



Bath and North East Somerset Placemaking Plan
Matters and Issues for Examination
ID/3A Rev1

Matter 5 - Building strong and vibrant communities

Issue: Whether the relevant proposed policies are positively prepared, justified, effective and consistent with national policy in the context of the adopted CS.

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Q1. Is Policy H1 sufficiently flexible to be effective?

1.1 It is necessary for H1 to set parameters on Housing for the elderly, for a number of reasons:

- a) Space in Bath is limited;
- b) Elderly care housing can be used in large developments to meet affordable housing obligations. It is therefore particularly important that there are quality parameters set to avoid inequalities being built in to a development site where the affordable/elder car specification is substantially lower quality than that of the whole development.

Q2. Is Policy H8 positively prepared and effective?

2.1 Given the shortage of affordable housing in Bath, it is questionable whether the Policy gives sufficient encouragement for the development of affordable housing. For example, the presumption against no net loss should be accompanied by a presumption in favour of net gain, given other policy considerations (e.g. older post-war affordable family housing stock may be provided in detached/semi-detached properties which could be re-provided in terraces with greater density and energy efficiency without loss of amenity).

Q3. Policy LCR3 identifies land safeguarded for Primary School Use

Are the sites the most appropriate when considered against the reasonable alternatives, particularly in respect of Site 5: Land at Silver Street, Norton Hill, Midsomer Norton.

3.1 No comment

Q4. Is the approach to the designation of Local Green Spaces (Policy LCR6A) sound and is there justification for those that are designated?

4.1 Green spaces within Bath form part of the setting and raison d'être of the World Heritage Site and given the relatively high density of the historic built city it is justified to seek to retain green spaces within the City, it is to be noted that those spaces designated are on the whole ones which do not enjoy other forms of national protection such as Green Belt, AONB and registered Parks and Gardens.

4.2 The undeveloped land on the northern part of the University of Bath campus lies in close proximity to a scheduled Ancient Monument (Bathampton Camp) and provides an important green tree shelter belt shielding the university in long views and softening the boundary with open land. It is extensively used by walkers and is identified in the University's own masterplan as an important buffer. We would encourage the designation of this site as a protection and shelter belt.

4.3 Q5 is the final paragraph of Policy LCR7C that supports the material change of use of land consistent with paragraph 90 of the National Planning Policy Framework that does not include the material change of use of land as development that is not inappropriate development?

4.5 We support the thinking underlying the Inspector's question here. Commercial equestrian developments are sometimes used as a 'stalking horse' for further development in the Green belt, and the exclusion of such use from para 90 of the

NPPF implies that such developments are inappropriate. We would prefer the test for inappropriate development to remain for all new buildings except for re-provision on the site and scale of existing buildings.