green Belt, and not now being built on, by a company called Pegasus. We are delighted. Thank you very much.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 9 **Respondent:** Ms Sarah Mercer

RepresentationReference: 9\1

Plan Reference: Policy SV3: Radstock Town Centre Strategic Policy

Representation I have read some of the strategy and my only comment is about improving public transport links

(soundness): between Radstock and Bath (for commuters) and Radstock and Bristol (for commuters and shoppers).

In the 5 years that I have lived in Radstock it has been an ongoing struggle to commute to work in Bath (I have now learnt to drive and bought a car). The bus links to Bath are expensive and lengthy as buses get caught up in general traffic (despite the new 'bus lane' at Odd Down) and First Bus has no season ticketing which serves to increase length of time buses spend at each bus stop, plus making journeys more expensive.

Similar for Radstock to Bristol. Currently undoable if you work in Bristol as 178 service lengthy as takes in many rural villages and Keynsham and expensive and lengthy (as above).

Change sought to I would like to see some light transport scheme looked at for this area ie a tram using some of the
make sound: former railway line into Bath.

We need either a fast bus along the A39 or utilisation of the former railway line.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 10 **Respondent:** Mr Brian Bullock

RepresentationReference: 10\1

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation My comments are that whilst I appreciate more homes are to be provided, the facilities and amenities
(soundness): within Farmborough have been diminished and, relating to Policy RA1 a) we do not have at least three of the key facilities now within the village., ie, we only have a school and community meeting place. Our shop/post office facilities have been closed over 1/2 years ago. If homes are put within the village, how are people supposed to get to work now that petrol prices have been hiked up, and more importantly where is the work? Even in areas such as Paulton, where there is a vast house building programme, the shops are closing at an alarming rate and where are the people living in that area going to find work - or do they all have to live on the dole? Is it all very well, putting up homes in rural areas but if there are no facilities there for them what are they to do? Not everyone wants to live in cities, but villages must not be allowed to become ghost villages. For example, in Farmborough now, since the closure of the post office/stores, the only people seen walking through are the occasional dog walkers, all contacts within the village have been lost.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 11 Respondent: Civil Aviation Authority

RepresentationReference: 11\1 S

Plan Reference: Whole Document

Representation Thank you for your recent correspondence relating to the draft Core Strategy.

(soundness):

Whilst the CAA would not wish to comment on such plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly.

Notwithstanding the comments above, the following, whilst by no means a comprehensive list of all development/aviation related issues, might provide useful background material:

- 'Other' Civil Aerodromes. Operators/licence holders of civil aerodromes other than those that are officially safeguarded are advised to take steps to protect their locations from the effects of possible adverse development. To this end local authorities might agree to accept a 'non-official' safeguarding map from any local aeronautical site. If the Council has agreed to hold such maps, it should approach the site operator directly for comment on planning matters. Local planning authorities are asked to respond sympathetically to requests for non-official safeguarding. The CAA is prepared to offer advice on the preparation of a nonofficial safeguarding map at the request of any aerodrome operator or local planning authority. ODPM Circular 1/2003 (Annex 2, paragraph 13) refers.
- Telecom Installations. Whilst it is noted that the General Development Order states that applications for masts within 3 km of an aerodrome should contain evidence of notification to the CAA or aerodrome operator, the appropriate contact is the aerodrome operator. Notification to the CAA will result in advice to contact the aerodrome operator.
- Wind Turbines. All wind turbine proposals, whether prior to, or at, formal planning application stage, should be notified to both the CAA's Directorate of Airspace Policy and to the Ministry of Defence (Defence Estates). Addresses for each organisation are:
 - Directorate of Airspace Policy, K6 Gate 3, CM House, 45-59 Kingsway, London WC2B 6TE;
 - Safeguarding, Defence Estates, Blakemore Drive, Sutton Coldfield, B757RL
- High Structures. Notwithstanding the requirements of local aerodrome operators to consider the

impact of structures within their (officially or unofficially) safeguarded area, away from the immediate vicinity of an aerodrome, tall structures might nevertheless constitute an aviation hazard. In view of this, there is a mandatory lighting requirement for structures of a height of 150m or more. Moreover, away from aerodromes, even structures less than 150m high may need to be lit if by virtue of their nature or location they constitute a significant hazard to air navigation. It is recommended that all proposed developments over 90m in height should be notified to the Directorate of Airspace Policy (DAP) and comment sought relating to the need or otherwise for aviation obstruction lights. Additionally, to cater for the need to record in aviation documents and charts structures extending 91.4m (300ft) above ground level, local planning authorities are asked to inform the CAAIDAP about developments that might breach this level. DfT 10DPM Circular 1/2003 (Annex 2, paragraph 30-32) refers.

- Venting and Flaring. Venting and flaring of gas should be anticipated with mineral extraction. This might have a potential impact upon the safe operation of aircraft in the immediate vicinity. With this in mind, should planning permission be granted, it would be essential to establish whether such releases of gas would constitute a potential danger to overflying aircraft. If there were such a danger, the site would need to be promulgated to the aviation community along with advisory avoidance criteria.

We hope this is of use. Should the Council wish to discuss any related issue or seek clarification of any point, please do not hesitate to get in touch.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 12 Respondent: Ms Molly Conisbee

Representation Reference: 12\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation I wish to express my concern at the possible use of part of Beechen Cliff School playing fields for
(soundness): 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:

Respondent Number: 13 Respondent: Ms Annabel Jackson

RepresentationReference: 13\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 14 Respondent: Mrs G. Lewis

RepresentationReference: 14\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 15 Respondent: Ms Jenny Newbury

RepresentationReference: 15\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 16 **Respondent:** Mr Tom Battersby and Ms Tracey

RepresentationReference: 16\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): As the headmaster believes that the playing fields are required and pupil numbers have risen since the 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:

Respondent Number: 17 **Respondent:** Yves and Bett Dubois

RepresentationReference: 17\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): The Council rejected a similar plan about three years ago and we do not understand what can possibly 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:

Respondent Number: 18 **Respondent:** Mr Mathew Whitchurch

RepresentationReference: 18\1

Plan Reference: Policy B1: Bath Spatial Strategy

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

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:

Respondent Number: 19 **Respondent:** Mr Michael Berry

RepresentationReference: 19\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): • Pupil numbers have risen at the school and the land is subject to even greater use than before. The 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:

Respondent Number: 20 **Respondent:** Ms Marianne LeRoy-Lewis

RepresentationReference: 20\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 21 Respondent: Mr Thomas Leland

RepresentationReference: 21\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 22 Respondent: Mr and Mrs C. Bulley

RepresentationReference: 22\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 23 Respondent: Avon Wildlife Trust

RepresentationReference: 23\1

Plan Reference: Policy CP7: Green Infrastructure

Representation The revised Core Policy 7 GI is now very good however the Trust feels that this policy or the document
(soundness): as a whole is not yet consistent with Defra's Natural Environment Discussion document, October 2010. Defra's document will be used to shape national policy within the Natural Environment White Paper due to be released in spring this year. CP7 is not consistent or effective due to the lack of wording favouring not just protection of green infrastructure but enhancement of green infrastructure. It is ineffective in its ability to demonstrate targets for and other positive benefits of green infrastructure.

The Discussion Document states:

"The Coalition Programme for Government already sets out a range of commitments both to protect and to enhance the natural environment. (p2)

"We now have the opportunity to be the generation that finally puts a stop to the piecemeal degradation of our natural environment and, instead, seeks active opportunities to enhance its value. (p3)

"It will set out a programme of actions designed to put the value of the natural environment at the heart of Government and identify new ways of enabling local authorities and local communities to protect and enhance the natural environment. (p3)

"New jobs and opportunities can be created from activities which protect and enhance the natural environment." (p19) Defra's Natural Environment Discussion Document, October 2010.

Change sought to The policy should have frequent reference to 'enhancement' of green infrastructure (GI) (where
make sound: applicable) as well as throughout the document in order to be consistent with national policy and increase the effectiveness of this core policy.

To further improve the effectiveness of this policy; 'the delivery of biodiversity restoration targets for B&NES Strategic Nature Areas (SNAs) in line with Biodiversity South West Nature Map' in terms of GI enhancement, should be included.

Following the recent release of Defra's Payments for ecosystem services, 2010 we suggest an update in the language used referring to the benefits of biodiversity and GI. Payments for ecosystem services (PES) highlights the value of the natural environment and the diverse range of benefits that it delivers including food, clean water, healthy soil and carbon storage, recreational opportunities, valued

landscapes and the recycling of nutrients. The policy should acknowledge the possibilities and variety of benefits that will arise from enhancing GI with reference to the PES document and Defra's Natural Environment Discussion Document, October 2010.

For example, 'Payments for ecosystem services (PES) can be employed as a strategy for providing a well designed managed network of GI. PES provides the opportunity to link up beneficiaries and providers as well as engaging in a broad spectrum of stakeholders which can deliver improved outcomes for the natural environment and its many beneficiaries at local catchment, national and in the case of climate regulation and biodiversity, potentially international level.'

While the policy is very good at present these alterations would significantly improve the effectiveness, consistency and clarity of this policy.

The Trust welcomes the opportunity to be consulted during the period of development of the GI Strategy.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 23\2

Plan Reference: Strategic Objective 2: Protect and enhance the District's natural, built and cultural assets and provide green infrastructure.

Representation The Trust feels that this objective is missing important information regarding the potential value of **(soundness):** brownfield sites for wildlife and is therefore not as effective as it should be.

Change sought to Include within the objective point

make sound: • "making optimum use of brownfield opportunities in meeting housing and economic development needs and avoiding greenfield land as far as possible"

the statement; 'whilst ensuring brownfield sites are given the same consideration in ecological terms as Green Belt sites due to the potential importance they can have for wildlife'.

This means they should be considered for ecological surveys before development can take place.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 24 **Respondent:** Norton Malreward Parish Council

RepresentationReference: 24\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation The received Draft Core Strategy has been circulated and highlights discussed at the Parish Council **(soundness):** meeting held on Tuesday 11th November 2011.

The Parish Council fully supports the contents of the Strategy and are delighted to note that the green belt in the Parish will be protected against the building of new properties. Likewise the scrapping of the proposed South East Urban extension to the City of Bristol was warmly received by the Councillors. We wish for our comments to be taken into account by the respective Inspector.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 25 Respondent: Dr Kate Jenkins

RepresentationReference: 25\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): The SHLAA report has ignored the considerable opposition of local councillors which was expressly 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:

Respondent Number: 26 Respondent: Ms Nancy Robertson

RepresentationReference: 26\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 27 Respondent: Mrs Angela Frith

RepresentationReference: 27\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 28 Respondent: Mrs Sue Kinchin-Smith

RepresentationReference: 28\1

Plan Reference: Policy B1: Bath Spatial Strategy

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

(soundness): 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:

Respondent Number: 29 Respondent: Sheila and Margret Youd

RepresentationReference: 29\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 30 Respondent: Chris Kinchin-Smith

RepresentationReference: 30\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 31 Respondent: Mr and Mrs Kemp

RepresentationReference: 31\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 32 Respondent: Mr Andrew Vickers

RepresentationReference: 32\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 33 Respondent: Ms Margaret Crossley

RepresentationReference: 33\1 S

Plan Reference: Policy CP10: Housing Mix

Representation Redevelopment or new housing is essential for individuals or couples e.g. bedsits, one and two

(soundness): bedroom flats. It is well known that lower income or younger adults have great difficulty living locally.

Many live out of area or are still with parents. We need to meet the needs of all our residents.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 33\2 S

Plan Reference: Policy CP1: Retrofitting Existing Buildings

Representation Positive and substantial support to enable established buildings to greatly minimise carbon emissions

(soundness): and environmental impact whilst protecting our cities heritage.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 34 Respondent: Bath Independent Guest House Association

RepresentationReference: 34\1

Plan Reference: Policy B2: Central Area Strategic Policy

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 Policies B1 and B2 to take account of existing permissions.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 35 Respondent: Mr Paul Robinson

Representation Reference: 35\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 36 Respondent: Mr Jim Canham

Representation Reference: 36\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 37 **Respondent:** Mr Gordon Rawlings

RepresentationReference: 37\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 38 **Respondent:** Ms Marian McNeir

RepresentationReference: 38\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 39 Respondent: Deirdre and Robert Sackett

RepresentationReference: 39\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 40 Respondent: Ms Eileen Vickers

RepresentationReference: 40\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 41 Respondent: Mrs Jill Travis

RepresentationReference: 41\1 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation I believe the Core Strategy is sound. I am a Clutton resident which at present is NOT seen as an RN1
(soundness): village not able to cope with much development. I believe this to be sound for the following reasons:

- Clutton has a very overused small lane system running through it. The side lanes and the hub of the village cannot cope with much increased traffic. It already has a new development on Station road "The Sidings" increasing traffic, with more houses earmarked for that site. Venus Lane is already a 'rat run' with drivers speeding through it, due to its straight layout. There are very few pavements in Clutton. The roads are already overused by cars and lorries and have many potholes and patches from overuse.
- The village has very little infrastructure where facilities are concerned. There is a butchers, a post office and three pubs. There is no shop and very few potential sites to create more provisions such as shops to cope with more people. The main road through the village is impossible to widen having residential development lining it. There are a few sports and children's facilities but very little. The village needs a shop to provide for existing houses, not more houses to support the trades in the village.
- The local school is flourishing and is NOT short of pupils. There is competition for all local children to get a place, so this is not a reason for needing more houses.
- There are very few areas for safe parking in the hub of the village – the primary school edges onto the road and more cars parked would endanger the children coming out of the school and crossing the road.
- The rural characters of Clutton and neighbouring village Temple Cloud are very different, but both are accentuated by surrounding fields and green areas which are very popular dog walking, rambling, play areas for local people. To merge Clutton with Temple Cloud would be a great mistake, particularly with the heavy lorry traffic piling down the tiny Temple Inn Lane and Marsh Lane to the terribly misplaced ind' estate on Marsh Lane between Clutton and Hallatrow.
- There are a couple of areas of development in Clutton, which have historical importance relating to the village's past. Maynard Terrace, for instance is a pretty row of miners cottages which greatly enhance the village's character and needs to be protected from new development close by swallowing up the beauty of this area of the village.

Please keep CLUTTON out of the RN1 village category. It is already struggling with traffic loads on its small lanes and the lack of local services and shops. It is in danger of becoming just a commuter village for Bristol and it has an important history and character, which should be upheld and protected.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 42 Respondent: Bitton Parish Council

RepresentationReference: 42\1 S

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation Take into account the need to retain Keynsham Town Centre as a vibrant and commercially viable
(soundness): shopping area serving the needs of all residents in many ways

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 42\2 S

Plan Reference: Table 6: Summary of Key Infrastructure in Keynsham

Representation The continued need to ensure that Keynsham Station meets and serves the needs of all local residents
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 42\3

Plan Reference: Policy CP13: Infrastructure Provision

Representation the continued provision of effective cross-boundary public transport links to enable people from a
(soundness): wider area to access facilities in the Keynsham area.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 43 **Respondent:** G. Bunn

RepresentationReference: 43\1

Plan Reference: Policy B1: Bath Spatial Strategy

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. Futhermore 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 length 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:

Respondent Number: 44 **Respondent:** Peter and Caroline Laws

RepresentationReference: 44\1

Plan Reference: Policy B1: Bath Spatial Strategy

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.

Futhermore, any development of the Lower Field will have a significant impact on Devonshire Buildings. These are very fine buidlings 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:

Respondent Number: 45 Respondent: Ms Annabelle Petter

RepresentationReference: 45\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): The school has insufficient space for informal games, the area is used extensively by the school now 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 planing 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 draingage 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:

Respondent Number: 46 Respondent: Mr S. Petter

RepresentationReference: 46\1

Plan Reference: Policy B1: Bath Spatial Strategy

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 Astro turf 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:

Respondent Number: 47 Respondent: Mr William Robertson

RepresentationReference: 47\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 48 Respondent: Lt. Cdr. M. Phelp

RepresentationReference: 48\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 49 **Respondent:** Clutton Parish Council

RepresentationReference: 49\1 S

Plan Reference: Policy RA2: Development in the Villages outside the Green Belt not meeting Policy RA1 Criteria

Representation (soundness): "This council, having considered the settlement designations in the Core Strategy proposed by B&NES Council and the data on which they are based, supports the designation of Clutton as an RA2 Settlement."

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 49\2

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation (soundness): Clutton Parish Council has over the past 6 years had many discussions, conducted surveys and consultation exercises in the process of developing a Parish Plan. The Parish Plan was formally adopted by the Council at its meeting of 18th October 2010. This process overlapped in its later stages with the developing discussions about the B&NES Core Strategy. The Parish Council considered at several meetings the proposal that Clutton be identified as a village in which further commercial and housing development is appropriate, and on each occasion concluded that the existing infrastructure – both of roads and drainage, and of community facilities – made this inappropriate. Neither during the consultations over the Parish Plan, nor in responses to the survey conducted by the Council, nor in connection with the Council's discussions about the drafts of the Core Strategy, were representations made to the Council which pressed for more housing in the village.
Note that neither the Council nor anyone else so far as we are aware has conducted a formal, independent, housing needs survey in the parish, though we would be happy if such a survey were conducted.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 49\3

Plan Reference: Policy CP8: Green Belt

Representation (soundness): Clutton Parish Council has for many years sought to ensure that its proximity to Bristol and Bath does not lead to it growing into a huge dormitory for either of those cities. When proposals were made some years ago for an expansion to the north of Temple Cloud, the Council expressed real concern

about the danger that this would lead on to an amalgamation of Temple Cloud with Clutton. There is an equal danger of development to the west of High Littleton leading to a similar amalgamation.

The current delineation of the Green Belt offers no protection from a gradual erosion of the open spaces (fields) which currently separate the three villages, and it is not at all clear how the policies in the Core Strategy would prevent such erosion (for example, by the use of these fields as exception sites).

Change sought to make sound: The Council would like to see the boundary of the Green Belt drawn further south in the vicinity of Clutton, so that it passes between Clutton and Temple Cloud/High Littleton: effectively making Clutton into a village 'washed over' by the Green Belt, rather than one which stands on the boundary of the Green Belt.

The adoption of the Core Strategy offers an excellent opportunity to introduce this simple measure of protection for the village over the next generation, and we would like to argue for this amendment to the Strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 50 Respondent: Saltford Parish Council

RepresentationReference: 50\1 S

Plan Reference: Chapter 1: The Spatial Vision

Representation (soundness): Having considered the Draft Core Strategy document, Saltford Parish Council has no comments to offer on the content.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 51 Respondent: Ms Laura Brown

RepresentationReference: 51\1

Plan Reference: Policy B1: Bath Spatial Strategy

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

Respondent Number: 52 Respondent: Ms Lisa Oestreicher

RepresentationReference: 52\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 53 Respondent: Ms Patricia Harbord

RepresentationReference: 53\1

Plan Reference: Policy B1: Bath Spatial Strategy

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 zones 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 recreational 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:

Respondent Number: 54 Respondent: Mr John Toplis

Representation Reference: 54\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation Is contrary to the local plan which was approved by the Council in 2007, which stated that the field
(soundness): 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:

Respondent Number: 55 Respondent: Ms Pat Toplis

RepresentationReference: 55\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation - The site is part of the green belt on the South side of Bath and is used generally by the surrounding
(soundness): 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:

Respondent Number: 56 Respondent: Mr Mike Ross

RepresentationReference: 56\1

Plan Reference: Policy B1: Bath Spatial Strategy

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

Respondent Number: 57 Respondent: Mrs Joanna Ross

RepresentationReference: 57\1

Plan Reference: Policy B1: Bath Spatial Strategy

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

Respondent Number: 58 Respondent: Julian David

RepresentationReference: 58\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation All the reasons why this land is unsuitable for development still apply. The school needs the play space, **(soundness):** 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:

Respondent Number: 59 Respondent: Mrs Jean Stidson

RepresentationReference: 59\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 60 Respondent: Mr B. Stidson

RepresentationReference: 60\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 61 Respondent: Mr Jamie Carruthers

RepresentationReference: 61\1

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation There is no need for more housing in the village. It will destroy a green site. Create more traffic and
(soundness): pressure on services. Cause havoc while building with lorries etc. Ruin people's views, de-value their property and bring no advantages to the village. It's just so some developers can make money, nothing else. Not to mention the impact on wildlife. We are lucky enough to get a lot of wildlife in this area including roe deer, fox, rabbit, badger (I don't know if there is a badger set in this proposed site but if there is, it will be protected by law). A lot of bird species, Manard Terrace seems to be a hot spot for those sparrows in its hedgerows. This is a species that is in trouble nationally and would be effected by development. Many of the hedges and trees in this site would be at risk as the land gets levelled and drains etc are put in most of them would be cut down. These are lovely fields and if lost what then, will be the next field then next and the next, until the very thing that people moved here for in the first place is gone!! And Clutton is no longer a village but a sprawling town. Then people will be moving out, me included. Enough is enough put a stop to it now

Change sought to Do not build it, and leave as green fields and trees. If a new scout/youth hut is built independently,
make sound: developers would have no excuse for building houses, as this is the only thing they ever offer

Representation (legal compliance): do not know the law to comment

Change sought to make legally compliant:

Respondent Number: 62 **Respondent:** Mr Joe Segura

RepresentationReference: 62\1 S

Plan Reference: Whole Document

Representation Supportive of the whole document.
(soundness):

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 63 **Respondent:** Mr John Bishop

RepresentationReference: 63\1

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation I firmly believe there is a will in the community for development which promotes a wide social mix ie
(soundness): diversity

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 64 **Respondent:** Miss Liece Curtis

RepresentationReference: 64\1

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Actual villagers can not afford to buy a house in the village and have to live elsewhere but would love
(soundness): to come back

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 65 **Respondent:** B. Doyle

RepresentationReference: 65\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 66 **Respondent:** Mr Peter Martin

RepresentationReference: 66\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 67 Respondent: Mr Trevor John

RepresentationReference: 67\1 S

Plan Reference: Whole Document

Representation (soundness): Supportive of the whole document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 68 Respondent: Mrs Jennifer John

RepresentationReference: 68\1 S

Plan Reference: Whole Document

Representation (soundness): Supportive of the whole document.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 69 Respondent: Dr Stephen Hayward

RepresentationReference: 69\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): - the SHLAA goes against the recently expressed views of our local ward Councillors
- 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:

Respondent Number: 70 Respondent: Mrs Caroline Hayward

RepresentationReference: 70\1

Plan Reference: Policy B1: Bath Spatial Strategy

- 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:

Respondent Number: 71 Respondent: Mrs Margaret Jeffery

RepresentationReference: 71\1

Plan Reference: Policy B1: Bath Spatial Strategy

- 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:

Respondent Number: 72 Respondent: Ms Margaret Carter

RepresentationReference: 72\1

Plan Reference: Policy B1: Bath Spatial Strategy

- 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:

Respondent Number: 73 Respondent: Newton St Loe Conservation Group

RepresentationReference: 73\1 S

Plan Reference: Policy B4: The World heritage Site and its Setting

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:

RepresentationReference: 73\2 S

Plan Reference: Paragraph 5.36

Representation With regard to agriculture it is predicted that agricultural production for local markets will become
(soundness): increasingly important as energy prices rise and globalised food supplies are disrupted by changing weather patterns. Farming in the rural areas will have an important role to play in supporting food security and as such, local farm shops, local food production and small scale farm developments will be supported.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 73\3 S

Plan Reference: Policy B1: Bath Spatial Strategy

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:

RepresentationReference: 73\4 S

Plan Reference: Strategic Objective 6: Plan for development that promotes health and well being.

Representation Specifically we find sound and support:

(soundness): Objective 6 -encouraging and facilitating increased local food production

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 73\5 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Specifically we find sound and support the following vision and policies in the new Core Strategy:

(soundness): 3 .Prioritising the use of brownfield opportunities for new development in order to limit the need for development on greenfield sites and

4. retaining the general extent of Bristol – Bath Green Belt within B&NES with no strategic change to the boundaries also

6. protecting the district’s biodiversity resource including sites, habitats and species of European importance

Page 19 1.26

The strategy is to locate new development in the most sustainable locations and therefore the priority is to steer growth to brownfield land in urban areas of Bath, Keynsham and the larger settlements in the Somer Valley.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 73\6 S

Plan Reference: Strategic Objective 2: Protect and enhance the District's natural, built and cultural assets and provide green infrastructure.

Representation Specifically we find sound and support: Objective 2 - making optimum use of brownfield opportunities

(soundness): in meeting housing and economic development needs and avoiding greenfield land as far as possible helping to conserve and enhance the quality & character of our built and natural heritage helping to conserve, enhance and restore the diversity and resilience of the District’s wildlife sites

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 73\7 S

Plan Reference: Policy CP8: Green Belt

Representation Core Policy CP8 conforms with national policy which also states that the general extent and detailed **(soundness)**: boundaries of the Green Belt should be altered only exceptionally.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 74 **Respondent:** Mr Stephen Clarke

RepresentationReference: 74\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 75 **Respondent:** Bath Independent Guest Houses Association

RepresentationReference: 75\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

RepresentationReference: 75\2

Plan Reference: Policy B2: Central Area Strategic Policy

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: Policy B2 for the Central areas again refers to the requirement for an additional "500-750 hotel 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:

Respondent Number: 76 Respondent: Mr Mark Jarvis

RepresentationReference: 76\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 77 Respondent: Mr Peter Larkin

RepresentationReference: 77\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation • The SHLAA is against views expressed by councillors - as I understand the matter. It also ignores the **(soundness)**: 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:

Respondent Number: 78 Respondent: Mr Robin McKie

RepresentationReference: 78\1

Plan Reference: Policy B1: Bath Spatial Strategy

- Representation** 1. The field has two registered public footpaths running through it. If one person objects to any **(soundness)**: 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:

Respondent Number: 79 Respondent: Ms Tracey Lee

RepresentationReference: 79\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation I have a young son and the fields are a valuable space for him to play. They are also a way for us to **(soundness)**: 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:

Respondent Number: 80 **Respondent:** Mr and Mrs Brock

RepresentationReference: 80\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation Firstly, we are extremely concerned about losing of a very significant green field area in a world
(soundness): 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:

Respondent Number: 81 **Respondent:** Camerton Parish Council

RepresentationReference: 81\1 S

Plan Reference: Whole Document

Representation Supportive of the whole document.
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 82 **Respondent:** Mr and Mrs Hanna

RepresentationReference: 82\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation 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:

Respondent Number: 83 Respondent: Ingham and Buffton

Representation Reference: 83\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation We believe this assessment in the SHLAA is too cursory and ignores council decisions in 2007. Our views (soundness): 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:

Respondent Number: 84 Respondent: Mr Roger Chapman

Representation Reference: 84\1

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation I have read the Chronicle of 20 Jan. I believe a shortage of housing, leading to inflated prices, is at the (soundness): heart of both economic and social problems in Bath and England as a whole. I am also a country lover, enjoying walking in this lovely part of the country. I think it is wrong for the council to rule out of its core strategy, the possibility of building homes on land offered by the Duchy of Cornwall between Bath and Newton St Loe. The Duchy considers this land suitable and I think the council is wrong to rule this out when the need for housing remains so great. I support the inclusion of this land in the plan and

oppose the local residents' vocal campaign against this, which smacks of nimbyism by people who already have a home.

Change sought to make sound: Accept the Duchy of Cornwall's offer to include land between Bath and Newton St Loe as suitable for housing in the core strategy.

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 85 Respondent: Mr Anthony Acton

RepresentationReference: 85\1

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): I wholeheartedly agree with the general thrust of the draft strategy, to avoid large scale development in the green belt, to concentrate on developing brownfield sites in Bath, and to look for opportunities to provide affordable housing. I am very pleased to see that the importance of the green setting of the World Heritage Site is recognised. The previous plan's worst feature, in my opinion, was the proposed destruction of the north side of the Avon Valley in its approach to Bath.

I note that the Duchy of Cornwall plan to challenge the new Draft Core Strategy. During the previous consultation exercise, you provided me with copies of minutes and correspondence between the Duchy and the council, under the freedom of information Act. I was concerned to note from those documents that the duchy were pushing their proposals very hard, and to some extent appeared to be driving the process. Inevitably during the period of several years where that policy was evolving, close relationships built up between the Duchy and some councillors and officials, I am very pleased to note that the council's new strategy makes clear that these relationships have not impeded a radical change of direction.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 85\2

Plan Reference: Policy RA4: Rural Exception Sites

Representation (soundness): I hope the need for more affordable housing, on a scale proportionate to the size of the existing communities, will if possible be given greater recognition. In a small village like Corston, the provision of say a dozen new affordable homes would be very beneficial for our local community. We recently had a very sad case where Somer evicted a very local family from their (deceased) mother's house. Families like that are part of our community and it would be good if they continue to live here.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 86 Respondent: Whitchurch Parish Council

RepresentationReference: 86\1

Plan Reference: Policy CP8: Green Belt

Representation Whitchurch Parish Council are delighted that the Regional Spatial Strategy and the Urban Extension to
(soundness): South East Bristol have both been scrapped.

We fully support Policy CP8 Green Belt on Page 120 of the Draft Core Strategy, which sets out the purpose and objectives of Green Belt within B&NES and that the openness of the Green Belt will be protected from inappropriate development .

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 86\2

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation We still do not think that Whitchurch Village qualifies as a RA1 Village as defined on page 96. Part a)
(soundness): states that the village has at least 3 of the following key facilities within the village: post office, school, community meeting place and convenience shop but Whitchurch Village only has two of these facilities a school and a community meeting place we do not have a post office or a convenience shop.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 87 **Respondent:** New Dawn Homes Ltd

RepresentationReference: 87\1

Plan Reference: Policy CP9: Affordable Housing

Representation The reduction in the affordable housing threshold from 14 units to 10 units and the requirement for
(soundness): small sites provision on developments of 5 to 9 dwellings is :-
1. Contrary to National Policy
2. Will result in excessive costs that can not be borne by small developments
3. Will ultimately restrict the provision of affordable housing on small infill sites, by preventing them coming forward on viability grounds

Change sought to Affordable Housing policies should comply with National Standards and guidance
make sound: Social Housing Grant should be applicable to new developments

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 88 **Respondent:** Ruth Gairns and Stuart Redman

RepresentationReference: 88\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation A plan to develop part of Beechen Cliff School Playing Fields was rejected on several grounds only three
(soundness): 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:

Respondent Number: 89 Respondent: Ms Suzy Granger

Representation Reference: 89\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation We have been living on Greenway Lane for 7 years and in that time the traffic has doubled. The
(soundness): 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 aesthetically. 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:

Respondent Number: 90 Respondent: Mr Geoffrey Lee

RepresentationReference: 90\1

Plan Reference: Policy B1: Bath Spatial Strategy

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 measurer in Greenway Lane.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 91 Respondent: Mr Simon Haywood

RepresentationReference: 91\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation (soundness): Using Brownfield sites as a priority for new housing is sound. No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus protecting this precious land.

I am pleased that the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this County and I hope your Draft Core Strategy is Adopted.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 91\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Para 5.20 This further enforces 5.18 as CP8 Green belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Para 5.36 It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 91\3 S

Plan Reference: Policy CP8: Green Belt

Representation This Policy will hopefully protect the Green Belt but there must also be care taken that developers do
(soundness): not take advantage of the 'Community Right to Build'.

Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 92 **Respondent:** Jo Haywood

RepresentationReference: 92\1 S

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Using Brownfield sites as a priority for new housing is sound
(soundness): No strategic changes to the Green Belt Boundary of Bristol-Bath within BANES thus protecting this precious land.

I am pleased tha the new housing numbers identified by BANES can be met by utilizing brown field sites, empty properties, allocating small housing developments around identified villages within the County and using certain redundant agricultural buildings.

This is great progress from the previously massive housing developments being thrust on this County and I hope your Draft Core Strategy is Adopted

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 92\2 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation Para 5.17, Para 5.18 and Para 5.20 I am pleased to see Whitchurch identified as a Focus Village with
(soundness): small scale development only.

Para 5.20 This further enforces 5.18 as CP8 Green belt protection must be considered with RA1 which will safeguard the area from any Urban Extension of Bristol.

Para 5.36 It is encouraging to see that Agriculture and the land is now being seen as important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 92\3

Plan Reference: Policy CP8: Green Belt

Representation This Policy will hopefully protect the Green Belt but there must also be care taken that developers do
(soundness): not take advantage of the 'Community Right to Build'.

Table 8 - It is right and sound to uphold the Green Belt and all 12 points are relevant.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 93 **Respondent:** Highways Agency

RepresentationReference: 93\1 S

Plan Reference: Strategic Objective 7: Deliver well connected places accessible by sustainable means of transport.

Representation The Agency strongly supports the inclusion of this strategic objective
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\2 S

Plan Reference: Chapter 1: The Spatial Vision

Representation The Agency is encouraged that the Council has added text to ensure that necessary. Infrastructure is
(soundness): put into place in step with development, supported by the objective to reduce the need to travel.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\3 S

Plan Reference: Chapter 1: Vision and District-wide Strategy

Representation On the whole the Agency is supportive of the spatial strategy that seeks to concentrate growth in the **(soundness):** most sustainable locations.

The Agency has reviewed the supporting Infrastructure Delivery Programme and notes that there is not any specific reference to the Strategic Road Network (SRN). Whilst it is acknowledged that the IPD is an evolving document subject to review, the Agency wishes to see specific reference to development that has potential to impact on the SRN and how any mitigation works are to be funded (by developer).

This is covered in greater detail in the Agency's representations to section 6G and policy CP13

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\4 S

Plan Reference: Strategic Objective 1: Cross cutting objective - Pursue a low carbon and sustainable future in a changing climate.

Representation The Agency is encouraged with the Council's aim to reduce the need to travel to reduce the impacts of **(soundness):** climate change.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\5 S

Plan Reference: Policy RA1: Development in the Villages meeting the listed criteria

Representation The Agency supports the approach to direct growth to the most sustainable villages, where there are **(soundness):** existing services and facilities.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\6 S

Plan Reference: Policy CP13: Infrastructure Provision

Representation Whilst we do not consider this makes the Strategy unsound, the Agency is concerned that there is no **(soundness):** reference to the Strategic Road Network within the Infrastructure Delivery Programme (although the Agency acknowledges that this is an evolving document). The IDP document is cross referenced several

times within the Core Strategy, where it is identified to be the mechanism for securing infrastructure in line with development.

The Agency's concerns specifically related to a lack of reference within the IDP about potential improvements required to the SRN as a result of development, and, that the explanatory text within the Core Strategy potentially limits infrastructure contributions to those identified within the IDP. This raises concerns for the Agency, as our position to require developers to fully fund mitigation works to the SRN, resulting from the impact of proposed development is potentially weakened.

Whilst the Agency is not suggesting that there are infrastructure improvement schemes required on the SRN at this stage, the lack of reference to the SRN may result in this tier of infrastructure being overlooked by developers during the preparation stage of schemes. This lack of clarity is of significant concern to the Agency, as the wording could potentially restrict the Agency's ability to secure funding for SRN infrastructure improvements required to mitigate development.

In addition, the Council identifies that the evidence base for infrastructure requirements is a key aspect of the Core Strategy (and that the IPO provides the mechanism to secure funding). On this basis, major applications must include a robust evidence base supported by an up-to-date Transport Assessment that is produced in line with the guidance set out within the OfT's Guidance on Transport Assessment document (2007). If mitigation works are required as a result of the development, then the developer will be required to fund works. The Council should also identify their interpretation of major development within the Core Strategy.

Change sought to make sound: The Council should insert text within the IPO and Core Strategy to identify the requirement for major applications to include a robust and up-to-date Transport Assessment, in order to ensure that the required infrastructure is provided in step with development growth.

The Agency wish to see the Council insert text within the IPO and CP13 of the Core Strategy to identify that a flexible approach to securing contributions for infrastructure in addition to what is identified within the IOP will be sought, in line with the guidance of Circular 05/2005 and Regulation 122 of the Community Infrastructure Levy (CIL) Regulations April 2010

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\7 S

Plan Reference: Policy B1: Bath Spatial Strategy

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

RepresentationReference: 93\8 S

Plan Reference: Paragraph 6.93

Representation The Agency supports the objective to reduce the need to travel.

(soundness):

Change sought to make sound: The Council should state that major applications need to be supported by a robust Transport Assessment using guidance within the OfT's Guidance on Transport Assessment document (2007). Such assessments need to identify the impact of development on the Strategic Road Network in addition to the local highway network.

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\9 S

Plan Reference: Somer Valley: The Vision

Representation The Agency notes the growth proposals and supports the Council's aspiration to increase self-containment in the larger settlements and improve sustainable forms of transport. The Agency is concerned about how any improvements to the SRN would be delivered when there is no reference to the SRN within the IDP. 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:

RepresentationReference: 93\10 S

Plan Reference: Chapter 3: Keynsham

Representation The Agency notes the congestion issues within Keynsham, and welcomes the aspiration to reduce out commuting. The Agency is concerned about how any improvements to the SRN would be delivered when there is no reference to the SRN within the IDP. 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:

RepresentationReference: 93\11 S

Plan Reference: Paragraph 2.30

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:

RepresentationReference: 93\12 S

Plan Reference: Paragraph 2.45

Representation The Agency welcomes reference to requirement for Travel Plans at paragraph 2.45.

(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\13

Plan Reference: Paragraph 2.15

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:

RepresentationReference: 93\14

Plan Reference: Policy DW1: District Wide Spatial Strategy

Representation Whilst we do not consider this makes the Strategy unsound, the Agency is concerned that there is no
(soundness): reference to the Strategic Road Network within the Infrastructure Delivery Programme (although the Agency acknowledges that this is an evolving document). The IOP document is cross referenced several times within the Core Strategy, where it is identified to be the mechanism for securing infrastructure in line with development.

The Agency's concerns specifically related to a lack of reference within the IOP about potential improvements required to the SRN as a result of development, and, that the explanatory text within the Core Strategy potentially limits infrastructure contributions to those identified within the IOP. This raises concerns for the Agency, as our position to require developers to fully fund mitigation works to the SRN, resulting from the impact of proposed development is potentially weakened.

Whilst the Agency is not suggesting that there are infrastructure improvement schemes required on the SRN at this stage, the lack of reference to the SRN may result in this tier of infrastructure being overlooked by developers during the preparation stage of schemes. This lack of clarity is of significant concern to the Agency, as the wording could potentially restrict the Agency's ability to secure funding for SRN infrastructure improvements required to mitigate development.

In addition, the Council identifies that the evidence base for infrastructure requirements is a key aspect of the Core Strategy (and that the IPO provides the mechanism to secure funding). On this basis, major applications must include a robust evidence base supported by an up-to-date Transport Assessment that is produced in line with the guidance set out within the OfT's Guidance on Transport Assessment document (2007). If mitigation works are required as a result of the development, then the developer will be required to fund works. The Council should also identify their interpretation of major development within the Core Strategy.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 93\15

Plan Reference: Paragraph 2.42

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:

Respondent Number: 94 **Respondent:** Mr Peter Nobes

RepresentationReference: 94\1

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 95 Respondent: The Coal Authority

RepresentationReference: 95\1

Plan Reference: Strategic Objective 1: Cross cutting objective - Pursue a low carbon and sustainable future in a changing climate.

Representation The Coal Authority considers that Objective 1 does not fully reflect the national policy requirement not
(soundness): only to make prudent use of mineral resources but also to safeguard them from sterilisation.

Change sought to The Coal Authority would therefore suggest the following additional text to the 6th bullet point:

make sound: • "facilitating the prudent use and reduced consumption of key natural resources such as undeveloped land, energy, water and minerals, along with the safeguarding of mineral resources from unnecessary sterilisation"

Reason – To comply with the guidance in MPS1 (Planning and Minerals)

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 95\2

Plan Reference: Paragraph 6.65

Representation (soundness): In response to the previous consultation on the Core Strategy in December 2009, The coal Authority made the following comments:

"The proposed Core Policy on Safeguarding Minerals currently makes no mention of the definition of Mineral Safeguarding Areas (MSAs). As such, the Coal Authority considers that the Core Strategy currently fails to meet the requirements set out in paragraph 13 of MPS1, which requires MSAs to be defined in Local Development Documents.

As outlined above, there are significant coal resources within Bath and North East Somerset which are capable of extraction by surface mining techniques. The Coal Authority has provided the Council with the Surface Coal Resource Plan in November 2009 to show where these resources occur within the Plan area. The Surface Coal Resource Plan has been developed in conjunction with British Geological Survey and surface mining operators for use within the planning process. It is therefore considered to represent the best available geological and minerals resource information for the area, as required by paragraph 32 of the MPS1 Practice Guide, and should form the evidence base for the definition of an MSA for coal.

Unless the issue of MSAs is addressed to some extent within the Core Strategy, the Coal Authority considers that there is a significant risk of the document being unsound in respect of the requirement for consistency with national policy. Indeed, the Coal Authority is likely to object to the Core Strategy on these grounds unless this issue is addressed within the Proposed Submission Draft of the document.

The Coal Authority therefore considers that the Core Strategy should acknowledge the presence of surface coal resources within the Bath and North East Somerset area. It should also contain a policy commitment to identifying an MSA for coal in order to ensure that this resource is not needlessly sterilised by non-mineral developments. The detailed boundary of the MSA (for which the evidence base should be the Surface Coal Resource Plan) should then be determined either within the Core Strategy or a subsequent Development Plan Document as the Council deems appropriate. However, if the latter option is preferred it may be appropriate to define the general extent of the coal resource area (along with any other relevant mineral resources) on the Key Diagram or another illustration in the Core Strategy.

Linked to the identification of MSAs, the Coal Authority also considers that the Core Strategy policy on Safeguarding Minerals should incorporate criteria to encourage the prior extraction of minerals in situations where it is necessary for non-mineral development to take place within MSAs. This is necessary in order to meet the requirements of paragraph 13 of MPS1 and avoid the unnecessary sterilisation of the nation's resource."

The Draft Core Strategy does not positively respond to these comments and still does not address the issue of mineral safeguarding as required by MPS1. As such The Coal Authority considers that the Core Strategy is UNSOUND.

It is noted that the Core Strategy in Paragraph 6.69 states: "Development proposals relating to minerals resources will continue to be considered within the context of national minerals planning policy and the saved minerals policies in the B&NES Local Plan until reviewed through the Placemaking Plan. Minerals Safeguarding Areas will be defined in the Placemaking Plan as will other minerals allocations and designations."

This proposed approach is at odds with the requirements of MPS1, the saved Local Plan Policy M.2 does not define Mineral Safeguarding Areas, it utilises the outdated approach of using old Mineral Consultation Areas. These areas also only cover small geographic areas and do not cover the full mineral resources that need to be safeguarded. As an example they do not in any way seek to safeguard the surface coal resource from unnecessary sterilisation as MPS1 requires. For the reasons set out above, the Coal Authority is of the firm view that, whilst it is inherently difficult to quantify the long term requirement for energy minerals such as coal, there will clearly remain a

significant demand for indigenous coal supply both during and beyond the period of the Core Strategy and beyond.

Coal Mining Legacy

As you will be aware, the Bath and North East Somerset area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area – particularly where coal exists near to the surface – including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning process in coalfield areas needs to take account of coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.

Within the Bath and North East Somerset area there are approximately 550 recorded mine entries. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy occurs as a result of mineral workings, it is important that new development delivered through the Local Development Framework recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

Change sought to make sound: As such, the Coal Authority considers that, in order to properly address the requirements of MPS1, the associated good practice guidance and MPG3 the Core Strategy should incorporate the following:

- Safeguarding of the geological surface coal resources across the plan area through the designation of a Mineral Safeguarding Area. The Surface Coal Resource Plan available from the Coal Authority should form the evidence base for this process;
- Suitable policies/policy criteria to support the prior extraction of minerals where sterilisation would otherwise occur from built development;
- Suitable policies/policy criteria for dealing with energy mineral proposals, including surface coal;
- Site allocations for any relevant strategic proposals that may be put forward by the industry (you should note however that the Coal Authority cannot support any individual operator in their proposal; any support would be on the basis of licensed areas and/or viable resources being present); and
- Policies/policy criteria for appropriate restoration and aftercare, to the best industry standard, to ensure that no future legacy or public safety issues arise from poor restoration

Mineral Safeguarding Areas should be illustrated on the Core Strategy Key Diagram, with the Proposals Map then defining the precise geographical extent of the areas in due course. The proposed current approach will not achieve the effective implementation of national planning policy and is not justified by any locally distinctive circumstances.

The neighbouring City of Bristol proposed not to safeguard mineral resources through its Core Strategy, however after a preliminary conclusion that the Inspector considered that the Core Strategy would be unsound without addressing the issue, they have proposed an interim position within the Core Strategy. They are constrained by the inability to make substantial changes at the examination, the Bath and North East Somerset Core Strategy is not that advanced and there is still adequate opportunity for the plan to be amended to remedy the unsoundness.

Reason – To comply with the guidance in MPS1 (Planning & Minerals), the MPS1 Practice Guide, the BGS Safeguarding Guidance and MPG3 (Coal Mining & Colliery Spoil Disposal)

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 95\3

Plan Reference: Paragraph 6.69

Representation (soundness): The Core Strategy does not address the issue of unstable land, it is noted that the saved Local Plan addresses the issue through Policy ES.14 it is not clear how and where this issue is now to be dealt with in the LDF. Policy ES.14 provided a comprehensive policy position and it also clearly indicated the broad spatial extent of areas where ground instability may arise as a consequence of former mining and quarrying activity. This would form a good basis for a new development management policy in a latter DPD.

However PPG14 requires both a strategic policy context and a development management type policy on the issue of unstable land. At present the Core Strategy does not propose to set any strategic context for the issue. The number of mine entries and other recorded hazards in the plan area from mining activity illustrate that it is a locally distinctive issue that needs addressing. To set an appropriate strategic policy context The Coal Authority considers that a policy criterion could be included within the Core Strategy either within Policy CP2 or Policy CP6, as the LPA sees fit, to address the policy vacuum.

Change sought to make sound: As a consequence of the coal mining legacy within Bath and North East Somerset, it is considered that policy criteria should be incorporated to ensure that new development proposals take account of any mining-related risks and, if necessary, incorporate appropriate mitigation measures to address them. This is required in accordance with paragraph 27 of PPG14. The following additional text is suggested for this purpose:

- “New development proposals within former coal mining areas should take account of any mining related risks and, if necessary, incorporate appropriate mitigation measures to address them.” The supporting text for this policy could also helpfully make reference to the fact that applicants will need the prior written permission of the Coal Authority in order to undertake any activities that intersect, disturb or enter any former coal seams, coal mine workings or coal mine entries.

Reason – To comply with the guidance in PPG14 (Development on Unstable Land)

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 96 **Respondent:** Keynsham Town Council

RepresentationReference: 96\1

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation • The Town Council are disappointed that the refreshment Town Plan was not able to go in - concerned
(soundness): that residents may feel that it was a waste of time completing it therefore felt there should have been an explanation in the Core Strategy explaining this situation as to why it was unable to go in.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\2 S

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation The Town Council is pleased to see that the Green Belt is being protected.
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\3 S

Plan Reference: Policy KE1: Keynsham Spatial Strategy

Representation The Town Council felt that the housing figures are realistic.
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\4 S

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation • The Town Centre/Somerdale – must be joined up and integrated with each other. Somerdale should
(soundness): not become an area/place in its own right. Larger industrial units are a must as mentioned in the Core Strategy as Keynsham presently only has smaller ones to offer.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\5

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation The Town Council feels very strongly that TPO's should be put on the trees on the driveway to the
(soundness): Somerdale site and that this should happen as soon as possible.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\6 S

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation The Town Council approved of retaining leisure centre facilities in the Town Centre as it is felt that this
(soundness): is very important.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\7 S

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation The Green infrastructure link – excellent.
(soundness):

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\8 S

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation The Town Council asks can there please be a strong emphasis on the management of transport /traffic
(soundness): through the Town Centre – residents feel strongly about this.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\9

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation The Town Council has some concerns over district heating however this could be due to a lack of
(soundness): knowledge.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\10

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation (soundness): A site has been identified for waste – the Town Council thought that this had been removed?

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 96\11 S

Plan Reference: Policy KE2: Keynsham Town Centre/Somerdale Strategic Policy

Representation (soundness): The Keynsham Town Council Planning Committee reviewed the Replaced Local Plan Policies and confirms that the replaced policies are fine.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Respondent Number: 97 **Respondent:** Pat Finnegan

RepresentationReference: 97\1

Plan Reference: Policy B1: Bath Spatial Strategy

Representation (soundness): It is short-sighted and unnecessary to use children's playing fields to build houses. The SHLAA ignores 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:

Respondent Number: 98 **Respondent:** Mr Mark O'Sullivan

RepresentationReference: 98\1

Plan Reference: Paragraph 6.93

Representation (soundness): The first is surface transport to Bristol (Lulsgate) Airport, a distance of about 18 miles, and a journey of great importance to the small high-tech firms which are critical to Bath's economy. The Strategy makes much of the excellent communications of Bath, but in truth travelling to and from Lulsgate is difficult. All the road routes are congested, especially at the times of day when businesspeople need them. This does not just make the journey time-consuming: for a small airport with few daily flights to each

destination, and in an era when business organisations are compelled to use non-refundable tickets for pre-booked flights, the journey to the airport on highly congested roads is either intolerably stressful or intolerably long. The only remedy advertised is to take the train to Bristol and an airport bus from there, but the bus must still travel 8 miles from Bristol to Lulsgate in Bristol's city traffic with little help from bus lanes; this saves no time and is almost as unpredictable as the direct road journey.

Change sought to make sound: The airport, however, is little more than two miles from the Bath/Bristol to Weston-super-Mare railway line, and the Strategy should include a commitment to use this link to improve the journey (an effective shuttle by taxi or bus from the existing Nailsea & Backwell station could be arranged very readily, and facilitated in due course by a new entrance to the airport from Downside Road; better shuttle solutions such as a maglev track might be explored in the longer term).

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 98\2

Plan Reference: Chapter 5: Rural Areas

Representation (soundness): The third is the relationship between the Strategy and the Cotswolds Area of Outstanding Natural Beauty Management Plan (2008-13). That Management Plan is the property of the Conservation Board, not jointly of the local authorities for the AONB, but it was prepared after extensive consultation with B&NES. The policies in section 5 (Rural Areas) need to acknowledge their interaction with the Management Plan, both in respect of its Policy LP1 ("That the unique character, tranquillity, and special qualities of the Cotswolds landscape are conserved and enhanced") and more generally, setting out what weight should be given to the Cotswolds Area of Outstanding Natural Beauty Management Plan in development control within the B&NES area. There may of course be similar issues in relation to the Mendips AONB, but I have not had an opportunity to look at them.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

RepresentationReference: 98\3

Plan Reference: Policy B1: Bath Spatial Strategy

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:

Respondent Number: 99 Respondent: Mr Robert Bargery

RepresentationReference: 99\1

Plan Reference: Policy B4: The World heritage Site and its Setting

Representation (soundness): The Georgian Group has reservations about the wording of paragraph 2.33, supporting Policy B4.

"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:

Respondent Number: 100 Respondent: Mr Leslie Redwood

RepresentationReference: 100\1

Plan Reference: Policy B1: Bath Spatial Strategy

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: