

# Schedule of Comments on the Placemaking Plan Launch Document (2013)

Schedule of Comments on the Placemaking Plan Launch Document: Sorted by Change Reference.

## Site/Discussion Point: General Comment

**Respondent Number:** 95  
**Comment Number:** 1  
**Respondent Name:** The Coal Authority  
**Agent ID:**  
**Agent Name:**

**Respondent Organisation:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** General Comment

### Part2b: Comments on sites or policy areas

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The Coal Authority set up a Planning and Local Authority Liaison Department in 2008 to re-engage with the three planning systems across England, Scotland and Wales. The main areas of planning interest to The Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in the National Planning Policy Framework in England; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in the National Planning Policy Framework in England.

#### COMMENTS ON THE BATH & NORTH EAST SOMERSET PLACEMAKING PLAN - DRAFT

##### Surface Coal Resources and Prior Extraction

As you will be aware, the Bath and North East Somerset Council area contains coal resources which are capable of extraction by surface mining operations. Information on these resources is available to Mineral Planning Authorities free of charge from The Coal Authority following signing a data sharing licence and was given to Bath and North East Somerset Council in November 2009, and recently reissued in June 2013.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers' website at: [www.coalpro.co.uk/members.shtml](http://www.coalpro.co.uk/members.shtml).

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

##### Coal Mining Legacy

As you will be aware, the Bath and North East Somerset Council 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



**Schedule of Comments on the Placemaking Plan Launch Document: Sorted by Change Reference.**

inviting comment on the process for drawing up the plan, or on the processes to be followed in subsequent procedures?), and by an excessive use of imprecise and aspirational language whose concrete meaning is debateable. These comments are on the assumption that the Plan is intended to provide (i) for consultative procedures with local communities in the course of working up development plans affecting them, (ii) for the principles to underlie the masterplans which will govern how major development sites are designed, (iii) for the principles which will determine development control throughout the B&NES area.

<b>Respondent Number:</b> 98	<b>Comment Number:</b> 7	<b>Respondent Name:</b> Mark O'Sullivan	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** General Comment

**Part2b: Comments on sites or policy areas**

I can find nothing in the Launch Document about the Duty to Co-operate under the Localism Act 2011. This should be a significant part of the Plan. Areas which in particular require the DTC to be exercised are (i) the need for B&NES (which because of protective designations is manifestly unable to meet its own housing demand within its boundaries) to persuade other authorities to meet part of its demand, perhaps through a New Town at the M4-M5 intersection on the analogy of Cambourne or Longstanton/Oakington in Cambridgeshire, and (ii) the need for an alternative major river crossing to be developed in Wiltshire to enable the crossing at Bath to be closed to commercial vehicles.

<b>Respondent Number:</b> 102	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Federation of Bath Residents' Associations	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

FoBRA's full comments on B&NES' launch version of the Placemaking Plan are attached. Our key points are as follows:

- Firstly, FoBRA feels the document lacks a sense of Central Bath as a whole, or as a neighbourhood; and a plan for it, led by a Vision of what we want it to be like.
- Next, we have concern, as always, for the high levels of traffic congestion and air pollution in Bath. These need to be treated seriously, supported by the Bath Transport Strategy, and linked to a coherent parking policy for residents, visitors, hotels and businesses alike, with encouragement of alternatives to use of cars, more (and more intensively used) P&Rs, supporting a squeeze on city parking.
- On land we want to see brownfield always used before greenfield.
- And in housing, we need Space Standards.
- Lastly, we generally support the development ideas in the document, including improvement of the riverside.
- But, where are the plans to consult with stakeholders in the city, and to address the ongoing governance deficit?

**Site or Discussion Point:** General Comment

**Part2b: Comments on sites or policy areas**

A plea from those who have to read and comment on successive iterations of this document: please can we have an easy way to identify changes in new issues?





in their wider context, provide clear guidelines on key issues such as building heights, massing and materials, and promote the role of individual property owners/occupiers in preserving historic buildings and streetscapes.

4. Placemaking policy needs to recognise that demand for market housing in Bath will always outstrip supply. Brownfield before greenfield should apply to residential as well as employment developments and increasing the supply of affordable housing must be a key priority for all development sites.

5. There needs to be a clear strategy for opening up the river Avon for recreational/amenity use throughout the city, united with any flood amelioration. This cannot be satisfactorily addressed on a site-by-site basis.

6. There is insufficient emphasis on the need for a coherent transport and traffic management strategy for Bath and its environs.

**Site or Discussion Point:** General Comment

**Part2b: Comments on sites or policy areas**

Page 5: Delete the last 4 words of the first bullet. Environmental assets need to be protected, irrespective of their sensitivity to change, if the aim is to create better places.

**Respondent Number:** 234 **Comment Number:** 1 **Respondent Name:** Taylor Wimpey UK Ltd

**Respondent Organisation:**

**Agent ID:** 27 **Agent Name:** Turley Associates

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** General Comment

**Part2b: Comments on sites or policy areas**

Page 5 - "The Core Strategy is Key!"

Taylor Wimpey fully supports the statement that the Core Strategy is key to the Placemaking Plan. In that regard, we note that the Core Strategy is referred to throughout the Launch Document including in respect of the overall housing numbers and the Spatial Strategy. That said, the Core Strategy, as acknowledged in the Launch Document, is still in the process of being adopted and is subject to significant objections and concerns, including those raised by the Inspector presiding over the Core Strategy Examination.

Whilst we do not set out these issues in any detail at this correspondence, it is relevant to note that the concerns go to the very heart of the soundness of the Core Strategy. In particular, the Inspector has questioned whether the Strategic Housing Market Assessment is compliant with the National Planning Policy Framework and therefore whether the document is seeking to meet the objectively assessed housing need of the area.

Therefore, whilst we would normally commend an Authority for progressing a document such as the Placemaking Plan, in this case we have severe reservations that, in the absence of any certainty that the Core Strategy will be found sound in its current form, the launch document is premature. We also consider that there is a risk that it will raise expectations and/or cause confusion with the public should future versions be substantially different as a consequence of the Core Strategy Inspectors Report. Likewise, should the Core Strategy be found unsound, the Launch Document could prove abortive.

**Respondent Number:** 234 **Comment Number:** 3 **Respondent Name:** Taylor Wimpey UK Ltd

**Respondent Organisation:**

**Agent ID:** 32 **Agent Name:** Barton Willmore

**Further Information available in the original comment?**

## Part 2a: Comments on scope and content

**Site or Discussion Point:** General Comment

### Part2b: Comments on sites or policy areas

We recognise that this is an early stage of consultation, however, we have a number of general concerns relating to the production of this document, which we set out below.

The role of the Placemaking Plan is unclear. The document recognises that the Core Strategy is still at Examination Stage, but it has progressed to consultation despite this. Critically, it does not recognise the level of uncertainty over the progression of the Core Strategy. There are still significant areas in which the Plan could be found to be Unsound. Furthermore, as the Council has requested that the Inspector make Main Modifications to make the Core Strategy Sound, the Council has limited influence on the extent and form of any changes that could be made to the Core Strategy.

Future changes to the Core Strategy could conflict with the Placemaking Plan.

Our main concern is that we consider the housing requirement within the emerging Core Strategy to fall significantly short of the level of housing required to meet objectively assessed needs. Without certainty on the level of housing required, we question how the Placemaking Plan can be progressed now, in advance of the Core Strategy. Specifically, we do not consider that in the absence of the Core Strategy there can be any certainty that the sites included in the Placemaking Plan:

- are the most appropriate to meet the housing requirement;
- the sites in the Core Strategy and Placemaking Plan would reflect the Spatial Strategy of the Core Strategy; or
- the sites within the Placemaking Plan are the most appropriate to meet the needs of the District and demonstrated to be the most sustainable options through a robust Sustainability Appraisal that considers all reasonable options.

Crucially, it is widely acknowledged that the north western part of the District, next to the Bristol Urban area, is the most sustainable part of the District but there is no understanding of the level of development to be directed to this area or the proportion of development that will be accommodated within strategic sites. To ensure a Sound and robust Plan, it is critical that the overall quantum and strategy of development is established; and that the locations for growth are identified in response to this. Progressing the Placemaking Plan in advance of establishing the Core Strategy conflicts with these fundamental Plan making principles.

Furthermore, Mr Emerson, the Inspector for the Core Strategy, highlighted that the methodology that the Council has used in calculating their 5 year land supply within the Core Strategy is flawed and as a consequence, additional sites will be required in order to enable the Council to meet the 5 year requirement. This will need to be reflected within future Stages of the Placemaking Plan.

Finally, the Council published a great amount of new evidence to support the Placemaking Plan on 13th September 2013, as part of the Core Strategy process. No weight can be given to this new evidence at this stage due to its late introduction. Clearly there has not been sufficient time to review this and the impact it could have on the Placemaking Plan. We therefore reserve the right to comment on this in the future.

If it would be helpful, we would be happy to meet with Officers to discuss our comments further.









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Curo looks forward to engaging further with the Council as the Placemaking Plan progresses further.

<b>Respondent Number:</b> 2176	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Christopher Mackenzie	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** General Comment

#### Part2b: Comments on sites or policy areas

Please see attached RIBA paper published in response to the Farrell Review. Various parts of the paper relate to the role Local Authorities can play in enhancing the quality of the built environment. We would recommend that the Placemaking Plan is thoroughly reviewed in the context of this report and that every opportunity is taken to help enhance Design Quality in the Built Environment. Section 1.4 relates specifically to Placemaking

<b>Respondent Number:</b> 4639	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Lands Improvement	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 156	<b>Agent Name:</b> Turley Associates		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** General Comment

#### Part2b: Comments on sites or policy areas

Thank you for the opportunity to comment on the above document. Please find set out below the comments of my clients, Lands Improvement specifically in respect of their interests at Whitchurch, South East Bristol. We therefore, at this stage, restrict our comments to those sections of the Launch Document that deal with the "Rural Areas" and the Green Belt but reserve the right to respond on other issues in future versions of the Plan.

Page 5 - "The Core Strategy is Key!"

Lands Improvements supports the statement that the Core Strategy is key to the Placemaking Plan. In that regard, we note that the Core Strategy is referred to throughout the Launch Document including in respect of the overall housing numbers and the Spatial Strategy. That said, the Core Strategy, as acknowledged in the Launch Document, is still in the process of being adopted and is subject to significant objections and concerns, including those raised by the Inspector presiding over the Core Strategy Examination.

Whilst we do not set out these issues in any detail in this correspondence, it is relevant to note that the concerns go to the very heart of the soundness of the Core Strategy. In particular, the Inspector has questioned whether the Strategic Housing Market Assessment is compliant with the National Planning Policy Framework (NPPF) and therefore whether the document is seeking to meet the objectively assessed housing need of the area.

Therefore, whilst we would normally commend an Authority for progressing a document such as the Placemaking Plan, in this case we have severe reservations that, in the absence of any certainty that the Core Strategy will be found sound in its current form, the launch document is premature. We also consider that there is a risk that it will raise expectations

and/or cause confusion with the public should future versions be substantially different as a consequence of the Core Strategy Inspectors Report. Likewise, should the Core Strategy be found unsound, the Launch Document could prove abortive.

**Respondent Number:** 4695 **Comment Number:** 1 **Respondent Name:** Mr Richard Hemmings

**Respondent Organisation:**

**Agent ID:** 187 **Agent Name:** Grass Roots Planning Ltd

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** General Comment

**Part2b: Comments on sites or policy areas**

2.1 As the launch document clearly sets out the Core Strategy is key to the delivery of the Placemaking plan as it needs to expand on the strategic vision that the Core Strategy sets out.

2.2 Since the submission draft of the Core Strategy was submitted the Inspector, Mr Simon Emerson, has raised significant concerns regarding a number of key strategic issues. Over the course of the examination a large number of issues have been raised but in summary we consider the most significant and relevant to these to include:

- Concerns regarding the housing requirement for BANES as a whole;;
- Concerns over delivery of housing and the need for measures to encourage housing to be delivered sooner in the plan period;;
- Required BANES to consider historic shortfall and the need to apply a 20% buffer because of persistent under delivery to its five year housing land supply;;
- Affordable housing requirements needed further analysis;; and
- Concerns about the analysis of the evidence base that has underpinned the current strategy in relation to the Greenbelt.
- Further work was required to sequential and exception flood risk tests.

2.3 While the council has sought to address some of these concerns a large number of significant issues remain unresolved. Currently the examination is due to reopen to consider these issues further and in particular the relevant housing requirement.

2.4 It is clear that the resolution of these key issues are unlikely to happen soon, this will lead to further delay in the adoption of a Core Strategy, without which the overall strategic vision for the district, including the key matter of how much development needs to be accommodated within BANES, and specifically Keynsham, will remain undefined.

2.5 In light of this it is our opinion a large number of key issues remains outstanding which are critical to the preparation of the Placemaking Plan. In particular these include the overall housing requirement proposed for BANES as a whole, how this will deliver sufficient affordable housing and how the significant undersupply of five year housing land will be addressed.

2.6 Because the overall housing requirement for BANES as a whole is yet to be objectively tested and agreed as part of the Core Strategy work on the Placemaking plan is premature.

2.7 The reason for this is clear, if the proposition of many consultees involved in the Core Strategy process is correct and the overall housing requirement for BANES needs to be increased then the Placemaking plan will have to accommodate significantly more growth than it currently seeks to provide.

2.8 Therefore, our specific comments on the launch document are given without prejudice to our assertion that the preparation of the Placemaking plan should be suspended until the Core Strategy is adopted.

**Site/Discussion Point: Comment on the Consultation Procedure**

**Respondent Number:** 98    **Comment Number:** 2    **Respondent Name:** Mark O'Sullivan

**Respondent Organisation:**

**Agent ID:**        **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** Comment on the Consultation Procedure

**Part2b: Comments on sites or policy areas**

On procedure, the involvement of the local community in developing plans is in my opinion essential. In Bath this must be by the involvement of the residents' associations, which are developing into a strong and expert movement well able to engage effectively with such a task. Regular discussions between the planning department and FoBRA or individual associations would be the most appropriate backbone of such a process, supplemented by more conventional techniques such as public meetings, formal consultations and press publicity. I also believe that they should be drawn both into the further stages of working up the "Placemaking Plan", and into subsequent processes such as the development of masterplans or development briefs for particular sites.

**Respondent Number:** 124    **Comment Number:** 1    **Respondent Name:** Roger Nunn

**Respondent Organisation:** Greenway!, the Greenway Lane

**Agent ID:**        **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

I write in response to your invitation to comment on the Placemaking Plan Launch Document.

I comment not as a private householder, but as chairman of a Residents' Forum, GREENWAY!, which represents residents in an area of the city of Bath, defined by Greenway Lane, Devonshire Buildings, the 'Poet's roads east of Chaucer Road, Lyncombe Hill, Rosemount Lane, Lyncombe Vale and Lyncombe Vale Road. We act through an Action Group which is elected annually, and meets quarterly. This Action Group has studied the Placemaking Plan Launch Document, and the accompanying document My Neighbourhood.

We have consulted our neighbouring associations, the Widcombe Association and the Bear Flat Association, who we believe are also making responses.

**Site or Discussion Point:** Comment on the Consultation Procedure

**Part2b: Comments on sites or policy areas**

We believe that that adequate information should be in place regarding areas that we believe are not well addressed in the draft document, in particular concerning the CONSULTATION ARRANGEMENTS that should be in place with residents concerning any proposals for development and planning in a given area. We believe where major development is proposed, these should be thorough, including public meetings, public exhibitions, direct consultation with householders, publication in the Bath Chronicle, and on council web-sites.

We note the reference in the document 'My Neighbourhood' to the role of Resident's Associations (p. 34) and will be happy to be used as 'a way of disseminating information'. but we also believe we have a role in taking action to support or oppose significant proposals regarding any proposed development in our area. It is unclear at present whether 'neighbourhood forums' will develop to represent the views of those who live within the boundaries of the city of Bath (as contrasted with several village communities outside Bath) and in the absence of such forums, we (and our

neighbouring associations) are the only representative bodies for residents in our area.

<b>Respondent Number:</b> 224	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Ms Caroline Kay	<b>Respondent Organisation:</b> Bath Preservation Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** Comment on the Consultation Procedure

#### Part2b: Comments on sites or policy areas

Given the importance of the City of Bath as the principal economic, cultural and service centre in the district, properly thought-out mechanisms for community involvement in place-making is essential. It is disappointing that little thought appears to have been given to how this is to be achieved.

Bath's central area is a 'neighbourhood centre' in its own right and its residents and interest groups as well as businesses need to have the opportunity to contribute to the placemaking process through structures consultation.

BPT will continue to argue against new developments in the Green Belt and AONB surrounding Bath, at least until it is clear that all brownfield opportunities have been exhausted. Subject to the Planning Inspector's decision on the future of the Core Strategy, we will however participate in discussion of placemaking principles for the sites which have been identified.

<b>Respondent Number:</b> 4660	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mrs Jan Brown	<b>Respondent Organisation:</b> Norfolk Crescent Green Residents Association
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** Comment on the Consultation Procedure

#### Part2b: Comments on sites or policy areas

With apologies, comments in this section do not fit with your requested headings, but take a broader approach and seek to address issues which seem fundamental to achieving a reasonable outcome from this consultation. The headline issue is one of consultation on a Plan which focuses more on the specifics arising from the Core Strategy which may not reach fruition and how it might be proposed to work with consultees in these circumstances. It is hoped you will find these comments productive and helpful as is intended and feel able to take them into account.

CONTEXT /OVERVIEW OF EXTERNAL ENGAGEMENT –

Local Community Engagement in Bath Central Area

NCGRA is pleased to note that Planning Policy is considering carefully how to work with communities in Bath to ensure local views and aspirations are henceforth taken into account in formulation of planning policies and site development. As you rightly recognise, the absence of Parish Councils in Bath is an obstacle to community engagement, but this is a longstanding issue and was considered when the Neighbourhood Planning Protocol (NPP) was adopted a year ago. It was assumed the associated toolkit was being employed to reach a wider audience at that time, but reference to the same issue in the Overview of External Engagement for Bath Central Area is disconcerting and would suggest that little progress has been made in reaching Bath communities in the interim. It is most concerning that by default engagement may still be continuing with the same "stakeholder" and interest groups (e.g. Bath Preservation Trust, Bath Heritage Watchdog etc.) as pre the Localism Bill and NPP and communities are still not effectively involved. The long term engagement process to date appears to be that BANES have selected "stakeholders" in an arbitrary way to input to a range of

initiatives and that FoBRA (Federation of Bath Residents Associations) and possibly some of their member associations, have come to be regarded as key stakeholders representing the views of all Bath Residents and by implication Bath communities, both pre and post the Bath Forum. Whilst FoBRA have many members, they do not represent the views of NCGRA and indeed it would be most surprising if they represent views of all other Bath residents groups and/or communities. The unfortunate result of this for NCGRA was that although our community is more affected by significant change than any other in Bath (due to close proximity to BWR) we have not had a proper voice at BANES discussions of initiatives that affect us. It is trusted that past errors will now be righted and that in future all Bath residents associations and/or community groups will have every opportunity to fully participate in all discussions that affect them.

Given the ambitious and accelerated programme for the Placemaking Plan when approved by May 2013 Cabinet and that the collaborative approach has already been "tailored" to fit the programme, speed is clearly now of essence to ensure as many as possible, if not all Bath communities are appropriately represented and their input, be it City wide or site specific, is taken into account. Also it seems some catching up is necessary to bring Bath communities into line with Parish Councils for whom BANES held a workshop in February 2013. Is there a need to advertise and/or promote more widely to Bath communities to reach those who may not be aware of the launch of this plan so that they can be included in discussions, workshops etc. prior to the next stage?

There is another important issue arising which is the relative weight which will be accorded to input from previously selected Bath "stakeholders" compared to that forthcoming from Bath communities. It is trusted an appropriate balance will be struck once communities have their own representation in place.

#### Community Engagement on Bath River Corridor

It is noted that the process of engagement for the River Corridor will be as for the Bath Central Area. Hence the same considerations apply as above, although obviously subject to location, some communities who are not directly affected may not wish to input.

But far more significant is the change to the Core Strategy proposed in the consultation March – May 2013 from upstream flood storage to flood conveyance measures in the light of the findings of the Bath Flood Risk Management Project (Black & Veatch, February 2013). Whether the Core Strategy Examination continues is dependent on the outcome of the hearings of 17th September and even if it does, the Inspector wishes to examine Sequential Test and Flood Mitigation for Bath riverside scheduled for hearings between 26th to 29th November 2013; it is also presumed it would be some time after final group of hearings scheduled for January 2014 before he reaches his decision. This clearly would not fit with your programme of collaboration in Autumn 2013. However if this proceeds, as so few seem aware of the current proposals, it seems imperative these are fully explained to all participants along with the extensive implications for the Central Area e.g. re-profiling land, tree removal etc. and that sites along most of the river corridor will be raised. (It is assumed landowners where improved defences are proposed along the central south bank will be the subject of separate discussions.) It will also need explaining flood conveyance proposals are a pre-requisite if BANES are to proceed with their Core Strategy proposals to develop along the river corridor and that flood mitigation will be dictated by technical requirements so as to avoid consultees suggesting changes which cannot be considered e.g. changing bank profile, public realm along river bank, lowering sites. It is trusted consultees can be informed of the intended height by which individual sites will be raised as this may be an important consideration to those in close proximity and also ref Bath Buildings Heights Strategy and City of Bath World Heritage Site Setting SPD.

Whilst a River Corridor Strategy has been embraced as one of BANES strategic objectives within the Core Strategy, the River Regeneration Trust seem to have been given the responsibility for consultation. It would be advantageous if TRRT consultations ref Bath River Corridor could be conducted in combination with the PMP collaboration as otherwise further unexpected changes may result in due course. This would also have the advantage of TRTT being tutored regarding the above technical constraints at the same time

## Site/Discussion Point: Comment relating to the SHLAA

Respondent Number: 1556 Comment Number: 6 Respondent Name: Strategic Land Partnerships

Respondent Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?



ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in paragraphs 143 and 144 of the NPPF.

Given that coal mining legacy is most prevalent within the south of the LPA area, these checks undertaken by the LPA should particularly apply to proposed Development Sites in the Somer Valley.

Reason – In order to ensure that issues of safeguarding mineral resources are afforded due consideration in line with the requirements of paragraphs 143 and 144 of the NPPF, together with unstable land resulting from past mining activity, in accordance with paragraphs 109, 120, 121 and 166 of the NPPF.

<b>Respondent Number:</b> 124	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Roger Nunn	<b>Respondent Organisation:</b> Greenway!, the Greenway Lane
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

### Part 2a: Comments on scope and content

**Site or Discussion Point:** Sites: Comment on B&NES sites in general

### Part2b: Comments on sites or policy areas

We note that the area we serve is largely residential, and NOT an area in which any significant major development is being currently considered, and therefore does not feature in the sections regarding development sites from pp 8 onwards in the Placemaking Plan..

Our area is typical of many in this city which is a World Heritage site, and which has areas which need protecting from a 'Green' and 'Heritage' point of view.

In particular we believe our members would wish us to oppose any housing or other development in the following areas:

1. The playing fields of Beechen Cliff School (It was a threat to develop the Lower Field for housing that led to the formation of our Forum some years ago)
2. The land in Lyncombe Vale, now surrounding the much appreciated Sustrans Two Tunnels Cycle and Pedestrian path.
3. The wooded slopes of Beechen Cliff and the land behind , which has recently been the subject of (now discontinued) discussion about the possibility of a takeover by the National Trust.
4. The area of Alexandra Park, now cared for by a separate Forum
5. The two allotments, one behind Beechen Cliff, the other at the west end of Lyncombe Vale Road.

Although it is not strictly in our area we would oppose any development of Entry Hill Golf Course, a valued amenity. In general we give our wholehearted support to Bath's conservation areas; in particular we would oppose any development in the large field between Lyncombe Vale and Lyncombe Vale Road, and in the field to the north of Rosemount Lane

We are also concerned at the effects of developments currently being considered to the MoD site at Foxhill, both from a 'skyline' angle and more importantly because a large housing development there is bound to have an effect on traffic on Entry Hill, Greenway Lane, Lyncombe Hill and Prior Park Road/ Ralph Allen Drive. Similarly we are in general support of the 'Rossiter Road' proposals from the Widcombe Association but are concerned that these developments may lead to a greater use of Greenway Lane and Lyncombe Hill as a 'rat-run', for through traffic.

As citizens we are well aware of the urgent national need for more low-cost housing, and we applaud the references in the 'My Neighbourhood' document to 'The Importance of Trees', the Community Right to Build', and the 'Green Infrastructure Strategy',

We will be willing to take part in any further consultative meetings, and would appreciate being kept in touch with future developments.





Having regard to the above, it is perhaps a little premature, and maybe something of an abortive exercise, to initiate consultation on a plan which may be subject to considerable change in terms of scope and content, not least in respect of some of the development sites that it provisionally identifies. It is also questionable whether consultation can meaningfully proceed on a development plan document within which the key provisions for accommodating the strategic requirements for development, and which will have implications for the scope and content of the remainder of the document, are barely addressed. The detailed delineation of the strategic sites, and the accordant adjustment of Green Belt boundaries where this is necessary to accommodate them, is likely to have considerable implications for scope and content of the document overall. It is therefore difficult to comment meaningfully on the scope and content of the plan in the absence of these fundamental elements, since its scope and content is likely to be subject to such extensive change as to result in a fundamentally different Development Plan Document.

It is therefore considered that the scope and content of the document should address the strategic sites, and at the very least identify notional boundaries, including adjustment of Green Belt boundaries having regard to the requirement to provide long term boundaries that will endure, to provoke discussion and debate. In the absence of any more detail than is currently provided in the Core Strategy in order to initiate discussion and debate, it is difficult to perceive how consultation on the current document can assist with expediting the Placemaking Plan towards submission and adoption assuming the Core Strategy proceeds further. Having regard to the delays that have beset the Core Strategy as a result of the suspended Examination, the need to expedite meaningful progress on the Development Plan Document through which site allocations will be made and development requirements delivered, is paramount

**Site or Discussion Point:** Sites: Comment on B&NES sites in general

### **Part2b: Comments on sites or policy areas**

Notwithstanding the foregoing comments relating to the scope and content of the DPD, and the anticipation that it is likely to be subject to considerable change and further consultation, the following brief comments are made on the sites and policy areas that it contains.

#### Development Sites (Bath / Keynsham / Somer Valley)

The DPD contemplates a contribution to development from a large number of potential redevelopment opportunities, and seeks comments on aspects of the mix and complexion of schemes that might come forward. However, it is apparent that not all of the opportunities that are identified are likely to be available for redevelopment. For example:

- SB1: this includes the site of the Hilton Hotel which it is acknowledged may provide an opportunity "... one day potentially...".
- SB2: reference is made to the Plan setting an 'aspirational' context.
- SB3: there are significant existing users who would need to be relocated and it is understood, as yet, have no firm commitment to doing so or alternative sites identified.
- SB5: redevelopment of this site has previously been refused planning permission on grounds of flood risk.
- SK3: the importance of retaining car parking, which is already under pressure in the town, to support the town centre, may preclude the availability / suitability of the site for development.
- SK4: this site is currently unavailable, and there is no certainty that the existing occupier will relocate during the plan period.
- SK5: this is an existing, intensively developed and occupied site, and is unlikely to contribute significantly to accommodating requirements for new development during the Plan period.

The guidance in the NPPF is that Local Plans should be "...aspirational but realistic" (para. 154). The requirement to be 'realistic' is reflected in the Core Planning Principles that are set out in paragraph 17, which requires development needs of an area to be 'objectively identified' and then 'met'. Moreover, it is enforced through the Plan-making process in that one of the tests of Soundness in Examining Local Plans is that they should be 'effective' in terms of being 'deliverable' over the plan period (NPPF, para. 182).

Therefore, it is insufficient for any site allocations in the Placemaking Plan merely to be aspirational. If reliance is to be placed on them for accommodating development requirements set out in the strategic policies, then they must also be realistic and deliverable during the Plan period. The Council will therefore need to demonstrate through any evidence base in support of the Placemaking Plan as it moves forward that the plan will be 'effective' in terms of the site allocations that it contains. Only site allocations that are deliverable over the Plan period should be included in any





**Respondent Number:** 23    **Comment Number:** 1    **Respondent Name:** Dr Lucy Rogers    **Respondent Organisation:** Avon Wildlife Trust

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Avon Wildlife Trust welcomes the opportunity to comment on the above document and would like to be involved in further discussions on future stages of the consultation process and the Plan’s implementation.

Bath –Overview

The Vision page mentions a River Corridor Strategy which will inform the Place-Making Plan. The Trust has been heavily involved in the Avon Catchment Pilot Project and would like to learn more about this and be consulted on it when a draft is available.

Bath Central Area Priority Development Sites/Development Sites Bath – Twerton and Newbridge Riversides

The Trust welcomes the identification of proposals for green infrastructure and the strategic importance of the river corridor in terms of creating a ‘green heart’ for the city. The development sites give an opportunity for people to directly access the river corridor and enjoy the wildlife using it. We support the recognition that creating and enhancing natural riverside habitat needs to be an integral theme as part of the development of these sites.

**Respondent Number:** 93    **Comment Number:** 1    **Respondent Name:** Highways Agency    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

The context is clear and easy to follow and sets the scene very well. The link with neighbourhood plans and the impact on them of this document is less clear.

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Bath Overview – the plan is clear and sets very ambitious aspirations. The Highways Agency is interested in the transport strategy that is being developed to support the aspirations and would welcome the opportunity to be involved as it progresses.

**Respondent Number:** 98    **Comment Number:** 3    **Respondent Name:** Mark O'Sullivan    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** Sites: Comment on Bath sites in general



Other issues might include hotel provision, licensing, the conversion of residential houses to short-term lets (hen parties), and parking policy. [See new section proposed below.

Page 14: Insert new section after page 14: “BATH CITY CENTRE.

Under Policy B2 of the Core Strategy, the role of the central area (the city centre and neighbouring areas) is to provide:

- An important cultural asset for the world
- One of the country's most desirable and beautiful places in which to live and work
- A more dynamic place for business, enterprise, creativity and innovation
- An attractive centre for shopping, leisure and recreation
- A spa town that inspires, relaxes and entertains
- A visitor destination of international renown
- A place that connects people to the natural environment
- A place in which people increasingly travel by walking, cycling or by using public transport.

The achievement of these aspirations in the city centre faces a number of challenges:

a. First and foremost, traffic congestion blights the city centre and gravely affects the setting of the key elements of the World Heritage Site such as The Circus and Queen Square. Bath's traffic is notorious among residents and visitors alike. Is it really acceptable that a constant stream of heavy traffic passes through the very centre of this World Heritage City? Or do we want a city centre that is free of all but essential traffic?

b. Air pollution, which is due almost entirely to road traffic, is at levels well above safe health limits set out in EU and British law. These levels of air pollution are harmful to the health of those who live and work in, and visit, the city centre. Air pollution, and vibration from traffic, are damaging the very fabric of the Georgian city on which the visitor economy relies. Unlawful and unhealthy levels of air pollution are quite unacceptable and need to be reduced.

c. The Core Strategy envisages the creation of more hotel accommodation in the centre. A strategy is required for parking by visitors to these hotels, bearing in mind the parking needs of city centre residents.

d. A night-time economy has been created in the city centre which often involves excessive drinking, noise and anti-social behaviour. This is to the detriment of city centre residents and is frequently the subject of adverse comment by visitors. What sort of night-time economy do we want in the city centre?

e. Is ever-increasing retail the way forward or should we aim for a more varied economy in the city centre?

f. Is there a need to encourage long-term residents and owner-occupiers in the city centre? Owner-occupiers care for the Georgian houses at their own expense. Are we content to see large numbers of city centre houses turned over to be HMOs or short-term rental properties (such as hen party venues)? The latter can often be noisy and increasing numbers of such establishments add to the pressures felt by city centre residents.

<b>Respondent Number:</b> 154	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mrs Jane Hennell	<b>Respondent Organisation:</b> Canal & River Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Central sites

Several of the central sites are in close proximity to the River Avon. The Trust owns some section of bank and associated towpath, in other areas it is simply navigation Authority. The Trust is pleased to note that in recent years the Council has recognised the worth of the River, particularly in place making and that policies are now being formed to enhance and protect this valuable asset.

Improved accessibility and connectivity is important in any riverside development. Not only should the riverside by

physically accessible but long distance views of it protected. New development should not present a physical or visual barrier; views through the site to the river should be retained.

Public realm improvements should encourage the public to stop and enjoy the river with seating and facilities for eating and drinking where possible. However proposals should ensure that that through movement is still possible to enable the riverside to act as a sustainable transport route. Linkages between existing routes, the riverside route and across the river are all important in maximising the use of the riverside way and therefore encouraging greater use of sustainable transport. New development should encourage and facilitate increased usage wherever possible.

Twerton & Newbridge Riverside sites

Further from the town centre the river corridor should be recognised as important Green infrastructure with a softer edge and improved habitat although its importance as a connection route out into open countryside for recreational purposes should be developed.

<b>Respondent Number:</b> 224	<b>Comment Number:</b> 3	<b>Respondent Name:</b> Ms Caroline Kay	<b>Respondent Organisation:</b> Bath Preservation Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** Sites: Comment on Bath sites in general

#### Part2b: Comments on sites or policy areas

BPT welcomes the recognition that development in Bath needs to be informed by a thorough understanding of the qualities of the city and its outstanding universal value as a World Heritage Site. We also welcome the prime position of this recognition.

As page 12 makes clear, much work has been done over the last few years to develop the strategies and planning documents which, if properly adopted and applied, should reduce the risk of repeating the errors of the post-war era when 'the need for development trumped the need for quality' (page 10). Firm and sustained political commitment to implementing initiatives such as the Public Realm and Movement Strategy and the Building Heights Strategy is essential. BPT is concerned that key documents like these must be adopted as SPDs if the Placemaking Plan is to deliver the vision for the city as set out in the Core Strategy.

Page 12 begins to set the context for future development of the city and should precede the overview of Bath's development sites which appears on page 11. These sites are closely connected, and the way they relate to each other and to the city centre as a whole must be explicitly considered as the placemaking process unfolds.

The yellow 'Vision' box needs to include a reference to the need to prioritise brownfield development ahead of green field sites, particularly on the edge of Bath.

It is not sufficient to state that the PMP will be 'informed' by the strategies and other documents listed on page 12: it needs to be both consistent with these strategies and given appropriate weight in the planning process by SPDs covering the key issues such as building heights and public realm standards.

The map on p14 should show the focus of the SAC, which will need to be taken into account in development plans.

The key to the map on p19 is incomplete.

BPT broadly supports the analysis on p20 and welcomes the recognition of the need to protect key WHS views.

<b>Respondent Number:</b> 249	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Royal Mail Estates Limited	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 31	<b>Agent Name:</b> BNP Paribas Real Estate		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

The scope and content of the Placemaking Plan appears to be generally in keeping with NPPF guidance save for the following two key points:

Royal Mail is of the view that in line with the NPPF there should be greater emphasis in the Placemaking Plan on the presumption in favour of sustainable development so that it is clear that development which is sustainable can come forward and be approved without delay (NPPF paragraph 15). Whilst Royal Mail appreciates that this is a launch document for the Place Making Plan, the Council may wish to consider including policies that guide how the presumption should be applied locally, even down as far as individual identified development sites.

The core planning principles listed on page 4 of the Placemaking Plan omits any reference to the need to take account of market signals (third core planning principle under paragraph 17 of the NPPF). To ensure deliverability of planned development, the Placemaking Plan should have due regard to land prices and affordability and take into account the needs of the residential and business communities, in line with NPPF guidance.

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Enterprise Area

Royal Mail agrees with the inclusion of the Manvers Street area (which includes Bath Delivery Office) within the Bath City Riverside Enterprise Area. However, Royal Mail considers that this section of the Placemaking Plan (page 11) should be clearer about what the Enterprise Area status means in practice, specifying what measures are available to landowners within the Enterprise Area to assist with the bringing forward and delivery of development.

<b>Respondent Number:</b> 281	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Amanda Grundy	<b>Respondent Organisation:</b> Natural England
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

Thank you for your consultation on the above which was received by Natural England on 24 July 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

General

The document reflects the need for the Placemaking Plan to complement the objectives and policies set out in the draft Core Strategy and conform to the National Planning Policy Framework.

In our view, the document has identified the main relevant issues and overarching principles with respect to landscape, public access and biodiversity interests, and has highlighted where further detail and input is needed to develop positive and proactive district-wide and site specific development management policies that would deliver the Core Strategy objectives and respond positively to the changes in national planning policy.

Natural England particularly welcomes the document's clear recognition of Bath and North East Somerset's very high quality built and natural environment and its economic, social and environmental importance to the District and its communities both now and in the future.

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Development Sites

Natural England is not sufficiently familiar with the individual development sites to provide detailed or site specific comments at this time. However we agree that development of the Central Area priority delivery sites and the Twerton Riverside sites could provide an opportunity to achieve a range of positive outcomes, including improved public access to the riverside and other public realm enhancements. However development in these locations will need to ensure it does not compromise the landscape or ecological interests, perhaps most notably those associated with the river. A detailed understanding of each site and its context will be necessary to ensure the potential effects, including on the river corridor habitats and species, are avoided or suitably mitigated. A particularly key concern for Natural England will be to maintain and/or enhance the river corridor function for foraging and commuting bat species associated with the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).

**Respondent Number:** 300 **Comment Number:** 9 **Respondent Name:** Mr Chris Trowell

**Respondent Organisation:** Curo

**Agent ID:** 171 **Agent Name:** Tetlow King Planning Ltd

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Curo commends the Council's overall approach to new development in central Bath and the call for a new paradigm in placemaking.

Curo welcomes the recognition of the significance of Bath's neighbourhoods. The plan should consider in more detail the role and function of these neighbourhoods and, in particular, the local centres. It is important that a clear hierarchy is established and consolidated. Curo agrees that 'struggling centres' need to be prioritised within a framework of wider regeneration.

**Respondent Number:** 828 **Comment Number:** 1 **Respondent Name:** Deeley Freed Estates Ltd

**Respondent Organisation:**

**Agent ID:** 149 **Agent Name:** Martin Bailey

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

Broadly agree.

It is important that the Core Planning Principles (page 4) should accurately summarise NPPF Core Planning Principles. For example, item 1 in the NPPF starts with the principle that: "planning should be genuinely plan-led". Similarly, item 11 in the NPPF includes the principle that: "planning should focus significant development in locations which are, or can be made, sustainable."

It will be important to ensure that the Placemaking Plan does not inadvertently act to delay much-needed development.

It will be important not to duplicate the work of the Core Strategy by reopening issues settled there.

**Site or Discussion Point:** Sites: Comment on Bath sites in general

**Part2b: Comments on sites or policy areas**

Bath Overview – Page 11 - The Enterprise Area appears to have considerable merit but the concept and principles are not clearly articulated. It is recognised that this reflects the same shortcoming in the Core Strategy and it is to be hoped that this issue will be settled in that forum.

<b>Respondent Number:</b> 2940	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Catherine Parker	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

I generally support the document which encourages discussion on how Bath (and other areas) should be developed. I have a few key points.

<b>Site or Discussion Point:</b>	Sites: Comment on Bath sites in general
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**Part2b: Comments on sites or policy areas**

The sites in Bath in particular need of regeneration in particular SB5, SB6 and SB7 should be prioritised above development of the sites in active use such as the car park sites and possibly the sorting office/ Police Station sites. These car park and other sites are used intensively and contribute significantly to the centre. They should be reserved for longer term development opportunities subject to their being related relocation plans, as part of the development proposals. For example, the removal of car parking and an area for private cars to drop off and pick up at the railway station has caused significant inconvenience, in favour of a few restaurants and large open space which has no purpose.

In addition, I would appreciate a more gradual and imaginative approach to planning as opposed to comprehensive planning in a monolithic modern style. For example the area developed immediately adjacent to the railway station has a monolithic appearance and the open area has a lack of sense of purpose. This is contrary to established “Responsive Environments” urban design principles.

There is a need for a permanent outdoor site for market stalls within the city centre. This would enhance the centre and add vitality and vibrancy, together with giving opportunities to entrepreneurs and traders. It would also free up space in the main shopping streets devoted to individual stalls.

An area with outdoor bars and cafes possibly surrounding the market stalls would be a welcome addition and add vitality to the centre.

There is a need for “affordable” shops to be developed in conjunction with any new shopping development. This should encourage enterprise, add vitality and enhance the shopping experience in Bath.

<b>Respondent Number:</b> 4222	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Patricia Spencer-Barclay	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

<b>Site or Discussion Point:</b>	Sites: Comment on Bath sites in general
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**Part2b: Comments on sites or policy areas**

I fully appreciate my views on the further destruction of Bath in the pursuit of money (like the selling off of the recreation ground to Big Business) will have absolutely no weight whatsoever, but I like to know what will happen to my area before I shuffle off this mortal coil, no doubt earlier than necessary due to stress generated by an increasingly illogical council. I

would also like to take this opportunity to deplore the spending of my council tax on ruining the river walk from Sainsbury's towards Lower Weston with ridiculous boundary fencing. The whole character has changed.

**Respondent Number:** 4660 **Comment Number:** 2 **Respondent Name:** Mrs Jan Brown

**Respondent Organisation:** Norfolk Crescent Green Residents Association

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** Sites: Comment on Bath sites in general

#### Part2b: Comments on sites or policy areas

Bath City Riverside Enterprise Area (Please refer also to River Corridor above)

The Enterprise Area will be a major determinant in the development of most of the river corridor sites in Bath, but at end of July 2013 the Development and Regeneration Team (in their response to Sainsbury's planning application for BWR East) stated that "A Master Plan framework is being developed for the Enterprise Area which will form part of the emerging Placemaking DPD." Whilst a broad mix of retail, commercial and residential uses were envisaged in the Bath Regeneration and Delivery Plan, no doubt the master plan will determine more precise site specific mixes. Being a key objective of the Core Strategy, timing of delivery of this framework will be of essence as regards all other consultation for the Placemaking Plan (PMP). Whilst it is recognised that next stage in the preparation of the PMP will be early 2014, if the Enterprise Area framework is not in place before the proposed programme of collaboration with local communities takes place this Autumn, aspirations expressed then are likely to be frustrated at this later stage. Hence if delay after this time is anticipated, it is recommended that all participating in the collaborative process this Autumn are made aware of the position. Given PCM is an iterative process, if the Enterprise Area Framework will be later than Autumn, could all consultees affected be notified of its release to give reasonable time to consider resulting changes?

**Respondent Number:** 4767 **Comment Number:** 1 **Respondent Name:** Ms Wendy Stott

**Respondent Organisation:** National Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

No specific comments.

**Site or Discussion Point:** Sites: Comment on Bath sites in general

#### Part2b: Comments on sites or policy areas

New development proposed for the development sites in and around the City of Bath should respect the historic character and appearance of the World Heritage Site and should not have an adverse effect on the green setting of the city.

**Respondent Number:** 4792 **Comment Number:** 1 **Respondent Name:** Cllr Manda Rigby

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content





<b>Respondent Number:</b> 224	<b>Comment Number:</b> 4	<b>Respondent Name:</b> Ms Caroline Kay	<b>Respondent Organisation:</b> Bath Preservation Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** SB1: Cornmarket, Cattlemarket, The Hilton Hotel**Part2b: Comments on sites or policy areas**

Redevelopment of this site or sites must seize the opportunity to open up the riverside and reintegrate with Walcot Street as a coherent whole. The views across to Bathampton Down and Prior Park from various points along the street are an important element of the character of the street and should be maintained. This would be easier to achieve with a fine grained mix of uses. The distinctive and eclectic character of Walcot Street needs to be retained and enhanced: Bath does not need an expansion of larger scale city centre uses in this area.

<b>Respondent Number:</b> 245	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Andy Reading	<b>Respondent Organisation:</b> Environment Agency
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** SB1: Cornmarket, Cattlemarket, The Hilton Hotel**Part2b: Comments on sites or policy areas**

This site falls predominantly in Flood Zone 1 due to existing defences being above the 1 in 100 year predicted flood level. Any development coming forward should ensure a sufficient standard of protection against flood risk is maintained for the lifetime of the development. In terms of relationship to the river corridor any new development should enhance the river corridor margin, seeking opportunities to improve public access and promote habitat creation where possible. As part of our maintenance requirements for main rivers we would look to have a sufficient margin next to the river (e.g. 8 metres) to allow access for inspection and any required emergency works.

<b>Respondent Number:</b> 837	<b>Comment Number:</b> 22	<b>Respondent Name:</b> Mr David Redgewell	<b>Respondent Organisation:</b> South West Transport Network / Railfuture
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** SB1: Cornmarket, Cattlemarket, The Hilton Hotel**Part2b: Comments on sites or policy areas**

The design of the cattlemarket and hotel need changing to fit in with the design of the waterfront and the tramshed  
The site needs to be developed as a hotel and shops within the Cornmarket and Cornmarket which should also include flats  
The waterfront need extending with quay site walkway



Bath. The association has around 300 members in all parts of the city centre in single and multiple accommodation. Of the five development sites in the city centre identified in the Launch Document we have selected for comment the two most relevant to our members' concerns, SB1, the Cattle Market site, and SB3, Manvers Street. In both cases we have used the council's Core Strategy Document (Policy B2) and Place Making Plan Launch Document as a frame of reference.

**CATTLE MARKET SITE SB1**

1. This is a transitional site which acts as a bridge between the commercial heart of the city and the Walcot Street area of residential streets and small, independent enterprises including pubs and restaurants and many craft and home related service businesses. Development of Site SB1 would provide an opportunity to establish a more effective link between these areas reducing the current relative isolation of Walcot Street and improving pedestrian flow to and from the city centre. Development of the site should emphasize mixed uses with residential uses predominating but with a continuous commercial frontage on Walcot Street combining small and medium sized units. While there could be a case for replacing the Hilton Hotel on the site in general large or multi occupancy uses should be avoided.
2. Building massing should reflect the character of the surrounding area with building heights limited to four levels above Walcot Street grade.
3. Traffic congestion on Walcot Street already ranges from moderate to severe throughout the day. Any mix of uses for Site SB1 should aim to reduce to a minimum the need for on-site parking and any temptation to continue to use the cattle market area as a parking resource for the city centre as a whole should be avoided.
4. Public access to the riverside must be protected. There could be a case for extending the riverside walkway north from Pulteney Bridge but if further extension to Beehive Yard and beyond proves impractical, as seems likely, then a suitable destination for pedestrians should be provided within the site. This could, for example, take the form of a riverside park with moorings and a pedestrian bridge across the river to St Johns Road could also be considered.
5. Any development of the site needs to incorporate a satisfactory role for the Corn Market building which has been in a derelict and unsightly condition for too long. Considering the numerous failed attempts to identify a future for this listed building an agreement under Section 106 of the Town and Country Planning Act 1990 covering a larger area of the site may need to be considered.

**Site/Discussion Point: SB2: Central Riverside & Recreation Ground**

**Respondent Number:** 102    **Comment Number:** 3    **Respondent Name:** Federation of Bath Residents' Associations    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SB2: Central Riverside & Recreation Ground

**Part2b: Comments on sites or policy areas**

The cross-river vision in bullet 2 is welcomed. A green avenue into the heart of Bath could be wonderful, by contrast with the more formal route along Great Pulteney Street.

The notion of relocating bus and car parks to the Central Riverside and Rec areas will worry residents there.

We question the creation of big new car parks (column 4) as the policy surely is to squeeze out central parking, to be replaced by P&R; not to expand or reprove it? Notwithstanding, coach parking and/or drop off in the Pulteney Road area are worthy of consideration.

<b>Respondent Number:</b> 224	<b>Comment Number:</b> 5	<b>Respondent Name:</b> Ms Caroline Kay	<b>Respondent Organisation:</b> Bath Preservation Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** SB2: Central Riverside & Recreation Ground**Part2b: Comments on sites or policy areas**

BPT supports the suggestion of a masterplanned approach to the whole of this area but questions whether this is can be achieved in time to influence Bath Rugby's proposals for redevelopment of the rugby stadium. Important issues for consideration include the visual and physical implications of access to the Colonnades and any new footbridge as well as any developments on the Rec; (BPT preference would be for new footbridge to be close to North Parade Bridge to keep clear sightlines to the weir and Pulteney Bridge the visual impact of any new hydropower installation on the weir (one of the most visually successful 20th Century developments in Bath); the wider implications for traffic management of any new car or coach parking facilities.

<b>Respondent Number:</b> 245	<b>Comment Number:</b> 3	<b>Respondent Name:</b> Andy Reading	<b>Respondent Organisation:</b> Environment Agency
<b>Agent ID:</b>	<b>Agent Name:</b>		

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** SB2: Central Riverside & Recreation Ground**Part2b: Comments on sites or policy areas**

The area falls within Flood Zone 3a and 3b and functions as an important storage area during flood events. Any built development proposals would therefore need to be fully justified on sequential and exception test grounds as detailed in our general comments above. It will need to be ensured as proposals coming forward are safe and do not result in an increase in risk to third parties. For information loss of storage from this site has not been taken into account as part of the Bath Quays Waterside flood conveyance project being progressed along the river to the south of the city. On site measures or a separate off site solution would therefore need to be progressed if non-water compatible development is proposed.

New development of this area provides a significant opportunity to enhance the river corridor at this location. There is likely to be an opportunity to remove, replace or improve the radial gate on Pultney weir. The gate is widely considered to be an eyesore on this stretch of the river and is likely to become a maintenance liability in the future. Also the concrete revetment at the toe of parade gardens is failing and becoming exposed. Through development of this wider area there is therefore a major opportunity for the Environment Agency to work in partnership with the Council, developers and landowners to combine available funding/resources and deliver a scheme that has wider benefits for this area of the city. As well as flood risk management benefits this could also include public realm improvements, habitat creation, new navigation and recreational activities, as well as the potential for hydropower already discussed in the launch document. We would therefore request that these significant opportunities are reflected in the Placemaking Plan to ensure any future planning applications in this area help to deliver these aspirations. For information the Environment Agency are seeking to meet with BANES Directors in early October to discuss these opportunities further.





conducted a long running case, including opening a statutory inquiry that ran from October 2002 to March 2007. In November 2012 the Commission published a draft Scheme subject to public consultation which had the following three main features:

- a. It established an independent body of trustees for the charity independent of BANES
- b. It sought to resolve the situation relating to the leisure centre; and
- c. It gave the new trustees a range of powers to resolve the situation regarding the rugby club, including the ability to issue a new lease covering a larger footprint to enable re- development at the Rec

2.9 The Charity Commission received 1868 representations on the Scheme. Of these, 1624 (87%) were in support and 244 (13%) objected to it. This picture is very similar to the results of the public consultation exercise carried out in 2011, when 85% of respondents agreed with the Trust's proposal.

2.10 The Scheme was formally 'made' on 12th June 2013 and a subsequent appeals period has also closed. Three appellants have emerged through the First-Tier Tribunal (Charity) process. We understand that their cases are based on subjective matters as opposed to matters of law, however, the appeals process is on-going.

#### Town and Village Green application

2.11 A resident of Bathwick submitted an Application in December 2012 to have the Rec registered as a Town or Village Green, pursuant to s.15(2) of the Common Act 2006. An independent QC was appointed as an Inspector to review the application. Objections to the application were raised by a number of local residents as well as BANES as trustee of the RGT and Bath Rugby

2.1 After reviewing all of the evidence the Inspector provided clear advice that the application should be dismissed. There followed a period for the applicant and objectors to provide additional evidence. We understand the nature of this evidence was not substantially different to original submissions. Although there is no set date for a final decision by BANES, the expectation is that the Inspector's original advice to dismiss the application would be followed by BANES.

#### The 1922 covenants

2.13 On 6th April 1922 the Bath Recreation Ground ("the Rec") was conveyed to the Bath and Recreation Ground Company Limited by Captain Francis W. Forester. The deed of conveyance sets out the 1922 Covenants.

2.14 These covenants, if enforceable, could affect the redevelopment at the Rec. Bath Rugby have been advised that these 1922 Covenants are not enforceable, and has engaged with local residents in trying to clarify this matter.

2.15 Alongside this consultation process, the club is continuing to engage with local residents regarding the 1922 Covenants and intends to gain full clarity on the issue through the courts ahead of construction at the Rec

#### Meeting Local Community and Recreational Needs

3.1 The Core Strategy (and the NPPF) seeks to ensure that adequate and accessible provision is made for the recreation, leisure and cultural needs of Bath. Recreational and cultural facilities and services are necessary to sustain community needs and support healthy lifestyles.

3.2 The Core Strategy policy identifies overarching principles which include the following:

- Promote healthy lifestyles
- Safeguard against the loss of community and sports facilities
- Encourage participation in community and cultural facilities
- Encourage flexible use of community and cultural facilities and venues

3.3 We support the principles for meeting local community and recreational needs, as is evident from the upcoming public exhibition for the redevelopment of the Rec and the financial investment to preserve and enhance the culture and recreational facilities available to the Bath community.

3.4 The Club is also incredibly active in the community, and it is envisaged that a rejuvenated Recreation Ground will



## Development Site SB2 – Central Riverside and Recreation Ground

4.1 Emerging Policy B2 of the Core Strategy provides the wider policy context for the Central Bath area and sets out the role of the Central Area. It provides a number of Placemaking Principles, outlines the key development opportunities and describes the anticipated scope of change.

4.2 Our response therefore focusses on Development Site SB2 and how the forthcoming planning application will benefit Central Bath and the benefits it will offer to the greater community.

## The scope and content of the Placemaking Plan

4.3 Draft Policy SB2 suggests the potential to ‘take a broader vision for the wider area, one that sets an aspirational context’ for future proposal. It raises the question as to whether this whole area could be viewed as a transition area.

4.4 In this context, the proposed alterations to the Rec could facilitate the ‘green heart’ approach and will be able to provide a forum and focus for leisure, recreation, entertainment and culture for the 21st century. The Council’s intention and approach is considered helpful to reaffirm the Club’s own emerging proposals for the Rec.

4.5 As set out in earlier submissions to the Core Strategy we proposed amendments to the policy to refer to an ‘arena’ rather than a stadium, and to clarify that its location within the Central Area is at the Rec.

4.6 The philosophy behind the future proposal for the Rec takes account of Bath’s cultural status as a ‘World Heritage’ site, and a redevelopment of this area would certainly allow for greater interpretation of the historic walks and architectural styles within the centre. This Placemaking approach in policy SB2 is accepted as an important facet for safeguarding the assets and attributes, such as views across the Grand Parade.

4.7 In principle, we agree with the general approach for policy SB2 and support the thinking that a remodelling of this area is required to make the best use of the existing attributes, like the river frontage, to facilitate its identity as a central feature for Bath.

4.8 Ultimately a more effective and suitable solution should be brought forward for managing foot traffic, cycle and vehicular movement in and around the identified SB2 development site, and proposals will need to consider pedestrian and cycle movement through this area, noting level changes.

4.9 Turning to the specific points raised on page 16, we respond as follows:

- The provision of a series of integrated spaces and development opportunities is supported, although we do note that the area covered by policy SB2 is diverse and a ‘one size fits all’ approach is unlikely to be appropriate;
- We support The Rec being a central feature and attraction, that rather than turning its back to the City, is a positive and attractive asset at its heart, linking with the town centre and surrounding land uses ;
- Subject to the separate representations and comments made to the recent Core Strategy policy, we continue to support a policy context which facilitates an enhanced arena facility at the Rec;
- There is a need for the long term future of the leisure centre to be firmed up to inform the development potential of that site.

5.1 Considerable work has already been undertaken to establish links with key stakeholders, including BANES, the Recreation Ground Trustees, Resident’s Associations, local Amenity groups and societies, English Heritage, and the Environment Agency, as well as with individual residents in the immediate vicinity of the site.

5.2 Bath Rugby has made a press release in advance of its first exhibition to consult with the community about Bath Rugby’s vision for improving its facilities at the Rec. It shows a clear interest in the need for the Development Site SB2 to be appropriately applied as a recreational and cultural centre.

5.3 Detailed design and technical considerations will of course be needed on this sensitive site, but it is one which has a current sports stadium use, and we are pleased to note that on the whole the Council’s policy facilitates its aspirations to improve this area for the good of Bath and its residents, in accordance with the Trust’s objectives and legal duties.













































































































**Respondent Number:** 4809 **Comment Number:** 1 **Respondent Name:** Mr Richard Wells and Brothers **Respondent Organisation:**

**Agent ID:** 123 **Agent Name:** Savills

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** Sites: Comment on Somer Valley sites in general

**Part2b: Comments on sites or policy areas**

Site plans supplied.

These representations have been submitted by Savills on behalf of Mr Richard Wells and Brothers, who are significant landowners within the Somer Valley, controlling a large area of land between Peasedown St John and Radstock. Details of the strategic development opportunities have been provided through the Strategic Housing Land Availability Assessment process, and three of the sites have been assessed under the references RAD16a, RAD16c and PEA10.

Our clients are seeking the allocation of two development parcels within their landownership, and therefore these representations contain the justification for the proposed allocation of the land north of Radstock and south of Peasedown St John, as shown in Appendix A.

## Critique of Allocated Sites

There is an emphasis within the emerging Core Strategy on focusing growth within the Somer Valley on previously developed land in the urban areas of Midsomer Norton, Radstock, Paulton, Peasedown St John and Westfield. Whilst we do not disagree with this, it is nevertheless very important to ensure that those sites identified for development are deliverable (suitable, available and achievable) in accordance with the NPPF. The allocation of land which is either unviable or undeliverable for any reason would skew housing land supply projections and inevitably result in a failure to deliver the required scale of development.

Whilst some of the identified sites do have the potential to come forward for residential or mixed use development, there are a number where the environmental or technical constraints raise significant doubts over their deliverability. We have highlighted two sites below where the constraints are so significant that they potentially jeopardise the delivery of housing during the lifetime of the Development Plan Document. The constraints emphasised are typical of many sites in the Somer Valley and there is therefore a need to balance the aspirations for regeneration of previously developed land with the certainty of delivery on Greenfield sites and the associated benefits that come with such development opportunities.

**Site/Discussion Point: SSV1: Midsomer Norton Town Centre Sites**

**Respondent Number:** 245 **Comment Number:** 18 **Respondent Name:** Andy Reading **Respondent Organisation:** Environment Agency

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV1: Midsomer Norton Town Centre Sites

**Part2b: Comments on sites or policy areas**

This site falls within Flood Zone 1 (low risk) due to the presence of the flood relief tunnel. This takes flood flows from the River Somer, preventing widespread flooding in the town centre. If there is significant regeneration of the town centre it would therefore be worth proposals ensuring that the tunnel will still be fit for purpose for the lifetime of the development, given the expected increase in flood flows due to climate change. We would therefore request this is included as part of the placemaking plan policies for the town centre.

**Respondent Number:** 837 **Comment Number:** 23 **Respondent Name:** Mr David Redgewell **Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV1: Midsomer Norton Town Centre Sites

**Part2b: Comments on sites or policy areas**

SSV1 Support town centre policy but add more housing units in the form of flats

**Respondent Number:** 1556 **Comment Number:** 2 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV1: Midsomer Norton Town Centre Sites

**Part2b: Comments on sites or policy areas**

Somer Valley SSVI - In relation to the Midsomer Norton Town Centre sites it is of vital importance that policy prevents any further loss of essential employment land within the town centre. The recent practice of granting planning permission for the redevelopment of town centre employment sites for residential use, if allowed to continue, will decimate the vibrant economy within the town centre. It also has the perverse effect of driving new employment provision towards greenfield edge of town sites whilst at the same time failing to adequately meet the needs of the areas housing requirements.

The Council has now accepted that greenfield sites on the edge of the principal settlements should be released for primarily housing development and therefore the urgency which the Council may have (misguidedly) felt in releasing employment land in the town centre for housing has been removed.

**Respondent Number:** 4793 **Comment Number:** 1 **Respondent Name:** Mr Andy MacFarlane **Respondent Organisation:** Greater Manchester Pension Fund

**Agent ID:** 174 **Agent Name:** Pegasus Planning Group

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

It is appropriate for the Placemaking Plan to include positive proposals to enhance the vitality and viability of Midsomer Norton Town Centre, if the Council's aspirations for the development of a foodstore and car parking on the South Road Car Park are to be integrated successfully with the High Street to complement and strengthen existing retailing outlets in



will assist in delivering this policy which will further strengthen Midsomer Norton's role as a principle centre.

**Respondent Number:** 837    **Comment Number:** 24    **Respondent Name:** Mr David Redgewell    **Respondent Organisation:** South West Transport Network / Railfuture  
**Agent ID:**    **Agent Name:**  
**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV2: Midsomer Norton – South Road Car Park

**Part2b: Comments on sites or policy areas**

SSV2 support food store proposal but should also flats and housing about the site mixed development plan should show more mixed use development of food store but also include housing and flats

**Site/Discussion Point: SSV3: Midsomer Norton – Town Park**

**Respondent Number:** 245    **Comment Number:** 19    **Respondent Name:** Andy Reading    **Respondent Organisation:** Environment Agency  
**Agent ID:**    **Agent Name:**  
**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV3: Midsomer Norton – Town Park

**Part2b: Comments on sites or policy areas**

The river Somer runs through the centre of this site. The delivery of the town park should therefore include consideration of potential habitat improvements to the river corridor.

**Respondent Number:** 1556    **Comment Number:** 3    **Respondent Name:** Strategic Land Partnerships    **Respondent Organisation:**  
**Agent ID:**    **Agent Name:**  
**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV3: Midsomer Norton – Town Park

**Part2b: Comments on sites or policy areas**

Midsomer Norton Town Park - in the future iterations of this DPD the Council should support this aspiration with clear evidence as to its deliverability.

**Site/Discussion Point: SSV4: Midsomer Norton – Welton Packaging Factory**

**Respondent Number:** 245 **Comment Number:** 20 **Respondent Name:** Andy Reading **Respondent Organisation:** Environment Agency

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV4: Midsomer Norton – Welton Packaging Factory

**Part2b: Comments on sites or policy areas**

The redevelopment of this site offers a major opportunity to deculvert the river that currently runs underneath the site. This could be restored to mimic the upstream natural sections through the site, and provide habitat creation/enhancement. As well as offering a significant local asset for the final development, this could also help contribute towards achieving Water Framework Directive objectives for this watercourse. We would also look for any development coming forward on the site to be set back from the river corridor, outside of the floodplain. This would avoid the need for costly flood risk mitigation or flood storage compensation to be provided.

**Respondent Number:** 269 **Comment Number:** 5 **Respondent Name:** Barratt Homes **Respondent Organisation:**

**Agent ID:** 187 **Agent Name:** Grassroots Planning Ltd

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV4: Midsomer Norton – Welton Packaging Factory

**Part2b: Comments on sites or policy areas**

The redevelopment of the Welton Packaging Factory offers significant opportunities for the town. The primary focus of it redevelopment should be for higher density employment uses because the council are seeking to encourage such uses in the Somer Valley and this site is well located for such uses given its relationship to the town centre and public transport links. Furthermore the site offers limited scope to provide larger houses suitable for families given its size, location and previous usage.

Consequently we recommend that this site should be redeveloped for employment generating uses in the first instance with some high density residential development in the form of apartments being the most appropriate secondary use for the site.

In light of this we consider the assumed residential capacity of the site to be too high.

**Respondent Number:** 837 **Comment Number:** 25 **Respondent Name:** Mr David Redgewell **Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV4: Midsomer Norton – Welton Packaging Factory

**Part2b: Comments on sites or policy areas**

SSV4 support protection employment land  
support employment land and proposed walking and cycling route improvements  
Midsomer Norton needs to retain employment land

**Respondent Number:** 1556 **Comment Number:** 4 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** SSV4: Midsomer Norton – Welton Packaging Factory

**Part2b: Comments on sites or policy areas**

Welton Packaging Factory- if this land is to be allocate for mixed use development clear evidence should be presented in relation to its capacity having regard to the inevitable heritage constraints, its deliverability having regard to development costs and the landowners expectations. As referred to above it is essential that such large employment sites within the town centre are not lost to housing especially to 100% housing. It may be in this case that a small proportion ofthe site should be identified for housing in order to facilitate the delivery or retention of the remainder as employment.

**Respondent Number:** 4746 **Comment Number:** 1 **Respondent Name:** Terrace Hill (Midsomer) Ltd **Respondent Organisation:**

**Agent ID:** 154 **Agent Name:** Nathaniel Lichfield & Partners

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

We agree with the general scope of the Placemaking Plan but have specific comments in relation to the content of any policy on development site SSV4 (see below).

Given that the plan is in an early stage of production with only limited content available for discussion, we reserve our right to comment on any subsequent iterations of the content of the plan (including more detailed policies).

For full details, please see accompanying letter of representation from Daniel Lampard of NLP dated 20/09/2013 (Our Ref: 30869/DL/5585577v5).

**Site or Discussion Point:** SSV4: Midsomer Norton – Welton Packaging Factory

**Part2b: Comments on sites or policy areas**

We write on behalf of our client, Terrace Hill (Midsomer) Ltd, to submit representations to the above consultation document. In mid 2012 Terrace Hill contracted to purchase the former Welton Bibby and Baron packaging factory (the WBB site) within Midsomer Norton. Terrace Hill (Midsomer) Ltd is currently progressing proposals for a mixed use development encompassing a foodstore and residential development. WBB have since vacated the site and relocated to alternative premises in Westbury . It is our client's intention that a planning application for this development will be submitted in the near future.

Development Site SSV4: Midsomer Norton - Welton Packaging Factory

The WBB site measures approximately 5ha and is located on the edge of Midsomer Norton town centre. Lt is a vacant brownfield site, following the relocation of Welton Bibby and Baron, and we agree that it is appropriately identified as a development site within the emerging Placemaking Plan.

The site has previously been allocated in the Local Plan for mixed use residential and business uses (Site NR14). We consider that the site remains appropriate for a mix of residential and employment generating uses (and as expanded upon subsequently retail development forms an employment generating use).

It is acknowledged within the emerging Core Strategy that the Somer Valley area currently suffers from high levels of out-commuting due to a lack of local employment opportunities, and that there is a need for the development of economic and community facilities within Somer Valley to increase the area's self-reliance and economic revitalisation.

As indicated above, our client has aspirations to develop the site for a mixed use development scheme, comprising retail and residential uses. In this respect, our client has undertaken initial Masterplanning work that has indicated the site is suitable to accommodate some residential development alongside a foodstore (circa 4,500sq m).

The provision of a foodstore at the WBB site would offer a number of benefits to Midsomer Norton and the wider Somer Valley area. Firstly, development of this nature at the WBB site would be capable of creating a number of employment opportunities of different types and across a range of skills, in an accessible, sustainable, location and on a site from which a significant number of jobs have recently been relocated from.

Additionally, a foodstore in this location, which is well located to other facilities within Midsomer Norton Town Centre, would allow expenditure that currently takes place at out-of-centre facilities, and facilities beyond the Somer Valley, to be clawed back into the local area. The close proximity of the site to these facilities in Midsomer Norton town centre would also encourage visitors to the foodstore to undertake linked trips to the town centre, thereby strengthening the centre's retail function. Furthermore, a development of this nature would enable a number of community improvements to be delivered, including significant enhancements to the gateway to the town centre, and improved pedestrian links to the High Street, further promoting linked trips.

To maximise the potential benefits of the site we consider that it is important that it is allocated to enable the development of a mix of uses. In terms of facilitating both social and economically sustainable development, the development of the WBB site would have a more sustainable balance if it were to provide both housing and complementary employment generating uses (such as retail development). This would be in line with the policy aspirations of Bath & North East Somerset's emerging Core Strategy, for example:

- Emerging Core Strategy Objective 5 that "enabling the delivery of new homes needed to respond to expected demographic and social changes and as far as possible to support the labour supply to meet our economic development objectives";
- Paragraph 1.29 states that ""In the Somer Valley there is significant net out-commuting due to lack of available jobs ... The strategy therefore recognises this position and seeks to facilitate economic-led regeneration enabling job growth in the area."
- Paragraph 4.15 of the emerging Core Strategy recognises that "In light of the high level of the objective of economic led revitalisation, it is important that the additional housing this [sic] does not significantly worsen the balance between homes and jobs and the out-commuting problems and the council may therefore seek to ensure an economic benefit from new housing."

Furthermore, the need for an appropriate mix of residential and other uses is also consistent with the NPPF (para 37) that states "planning policies should aim for a balance of land uses within the area so that people can be encouraged to minimise journey lengths".

We therefore consider that the Placemaking Plan should allocate development site SSV4 for a mixed use development of housing and employment generating uses (including retail development).

The forthcoming planning application will address the NPPF retail policy tests (i.e. the compliance of a foodstore in this location against the sequential and impact tests). Subject to timeframes the presentation of this analysis may precede or follow publication of the next iteration of the Placemaking Plan.

In view of the clear benefits that a foodstore at the WBB site could provide, and that the NPPF recognises retail development as an employment generating use, it is important that any allocation brought forward in advance of the







Given the constraints identified, even if the site were to come forward the impact on viability is such that there is a significant prospect of a reduced S106 / affordable housing package. If so, the development would not address the full housing needs of the local community.

In summary, there is considerable uncertainty over the deliverability of land within SSV6, particularly for the immediate 5 year period; a view which is consistent with the recent Core Strategy Hearing Examination notes. Whilst we do not object to this allocation and the establishment of the principle of regeneration in the Placemaking Plan, due to the uncertainty over deliverability, the Council should not rely upon the site coming forward and contributing to the achievement of strategic housing requirement. The Council must therefore look to alternative deliverable sites, such as land north of Radstock.

## Site/Discussion Point: **SSV7: Additional Housing in the settlements within the Somer Valley**

**Respondent Number:** 219 **Comment Number:** 4 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** SSV7: Additional Housing in the settlements within the Somer Valley

### Part2b: Comments on sites or policy areas

Policy: SSV7 (Additional Housing in the settlements within the Somer Valley)

- How should the housing development boundaries in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John best be amended to accommodate this?
- Which sites should be allocated to meet this additional housing need?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land West of Kilmersdon Road, Radstock (RAD 31B and RAD 31C on enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to an existing HDB and within close proximity of Radstock.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 100 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 5 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** SSV7: Additional Housing in the settlements within the Somer Valley

### Part2b: Comments on sites or policy areas

Policy: SSV7 (Additional Housing in the settlements within the Somer Valley)

- How should the housing development boundaries in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John best be amended to accommodate this?
- Which sites should be allocated to meet this additional housing need?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land West of Northmead Road, Midsomer Norton (MSN 23 on enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 45 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 7 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development

that currently being proposed at the various settlements.

**Site or Discussion Point:** SSV7: Additional Housing in the settlements within the Somer Valley

### Part2b: Comments on sites or policy areas

Policy: SSV7 (Additional Housing in the settlements within the Somer Valley)

- How should the housing development boundaries in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John best be amended to accommodate this?
- Which sites should be allocated to meet this additional housing need?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land at Boxbury Hill, Midsomer Norton (MSN 27 on enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 100 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required

**Respondent Number:** 219 **Comment Number:** 10 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** SSV7: Additional Housing in the settlements within the Somer Valley

### Part2b: Comments on sites or policy areas

Policy: SSV7 (Additional Housing in the settlements within the Somer Valley)

- How should the housing development boundaries in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John best be amended to accommodate this?
- Which sites should be allocated to meet this additional housing need?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land at Abbots Farm Close, Paulton (see enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 50 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

<b>Respondent Number:</b> 219	<b>Comment Number:</b> 12	<b>Respondent Name:</b> Edward Ware Homes Ltd	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 22	<b>Agent Name:</b> Ian Jewson Planning Ltd		
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>			

**Part 2a: Comments on scope and content**

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector’s concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** SSV7: Additional Housing in the settlements within the Somer Valley

**Part2b: Comments on sites or policy areas**

Policy: SSV7 (Additional Housing in the settlements within the Somer Valley)

- How should the housing development boundaries in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John best be amended to accommodate this?
- Which sites should be allocated to meet this additional housing need?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB’s) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land at Thicket Mead, Midsomer Norton (MSN 24A and MSN 24B on enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing urban area.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 120 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.









### Figure 1: Site Location

Parcel B lies to the west and comprises two fields that are both bounded by hedgerows, again interspersed with trees. A small yard accommodating two agricultural buildings also lies within this parcel with access into this yard taken directly off Chilcompton Road. Parcel B measures 2.96 hectares (7.31 acres).

The site lies within the following approximate walking distances of key facilities:

- Long Vernal Primary School = 1,200 metres
- Somervale School = 1,250 metres
- St John's Primary School – 1,300 metres
- Bus Stop = 50 Metres

A concept layout plan for the site was prepared and this showed that it could accommodate up to 129 dwellings, this plan is contained in appendix B.

The current layout has been informed by a landscape appraisal of the site, preliminary walkover survey, Environment Agency Flood Mapping and an initial assessment of potential access points.

As the site will deliver a significant number of open market dwellings to meet the council's housing requirement as well as much needed affordable housing it offers clear benefits. Therefore the site should be allocated for such development unless the adverse effects of doing so would outweigh these benefits. We now turn to assess these potential impacts.

### Transport and Access

The site is accessed off Chilcompton Road which currently serves a large number of residential properties and accommodates two lanes of traffic all the way to the edge of this site. As the road exits the existing settlement boundary it is over 6m in width with 2m width footpaths on either side.

To the north is a small roundabout that serves a recently constructed development located on Folly Close.

We have considered the available road width and visibility available at the site as well as the context of the development to the north of the site having been granted planning permission with access taken off Chilcompton Road, approximately 50 metres to the north. In light of these factors we consider that a technical solution to providing a safe access to the appraisal site should be feasible.

Such a technical solution may include a new junction, road widening and/or other measures, however as the option land includes both sides of the road there are no land constraints to the delivery of such a solution and nothing to suggest that suitable and safe access into both parcels cannot be achieved.

We are also not aware of any insurmountable highways capacity issues within the local area which would preclude the development of this site. Regular public transport links are also available in close proximity to the site.

The NPPF at Para 32 makes it clear that development should only be prevented on highways grounds if the cumulative impact of the development is severe. This is a different context when compared to planning policy in respect to access pre-NPPF and we consider that such severe impact would be difficult to justify in relation to this site.

### Flood Risk and Drainage

The site lies adjacent to the river Somer that runs along the eastern boundary of Parcel B. The environment agency flood map is presented as Figure 2 below. This shows that a small part of the fringe of Parcel B lies within either flood zone 1 or 2 and should therefore be excluded from the area proposed for development. The proposed layout accommodates this and allows a buffer between the identified flood zone and residential development.

### Figure 2: Extract of Environment Agency Flood Map

The remainder of Parcel B and the whole of Parcel A lies within flood zone 3 and is unlikely to have any constraints in

relation to fluvial flooding.

No constraints in relation to groundwater protection or surface water flooding issues have been identified in EA mapping or the local plan maps. Therefore, it is unlikely that any significant constraint will exist in this regard.

#### Sustainability

The site lies directly adjacent to the settlement boundary of Midsomer Norton. And the Town centre is approximately 1,300 metres to the north east. The Manual for Streets (MFS) discusses the need to create walkable neighborhoods which it defines as being area that provides a range of facilities that residents can comfortably reach on foot. It refers to the ideal that such facilities be located within a 10 minute walk away from development, or up to 800m but explains this should not be seen as an upper limit.

PPG13, which MFS refers to, stated that walking offers the greatest potential to replace short car trips, particularly those under 2km. This site lies clearly within these limits.

Given that the town centre is located well within 2km of the site and other key facilities such as schools are substantially closer the site should be considered to be sustainable as they are all within a reasonable walking distance and easily accessible by bike.

Midsomer Norton also have good public transport links to surrounding towns including Bath, these are typically available at least every hour during the working day. Therefore development at the town will maximise the use of these existing routes and their ability to be sustained and improved in the long term.

Although the council consider them limited there are job opportunities in Midsomer Norton, many of which lie within 2km of this site which should be considered walkable.

As we have set out earlier in this document the NPPF does not seek to eliminate car trips completely but to locate development where alternatives to car borne travel are available and the length of such trips can be minimised.

The site's proximity to the principle centre in the Somer Valley, Midsomer Norton, along with the availability of public transport means that development at the town, and specifically this location at Chilcompton Road, would meet the policy requirements of the NPPF.

#### Ecology and Biodiversity

Generally, the site consists of open agricultural fields with little biodiversity value. The exception to this will be the hedgerows and trees that exist on the site.

The large majority of these hedgerows can be retained as part of the development and the layout plan presented in appendix B demonstrates how the perimeter hedgerows will be retained and reinforced. The central hedgerow located within parcel B will be retained in part and compensatory planting provided on its southern boundary or within the proposed POS areas more than compensating for this loss.

We are not aware of any records of protected species on or adjacent to the site.

Therefore it is considered that with mitigation in the form of new planting and landscaped public areas the biodiversity value of the site can be enhanced and no adverse impact on ecology will occur.

#### Landscape

All new development that will be required to meet housing need at Midsomer Norton will have some impact on the landscape and it is within that context that proposals should be viewed because a zero change scenario is not feasible given the acute need for new housing.

However, we have assessed the suitability of the site at Chilcompton Road in Landscape terms. Accordingly Tisdall Associates were instructed to undertake a preliminary visual assessment of the site and their report on this matter forms

appendix C to these representations.

The key findings of this report can be summarised as follows:

- No specific Landscape designation applies to the site;
- The Zone of Theoretical Visibility (ZTV) that applies to the site is small because of the topography of the surrounding areas and the fact the site abuts the existing urban area;
- Views from within the ZTV are restricted by existing hedgerow and riverside planting and the site is well visually contained;
- The development of the site would represent a natural extension to the existing urban edge;
- Without mitigation some views of development in parcel B would be seen from within the ZTV but mitigation in the form of planting on this boundary would mitigate this; and
- Various other mitigation measures are proposed to ensure a transition between the rural and urban environments is successfully provided.

In light of these conclusions it is considered that no significant landscape constraints exist in relation to the development of the site.

#### Heritage

The site does not lie within or near to any conservation areas and we are not aware of any listed buildings that lie in close proximity to it.

#### Public Rights of Way

OS maps identify that a public right of way runs along part of Parcel B's boundary.

The proposed site layout allows this pathway to be incorporated into the development so this should not constrain the site or represent any adverse impact.

In conclusion our analysis of the site has identified that no adverse impact would occur as a result of the development, and certainly no impact that would outweigh the substantial benefit of the proposals could be sustained.

Locating new residential development at Midsomer Norton would also be sustainable given the services, employment and public transport links it provides. Furthermore concentrating development in this location would sustain these services and allow for their enhancement.

Accordingly, in accordance with paragraph 14 of the NPPF the site should be allocated to meet the objectively assessed housing needs of both the Town and BANES as a whole. Also of note is that given this conclusion the possibility of releasing this land for development now should be considered given that no adverse impacts would outweigh the benefits that its development would bring, specifically in assisting BANES to meet its current deficit in five year land supply.

#### FIVE YEAR LAND SUPPLY

In connection with the matter of five year land supply we note that BANES had previously accepted that it could not demonstrate a five-year housing land supply. The following recent appeals endorsed this position:

- 47 houses at Sleep Lane, Whitchurch (ref: 11/02193/FUL) – Appeal Allowed 29th November 2013 (you will be aware of this as it was a Barratt scheme)
- 36 dwellings at Maynard Terrace, Clutton (ref: 12/01882/OUT) – Appeal allowed 11th July 2013
- Residential development of up to 99 dwellings, Land to the South of Manor Road, Saltford (12/05315/OUT) – Appeal ongoing but SOCG prepared May 2013 agrees there is no five year land supply
- Residential development of 41 dwellings, Oak Court, The Batch, Bishop Sutton (12/05279/FUL) – Appeal allowed 20th September 2013

However, the council has recently changed its stance in relation to this issue. In June 2013 the Council published a findings report in relation to a recently undertaken SHLAA. This report also examined the identified housing supply against five-year requirements, the report's conclusion on this matter stated:

Against the latest household projections the Council concludes that it still has a 5 year land supply +38%.



















Initial feedback from our client's highways consultant has confirmed suitable access is achievable from the site onto Northmead Road. This confirms the SHLAA's assessment, which also suggests that the developers will need to provide data (LINSIG) showing how the signals at the Bridge will be affected by vehicles entering and leaving the site.

Existing services are located in the highway.

This site is available (and is actively being promoted), sustainable and deliverable within a short timeframe, with very little pre-commencement works. Due diligence is currently ongoing in preparation for continued promotion through the planning system. As such this land parcel would form a vital source of deliverable housing land within the first few years of the plan period.

## Site/Discussion Point: SSV8: Westfield

**Respondent Number:** 1556 **Comment Number:** 8 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** SSV8: Westfield

### Part2b: Comments on sites or policy areas

Policy SSV8- Westfield- additional land should be identified for growth of the industrial estate. This is a vibrant industrial estate close to the largest population centre outside of the green belt and close to the recently granted planning permission for 165 new dwellings and close to further opportunities for medium scale mixed use developments.

## Site/Discussion Point: SSV9: Paulton – Old Mills

**Respondent Number:** 819 **Comment Number:** 2 **Respondent Name:** Paulton Parish Council **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** SSV9: Paulton – Old Mills

### Part2b: Comments on sites or policy areas

- What is the vision for this area and how can the Placemaking Plan help to ensure it is delivered?  
Employment opportunities only - both commercial and industrial.
- How can employment best be secured?  
Utilising the existing commercial buildings but also ensuring that the commercial and retirement village are built on the Polestar site, creating full and part-time skilled, semi-skilled and unskilled work.  
The formerly redundant offices on the Old Mills site have been marketed for two years and the owners have been successful in attracting tenants to occupy approximately a third of the building floor space. Paulton Parish Council has had one meeting with the agents for the office building to explore potential uses and tenants for the remainder of the office building. The warehouse is also being marketed to secure tenants for the building.

## Schedule of Comments on the Placemaking Plan Launch Document: Sorted by Change Reference.

- Should a mix of uses be allowed on this site as part of a comprehensive scheme and to enable its delivery?  
No, a mix of uses should not include residential development.  
PPC must be involved and work with BANES and developers to input into the preparation of an agreed Development Brief for this site.
- What opportunities are there for renewable energy?  
Both existing buildings on the site have roofs that are suitable for potential solar energy installations

**Respondent Number:** 1556 **Comment Number:** 9 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** SSV9: Paulton – Old Mills

### Part2b: Comments on sites or policy areas

Policy SSV 9-Paulton Old Mills- the mechanism for delivery of this employment land should be through the CIL. No other development or mix of uses should be considered on this site. It is in an unsustainable location, remote from the town centre.

## Site/Discussion Point: Sites: Comment on Rural Areas sites in general

**Respondent Number:** 154 **Comment Number:** 2 **Respondent Name:** Mrs Jane Hennell **Respondent Organisation:** Canal & River Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** Sites: Comment on Rural Areas sites in general

### Part2b: Comments on sites or policy areas

The Kennet & Avon Canal runs through the rural areas to the east of Bath and is an important feature in the landscape. It should be recognised as a valued multi- functional asset not just within, but linking communities.

The canal/ river corridor is probably the most important Green infrastructure asset in the district, providing wildlife habitat, sustainable transport routes and a free recreational facility. It is hoped that the various local communities will recognise the value of their asset and welcome opportunities to improve and protect it.

**Respondent Number:** 300 **Comment Number:** 12 **Respondent Name:** Mr Chris Trowell **Respondent Organisation:** Curo

**Agent ID:** 171 **Agent Name:** Tetlow King Planning Ltd

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** Sites: Comment on Rural Areas sites in general

**Part2b: Comments on sites or policy areas**

Curo agrees with the focus of additional housing development in the more sustainable villages with a range of key services and facilities.

Curo remains concerned to ensure that there is sufficient opportunity to meet current and future affordable housing needs in rural areas. In this context, it will be important to review development boundaries especially in Green Belt locations; and to encourage clustering of functionally related parish areas in order to establish 'local connections' for the purpose of establishing local housing need.

**Site/Discussion Point: RURAL 1: Rural Areas**

**Respondent Number:** 219 **Comment Number:** 1 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** RURAL 1: Rural Areas

**Part2b: Comments on sites or policy areas**

Policy: Rural 1 (Rural Areas)

- What development opportunities are there to meet future and current housing needs, particularly affordable housing?
- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land South of Hayeswood Road, Timsbury (TIM 9 on enclosed plan) is an appropriate location for future housing development. The site is:

1. Adjacent to the existing HDB.
2. Close to existing services and facilities.
3. Well related to the established pattern of development and would represent an appropriate extension to the settlement.
4. Capable of delivering around 150 new dwellings (including affordable provision).
5. Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 2 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** RURAL 1: Rural Areas

### Part2b: Comments on sites or policy areas

Policy: Rural 1 (Rural Areas)

- What development opportunities are there to meet future and current housing needs, particularly affordable housing?
- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land South of the A39, High Littleton (see enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 150 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 3 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** RURAL 1: Rural Areas

#### Part2b: Comments on sites or policy areas

Policy: Rural 1 (Rural Areas)

- What development opportunities are there to meet future and current housing needs, particularly affordable housing?
- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that land at Maynards Terrace, Clutton (CLU 4 on the enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 35 to 40 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 6 **Respondent Name:** Edward Ware Homes Ltd

**Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** RURAL 1: Rural Areas

#### Part2b: Comments on sites or policy areas

Policy: Rural 1 (Rural Areas)

- What development opportunities are there to meet future and current housing needs, particularly affordable housing?
- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land West of St Marys School, Timsbury (TIM 5 on enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.

- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 80 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 8 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** RURAL 1: Rural Areas

### Part2b: Comments on sites or policy areas

Policy: Rural 1 (Rural Areas)

- What development opportunities are there to meet future and current housing needs, particularly affordable housing?
- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land North of Wells Road, Hallatrow (see enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 135 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

**Respondent Number:** 219 **Comment Number:** 9 **Respondent Name:** Edward Ware Homes Ltd **Respondent Organisation:**

**Agent ID:** 22 **Agent Name:** Ian Jewson Planning Ltd

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content



- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land at Lippiatt Lane, Timsbury (TIM 3 on enclosed plan) is an appropriate location for future housing development. The site is:

- 1) Adjacent to the existing HDB.
- 2) Close to existing services and facilities.
- 3) Well related to the established pattern of development and would represent an appropriate extension to the settlement.
- 4) Capable of delivering around 90 new dwellings (including affordable provision).
- 5) Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

<b>Respondent Number:</b> 219	<b>Comment Number:</b> 14	<b>Respondent Name:</b> Edward Ware Homes Ltd	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 22	<b>Agent Name:</b> Ian Jewson Planning Ltd		
<b>Further Information available in the original comment?</b> <input checked="checked" type="checkbox"/>			

#### Part 2a: Comments on scope and content

We agree with the proposed scope and content of the Placemaking Plan in that the purpose of the document is to allocate sites for development at settlements that have been identified as appropriate locations for development by the emerging Core Strategy.

Nevertheless it is important to note that we share the Core Strategy Inspector's concerns regarding the evidence that has been used to try and justify overall housing requirement that is being proposed in the emerging Core Strategy. As a result we expect that the overall housing requirement for the District will need to be increased, as will the level of development that currently being proposed at the various settlements.

**Site or Discussion Point:** RURAL 1: Rural Areas

#### Part 2b: Comments on sites or policy areas

Policy: Rural 1 (Rural Areas)

- What development opportunities are there to meet future and current housing needs, particularly affordable housing?
- How should Housing Development Boundaries be reviewed?

As set out in the emerging Core Strategy we agree that the Housing Development Boundaries (HDB's) of the identified settlements should be amended to accommodate future housing as it is clear that there is insufficient capacity within the existing built up areas.

We consider that the Land East of Mill Lane, Timsbury (TIM 7A and TIM 7B on enclosed plan) is an appropriate location for future housing development. The site is:

1. Adjacent to the existing HDB.
2. Close to existing services and facilities.
3. Well related to the established pattern of development and would represent an appropriate extension to the settlement.
4. Capable of delivering around 100 new dwellings (including affordable provision).
5. Within a single ownership and available for development now.

Finally, we would welcome the opportunity to discuss the site further with Officers and would be happy to submit further information should it be required.

<b>Respondent Number:</b> 259	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Edmund Bruegger	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 152		<b>Agent Name:</b> GL Hearn	
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

Yes

**Site or Discussion Point:** RURAL 1: Rural Areas

#### Part2b: Comments on sites or policy areas

With regard to the question “What development opportunities are there to meet future and current housing needs, particularly affordable housing” - Mr E Bruegger owns land to the south of Temple Inn Lane, Temple Cloud (see attached site location plan), which is considered to be an appropriate location for additional housing, given its status as a key settlement within the District and one that meets the criteria set out in emerging Core Strategy policy RA1. Mr Bruegger has promoted the land for development through the Council’s Strategic Housing Land Availability Assessment (SHLAA) and the latest version of this document (published in May 2013) concluded that the site is suitable for residential development in principle and could accommodate in the region of 75 dwellings (at a density of 30 dpha). As a result, Mr Bruegger has proceed to instruct us to prepare and submit an outline planning application for development of the site for around 70 dwellings; this application has been registered by the Council (Planning Ref No: 13/03562/OUT) and is currently being determined. A pre-application response from the Council has accepted that development of the site for residential is acceptable in principle, subject to resolving issues in relation to highway impact and design/layout. It is considered that these issues have been adequately addressed within the submitted application. Should the outline application be granted planning permission, a number of financial contributions will be secured via a S.106 Agreement towards potential improvements to the local Primary School and Village Hall, thus helping to improve local services and facilities. The development would also provide in the region of 25 affordable dwellings (a mix of social-rent and intermediate), which represents significant additional affordable housing provision in this area of the district.

<b>Respondent Number:</b> 269	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Barratt Bristol	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 152		<b>Agent Name:</b> GL Hearn	
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

Yes

**Site or Discussion Point:** RURAL 1: Rural Areas

#### Part2b: Comments on sites or policy areas

Barratt Bristol object to the Council’s continued insistence on seeking to arbitrarily limit the amount of development in the RA1 villages to “around 50” dwellings and limiting development in RA2 villages to “around 15” dwellings in the plan period. This restriction is contained within a policy document that has yet to be adopted and which is the subject of significant concerns regarding how housing requirements have been calculated. It may well be that overall housing numbers required in the district within the Plan period will have to increase fairly substantially, which could require the provision of additional development within and/or on the edge of the existing key settlements in the district. Such restrictions could result in sub-optimal development on sites that are acceptable for development in principle, but which can accommodate more than the 50 or 15 dwellings. It is considered that all potential allocations in RA1 or RA2 settlements should be assessed on their merits and without artificially limiting the quantum of development. The amount of development will be limited by such factors as: highways impact; visual impact; accessibility etc.

Finally, we would point out that developments within the RA1 and RA2 settlements could make a significant contribution towards new or improved local services and facilities. By seeking to artificially limit the amount of development, the contributions delivered may not be sufficient to bring forward any meaningful improvements.

<b>Respondent Number:</b> 269	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Barratt Bristol	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 36		<b>Agent Name:</b> D2 Planning Limited	
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** RURAL 1: Rural Areas

**Part2b: Comments on sites or policy areas**

NB Plan supplied as part of the original representation.

**CLUTTON - RURAL AREAS**

Objections are lodged to the principle of preparing this Placemaking Plan in advance of an adopted Core Strategy. This Inspector who reopened the Examination in respect of the Core Strategy has indicated that he has many concerns with regards the soundness of the Core Strategy as resubmitted. One such issue is the fact that the Core Strategy does not seek to meet it objectively assessed housing needs. Furthermore, the Council are unable to demonstrate a 5 year supply of deliverable housing. At the recent appeal in respect of land at Maynard Close, Clutton, the Inspector concluded that:

“The Council accepts that there is a significant shortfall in the number of deliverable housing sites available to meet the need for market and affordable housing in Bath and North East Somerset over the next five years. The Council has also acknowledged that as pointed out by the Inspector appointed to examine its emerging Core Strategy there is a record of persistent under delivery of housing in the district.”

In view of the above, it is considered that the preparation of a Placemaking Plan is premature until an adopted Core Strategy is in place and the Council have accepted that it cannot demonstrate a 5 year supply of deliverable housing sites. One way of achieving this is by identifying suitable sites which is something that the Placemaking Plan does not do particularly in the Rural Areas.

It is noted that the Council’s emerging Core Strategy recognises that a considerable proportion of its housing will need to be met through provision of new dwellings in rural settlements. It is therefore interesting to note that the Placemaking Plan does not identify any settlement capable of accommodating additional housing or sites. This represents a fundamental flaw in the Placemaking Plan and this provides no certainty as to the spatial visions for the Rural Areas in terms of the delivery of housing, both open market and affordable.

We consider that there are a range of settlements which meet the criteria in Policy RA1 of the draft Core Strategy. One such settlement is Clutton which has a wide range of services including a primary school, public house, shops, village hall etc. It is considered that the settlement has sufficient facilities that it should be identified as a residential settlement capable of accommodating additional housing. This again was the conclusion of the Inspector who dealt with the Maynard Terrace appeal.

Furthermore, the objector’s control land at Church Road, Clutton (see attached plan) which they consider is eminently suitable for residential development. The site is well related to the existing settlement and is well located to the facilities in the settlement by non car modes. There are no technical reasons which would prohibit development. Access can be achieved to the requisite standard and the site can be adequately drained for both foul and surface water. There are no other constraints to the development of the site coming forward.

In view of the above, it is requested that:

- i) The Placemaking Plan does not proceed any further until the Core Strategy has been found sound by the inspector;
- ii) Clutton is identified as an RA1 settlement; and
- iii) Land at Church Road, Clutton be identified for residential development

<b>Respondent Number:</b> 270	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Blue Cedar Homes	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 36		<b>Agent Name:</b> D2 Planning Limited	
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			
<b>Part 2a: Comments on scope and content</b>			

<b>Site or Discussion Point:</b>	RURAL 1: Rural Areas
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<b>Part2b: Comments on sites or policy areas</b>
Rural 1
<p>We object to this policy on the basis that it does not identify any rural settlements where development can be accommodated. We consider that the Placemaking Plan is fundamentally flawed in this respect in that it provides no certainty as to the spatial vision for the Rural Areas in terms of the delivery of housing.</p> <p>We consider that there are a range of villages which meet the criteria in Policy RA1 of the draft Core Strategy. One such village is East Harptree which has a wide range of services including a primary school, public house, shop, village hall etc. It is considered that the settlement has sufficient facilities that it should be identified as an RA2 settlement.</p> <p>Furthermore, land north of Ashwood Church Lane, East Harptree is located within the defined settlement limits. In such circumstances the principle of residential development is acceptable. The Placemaking Plan should identify this land as being suitable for residential development. The objector is a specialist retirement homes developer and they would propose the development of the site for a retirement scheme.</p> <p>There are no technical reason which would prohibit the site being developed. Access is available from Church Lane and the site can be adequately drained for both foul and surface water.</p> <p>The site does not constitute an important open space and its development would not adversely affect the character or the appearance of the Conservation Area nor the character of the Mendip AONB.</p> <p>The development would also be able to provide some additional land for the primary school to use as a playing pitch.</p> <p>In conclusion the Placemaking Plan should be amended to: -</p> <ul style="list-style-type: none"> <li>i. Identify East Harptree as an R2 settlement.</li> <li>ii. Identify land north of Ashwood Church Lane for residential development.</li> </ul> <p>The plan is flawed in that it is being prepared in advance of the adoption of the Core Strategy. The inspector has already indicated that he has considerable concerns about the revised Core Strategy particularly in that it does not meet its objectively assessed housing needs. In such circumstances there is no policy certainty in preparing this plan. It should therefore be withdrawn until the Core Strategy has been adopted.</p>

<b>Respondent Number:</b> 397	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Stokefield Trust	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 51		<b>Agent Name:</b> Hoddell Associates	
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>			





could be the thin end of the wedge for a huge development, which would be completely out of keeping for the rural area and devastate the village.

**Respondent Number:** 4790 **Comment Number:** 1 **Respondent Name:** Dr A Edwards **Respondent Organisation:**

**Agent ID:** 18 **Agent Name:** WYG

**Further Information available in the original comment?**

## Part 2a: Comments on scope and content

**Site or Discussion Point:** RURAL 1: Rural Areas

## Part2b: Comments on sites or policy areas

NB Site plan supplied with the original representation.

### Introduction

The purpose of this letter is to provide details of a site at Compton Martin, that the owner wishes to promote for residential development as part of the B&NES Placemaking Plan.

### The Site

The site a former orchard, is situated on the northern side of the A368 and to the west of Leamon Cottage, Compton Martin, as shown on the Local Plan Proposals Map enclosed. It is approximately 0.3ha in size and of a rectangular shape. The surrounding land uses are residential with houses built adjacent to the east and west of the site and farmland to the north and south boundaries.

The site is close to a range of village facilities, including a Public House, local Post Office combined with convenience shop, community hall and Church. There is also a bus stop roughly 100m to the west of the site outside Mendip Villas and a further bus stop opposite the Post Office, providing daily services to Bristol and Radstock.

### Suitability

The site is available for housing and there are no known constraints that would impair early delivery of the site. The site can deliver around 10 residential dwellings.

Policies RA1 and RA2 of the Composite Draft Core Strategy March 2013, support in principle limited residential development at villages such as Compton Martin, subject to it being of a scale, character and appearance appropriate to the village. Whilst the subject site is currently outside the Housing Development Boundary (HDB)(as shown on the Local Plan Proposals Map), it is considered that the HDB should be extended to include this site, owing especially to its position between 2 existing residential areas located within the village HDB.

Appropriately-scaled development will help to consolidate the role of the village and sustain local facilities, while contributing to the additional 1,100 new dwellings identified in the Core Strategy to be provided over the plan period in rural areas of Bath and North East Somerset.

The Placemaking Plan Launch Document May 2013 encourages some residential development in rural areas, stating provision should be made for around 50 dwellings in areas that meet the criteria of Policy RA1 and more limited development of around 15 dwellings within those villages meeting the criteria in Policy RA2. The subject site can deliver residential development of the scale envisaged for the villages.

In terms of site-specific issues, we point towards the following factors that indicate that the subject site can be successfully brought forward for housing:

- **Highways:** direct vehicular access to the site can be gained from the A368 and in a position where adequate visibility can be readily achieved.
- **Accessibility:** the site is located within easy walking distance of village facilities including bus stops, the closest being located approximately 100m to the west of the site. Development of the site may bring with it the opportunity to





Furthermore, there will be a palpable enhancement to the Conservation Area by bringing this redundant and steadily decaying site back into use, and an appropriate design could certainly ensure that this is achieved with sensitivity and deference to the local character. Development of the site will also provide resource to support the much needed repairs to the Grade II\* listed Manor House.

Our client has previously considered the development potential of the site, and it has been determined that the site could accommodate approximately 10 dwellings, which would provide a significant contribution to the 50 dwellings required across the plan- period at Chew Magna.

It is therefore critical that the PMP take account of the development potential of the site, and to recognise this through a redrawing of the Settlement Boundary and the formal allocation of this currently derelict site for residential development to contribute to the identified development requirement of the village.

If B&NES intends to review the current wash-over Green Belt designation at Chew Magna, with a potential view to excluding developed portions of the village, it will be necessary also to exclude the Manor House and associated Dark Lanes site. If the site were to remain in the Green Belt, it would place an onerous constraint upon the future of the site and listed manor house, and would likely preclude any opportunity to bring it into a positive and active use.

#### Conclusions

The spatial strategy set out in the draft Core Strategy indicates that 50 dwellings will need to be accommodated in Chew Magna over the plan period, though these cannot easily be delivered without a review of the currently restrictive policies relating to the Village.

Our client's site at Manor House and associated Dark Lanes land is a redundant, previously developed site which is currently having a harmful impact upon the Conservation Area and setting of the Grade II\* listed Manor House (the restoration of which is dependent on the delivery of the wider site). While this is a prime location in the folds of the developed area of Chew Magna, current policy in the form of the Green Belt and restricted settlement boundary is a considerable constraint upon delivering this.

We therefore urge the local planning authority to review the current constraints upon development at this site in order to facilitate the necessary development. As a minimum, the Manor House and Dark Lane should be incorporated into the Settlement Boundary and the site allocated for residential development. If a review of the Green Belt boundaries at Chew Magna is proposed, we would also request the local planning authority to exclude the site from the Green Belt in order to facilitate development and avoid any prejudice in favour of development at other less sustainable or appropriate locations.

We would welcome the opportunity to discuss this site and its role in the emerging Placemaking Plan in further detail. Please do not hesitate to get in touch if you require any further information: [jo.davis@gva.co.uk](mailto:jo.davis@gva.co.uk) / 0117 988 5224.

<b>Respondent Number:</b> 4808	<b>Comment Number:</b> 1	<b>Respondent Name:</b> E V Currell & Sons	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 51	<b>Agent Name:</b> Hoddell Associates		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** RURAL 1: Rural Areas

#### Part2b: Comments on sites or policy areas

East Harptree is a village to which Policy RA2 of the emerging Core Strategy applies. The latest policy states that, where certain criteria are met:

'...residential development sites may need to be identified in the Placemaking Plan and the housing development

boundary reviewed accordingly to enable delivery of 1,110 dwellings identified on the Key Diagram. Limited residential development on sites adjoining the housing development at these villages will be acceptable if identified in an adopted Neighbourhood Plan.'

We submit that land to the rear of High Street, East Harptree, as shown edged red on the attached plan, should be allocated for residential development in the Placemaking Plan.

We note that land which adjoins the south east corner of our client's land – Site EH 2 – is classified as a site forming part of identified future supply in the SHLAA. It is, therefore, clearly the Council's view that this is a suitable location for future development. In practice this site, which is in a number of separate ownerships, is unlikely to come forward within the next 5 years.

When developed, Site EH 2 will need to be accessed off High Street via an existing site entrance where land has been reserved, to the south, for road widening/junction improvement to enable development to proceed.

We consider that part of all of our client's land should be included as an extension to the existing EH 2 classification, and that an enlarged allocation in the Placemaking Plan would provide the following benefits:

- Improvements to an existing site access off High Street to enable the development of Site EH 2 together with part of our client's land;
- Improved access to the rear of existing properties fronting High Street;
- A site which is genuinely available and deliverable within a 5 year timescale. The total area of the land shown edged red on the attached plan is approximately 0.75 ha. Assuming a density of 35dph, this could deliver between 20 - 25 dwellings within 5 years.
- Scope to provide a sizeable contribution towards affordable housing provision within the village.
- Land not particularly visible from any public viewpoints.

<b>Site/Discussion Point:</b>	<b>RURAL 2: Additional housing development on the edge of Bristol at Whitchurch</b>
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<b>Respondent Number:</b> 837	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Mr David Redgewell	<b>Respondent Organisation:</b> South West Transport Network / Railfuture
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** RURAL 2: Additional housing development on the edge of Bristol at Whitchurch

**Part 2b: Comments on sites or policy areas**

Rural 2 Whitchurch Stockwood Hiksgate  
RA / RA1

Welcome the need for new housing development in this area with good urban design and high quality village Housing figures need to be much bigger than about 500 units

Welcome larger numbers to meet BANES housing registration waiting lists including rural communities

Good bus links A4/A37 bus corridor need link for Keynsham station to Whitchurch Park and Ride new site to Hengrove Hospital







standards, infrastructure contributions or other requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.”

The government is clear on its commitment to boost significantly the supply of housing (§47 of the Framework). In setting the requirements for policy DP1 (responding to climate change) and DP3 (securing sustainable design) the council need to ensure therefore that these policy requirements do not threaten development viability due to over cumbersome policies obligations. It is crucial therefore that the council have an up-to-date evidence base on viability. This will ensure that the needs and aspirations of the local community are achieved and that the level of development required is delivered. This is fundamental to the delivery of a development plan document that is compliant with the Framework. Points made here are also relevant to DP9 (meeting Local Community and Recreational Needs).

<b>Respondent Number:</b> 4787	<b>Comment Number:</b> 12	<b>Respondent Name:</b> Cllr Brian Webber	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DPG: Comment on Development Management Policies

**Part2b: Comments on sites or policy areas**

This introduction to development management policies is an appropriate point at which I might make a general comment from my 10 years experience as a member of the Development Control Committee. Any framework of policies must entail a fair amount of detail. However, some current policies are too 'black and white', with the result on occasions that contrived justifications have to be found for ignoring the letter of the policy in order to approve a proposal to which no-one has actually objected. The extant development management policies should be critically reviewed to see whether they could be merged or simplified and/or expressed more broadly in terms of their objective(s). I am also struck by the sheer volume of documentation which accompanies all but the smallest proposals. A legion of new expert consultants seem to be feeding on the development process, leading to extra expense and delay. Developers should not be expected to provide tomes of background information or survey data – most of which, one suspects, goes unread – just to tick boxes. A topic needs to be discussed and evidenced at length only if is of substantial significance.

**Site/Discussion Point: DP1**

<b>Respondent Number:</b> 102	<b>Comment Number:</b> 17	<b>Respondent Name:</b> Federation of Bath Residents' Associations	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP1

**Part2b: Comments on sites or policy areas**

**Food:** FoBRA has reservations about the climate change benefits of local food. Being small scale, it normally leads to higher emissions than non-local food bought from supermarkets. This is not something the Council should spend our money on.

<b>Respondent Number:</b> 154	<b>Comment Number:</b> 3	<b>Respondent Name:</b> Mrs Jane Hennell	<b>Respondent Organisation:</b> Canal & River Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP1**Part2b: Comments on sites or policy areas**

DP1- Responding to climate change

When promoting sustainable forms of heating the Council should promote the use of canal/river water not only for small scale HEP, but also for use in the heating and cooling of buildings. Communities and individuals should be encouraged to consider this option alongside other more recognised alternative energy methods such as solar or wind power. A DM policy should be used to ensure development considers all types of alternative power sources prior to submission, with explanations regarding unsuitability if necessary. Ensure all site-specific opportunities to deliver low carbon, climate adapted development are exploited

<b>Respondent Number:</b> 245	<b>Comment Number:</b> 23	<b>Respondent Name:</b> Andy Reading	<b>Respondent Organisation:</b> Environment Agency
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP1**Part2b: Comments on sites or policy areas**

We would support the inclusion of policies in the placemaking plan in relation to mitigating for climate change impacts. For example different site specific standards for sustainable construction could be required based on whether the proposed activity is expected to have high water or energy consumption. In relation to climate change adaption we would highlight the climate change flood maps that are available in the Council's SFRA Level 2 document, which could form part of the evidence base for any policies in relation to climate change resilience.

<b>Respondent Number:</b> 262	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Mr Justin Milward	<b>Respondent Organisation:</b> Woodland Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP1**Part2b: Comments on sites or policy areas**

Responding to climate change – DP1 &amp; 3 (p. 46 &amp; 48)

We believe that trees and woods can play a significant role in climate change mitigation and adaptation -

1. Health & Wellbeing













(sustainable urban drainage measures, for example) would help to maintain and enhance the natural setting of Bath and other settlements.

**Respondent Number:** 4798 **Comment Number:** 2 **Respondent Name:** Paulton Builders' Merchants Ltd **Respondent Organisation:**

**Agent ID:** 183 **Agent Name:** Colliers International

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP1

**Part2b: Comments on sites or policy areas**

Climate Change DP1 – where dealing with climate change policies, it should be reasonable for them to be drafted positively. Climate change policy principles are reflected in Flood Risk policy, for example. In seeking to encourage sustainable development, local policy should not shy away from encouraging technical solutions to resolve, for example, flood risk or other issues when considering development proposals and allocating development sites. Policies should be positive in their direction and purpose and positively worded.

**Site/Discussion Point: DP2**

**Respondent Number:** 23 **Comment Number:** 5 **Respondent Name:** Dr Lucy Rogers **Respondent Organisation:** Avon Wildlife Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP2

**Part2b: Comments on sites or policy areas**

The Trust supports a policy that safeguards against the loss of allotment land and seeks the provision of new allotments in the Plan. This policy needs to be strongly worded so that allotments are protected; allotments which have been used for a number of years will be very valuable for food growing as well as supporting biodiversity, particularly if they are part of ecological networks.

**Respondent Number:** 102 **Comment Number:** 18 **Respondent Name:** Federation of Bath Residents' Associations **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP2

























































































**Site or Discussion Point:** DP11**Part2b: Comments on sites or policy areas**

Green Belt – Discussion Points 10 and 11

The Launch Document states:

“The NPPF explicitly states that once established Green Belt boundaries should only be altered in exceptional circumstances. The Core Strategy sets out the strategic approach to the Green Belt through Policy CP8 to reflect national policy and the general extent of the Green Belt will be established through the Core Strategy.”

This, in our view, is an implicit acknowledgement of the intended longevity of Green Belt boundaries as confirmed in the NPPF. However, it must be remembered that the Council’s approach at the Core Strategy Examination is that should an unmet need at Bristol be identified, for example as a result of the findings of a future West of England SHMA, then this would be dealt with by way of an early review of the Core Strategy. This would necessarily require a further and almost immediate Green Belt review which runs contrary to the principles of longevity for Green Belt boundaries.

Again the Core Strategy’s approach to the Green Belt is subject to significant concerns including those of the Core Strategy Inspector. This reinforces the need for the findings of the Core Strategy Examination to be known in advance of meaningful progress on the Placemaking Plan.

We would be grateful if the above comments could be taken into account at this stage. We would also welcome the opportunity to be involved in future iterations of the Plan and request that we are kept informed of future developments.

<b>Respondent Number:</b> 4695	<b>Comment Number:</b> 3	<b>Respondent Name:</b> Mr Richard Hemmings	<b>Respondent Organisation:</b>
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**Agent ID:** 187 **Agent Name:** Grass Roots Planning Ltd**Further Information available in the original comment?** **Part 2a: Comments on scope and content****Site or Discussion Point:** DP11**Part2b: Comments on sites or policy areas**

Green Belt

3.11 In his note in relation to the Core Strategy dated 26th July 2013 the Inspector has quite rightly raised concerns regarding the process of assessment that has been undertaken to assess where potential land in the green belt could be released for development.

3.12 The PMP launch document now simply brings forward the assumptions made in the Core Strategy about Green belt land release, without the Inspector's concerns being addressed and a final Core Strategy adopted this is a flawed approach to plan making.

3.13 Our analysis of the available evidence suggests that the assessment of potential site's in the Green Belt, and in particular on the western edge of Keynsham, has been limited.

3.14 Therefore we urge the council to look again at the Green belt as a whole, but also specifically west Keynsham, to assess whether any land could be released in this area to assist in meeting their housing requirements and five year land supply deficit and associated historic shortfall.

Keynsham

3.15 Given that Keynsham is the second largest settlement in BANEs and provides a wide variety of shops, services and employment opportunities as well as being provided with good train and bus links to both Bristol and Bath means that it would be a logical location for the identification of further reserve sites in the emerging plan.



heritage apply to it (see figure 1 below).

Figure 1: Extract of Local Plan Proposals Map

4.11 The site does lie adjacent to a site of Nature Conservation interest. This feature will be of local value and any future development of the site could incorporate mitigation measures such as buffer planting that would avoid any adverse impacts on this feature.

4.12 Its development for housing could accommodate extensive planting and landscaping which would integrate it into its surroundings and provide much greater biodiversity benefit that it current offers. Accordingly our preliminary view is that no adverse impact would arise from the development that would outweigh its benefits.

4.13 The site is also served by access provided via St Francis Road and if this proves to be inadequate various access options could be pursued via Lays Drive, Westfield Close or Heathfield. The site is ready for development now and no other significant constraints would prevent the site from being delivered within five years.

4.14 In conclusion we consider that the site offers a sustainable location for development being located within walking distance of the town centre of Keynsham, the smaller centre of Queens Road and train and bus links. Furthermore our preliminary view is that no significant constraints would apply to the development of the site and therefore the site should be considered for inclusion in the emerging plan for residential development.

## 5.0 Conclusion

5.1 In summary we have concerns regarding the emerging Placemaking Plan because the launch document does not deal with the substantial issues that have been raised by the Planning Inspector when examining the emerging Core Strategy. The most salient of these issues include:

- Concerns regarding the housing requirement for BANES as a whole;;
- Concerns over delivery of housing and the need for measures to encourage housing to be delivered sooner in the plan period;;
- Required BANES to consider historic shortfall and the need to apply a 20% buffer because of persistent under delivery to its 5 year housing land supply;;
- Affordable housing requirements needed further analysis;;
- Further work was required to sequential and exception flood risk tests;; and
- Concerns about the analysis of the evidence base that has underpinned the current strategy in relation to the Greenbelt.

5.2 Any further work on the Placemaking plan, prior to these issues being addressed, would be flawed and premature and result in a submission plan that was unsound.

5.3 In addition to this key concern the emerging document is currently unsound as it plans for insufficient housing growth within BANES. In particular it does not accommodate any flexibility to deal with rapid change and is therefore non-compliant with the NPPF.

5.4 In order to be flexible we consider that reserve sites need to be considered for both employment and residential development to allow flexibility. Such sites should be selected on sustainable sites on the edges of existing primary urban areas such as Bath, Keynsham and Midsomer Norton.

5.5 The site we have identified at west Keynsham is considered to represent a sustainable option for housing growth and therefore the council should consider allocating this land as part of the emerging plan unless the adverse affect of doing so outweighs the benefits. We do not consider that any adverse affects can be identified in this regard.

5.6 Therefore we commend this site to the council for allocation in the emerging plan once the Core Strategy is adopted.



If this land at Salford is not allocated in the B&NES Core Strategy, or is not allowed at appeal, there should be a clear commitment to reconsider its Green Belt status in early reviews of the Local Plan.

**Respondent Number:** 4719 **Comment Number:** 1 **Respondent Name:** Kingswood Foundation

**Respondent Organisation:**

**Agent ID:** 39 **Agent Name:** GVA

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP11

### Part2b: Comments on sites or policy areas

#### Context

We write on behalf of our client, the Kingswood Foundation, to make representations to Bath and North East Somerset Council's (B&NES) Placemaking Plan (PMP) Launch Document (July 2013). As a major landowner, employer and education provider within the city, the Kingswood Foundation has a significant interest in the future growth of Bath and in B&NES's emerging planning policy framework, which will enable this planned growth to take place and facilitate future development/ investment.

The Kingswood Foundation encompasses both the Senior and the Preparatory Schools and is the freehold owner of a suite of sites which sit within their portfolio linked to their main campus at Lansdown, Bath. This portfolio, as illustrated on the attached drawing (ref. 1711/SU/001), consists of two main locations comprising: the School campus, listed buildings, residential boarding houses, indoor and outdoor sports provision and agricultural land. The portfolio extends to approximately 49 ha (122 acres). The second attached drawing (ref. 1711/SU/002) identifies 6 locations within the portfolio with potential for development as detailed further below .

#### Estate Strategy

The Foundation is currently engaging in the preparation of an Estate Strategy to consider how it will expand and grow to meet future needs. The Foundation has set two overarching objectives for the Strategy:

- To develop and improve its facilities to meet its future needs and enhance its position as the leading co-educational day and boarding school provider of all round education in the Bath area and its growing international reputation. These include improvements to its teaching, boarding and sports facilities.
- To make optimum use of its estate including justifying development of some of its land interests for residential development to allow the Kingswood Foundation to re-invest in improving its facilities. This could also assist the growth objectives of the B&NES Core Strategy.

In order to achieve these objectives, the Foundation has also identified three interrelated outputs:

- The release of the Kingswood Foundation's land interests from the Green Belt in order to enable the School to make optimum use of its estate.
- The designation of the main campus as a 'major existing developed site in the Green Belt'.
- The inclusion of Areas 1-6 in any review of land available for potential residential development, and their subsequent removal from the Green Belt.

We are keen to engage with the Council over how these outputs can be achieved through the emerging planning policy framework, and would be keen to meet as soon as possible to establish a dialogue.

In this context the Kingswood Foundation wishes to make the following representations to the Placemaking Plan Launch Document, in order that B&NES give full consideration to addressing these issues as the draft document emerges.

Comment upon the Launch Document

Schedule of Comments on the Placemaking Plan Launch Document: Sorted by Change Reference.

These comments are provided in relation to the different discussion points and development areas identified by the document.

- Detailed Green Belt Boundary – DP11: We support the suggested detailed review of the Green Belt boundaries across Bath. Through this process, we request that the LPA reviews the existing Green Belt boundaries that constrain the Kingswood Foundation estate, from within and on its borders,

Whilst the Kingswood Foundation acknowledges the role and purpose of the Green Belt, the School sites do not benefit collectively from a major developed site status in the Green Belt and its current designation solely as Green Belt land significantly restricts the ability of the school to invest in the delivery of new and improved facilities.

The Kingswood Foundation also requires, as part of its Estate Strategy, to undertake improvements to the education offered on site and to deliver alternative land uses on land no longer required for core educational purposes.

RECOMMENDATIONS FOR PMP: This submission requests the Council to consider the Kingswood estate in any review of the Green Belt boundaries around Bath. Consideration should be given to removing the School’s estate from the Green Belt boundary in its entirety, or alternatively to designate the School sites as ‘major existing developed site in the Green Belt’ consistent with other schools in Bath (see below ). This review is necessary to support the consolidation, development and growth of the main campus in a sensitive and responsible manner.

<b>Respondent Number:</b> 4767	<b>Comment Number:</b> 7	<b>Respondent Name:</b> Ms Wendy Stott	<b>Respondent Organisation:</b> National Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP11

**Part2b: Comments on sites or policy areas**  
The National Trust considers that the Green Belt plays an important role and would be unlikely to support any reduction of the area of designation.

<b>Respondent Number:</b> 4788	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mr Philip Chichester	<b>Respondent Organisation:</b> Stratland LLP
<b>Agent ID:</b> 182	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**  
These comments reflect representations made by Pegasus Planning Group on the draft Core Strategy relating to the approaches of the Strategic Housing Market Assessment and the Green Belt review.  
  
The scope of the Placemaking Plan has been unduly limited by the approach taken by the draft Core Strategy to proposals for overall housing numbers and their distribution; including the relevance of Bristol’s Housing Market Area to that distribution and the need for releases of Green Belt land to achieve the required overall provision of housing and an appropriate distribution of sites to serve the housing requirement.  
  
Whilst Pegasus Planning Group and Stratland LLP will continue to engage in the Core Strategy Examination process, it is also necessary to reiterate these comments in relation to the Placemaking Plan because of the interrelationship and overlapping programmes of the two plans.

**Site or Discussion Point:** DP11









important characteristic of Bath and its setting and here this characteristic can be maintained without a Green Belt designation running across the residential property to abut the road frontage of Bathwick Hill. Other planning controls are available to safeguard the interests of character and setting in respect of any future proposals for this land. Assist in urban regeneration by encouraging the recycling of derelict and other urban land: The site is not of a scale that would prejudice the recycling of derelict and other urban land and is itself in a very sustainable location within the built-envelope of the city.

6.2 In these circumstances, the Green Belt designation is considered to be an anomaly that should be rectified through the Placemaking Plan. A revised Green Belt boundary is therefore proposed as shown in Appendix 3. This boundary reflects the general principle, exhibited generally by the Green Belt boundary in the vicinity, following the rear boundaries of properties defining the edge of the urban area. The proposed boundary follows the strong belt of trees and hedging, at a point where there is a discernible change in topography, to the north of the dwelling. While there are no current plans for development on the land, this should not be precluded in principle by Green Belt designation of such a sustainable site. Adequate controls over impact on character and setting are provided by the Conservation Area designation and a range of existing and proposed policies. In this respect it should be noted that the very character that is now the subject of conservation was created through development on land around this anomalous pocket of Green Belt.

6.3 Amendment of the boundary as proposed would therefore establish a Green Belt boundary that does not continue to include land which it is unnecessary to keep permanently open, defining the boundary using physical features that are readily recognisable and likely to be permanent and would facilitate a pattern of sustainable development, in accordance with the provisions of the NPPF. Such an amendment would maintain a very substantial tongue of open Green Belt land penetrating the built-up area.

#### 7. Conclusion

7.1 The land as outlined in Appendix 1 does not fulfil the purposes of the Green Belt and its designation as such is an anomaly, out of keeping with the general alignment of the Green Belt along the rear boundaries of residential plots in this location on the edge of Bath. The proposed realignment of the Green Belt boundary as shown in Appendix 3 would address this anomaly while safeguarding the purposes of the Green Belt and establishing a clear boundary to the Green Belt that is capable of enduring beyond the period of the emerging Placemaking Plan. The local planning authority is therefore requested to make this boundary alteration within its Placemaking Plan development plan document.

<b>Respondent Number:</b> 4807	<b>Comment Number:</b> 5	<b>Respondent Name:</b> Mr Phil Baker	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP11

#### Part2b: Comments on sites or policy areas

No

<b>Respondent Number:</b> 4811	<b>Comment Number:</b> 1	<b>Respondent Name:</b> F R Daw	<b>Respondent Organisation:</b> Prior Park Garden Centre
<b>Agent ID:</b> 28	<b>Agent Name:</b> Nash Partnership		
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>			

#### Part 2a: Comments on scope and content

Site or Discussion Point: DP11

**Part2b: Comments on sites or policy areas**

NB Photos, plans and planning history supplied with the representation.

**1. Introduction**

1.1 Nash Partnership is instructed by F R Daw the owners of Prior Park Garden Centre to make representations through the Bath and North East Somerset (B&NES)'Placemaking' plan process in respect of amendment to the current Green Belt boundary. The proposed amendment and the planning case are set out in this report.

**2. The Site**

2.1 The site (see Appendix 1) is substantially developed and accommodates Prior Park Garden Centre, a major retail based commercial operation that forms part of the built up area of the city of Bath. This comprises a large single storey range of buildings adjacent to substantial hard-surfacing to provide for car parking, servicing and outdoor sales area, together with a disused area in the north-west corner. This latter area was historically used for cultivation by the Garden Centre but is now overgrown and littered with redundant poly-tunnels, fence panels etc.

2.2 The site is surrounded on three sides by a residential neighbourhood, with open land to the south. It fronts directly on to Prior Park Road to the east, with large villas fronting the road opposite the site and the 5/6 storey terrace of Widcombe Terrace rising high on the hillside beyond. To the north the boundary is defined by a boundary wall along Forfield Rise and to the west the site adjoins an enclosed area that appears to be maintained as garden orchard, with residential properties fronting Lyncombe Hill immediately beyond this. The northern boundary is defined by a strong belt of trees and hedging, beyond which lies open land known as Rosemount Field.

**3. Planning History**

3.1 Planning permission for use of land within the site as a garden centre was granted in 1974. Over the years the use of the site for garden centre purposes and the associated extent of physical development has expanded and intensified, including developments over the past 10 years or so. A summary of the planning history of the site from the B&NES online and historic records is included at Appendix 2 .

**4. Green Belt Designation**

4.1 The Bristol/Bath Green Belt was designated in 1966 through the Gloucestershire, Somerset and Wiltshire County Development Plans. It has since been subject to a number of reviews and amendments, the most relevant of which was the definition of the inner Green Belt boundary around Bath via the Bath City Plan.

4.2 At the City Plan Public Local Inquiry in April 1988 objections were made on behalf of the owners of the Garden Centre in respect of the site's inclusion in the Green Belt and the suitability of part of the land for housing development. The Local Plan Inspector reported to Bath City Council in October 1988. In relation to the site he endorsed the views put forward on behalf of the Garden Centre and recommended that the site be deleted from the proposed Green Belt and that part of the site occupied by the Garden Centre should be developed for housing in accordance with a design brief.

4.3 The Local Plan Inspector acknowledged the significance of open countryside penetrating the urban area from the south but found that "this appears to terminate at the hedgerow which separates the site from Rosemount Field, and this hedgerow, in my view, marks the limits of development, and should form the boundary of the Green Belt."

4.4 Bath City Council initially resolved, on 5 June 1989, to allocate part of the site for housing, via a decision of it's a Special Joint Meeting of the Policy, Housing and Environment and Planning Control Committees. This was subsequently reversed by a full City Council meeting on 13 June 1989 and as a result the site is currently within the designated Green Belt at the edge of the urban area in this location on the south-western fringe of the city. The boundary of the Green Belt is shown at Appendix 3.

**5. Planning Policy**

5.1 Bath and North East Somerset Council (B&NES) is in the process of producing a Core Strategy. This will set out broad strategic policies across B&NES and the 'Placemaking Plan' will set out more detailed policies and site allocations for particular places within B&NES. These documents will replace the current Bath and North East Somerset Local Plan to become the new Local Plan for the area.

5.2 It is the Placemaking Plan that will set the detailed Green Belt boundary. In this respect, a Placemaking Plan launch document has been published for consultation and this invites proposals to make detailed amendments to the Green Belt boundary where there are exceptional circumstances, within the context of national policy as set out in the National Planning Policy Framework (NPPF).

5.3 The National Planning Policy Framework (NPPF) provides (para. 80) that there are five purposes for Green Belts. These are to:

1. Check unrestricted sprawl of large built-up areas.
2. Prevent neighbouring towns merging into one another.
3. Assist in safeguarding the countryside from encroachment.
4. Preserve the setting and special character of historic towns.
5. Assist in urban regeneration by encouraging the recycling of derelict and other urban land.

5.4 The NPPF goes on to say (para 83) that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time authorities are advised to consider Green Belt boundaries having regard to their intended permanence so that they should be capable of enduring beyond the plan period. When drawing up or reviewing Green Belt boundaries authorities are advised to take account of the need to promote sustainable patterns of development (para 84) and to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open and to define boundaries clearly using physical features that are readily recognisable and likely to be permanent.

## 6. Amendment to the Green Belt Boundary

6.1 The site is situated within a mature residential area with residential properties on three sides. It is a residential area that extends, on two sides of the site, southward towards open countryside to a point beyond the site's southern boundary. The designation of the site does not serve any of the purposes of the Green Belt as set out in the NPPF:

**Check unrestricted sprawl of large built-up areas:** The site is situated within the broad envelope of the built up area of Bath, surrounded on three sides by a residential neighbourhood that is outside the Green Belt and which extends southward beyond the site's southern boundary with open land. The site itself is occupied by a large single-storey retail building, extensive hard-surfacing and a number of disused structures. The Green Belt designation of the site therefore plays no role in checking urban sprawl.

**Prevent neighbouring towns merging into one another:** The site is within the broad envelope of the built up area of Bath and fulfils no function in preventing merger with other towns.

**Assist in safeguarding the countryside from encroachment:** As outlined above, the site is developed and in commercial use as a garden centre. The open land at this point on the edge of the built up area of the city, as concluded by the Local Plan Inspector considering the former Bath City Plan, begins to the south of the site. Here, there is a strong hedge and tree line reflecting well established historic curtilage boundaries and the countryside can properly be safeguarded from encroachment through re-setting of the Green Belt boundary to mark the boundary of land that it is necessary to keep permanently open.

**Preserve the setting and special character of historic towns:** The site is situated within the City of Bath World Heritage Site and Bath Conservation Area and is therefore subject to important sensitivities in respect of the character of the city. However, Green Belt designation is not necessary in this location for safeguarding the setting of heritage assets or the Universal Values of the World Heritage Site. In this respect, the requirements set out in the NPPF for designation of new Green Belts is instructive in relation to whether land should or should not be included within the Green Belt. At paragraph 82 the

NPPF provides that the designation of Green Belts should not include land where normal planning and development management policies would be adequate. It makes clear that designation of land as Green Belt is an exceptional measure.

In this respect, given the existing use of the site and the buildings and structures upon it, the land is not land that can be kept permanently open. Policies and requirements exist within the adopted Local Plan and can be incorporated within the

emerging Placemaking Plan to adequately preserve the setting of the city in relation to any future proposals regarding use or development of the site. This includes appropriate safeguarding of green characteristics of the site created by mature trees on its boundaries.

Fingers of open green land penetrating the fringe of the built-up area are an important feature of the character of Bath and its setting. As noted, the site itself does not constitute open land of this nature as it is occupied by a substantial garden centre, with buildings, structures and hard-surfaced areas that have increased in extent over the years. Indeed the area of site under discussion is surrounded by well-defined historic boundaries. The land that is open, extending into the city from the broader expanse of countryside to the south, does however warrant Green Belt designation to permanently preserve its openness and contribution to the character and setting of the city. This land does not include the Prior Park Garden Centre.

Assist in urban regeneration by encouraging the recycling of derelict and other urban land: The site itself is in commercial use as described above and at some future date it might be appropriate to consider the 'recycling' of this land. This is a reason for the site to be excluded from the Green Belt.

6.2 Amendment to the Green Belt boundary is an infrequent occurrence that should be pursued, through the preparation or review of the Local Plan, where exceptional circumstances pertain. In respect of Prior Park Garden Centre, amendment of the Green Belt boundary through the Placemaking Plan is appropriate and necessary because the site:

- Is not open, but occupied by a substantial retail based commercial operation, housed in a large single storey building with associated structures and hard-surfaced parking, outdoor sales and servicing areas.
- Does not comprise an isolated development within open countryside but physically adjoins and forms part of the built-up area of the city of Bath.
- As a developed site forming part of the built-up area, is consistent with policy objectives for sustainable development and contributes to the sustainability of the city, reducing the need for travel.
- Does not fulfil any of the established purposes of the Green Belt.
- Is, and can in the future, be subject to adequate non-Green Belt policy and other controls sufficient to safeguard its contribution to and impact upon the character and setting of the city.
- The site has long established and well defined physical boundaries to adjacent land.

6.3 The key characteristics of the site in relation to its context on the edge of the built up area are illustrated at Appendix 4 and Appendix 5, highlighting the merits of redrawing the Green Belt boundary in this location. A revised Green belt boundary is proposed as shown at Appendix 6. This follows physical boundary features that are well established, readily recognisable and likely to be permanent, as highlighted in Appendices 4 and 5. While a case can be made for a straighter boundary, running from east to west along the line of trees and hedges defining Rosemount Field to the south, the proposed amendment has the advantage of continuing the finger of green and open land further into the built up area of the city.

6.4 Amendment of the boundary as proposed would establish a Green Belt boundary that does not continue to include land which it is unnecessary and unrealistic to keep permanently open, defining the boundary using physical features that are readily recognisable and likely to be permanent and which is reflective of a pattern of sustainable development, in accordance with the provisions of the NPPF.

## 7. Conclusion

7.1 The land, as outlined in Appendix 1, does not fulfil the purposes of the Green Belt and its designation as such is not justified. It is considered that there are exceptional circumstances to justify detailed amendment to the Green Belt Boundary in this location. This was the conclusion of the independent Inspector on the last occasion that the alignment of the Green Belt boundary was considered through a Local Plan process in relation to the site.

7.2 The proposed realignment of the Green Belt boundary, as shown in Appendix 6, would remove land that does not fulfil a Green Belt purpose, while maintaining a finger of green open land penetrating the built-up area and establishing a clear boundary to the Green Belt that is capable of enduring beyond the period of the emerging Placemaking Plan. In respect of any future changes within the site itself, adequate safeguarding of the character and setting of Bath is provided by the Conservation Area designation, the requirements of existing policies and the ability for new Placemaking Plan policies to make similar provision. Green Belt designation is an exceptional measure with very specific purposes and should not unnecessarily duplicate other planning policy provisions.

7.3 The proposed amendment accords with the purposes of the Green Belt as set out in the NPPF and the local planning authority is therefore requested to make this Green Belt boundary alteration within its Placemaking Plan development plan document.

<b>Respondent Number:</b>	5175	<b>Comment Number:</b>	1	<b>Respondent Name:</b>	Dr Jeremy Gilbert	<b>Respondent Organisation:</b>	
<b>Agent ID:</b>		<b>Agent Name:</b>					
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>							

## Part 2a: Comments on scope and content

**Site or Discussion Point:** DP11

## Part2b: Comments on sites or policy areas

I am writing with reference to Mr Daone's recent letter of 18th September, kindly extending the deadline for me to contribute to the consultation process of the Green Belt boundary review.

Part of my residential property, including my garage, lies within the boundary of the Bath Green Belt and I would appreciate it if the council, when reviewing the Green Belt boundary, would consider my request for a minor change to the boundary so that I can manage my land without it being subject to Green Belt restrictions.

### Description

My garage and the triangle of land it is sited on is part curtilage of my house and in residential use. It is located on the edge of the Green belt boundary in a residential area, and lies between my house (20B Horseshoe Walk) and another residential property, Smallcombe Nursery. The land is of approximately 1/2 an acre and bounded on 2 sides by metalled roads with the boundary with Smallcombe Nursery completing the triangle. All the boundaries are clearly evident on the ground and marked on the Ordnance Survey map. It is wooded with mainly self-seeded Hazels and Sycamores and I have been resident in my property for 18 years.

### Exceptional circumstances:

The exceptional circumstances that I believe should be considered to justify removal of this parcel of land from the Green Belt are:

- The contours of the surrounding land make it very secluded and it contributes little if anything to the openness of the Green Belt.
- It provides no access to the Green Belt.
- It has clearly marked boundaries.
- Green Belt restrictions make it difficult and are a disincentive for me to make effective use of this land. The garage is in need of repair and improvement, as it is only just big enough to fit an average family saloon car (and that is with the bumper against the rear wall). It opens onto a blind bend on Horseshoe Walk and should ideally be re-constructed and re-orientated with doors opening the opposite end and accessed via Smallcombe Nursery's private road onto which I have legal right of access. Some years ago, when I made informal enquiries to the Bath planning Department about extending the garage and putting a pitched roof on so as to improve its appearance and weatherability, I was told that I was unlikely to get approval for any changes, however necessary, as it was sited within the Green Belt. In the meantime the building has deteriorated further and will continue to do so unless I am able to manage the property appropriately.

### Summary

After 18 years of owning this land I can't help but feel that, rather than being saved by inclusion in the Green Belt, it has instead become imprisoned and isolated serving no useful function and failing to realise its potential. It is treated with little respect by the passing public who deposit litter in it and use it as a convenient toilet. It has been subject to fly-tipping with builders waste and even a large industrial freezer that had to be removed at my expense.

Changing the boundary will not have any negative impact on the Green Belt and it would allow me greater options for improving the plot with positive implications for the remainder of the Green Belt.

I recommend a minor change to the Green Belt boundary, as indicated in the attached Ordnance Survey maps of the plot, with the proposed amendment marked in red.

I would be grateful if you would keep me informed of progress.

<b>Respondent Number:</b>	5176	<b>Comment Number:</b>	1	<b>Respondent Name:</b>	Mrs Oraline Perry	<b>Respondent Organisation:</b>	
<b>Agent ID:</b>		<b>Agent Name:</b>					
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>							

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP11

**Part2b: Comments on sites or policy areas**

My sister and I own a small parcel of land which lies on the S.E. boundary of Farmborough village (I enclose a plan). We are writing to request that consideration might be given to include this land for any future housing development in any proposed boundary changes to the village.

The land is well contained within the existing road network. Timsbury Road forms the eastern boundary, Little Lane is the North Eastern boundary and Tilley Lane forms the southern boundary. There is a well-established hedge on the Western boundary. Also, there are existing house (off Little Lane) on the North Western boundary.

Farmborough is a sizeable village with a school, playing fields, shop, hairdressers and a village hall. The village hall is sited off Little Lane immediately opposite our land. There is also a regular bus service to and from Bath and a daily service to Bristol.

We understand that our land lies within the exiting Green Belt. However, there are further dwellings and farm buildings to the South-east along the road to Timsbury. These existing buildings are within the Green Belt boundary. Should the Council consider that Farmborough is a suitable village for further expansion, we request that your consideration is given to including our land within any proposed changes to the boundaries of the Green Belt and Farmborough village for the following reasons:

1. Our land is immediately adjacent to the village and all its facilities
2. Our land is well contained within the existing network
3. There is ease of access from the existing roads
4. It does not form part of any long-distance views

We would be grateful if you could kindly acknowledge this letter and keep us informed of any proposed changes to the boundary of Farmborough village. If you have any queries or require further information we would be happy to provide it.

**Site/Discussion Point: DP12**

**Respondent Number:** 283    **Comment Number:** 2    **Respondent Name:** Prior Park College and the Paragon School    **Respondent Organisation:**  
**Agent ID:**                **Agent Name:** GVA  
**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP12

**Part2b: Comments on sites or policy areas**

We write on behalf of our client, Prior Park College and the Paragon School, to make representations to the Bath and North East Somerset Council (B&NES) Placemaking Plan Launch Document (July 2013).

My client’s interest relates to the Prior Park College campus, which is located to the south- west of Bath within a prominent location overlooking the Bath World Heritage Site, and the Paragon School, Lyncombe Vale, Bath. A full plan of the land ownership at Prior Park College is attached.

Prior Park College is set in 20.25 hectares of land, containing a complex of Grade I, II\* and II listed buildings, which date back to 1742. The College is one of the largest and highest profile, fully co-educational Catholic independent boarding and day schools in the country. The entire College site lies within a major development area in the Bristol and Bath Green Belt, the Cotswolds Area of Outstanding Natural Beauty (AONB) and the City of Bath Conservation Area. Since 2000, the College has been the subject of a programme of refurbishment and reconfiguration in order to ensure that it remains able to offer the high standard of facilities required to remain one of the leading schools in the country.

The Paragon School, the primary school affiliated with the College, is located off Lyncombe Vale in the Bath Green Belt, it is well-contained and due to the surrounding topography and established woodland, has no visual impact on the openness of the Green Belt. The property includes a range of buildings including the main listed house. The operation of the primary school in this location is severely restricted by its location within the Green Belt.

Placemaking Plan – Development Management Policies DP11 and DP12

My client’s predominant concern is that the Plan should allow for the continued upgrade and investment in facilities at the College and Paragon School sites in the Green Belt, so that both education institutions are able to maintain and improve its reputation as a leading provider of high-standard education.

A strategy for the growth of education facilities across the district is inextricably linked to the delivery of housing development and therefore the Council must recognise the importance of flexibility for development at sites like Prior Park College and Paragon School.

It is essential that the Council maintain the adopted Local Plan allocation for Prior Park School as a Major Existing Development (MED) Site in the Green Belt, as it is a key designation to allow continued investment in the college to maintain its high standards.

Secondly, the Paragon School site does not benefit from the MED designation and as such, its current location in the Green Belt poses a considerable restriction upon the operational requirements of the school and its role as a custodian to the listed building. The Paragon School requires, as part of its business plan, to undertake limited expansion to improve the education offer on site (for example, new changing rooms and reconfiguration of existing music rooms to meet current educational standards).

This submission urgently presses the Council to designate the Paragon School site as a major existing development site within the Green Belt, consistent with the approach at the Prior Park campus. This would ensure that limited and sensitive infilling, respectful of the historic and environmental considerations across the site, can take place over the plan period so that the operational requirements of the Paragon School can be secured. A plan of the site is attached to this submission for consideration.

Whilst the College notes that draft Core Strategy Policy GB.3 'Major Existing Developed Sites' is to be saved until replaced through the B&NES Local Development Framework, we are concerned that a lack of reference to the continued role of the College or any identification of the site and its important role in the Core Strategy or Placemaking Plan could lead to it being overlooked. This would place a considerable restriction on the ability for the College to continue its programme of investment. On this basis, the College seeks some form of recognition of both its role, and the future strategic designation attached to it within the Green Belt.

Conclusions

Prior Park College and Paragon School are very keen to protect their ability to re-invest and enhance the high standard of facilities currently offered by the College and the School. To achieve this, the Council needs to recognise the key role of the establishment and to plan for its enhancement by continuing the College's designation as a major site within the Green Belt. With consideration to our previous representations to the Core Strategy, and the opportunity presented here for the Council to amend its overall strategy, we are disappointed that this document does not take this into account the risk of the College experiencing significant development and investment barriers in future.

The College and Paragon School appreciates the opportunity to comment upon the Placemaking Plan Launch Document and we look forward to future involvement in the emerging B&NES Local Development Framework.

Our comments are provided in the spirit of collaboration and we welcome the opportunity to discuss this with you if desired: jo.davis@gva.co.uk / 0117 988 5224

<b>Respondent Number:</b> 300	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Mr Chris Trowell	<b>Respondent Organisation:</b> Curo
<b>Agent ID:</b> 171	<b>Agent Name:</b> Tetlow King Planning Ltd		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP12

**Part2b: Comments on sites or policy areas**  
 Curo supports the adoption of a more flexible approach to developing housing, particularly affordable housing, on previously developed sites in the Green Belt. This should be in addition to the supply of new housing, including affordable housing, on 'rural exception sites'.

<b>Respondent Number:</b> 819	<b>Comment Number:</b> 14	<b>Respondent Name:</b> Paulton Parish Council	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP12

**Part2b: Comments on sites or policy areas**  
 - If the approach of identifying the largest 'previously developed sites' is continued, are there any other large sites which play an important role or function (e.g. educational or employment) which needs to be safeguarded and enhanced? Old Mills should only be developed as employment use. See previous comments on this.

Agrees with the other discussion points.

**Respondent Number:** 4719 **Comment Number:** 2 **Respondent Name:** Kingswood Foundation

**Respondent Organisation:**

**Agent ID:** 39 **Agent Name:** GVA

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP12

**Part2b: Comments on sites or policy areas**

• Previously Developed Sites in the Green Belt – DP12: We recognise that there is a significant and growing need for school places (both independent and public sector) within the Council’s administrative area. It would be prudent for the PMP to allow for sensitive expansion of education facilities within the Kingswood Estate to satisfy the School’s future needs. The Green Belt designation is currently a substantial constraint upon even relatively minor development proposals.

RECOMMENDATIONS FOR PMP: Given the presence of numerous education establishments within the Green Belt, we encourage the LPA to make provision to formally identify sites as ‘Existing major developed sites in the Green Belt’, as under current local policy. As such, the Kingswood Estate should be recognised with this designation in order to provide greater flexibility for the Foundation to plan improvements and enhancements.

**Respondent Number:** 4787 **Comment Number:** 21 **Respondent Name:** Cllr Brian Webber

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP12

**Part2b: Comments on sites or policy areas**

Tight control on the MEDs is necessary to ensure that the over-arching objectives of the green belt are not lost sight of, notwithstanding the employment/educational importance of these sites.

**Site/Discussion Point: DP13**

**Respondent Number:** 23 **Comment Number:** 8 **Respondent Name:** Dr Lucy Rogers

**Respondent Organisation:** Avon Wildlife Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

The Trust strongly supports this draft policy and welcomes the fact that the Council is building on the aspirations of its Green Infrastructure Strategy (we fed into the strategy and support it).

We agree with the principle that green infrastructure should be integral to the design of new developments (see our comments above on DP3) and proposals should respect and enhance GI within the site and demonstrate strong links to the wider network.

To ensure that all the GI benefits are realised, the Placemaking Plan needs to be strongly worded so that it builds upon and delivers the GI strategy's objectives. We agree that policy should be supported by both strategic and neighbourhood maps. We also support the final bullet point that all major development proposals should be accompanied by an assessment as outlined in the text.

<b>Respondent Number:</b> 98	<b>Comment Number:</b> 4	<b>Respondent Name:</b> Mark O'Sullivan	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

I agree about the need to appeal to the European Landscape Convention (DP13).

<b>Respondent Number:</b> 102	<b>Comment Number:</b> 26	<b>Respondent Name:</b> Federation of Bath Residents' Associations	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

- a. Where is reference made to B&NES' recently approved GI policy?
- b. What about reference to the recently approved WHS Setting SPD?

<b>Respondent Number:</b> 154	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Mrs Jane Hennell	<b>Respondent Organisation:</b> Canal & River Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

It is important the major Green infrastructure assets are mapped on key infrastructure map but it may then be more appropriate for larger scale area based maps to show more detail and highlight areas in need of improvement to quality, provision or linkages.

We fully agree that applications for major development should be required to undertake an audit of existing green infrastructure assets. However it is not enough to look s only at assets within the site but it is also necessary to look at any nearby assets which are likely to be affected by proposals. This audit should consider the amount and standard of existing provision as well as the anticipated outcome of the development and any mitigation/ improvements needed to ensure that the GI asset is not degraded as a result of additional usage and if necessary is improved to encourage additional usage not just by the occupiers of the development but for wider public benefit.

The Council is now beginning to recognise that the Canal is more than just a transport artery, but also represents a form of open space, performing a variety of functions such as;

- strategic links between areas;
- important wildlife corridors;
- a recreation and sport resource;
- accessible amenity in urban areas;
- access to the countryside;
- visual amenity; and
- a community resource.

It is unlikely that the Kennet & Avon Canal and its towpath will be within a site and it will be rare that the River Avon is located within the heart rather than the periphery of a site. However residents living in a site near the canal will use it for recreation purposes and as a sustainable transport route for commuter travel. The additional development is therefore directly impacting on the quality and maintenance of the GI asset even though it may be outside of the site. In the same way improved links to GI infrastructure may cause degradation to an asset if the impact of additional usage is not considered and the cost of improvement / additional upkeep borne by the developer.

<b>Respondent Number:</b> 224	<b>Comment Number:</b> 26	<b>Respondent Name:</b> Ms Caroline Kay	<b>Respondent Organisation:</b> Bath Preservation Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

We consider that the green infrastructure policy should be supported as described in bullet points 2, 3 and 4 of DP13.

<b>Respondent Number:</b> 245	<b>Comment Number:</b> 24	<b>Respondent Name:</b> Andy Reading	<b>Respondent Organisation:</b> Environment Agency
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

The placemaking plan should ensure green infrastructure aspirations are realised by clearly mapping out the existing green infrastructure network and having clear policies for each site on what scale and type of green infrastructure contribution are expected based on this. We would also support major developments being required to demonstrate at the planning application stage what their contribution to the green infrastructure network will be.

**Respondent Number:** 262    **Comment Number:** 5    **Respondent Name:** Mr Justin Milward

**Respondent Organisation:** Woodland Trust

**Agent ID:**          **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

We are pleased to see this discussion point and would wish the Placemaking Plan to highlight the new Bath & North East Somerset Green Infrastructure Strategy March 2013 (Final version approved as Council Strategy). In particular it is important that this section highlights the key role that trees and woods can play in green infrastructure provision – the BANES Green Infrastructure Strategy comments –

“Green infrastructure and trees & woodlands (P.34/35)

Trees and woodlands are essential components of green infrastructure because of their unique ability to deliver such a wide range of benefits for the community, wildlife and the local economy and also linking a variety of services which green infrastructure provides.

Tree and woodland priorities

- Review quality and condition of existing woodlands
- Identify need and prioritise locations for new woodland and opportunities to link these within and beyond the district
- Develop a tree planting plan to define opportunities for street trees and urban woodland
- Develop a target for woodland cover
- Encourage owners to bring existing trees and woodlands into positive management where appropriate
- Protect ancient woodlands, veteran and notable trees
- Increase community engagement with and awareness of the benefits of trees, through community planting, ownership and management
- Promote the importance of tree planting within private gardens
- Explore the role of wood fuel as a renewable energy source and encouraging woodland-based businesses

This chimes with current Government Policy on woodland creation –

The National Planning Policy Framework (NPPF) supports the need for more habitat creation by stating that: ‘Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’, (DCLG, March 2012, para 114). Also para 117 states that: ‘To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan’.

The new England Biodiversity Strategy which makes it clear that expansion of priority habitats like native woodland remains a key aim – ‘Priority action: Bring a greater proportion of our existing woodlands into sustainable management

and expand the area of woodland in England’, (Biodiversity 2020: A strategy for England’s wildlife and ecosystems services, DEFRA 2011, p.26).

A reading of these new policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this Strategic Policies document.

Woodland creation also forms a significant element in the conclusions of the Government’s Independent Panel on Forestry, which states: ‘Ensure woodland creation, tree planting and maintenance is part of the green space plan for new commercial and housing development’ (Defra, Final Report, July 2012). This has now been endorsed by the response in the recent Government Forestry Policy Statement (Defra Jan 2013): ‘We believe that there is scope for increasing England’s woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity’.

The South West Forestry Framework Implementation Plan 2009-2012 (Forestry Commission, 2009, Action 2.3) highlights the need to “Encourage tree planting and woodland establishment”, and this is repeated in Action 3.6 -“Develop spatial framework for targeting tree planting and woodland creation”.

There are already good examples emerging of suitable wording on woodland habitat expansion emerging in other Core Strategies –

Solihull Draft Local Plan - Pre-Submission draft January 2012  
Policy P10 Natural Environment

The Council will seek to protect, enhance and restore the diverse landscape features of the Borough and to create new woodlands and other characteristic habitats, so as to halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness.

The Council will seek to conserve, enhance and restore biodiversity and geodiversity, to create new woodlands and other habitats and to protect and enhance semi-natural ancient woodland and green infrastructure assets across the Borough.

Draft Core Strategy for Chesterfield Borough Council – Feb 2012

5.25 Both the Chesterfield and North East Derbyshire Sustainable Community Strategy and the Chesterfield Greenprint aim to increase the tree cover in the borough for the benefit of both people and wildlife as well as improve landscape quality. Tree and woodland planting will help the borough to respond to climate change and flood alleviation, as well as improve biodiversity and levels of amenity.

We would therefore like to see this Placemaking Plan highlight the role of trees and woods in delivering green infrastructure.

<b>Respondent Number:</b> 281	<b>Comment Number:</b> 6	<b>Respondent Name:</b> Amanda Grundy	<b>Respondent Organisation:</b> Natural England
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

We note the range of initiatives that will inform the Placemaking Plan includes the Green Infrastructure Strategy, which is most welcome. You may also wish to consider other green infrastructure related information available on our website, which includes a number of case studies:

<http://www.naturalengland.org.uk/ourwork/planningdevelopment/greeninfrastructure/default.aspx>

<b>Respondent Number:</b> 819	<b>Comment Number:</b> 15	<b>Respondent Name:</b> Paulton Parish Council	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
Further Information available in the original comment? <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

- How can the Placemaking Plan best ensure that the Green Infrastructure benefits are realised?  
 Maintain existing Green Belt and extend the protection to other green areas as perceived by communities and do not compromise on this.

- Should the policy be supported by neighbourhood maps (ward and parish) which indicate existing Green Infrastructure assets and opportunities for enhancements?  
 Yes, in accordance with our comments about these areas. Please see the Plan on page 17 of the Village Design Statement (VDS) which shows the areas making a contribution to the rural setting of Paulton. Note:- the VDS is approved as Supplementary Planning Guidance.

Agrees with the other discussion points.

<b>Respondent Number:</b> 1556	<b>Comment Number:</b> 19	<b>Respondent Name:</b> Strategic Land Partnerships	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
Further Information available in the original comment? <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

The problem with green infrastructure policies is that often they are aspirational only. For policies to be effective clear evidence needs to be provided as to their need and importantly the deliverability of the green infrastructure required.

<b>Respondent Number:</b> 4548	<b>Comment Number:</b> 7	<b>Respondent Name:</b> Mrs Fiona Gourley	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
Further Information available in the original comment? <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

Greenbelt: this section refers to village buffers, safeguarding biodiversity and wildlife, and distinct landscapes. If 300 houses are built on the South Stoke plateau, it would irreparably impact the Wansdyke, a significant bat feeding area, the habitat of rare and threatened birds including the skylark. Yes of course there should be maps which define areas of Green

infrastructure including the South Stoke Plateau which is part of the Cotswold Area of Outstanding Natural Beauty.

**Respondent Number:** 4767 **Comment Number:** 8 **Respondent Name:** Ms Wendy Stott **Respondent Organisation:** National Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP13

#### Part2b: Comments on sites or policy areas

The National Trust would support a strong emphasis on green infrastructure (GI), in particular to conserve and enhance the green setting of Bath and the World Heritage Site. The suggestion of identifying existing GI assets and opportunities for enhancements sounds, on the face of it, a good one. Opportunities to link existing GI to surrounding neighbourhoods should also be encouraged.

**Respondent Number:** 4787 **Comment Number:** 22 **Respondent Name:** Cllr Brian Webber **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP13

#### Part2b: Comments on sites or policy areas

I do not have sufficient knowledge to fairly assess the issues involved, but my impression is that if the requirements placed on applicants were more focussed, decision-makers would be more sympathetic to ecological concerns and the results in terms of protection would be greater

**Respondent Number:** 4796 **Comment Number:** 1 **Respondent Name:** Mrs Danielle Fleming **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP13

#### Part2b: Comments on sites or policy areas

NB Plan supplied as part of the original representation.

To ensure clarity within the plan and to ensure that there is a framework for local GI improvements it would be helpful for GI sites and designations to be identified; however, such designations should be specific and not general, i.e. they should state with precision and clarity (based on relevant evidence) the reasons for any GI designations such as ecological or Play/Recreation value.

Schedule of Comments on the Placemaking Plan Launch Document: Sorted by Change Reference.

Where appropriate and justified the use of Local Green Space designations should be considered. One site that would be particularly suited to such a designation is the Whitewells Public Open Space, as shown on the plan below. This area is a valuable local resource for play and recreation and opportunities for various landscape and biodiversity improvements are likely to exist. This area was (erroneously) omitted from the Open Space designations made within the old Local Plan and this should be rectified by the proposals map going forward.

**Respondent Number:** 4798 **Comment Number:** 6 **Respondent Name:** Paulton Builders' Merchants Ltd **Respondent Organisation:**

**Agent ID:** 183 **Agent Name:** Colliers International

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP13

**Part2b: Comments on sites or policy areas**

Landscape – DP13 – the discussion point on landscape quality and views is worthy of note. It would be a sensible to use policies to improve the appearance of urban edges and apply weight in the determination process to the physical improvement and enhancement proposed as part of a development proposal. Such a policy should not simply fall back to the screening of development through planting and landscaping.

**Site/Discussion Point: DP14**

**Respondent Number:** 102 **Comment Number:** 27 **Respondent Name:** Federation of Bath Residents' Associations **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP14

**Part2b: Comments on sites or policy areas**

What about reference to the recently approved WHS Setting SPD?

**Respondent Number:** 154 **Comment Number:** 9 **Respondent Name:** Mrs Jane Hennell **Respondent Organisation:** Canal & River Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP14

**Part2b: Comments on sites or policy areas**

It is important to recognise that GI assets are often multi-functional, as detailed in our response to DP13. Overly

restricted policies aimed at protecting one function may reduce its benefits for other functions. For example the desire to protect habitat needs to be tempered with the desire to improve accessibility and public use.

**Respondent Number:** 224    **Comment Number:** 27    **Respondent Name:** Ms Caroline Kay    **Respondent Organisation:** Bath Preservation Trust

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP14

#### Part2b: Comments on sites or policy areas

Bath's landscape setting is protected through the WHS SPD, which must be rigorously applied if the legal obligation to protect the OUV of the WHS is to be met. BPT sees merit in developing an overall GI/landscape protection map or maps which identifies locally important places and views as well as those places benefitting from statutory protection.

**Respondent Number:** 281    **Comment Number:** 7    **Respondent Name:** Amanda Grundy    **Respondent Organisation:** Natural England

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP14

#### Part2b: Comments on sites or policy areas

The Council may wish to consider the updated National Character Area (NCA) descriptions when developing its landscape policy for the Placemaking Plan. For more information regarding NCAs within Bath and North East Somerset please see: <http://publications.naturalengland.org.uk/category/587130>

**Respondent Number:** 819    **Comment Number:** 16    **Respondent Name:** Paulton Parish Council    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP14

#### Part2b: Comments on sites or policy areas

- Should a more detailed landscape policy be developed which promotes the protection, planning and management of all landscapes regardless of whether they enjoy national protection, or would such a policy hinder agricultural diversification?

Yes there should be a more detailed landscape policy and it would not hinder agricultural diversification.

- It is important to ensure that cultural social, cultural, and environmental significance of landscape character is understood and this understanding is reflected in

proposals. How can this be best achieved?  
 Include this requirement in Development Briefs, and include as part of the information to be submitted for planning consent.

- How can we ensure important views are safeguarded in decision making?  
 Landscape assessment

- How important is it to maintain the separate identity of those settlements outside the Green Belt?  
 Should the Local Plan 'village buffers' policy be retained?

Yes, retain the Local Plan 'village buffers' policy

Agrees with the other discussion points.

<b>Respondent Number:</b> 4548	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Mrs Fiona Gourley	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP14

**Part2b: Comments on sites or policy areas**  
 This section also refers to taking account of the views of those who live and work in this area. As a local community we have been fighting to preserve the rural nature of this Area of Outstanding Natural Beauty and locally valued landscape for 30 years against plans for development by the landowners and have responded vociferously to every iteration of those plans and change in government, both local and national. We have gained great support from thousands of people through petitions and campaigns including national and local media. The South Stoke Plateau should have the same protection as the National Parks. Yet our voices do not seem to be heard by those in power as once again, it is threatened with development.

<b>Respondent Number:</b> 4588	<b>Comment Number:</b> 9	<b>Respondent Name:</b> Withies Farm Landowners' Group, Glenavon Farm	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP14

**Part2b: Comments on sites or policy areas**  
 The Plan should not include any protective landscape designations in addition to those already shown on the Policies Map. Government policy has previously turned against the use of local restraint designations due to the widespread application of them and undue restraints on development that they have been perceived to place on developments through the Development Management process. It would be a retrograde step to reintroduce such local designations, and would be potentially fetter a positive approach to decision-taking to foster the delivery of sustainable development, as required through the NPPF (para. 186).  
  
 In accordance with paragraph 113 of the NPPF, should local policy guidance additional to that contained in the Core Strategy be deemed to be necessary, such protection should be afforded through criteria based policies which draw distinctions between the hierarchy of international, national and locally designated sites so that protection is

commensurate with their status. Any policy framework should acknowledge that some loss of landscape character may be inevitable in order to accommodate requirements for development.

**Respondent Number:** 4767 **Comment Number:** 9 **Respondent Name:** Ms Wendy Stott

**Respondent Organisation:** National Trust

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP14

### Part2b: Comments on sites or policy areas

The National Trust would support a more detailed landscape policy to promote the protection, planning and management of all landscapes regardless of whether they enjoy national protection. Given that agricultural diversification often involves reuse of redundant farm buildings, this policy is unlikely to hinder such diversification. In any case, a detailed landscape policy would have to be read in conjunction with other policies that may encourage or discourage the specific type of development in question.

In terms of identifying local valued landscapes on maps, there may be some benefit in broadly outlining the characteristics or features of undesignated countryside, but there is a danger that - if locally valued areas are annotated on a map - other areas might be considered 'unvalued'. Overall, a focus on setting out the landscape character and features of all areas may be beneficial. This should be accompanied by a strong emphasis on ensuring that development proposals are compatible with the prevailing character and features.

In terms of the cultural, social and environmental significance of landscape character, this is often neglected in the face of assessments of how much a new development could be seen from which locations. It would be good, for example, to encourage an understanding of the 'spirit of place' of each locality, or the 'sense of place' of each character area. Development proposals should be expected to be compatible with that spirit or sense of place.

The National Trust supports the protection of landscape and topographical features that contribute to local distinctiveness. Important local hillsides should be noted in landscape character assessments, and for the most valued - including perhaps some visible from the centre of Bath - it may be appropriate to specifically protect them from harmful development. Again this relates to the green context and setting of Bath as a World Heritage Site.

To safeguard important views, identifying those views on maps and in more general terms, ensuring that developers are required to assess the effect of their proposals on such views, and having policy support for the protection of such views, would all be appropriate.

**Respondent Number:** 4787 **Comment Number:** 23 **Respondent Name:** Cllr Brian Webber

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP14

### Part2b: Comments on sites or policy areas

I do not have sufficient knowledge to fairly assess the issues involved, but my impression is that if the requirements placed on applicants were more focussed, decision-makers would be more sympathetic to ecological concerns and the

results in terms of protection would be greater

## Site/Discussion Point: DP15

**Respondent** 23 **Comment** 9 **Respondent** Dr Lucy Rogers  
**Number:** **Number:** **Name:**

**Respondent** Avon Wildlife Trust  
**Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

Regarding the discussion points, the Trust's view is that it would be extremely useful to have a clearer exposition of policy with regard to protecting and enhancing ecosystem services. This is a wider concept than GI and underpins current national biodiversity policy stemming from the Natural Environment White Paper and the Lawton Review. The Wildlife Trusts support landscape-scale protection, enhancement, creation and restoration of habitats and the ecosystem services concept is a tool for furthering this approach.

Mapping of components on the Proposals Map could include priority habitats such as species-rich grassland, building on the South West Nature Map and the Avon BAP Atlas. The Trust's Living Landscape Grasslands Project has shown that extensive areas of species-rich grassland can be restored by mapping and surveying initial areas, liaising with landowners and working with them to restore and manage their wildlife-rich landscapes, join up fragmented habitats, and so create a robust and sustainable countryside that will help people and wildlife to adapt to climate change.

**Respondent** 245 **Comment** 25 **Respondent** Andy Reading  
**Number:** **Number:** **Name:**

**Respondent** Environment Agency  
**Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

Given the broad definition of green infrastructure and the importance of the natural environment we would recommend including specific policy wording in the placemaking plan where appropriate in relation to the protection, enhancement and creation of natural habitats.

**Respondent** 262 **Comment** 6 **Respondent** Mr Justin Milward  
**Number:** **Number:** **Name:**

**Respondent** Woodland Trust  
**Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

<b>Site or Discussion Point:</b>	DP15
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**Part2b: Comments on sites or policy areas**

We are pleased to see the reference to conserving, enhancing and restoring natural habitats. However in any Placemaking Plan it is critical that the irreplaceable semi natural habitat of ancient woodland is specifically protected.

Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with national policy as set out below.

Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection: for instance 86% of ancient woodland in the South West has no statutory protection. This is particularly relevant as ancient woodland is still facing considerable threats – research from the Woodland Trust shows that in the last decade 100 square miles (26,000 hectares or 5% of the total amount of ancient woodland remaining in the UK) of ancient woodland in the UK has come under threat from destruction or degradation.

Just 1.86% of BANES is comprised of ancient woodland compared to an average for Great Britain of 2.40%, so it is vital that the Council does all it can to protect the remaining resource in this Placemaking Plan.

It is also important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees. The Ancient Tree Hunt (<http://www.ancient-tree-hunt.org.uk/>) is designed specifically for this purpose and has already identified ancient trees in the area, such as the large group of ancient trees in Prior Park.

Government policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The new National Policy Planning Framework clearly states: "...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland..." (DCLG, March 2012, para 118).

However this NPPF wording should be considered in conjunction with other stronger national policies on ancient woodland -

- The Government's policy document 'Keepers of Time – A statement of Policy for England's Ancient & Native Woodland' (Defra/Forestry Commission, 2005, p.10) states: 'The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland'.

- The Government's Independent Panel on Forestry states: 'Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time – A statement of policy for England's ancient and native woodland)....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.' (Defra, Final Report, July 2012). This has been endorsed by the response in the recent Government Forestry Policy Statement (Defra Jan 2013): 'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'.

-The Government's Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: 'The Government is committed to providing appropriate protection to ancient woodlands....'.

-The new Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England's Wildlife & Ecosystem Services, Defra 2011, see 'Forestry' para 2.16) states that – 'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'.

-The SW Forestry Framework (Forestry Commission, 2005) contains a key objective to ‘Protect, improve and manage Ancient Semi-Natural Woodland...’.

The new Bath & North East Somerset Green Infrastructure Strategy March 2013 (Final version approved as Council Strategy) also highlights this by stating as a priority the need to: ‘Protect ancient woodlands, veteran and notable trees’ (Green infrastructure and trees & woodlands (P.34/35).

Another example of good Local Authority policy on ancient woodland is provided by North Somerset Council Core Strategy Adopted April 2012 -

‘Policy CS4: Nature conservation

North Somerset contains outstanding wildlife habitats and species. These include limestone grasslands, traditional orchards, wetlands, rhynes, commons, hedgerows, ancient woodlands and the Severn Estuary. Key species include rare horseshoe bats, otters, wildfowl and wading birds, slow-worms and water voles.

The biodiversity of North Somerset will be maintained and enhanced by:...

3) seeking to protect, connect and enhance important habitats, particularly designated sites, ancient woodlands and veteran trees’.

The Plan for Stafford Borough - Pre-submission publication: Jan 2013 states in Policy N5 that: ‘New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows’.

The Swindon Borough Local Plan 2026 (Pre-Submission Draft - Dec 2012) states in Policy EN1 Green Infrastructure Network that: ‘New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows’.

We would therefore like to see this Placemaking Plan contain a specific Trees & Woods Policy policy to read: ‘Planning permission will be refused for developments resulting in the loss of or adverse effects upon ancient woodland or ancient trees’ in accordance with the latest national policy.

<b>Respondent Number:</b> 281	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Amanda Grundy	<b>Respondent Organisation:</b> Natural England
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP15

**Part2b: Comments on sites or policy areas**

The document raises a number of questions related to biodiversity and the natural environment as set out below, which are followed by our comments:

• Is there a need for policy to protect Ecosystem services, or is reference in Green Infrastructure Strategy sufficient?

The ecosystem approach provides a framework for building understanding of the services provided by the environment and their interrelationships with the economy and society. It demonstrates the benefits or services we gain from a healthy environment or ecosystem: provisioning – clean air, and water; regulating – climate control and disease; supporting – food, nutrient cycles, and crop pollination; cultural – wellbeing and recreational benefits

A strong link to the GI Strategy should ensure ecosystem services are taken into account in new development; however the Council may wish to develop a separate policy that affords particular consideration and protection of ecosystem

services in recognition of their vital role in achieving sustainable development.

We would also draw the Council's attention to a Natural England in-house literature review titled „Micro-Economic Benefits of Investment in the Environment Review“, which is focussed around "green infrastructure" interventions and using the Ecosystem Approach:

<http://www.naturalengland.org.uk/ourwork/planningdevelopment/greeninfrastructure/default.aspx>

- Is there a need to address more overtly the creation, protection, enhancement and management of networks of biodiversity through a policy?

Natural England would welcome further policy guidance regarding biodiversity networks, preferably informed by a detailed understanding of existing networks and future priorities and opportunities for enhancement. We would expect the locally specific green infrastructure mapping exercise the Council is undertaking will further inform the application of such a policy.

- Is there a need for new policy to address restoration of priority species populations and restoration and re-creation of priority habitat?

As referred to above, such a policy could be helpful and positive providing it is underpinned by evidence and an understanding of current conditions and future trends.

- Is there a case for including the nature conservation policy framework entirely within the Green Infrastructure policy framework?

Natural England would advise against subsuming the nature conservation policy framework within that of GI; while nature conservation should be an important consideration of well planned green infrastructure, a separate policy framework would ensure it is given due regard and appropriate priority depending on locally specific circumstances.

- The hierarchy of international, national and locally designated sites is already shown on the Proposals Map. What other „components“ should be mapped to ensure a comprehensive network is identified?

We would expect the green infrastructure mapping exercise being undertaken by the Council (referred to above) will help to identify other essential components of the network.

- The NPPF states that areas identified by „local partnerships“ for habitat restoration or creation should also be mapped.

Do you think it is appropriate for this to use the South West Nature Map and Avon Biodiversity Action Plan (BAP) Atlas? The South West Nature Map and Avon BAP are likely to be useful reference documents when determining areas for habitat restoration or creation. However we would also expect the local GI mapping that is being undertaken by the Council, alongside other studies and assessments produced to inform the emerging Core Strategy, will also be relevant. Ideally there should be linkages with (where applicable) BAPS, NIAs, LNPs, NCAs, NP/AONB Management Plans, ROWIPs, and Green infrastructure strategies.

**Respondent Number:** 819 **Comment Number:** 17 **Respondent Name:** Paulton Parish Council

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

- Is there a need for policy to protect Ecosystem services, or is reference in Green Infrastructure Strategy sufficient?  
Use the Green Infrastructure Strategy

- The hierarchy of international, national and locally designated sites is already shown on the Proposals Map. What other 'components' should be mapped to ensure a comprehensive network is identified?  
None

Agrees with the other discussion points.

**Respondent Number:** 1556 **Comment Number:** 20 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

We would suggest that there is already ample regulatory and legislative frameworks in order to ensure the protection, management and enhancement of biodiversity interests. The DPD should not replicate or worse produce policies which conflict with other such guidance.

**Respondent Number:** 4588 **Comment Number:** 10 **Respondent Name:** Withies Farm Landowners' Group, Glenavon Farm **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

The raft of nature conservation policies contained in the adopted Local Plan is confusing and, to an extent, repetitive. The policy framework should be simplified and given greater clarity in terms of the local policy priorities for the protection of biodiversity, and how these are to be balanced against other priorities, including the need for development.

As adduced in earlier submissions, the emphasis in the NPPF is upon criteria-based policies, rather than restraint designations on a Proposals Map. Moreover, since, by its very nature, biodiversity is very transient and the value of sites can change over short timescales in response to a variety of purposes, including land management and husbandry, sites of importance are more appropriately identified separately from a Proposals Map.

**Respondent Number:** 4767 **Comment Number:** 10 **Respondent Name:** Ms Wendy Stott **Respondent Organisation:** National Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

The National Trust does not have detailed comments to make under this section, but would generally support the enhancing and joining up of areas of biodiversity, and support for specific habitats and species. The Trust would support a

policy to protect 'Ecosystem services'.

**Respondent Number:** 4787 **Comment Number:** 24 **Respondent Name:** Cllr Brian Webber  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

I do not have sufficient knowledge to fairly assess the issues involved, but my impression is that if the requirements placed on applicants were more focussed, decision-makers would be more sympathetic to ecological concerns and the results in terms of protection would be greater

**Respondent Number:** 4798 **Comment Number:** 7 **Respondent Name:** Paulton Builders' Merchants Ltd  
**Agent ID:** 183 **Agent Name:** Colliers International

**Respondent Organisation:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP15

### Part2b: Comments on sites or policy areas

Biodiversity and the natural environment – DP15 – the policy approach to biodiversity should be positive inasmuch as it should encourage solutions through approaches and techniques to mitigate significant harmful effects of development should they arise – which responds to NPPF para 118 bullet 1.

## Site/Discussion Point: DP16

**Respondent Number:** 819 **Comment Number:** 18 **Respondent Name:** Paulton Parish Council  
**Agent ID:** **Agent Name:**

**Respondent Organisation:**

Further Information available in the original comment?

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP16

### Part2b: Comments on sites or policy areas

- As the White Paper suggests it is for Local Planning Authorities to decide whether and how to recognise an NIA in their local plans, what do you consider is the best approach to recognising any NIA that may be identified?  
Consult local established Wildlife groups.

**Respondent Number:** 4588 **Comment Number:** 11 **Respondent Name:** Withies Farm Landowners' Group, Glenavon Farm **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP16**Part2b: Comments on sites or policy areas**

With regard to Nature Improvement Areas, the Local Plan is not considered to be the appropriate vehicle for identifying such areas. Notwithstanding this position, if they are to be identified then it should be through references in the text / policy criteria to broad areas rather than through detailed designations on a Proposals Map. Any such areas that may be identified should be away from the district's recognised settlements and should not fetter the ability to meet the development requirements of the district (both immediate and longer term). However, it may be acknowledged that large scale urban extensions may offer opportunities for enhancement of biodiversity where they are to incorporate green infrastructure and, as acknowledged in the NPPF in relation to the supply of new homes, the best way of achieving sustainable development can sometimes be through planning for larger scale development (para. 52).

**Site/Discussion Point: DP17**

**Respondent Number:** 102 **Comment Number:** 28 **Respondent Name:** Federation of Bath Residents' Associations **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

Some Overarching Principles: Add –

- "Protect the historic environment from the traffic congestion and air pollution that currently disfigure and damage it."

**Respondent Number:** 224 **Comment Number:** 28 **Respondent Name:** Ms Caroline Kay **Respondent Organisation:** Bath Preservation Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

Overarching principles: 'conserve' rather than 'preserve' in the first bullet point.

Our answer to all the discussion points at DP17 is 'yes'. It is vital that the Council provides adequate resources to

**Schedule of Comments on the Placemaking Plan Launch Document: Sorted by Change Reference.**

maintain the Historic Environment Record; updates into a compliant form, and adopts, a new Bath Conservation Area Character appraisal; and maintains sufficient planning and conservation officer resource to deliver the pre-application advice necessary for proper fulfilment of statutory requirement and the management of the hisotoric environment generally.

<b>Respondent Number:</b> 249	<b>Comment Number:</b> 4	<b>Respondent Name:</b> Royal Mail Estates Limited	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 31	<b>Agent Name:</b> BNP Paribas Real Estate		
<b>Further Information available in the original comment?</b> <input checked="" type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP17

**Part2b: Comments on sites or policy areas**  
 Royal Mail comments that B&NES should not seek to augment the guidance on conserving and enhancing the historic environment that I set out in paragraphs 126 to 141 of the NPPF. Notwithstanding Bath’s World Heritage Site status, the NPPF guidance still applies and care should be taken by B&NES not to deter beneficial development / regeneration from taking place by over emphasis on heritage constraints in planning policy.

<b>Respondent Number:</b> 279	<b>Comment Number:</b> 2	<b>Respondent Name:</b> Rohan Torkildsen	<b>Respondent Organisation:</b> English Heritage
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP17

**Part2b: Comments on sites or policy areas**  
 The inclusion of a policy for the historic environment is welcomed and I would be pleased to provide more detailed advice in due course to ensure a precise, consistent and effective policy is promoted.  
  
 Great care is evidently required to ensure the subtitles of national policy for the conservation of the significance of the historic environment is secured. I refer to the 3rd bullet point and reference to wider public benefits derived from the retrofitting of buildings to improve their environmental efficiency. It should be noted that great weight should be given to an asset’s conservation to ensure its significance is sustained and enhanced.  
  
 Might the policy seek to ensure that all the potential least invasive opportunity’s to improve environmental performance are employed before less sympathetic changes?

<b>Respondent Number:</b> 819	<b>Comment Number:</b> 19	<b>Respondent Name:</b> Paulton Parish Council	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

- The applicant provides sufficient information and/or assessments of the historic environment to support the merits of the scheme?

Yes, see information in the VDS

- Substantial, total loss or the demolition of a designated heritage asset(s) is wholly exceptional unless it can be demonstrated the scheme has overwhelming public benefit that outweighs the loss or harm to the heritage asset(s)?

Do not entirely agree, this is going too far

Agrees with the other discussion points.

<b>Respondent Number:</b> 837	<b>Comment Number:</b> 36	<b>Respondent Name:</b> Mr David Redgewell	<b>Respondent Organisation:</b> South West Transport Network / Railfuture
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

DP17 support the policy

Object if policy is used to prevent planning applications being refused under the Public Equity Duty 2010 to provide goods and services to disabled people, BMI and members of the LGBT community.

<b>Respondent Number:</b> 1544	<b>Comment Number:</b> 4	<b>Respondent Name:</b> Mr Jonathan O'Shea	<b>Respondent Organisation:</b> St John's Hospital
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

SJH supports developments that make a positive contribution to the local identity and character including the sensitive retrofitting of historic buildings for energy efficiency. We support Policy CP6(2) believing the historic environment should be viewed as an opportunity not a constraint

<b>Respondent Number:</b> 1556	<b>Comment Number:</b> 21	<b>Respondent Name:</b> Strategic Land Partnerships	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

We would suggest that there is already ample regulatory and legislative frameworks in order to ensure the protection, management and enhancement of heritage interests. The DPD should not replicate or worse produce policies which conflict with other such guidance.

<b>Respondent Number:</b> 2429	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Mr Nicholas Stubbs	<b>Respondent Organisation:</b> Stubbs Rich Architects
<b>Agent ID:</b>	<b>Agent Name:</b>		

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

The Council's publication on retrofitting historic properties does not deal with the cost merits of doing so. In order to balance the risk of devaluing the historic stock, it is essential that the cost-of-carbon be assessed and schemes with unacceptably high cost-of-carbon be rejected. The level might be set relative to the current Shadow Price of Carbon set by Government under the CRC. We OBJECT to the suggestion that non-designated historic assets be afforded the same protection as designated – this violates the principle of protection: if the protection body cannot be persuaded of the historic merits such that the site or property may be designated, then, by definition the assets are not of equal significance and should not be treated as equal. It would be reasonable to insist that works to non-designated older sites or properties should be of a good quality and sympathetic to the context, but this should not preclude contemporary changes

<b>Respondent Number:</b> 4588	<b>Comment Number:</b> 12	<b>Respondent Name:</b> Withies Farm Landowners' Group, Glenavon Farm	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

The NPPF contains quite detailed guidance approach to be taken to the determination of applications affecting heritage assets. The discussion points set out in the Launch Document relate in the main to matters that are already adequately covered in the NPPF, and therefore do not require local policy guidance. The matters set out in the NPPF should not merely be duplicated in the Placemaking Plan.

<b>Respondent Number:</b> 4767	<b>Comment Number:</b> 11	<b>Respondent Name:</b> Ms Wendy Stott	<b>Respondent Organisation:</b> National Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP17**Part2b: Comments on sites or policy areas**

Particularly in a World Heritage Site context, applicants should be encouraged as much as possible to provide sufficient information and/or assessment of the historic environment to enable the proper consideration of their proposals. When the text refers to the weighing up of the significance of heritage asset against the benefits of a proposal, it is important that the 'setting' of heritage assets is not forgotten. This should be specifically referred to. Otherwise much of the policy on balancing conservation with the benefits of development derives from the NPPF, and the challenge is to make that specific to BaNES where possible.

**Site/Discussion Point: DP18**

**Respondent Number:** 102    **Comment Number:** 29    **Respondent Name:** Federation of Bath Residents' Associations    **Respondent Organisation:**

**Agent ID:**    **Agent Name:****Further Information available in the original comment?** **Part 2a: Comments on scope and content****Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

Sustainable Transport - Context:

- a. The first sentence should mention the fact that Bath already suffers from high levels of traffic congestion and air pollution (the latter evidenced by the fact that the entire main road network has been designated as an Air Quality Management Area). It is not just a question of minimising congestion due to new development, important as that is, but of addressing the woes that already exist.
- b. Amend final sentence to read: "These principles will be derived from Bath's Transport Strategy (being developed separately) and will underpin the sustainable transport policies in this Plan."

Sustainable Transport - Some Overarching Principles:

- Add to bullet 2: "...while making appropriate provision for residents' parking."
- Bullet 3: Clarify. The meaning is not clear.
- Bullet 4: Clarify. Does this mean that new routes always have to be provided, but that they must be "safe and sustainable"? What does this mean, anyway?
- Add new bullet 6: "Encourage separation of cyclist, pedestrian and vehicle routes."
- Add new bullet 7: "Reduce existing high levels of traffic congestion".
- Add new bullet 8: "The need to reduce associated pollution (from nitrogen dioxide and particulates) must be mentioned, together with its significance for health and to the law."

Key Transport Infrastructure:

Give details of first 3 retained schemes or where this detail can be found.

**Respondent Number:** 281    **Comment Number:** 9    **Respondent Name:** Amanda Grundy    **Respondent Organisation:** Natural England

**Agent ID:**    **Agent Name:****Further Information available in the original comment?** **Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

Improving sustainable access to the natural environment - Natural England encourages local authorities to consider how they can improve environmentally sustainable access to the natural environment for both local residents and visitors, in both urban and rural settings. More environmentally sustainable forms of access to the natural environment can deliver a range of benefits for people, the environment and the economy. Natural England encourages local planning authorities to involve Local Access Forums, whose role is to advise local authorities on improving public access for open air recreation and enjoyment.

Integrating Rights of Way Improvement Plans (ROWIPs) - the public Rights of Way (RoW) network is an integral part of the transport system. It provides a means of sustainable, active travel, particularly for short journeys, in both urban and rural areas, and can play a significant part in reducing traffic congestion and harmful emissions, providing safer routes for vulnerable travellers. Natural England encourages local planning authorities to have early and continued dialogue with their RoW officers and Local Access Forum to ensure that the contribution the RoW network can make to sustainable transport is fully embedded in the plan.

Delivering green infrastructure - multi-functional green infrastructure can deliver a range of benefits for the natural environment and local communities, including health and recreation, climate change adaptation, flood alleviation and water management, sustainable transport and biodiversity. A green infrastructure network of existing and new RoW, quiet lanes and greenways, and other green spaces and corridors provides an essential framework for an effective non-motorised transport network threading through an urban area, linking homes to schools, places of employment, recreational areas and the countryside.

<b>Respondent Number:</b> 819	<b>Comment Number:</b> 20	<b>Respondent Name:</b> Paulton Parish Council	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

- Encourage movement by public transport, bicycle and on foot, including traffic management and assisting the integration of all forms of transport?  
Require new development sites to be linked to existing footways and to be located close to existing or new bus routes.
- Seek the improvement of existing and the provision of new public transport facilities?  
Secure funding through Section 106 payments to support public transport
- Enhance facilities for pedestrians, cyclists and the mobility impaired?  
Require new footways and public rights of way to be provided within new developments.
- Use former railway land for sustainable transport purposes?  
Yes

<b>Respondent Number:</b> 837	<b>Comment Number:</b> 6	<b>Respondent Name:</b> Mr David Redgewell	<b>Respondent Organisation:</b> South West Transport Network / Railfuture
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

Bath North East Somerset Council

**Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

No public transport policy is developed for buses or improvement in bus station interchanges, i.e. Southgate in Bath of Keynsham Ashton Way bus interchange or Radstock Victoria Hall ro Midsomer Norton town centre or the greater Bristol bus network

**Respondent Number:** 1556 **Comment Number:** 22 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**Further Information available in the original comment? **Part 2a: Comments on scope and content****Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

We suggest that all of the ideas identified are enshrined within sustainable development as defmed within the NPPF and therefore these are not necessary.

**Respondent Number:** 2429 **Comment Number:** 9 **Respondent Name:** Mr Nicholas Stubbs **Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**Further Information available in the original comment? **Part 2a: Comments on scope and content****Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

We SUPPORT the aspirations of this DP.

**Respondent Number:** 4588 **Comment Number:** 13 **Respondent Name:** Withies Farm Landowners' Group, Glenavon Farm **Respondent Organisation:**

**Agent ID:** **Agent Name:**Further Information available in the original comment? **Part 2a: Comments on scope and content****Site or Discussion Point:** DP18**Part2b: Comments on sites or policy areas**

The transport policies of the Plan must be realistic and acknowledge that, in order to deliver the development requirements during the Plan period, it may be necessary to permit developments that create additional loadings on the highway network that are sub-optimal in highway terms. Whilst reasonable contributions can be sought to addressing the

impacts, since many of the districts principal routes are already at, or close to, capacity, it is unrealistic not to permit any further developments unless and until additional capacity is created, and unreasonable for development to be expected to fund infrastructure improvements to resolve existing problems to which the development itself does not give rise.

The Plan should incorporate a joined-up approach to delivering sustainable transport solutions through allocating development to the most sustainable locations, identifying necessary infrastructure improvements to support development in those locations, and providing the necessary funding for such improvements through a combination of reasonable S106 contributions and Community Infrastructure levy. This is likely to involve permitting development in advance of the implementation of supporting infrastructure in some instances, and the policy framework must incorporate such flexibility.

<b>Respondent Number:</b> 4767	<b>Comment Number:</b> 12	<b>Respondent Name:</b> Ms Wendy Stott	<b>Respondent Organisation:</b> National Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP18

### Part2b: Comments on sites or policy areas

The National Trust supports initiatives to encourage movement by public transport, bicycle and on foot, and the integration of those non-car forms of travel. Given the recent popularity of cycling, there should perhaps be particular emphasis on providing safe routes and parking facilities for cyclists. Use of former railway land for sustainable transport purposes sounds like a good idea as long as it does not preclude the re-opening of any viable rail routes in future.

<b>Respondent Number:</b> 4798	<b>Comment Number:</b> 8	<b>Respondent Name:</b> Paulton Builders' Merchants Ltd	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 183	<b>Agent Name:</b> Colliers International		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP18

### Part2b: Comments on sites or policy areas

Sustainable transport – DP18 – in formulating policy and considering the issue of sustainability, it should be recognised that there are fewer opportunities in rural areas and rural settlements to limit the use of the private car. Therefore, due consideration and weight should be given to proposals which seek to balance the delivery of land uses within an area helping to address inequalities and minimising journey lengths – the latter reflecting NPPF para 37.

## Site/Discussion Point: DP19

<b>Respondent Number:</b> 102	<b>Comment Number:</b> 30	<b>Respondent Name:</b> Federation of Bath Residents' Associations	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP19**Part2b: Comments on sites or policy areas**

- Bullet 1- details of these retained schemes must be made available before they are considered for elimination.
- Bullet 2 – consider adding (a) rail trackbed where Bus Rapid Transit would have been built (ie from the east end of the Bristol/Bath cycling track at Brassmill to Station Road), and (b) road widening capability on Lower Bristol Road between Windsor Bridge junction and Twerton Fork.
- Add new bullet 3: “The need for the shortest possible A46/A36 link road to remove excess traffic from London Road and Bathwick Street.”

**Respondent Number:** 819    **Comment Number:** 21    **Respondent Name:** Paulton Parish Council

**Respondent Organisation:**

**Agent ID:**        **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP19**Part2b: Comments on sites or policy areas**

- Is there sufficient evidence or reason to justify the retention of these schemes through the Placemaking Plan?

No

- Are there further major transport routes or infrastructure that should be identified and protected in order to help deliver development and widen transport choice?

Not aware of any

**Respondent Number:** 837    **Comment Number:** 7    **Respondent Name:** Mr David Redgewell

**Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:**        **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP19**Part2b: Comments on sites or policy areas**

Object to including the Clutton bypass A37 / Clutton Weston route within the plans

Whitchurch bypass

These policy need removing from the Core Strategy and West of England Partnership Joint Local Transport Plan

**Respondent Number:** 837    **Comment Number:** 35    **Respondent Name:** Mr David Redgewell

**Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:**        **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP19**Part2b: Comments on sites or policy areas**

DP 19 The rail routes fo the Frome to Radstock rail corridor for future rail services  
Somerset and Dorset rail corridor Bath City Centre to Radstock. Midsomer Norton via Midford.  
Rail corridor Bath to Warmley and Bristol via Kelston and Bitton for future transport rail / tram provisionA rail safeguard  
on land policy is required including freight facilities at Westmorelands Yard  
Saltford and Bathampton station sites

**Respondent Number:** 1556 **Comment Number:** 23 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment? **Part 2a: Comments on scope and content****Site or Discussion Point:** DP19**Part2b: Comments on sites or policy areas**

Infrastructure required should be identified in a new Infrastructure Delivery Plan to be considered alongside the CIL and alongside this DPD so that all infrastructure matters which may be required can be considered alongside the means by which much of it will be financed

**Respondent Number:** 2429 **Comment Number:** 10 **Respondent Name:** Mr Nicholas Stubbs **Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**

Further Information available in the original comment? **Part 2a: Comments on scope and content****Site or Discussion Point:** DP19**Part2b: Comments on sites or policy areas**

We SUPPORT the aspirations of this DP.

**Site/Discussion Point: DP20**

**Respondent Number:** 102 **Comment Number:** 31 **Respondent Name:** Federation of Bath Residents' Associations **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment? **Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP20**Part2b: Comments on sites or policy areas**

- Bullet 1: No traffic management proposals currently exist for the whole of the centre of Bath (ie including George Street, Queen Square and Circus).
- Bullet 2: FoBRA wishes to see through traffic discouraged or prevented from passing through Bath city centre (ie George Street/Queen Square). Queen Square and The Circus are Key Elements of the World Heritage Site (identified as such in the WHS Management Plan). George Street is a busy shopping/restaurant street which also forms a link (currently a major barrier) between the main shopping centre and the principal Georgian heritage sites.

**Respondent Number:** 279 **Comment Number:** 3 **Respondent Name:** Rohan Torkildsen**Respondent Organisation:** English Heritage**Agent ID:** **Agent Name:****Further Information available in the original comment?** **Part 2a: Comments on scope and content****Site or Discussion Point:** DP20**Part2b: Comments on sites or policy areas**

It is vital that development management policy ensures that all future transport/highway /bus/cycling initiatives across the District employ the principles, and where appropriate, the specific standards, advocated by the Bath Public Realm and Movement Strategy.

**Respondent Number:** 819 **Comment Number:** 22 **Respondent Name:** Paulton Parish Council**Respondent Organisation:****Agent ID:** **Agent Name:****Further Information available in the original comment?** **Part 2a: Comments on scope and content****Site or Discussion Point:** DP20**Part2b: Comments on sites or policy areas**

- Should the policy framework only relate to traffic management proposals for the centres of Bath, Keynsham, Midsomer Norton and Radstock?

No, the larger villages such as Paulton and Peasedown should also be included in the Policy framework

- Should through traffic and other unnecessary motorised vehicles be discouraged from the main shopping streets?  
Yes

- How should the amount and speed of traffic in residential areas be reduced and how should through traffic be discouraged from using unsuitable routes?

The proposed 20 mph limit should be implemented and ideally this should be enforceable as soon as possible, and more traffic calming introduced.

**Respondent Number:** 837 **Comment Number:** 32 **Respondent Name:** Mr David Redgewell **Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP20**Part2b: Comments on sites or policy areas**

DP20 traffic management and car parking policy should be used as a demand management tool plus short term parking. High street should pedestrians in Bath, Keynsham, Midsomer Norton

**Respondent Number:** 2429 **Comment Number:** 11 **Respondent Name:** Mr Nicholas Stubbs **Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP20**Part2b: Comments on sites or policy areas**

Traffic management of other than the city and town centres should be informed by the data, to which we are not privy. If the Highways Officers make a sound case for management, then we would support this. However, individual developments must not be expected to bear disproportionate costs of wider benefits than those which accrue to the scheme itself.

**Site/Discussion Point: DP21**

**Respondent Number:** 102 **Comment Number:** 32 **Respondent Name:** Federation of Bath Residents' Associations **Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP21**Part2b: Comments on sites or policy areas**

- Bullet 1: .The P&Rs should operate for much longer, with suitable security for vehicles parked overnight. At present the P&Rs are of no use to overnight or late-night visitors.
- Bullet 2: The plan should urgently identify a P&R site to the east of Bath.

**Respondent Number:** 224 **Comment Number:** 29 **Respondent Name:** Ms Caroline Kay **Respondent Organisation:** Bath Preservation Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP21**Part2b: Comments on sites or policy areas**

BPT regards the development of a coherent and comprehensive city-wide transport policy for Bath as essential if the Core Strategy's aspirations are to be delivered. We do not claim any particular expertise in transport issues and do not therefore wish to comment on most of the bullet points in DP18 to 23. However we recognise the desirability of identifying a suitable site for a P&R facility to the east of Bath if one can be found without undue landscape harm: if such a site can be identified it should be allocated through the PMP (DP21).

**Respondent Number:** 819 **Comment Number:** 23 **Respondent Name:** Paulton Parish Council **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP21**Part2b: Comments on sites or policy areas**

Unable to comment

**Respondent Number:** 2429 **Comment Number:** 12 **Respondent Name:** Mr Nicholas Stubbs **Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP21**Part2b: Comments on sites or policy areas**

A parking strategy for the District has been promised, but we are not privy to its contents, because it has not been published (as far as we have been able to ascertain). The future of parking should depend on a robust needs case, giving more weight to the economic implications on business of good communication and we would recommend that this is an area which needs greater background information than has been presented to date for respondents, including ourselves, to give informed comment.

**Respondent Number:** 4787 **Comment Number:** 25 **Respondent Name:** Cllr Brian Webber

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP21

### Part2b: Comments on sites or policy areas

Identifying a site for the eastern Park & Ride is a priority, but it may take a long time. It should not be allowed to delay the completion of the rest of the Placemaking Plan.

**Respondent Number:** 4789 **Comment Number:** 1 **Respondent Name:** Jeremy Heffer

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP21

### Part2b: Comments on sites or policy areas

Park & Ride

- What essential criteria should be included in a policy framework for new or expansion of existing Park and Ride sites?

Green Belt policy should be retained whilst considering P&R. P&R needs to be demonstrated as a viable solution to reducing the number of vehicles on the roads, not a mechanism for creating more vehicle movements and diversions.

- In view of the need for a Park and Ride facility to the east of Bath, should a specific site be investigated and allocated through the Placemaking Plan?

Important views across the river valleys need to be retained to maintain World Heritage Standards and the AONB status, e.g. Bathampton meadows, Woolley valley, etc  
More consultation with residents should be encouraged.

## Site/Discussion Point: DP22

**Respondent Number:** 819 **Comment Number:** 24 **Respondent Name:** Paulton Parish Council

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP22

**Part2b: Comments on sites or policy areas**

All public car parking (excluding Bath) should be free during normal business hours to encourage use of these town centres.

**Respondent Number:** 837    **Comment Number:** 33    **Respondent Name:** Mr David Redgewell    **Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP22

**Part2b: Comments on sites or policy areas**

DP21 Bathampton should be open as a new rail based Park and Ride along Corsham and Saltford

**Respondent Number:** 837    **Comment Number:** 34    **Respondent Name:** Mr David Redgewell    **Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP22

**Part2b: Comments on sites or policy areas**

DP22 bus based park and ride should be developed in Bathampton/Batheaston Bathford  
Be strict enforcement and charging in car parks Keynsham Midsomer Norton Radstock Bath City

**Site/Discussion Point: DP23**

**Respondent Number:** 93    **Comment Number:** 2    **Respondent Name:** Highways Agency    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP23

**Part2b: Comments on sites or policy areas**

DP23 Sustainable transport – the Highways Agency supports the need for planning applications to be supported by an appropriate transport assessment or transport statement

<b>Respondent Number:</b> 98	<b>Comment Number:</b> 6	<b>Respondent Name:</b> Mark O'Sullivan	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP23

**Part2b: Comments on sites or policy areas**

The proposed coverage of transport issues in the Plan, at DP23, is far too cursory. Transport problems are a major constraint on development in B&NES, and politicians have failed to grasp the nettle for many years: even the opportunity of the JLTP was not taken, as that key plan has little to say about Bath. Talk about waiting for the Transport Commission is not enough: more thorough action now is needed. In particular, the principle should be laid down that housing development in the Bath area will not be permitted unless the impact on the city of any traffic generated by the development is first at least wholly mitigated.

<b>Respondent Number:</b> 102	<b>Comment Number:</b> 33	<b>Respondent Name:</b> Federation of Bath Residents' Associations	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP23

**Part2b: Comments on sites or policy areas**

- Bullet 4: Most of the Bath road system already carries an "excessive volume" of traffic on "unsuitable roads" in "environmentally sensitive areas". This existing traffic must be dealt with, as well as preventing the introduction of even worse traffic.

<b>Respondent Number:</b> 224	<b>Comment Number:</b> 30	<b>Respondent Name:</b> Ms Caroline Kay	<b>Respondent Organisation:</b> Bath Preservation Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP23

**Part2b: Comments on sites or policy areas**

We strongly support the 4th bullet point of DP23. The streets of central Bath were not designed for modern vehicular traffic, and the damage being inflicted on our historic buildings and pavements, as well as on amenity and air quality, cannot be allowed to continue unchecked.

**Respondent Number:** 819 **Comment Number:** 25 **Respondent Name:** Paulton Parish Council

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP23

### Part2b: Comments on sites or policy areas

- A high standard of highway safety?  
Yes, of paramount importance

- Safe and convenient access for pedestrians, cyclists and with mobility impairment?  
Yes, of significant importance and in the case of mobility impairment is a statutory obligation for public buildings

- Suitable vehicular access and appropriate level of on-site servicing and parking is provided?  
Yes, preferable

Remaining points are absolutely essential

**Respondent Number:** 837 **Comment Number:** 31 **Respondent Name:** Mr David Redgewell

**Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP23

### Part2b: Comments on sites or policy areas

DP23 Lack of a policy on bus priority measures within the policy is concerning with regards to the Bath Transport Strategy including bus and taxi lanes

The policy is weak in the support of the bus network and traffic management measures.

Note DFT Green Light for Buses and PPG13.

There is no policy in DP23 for water taxi buses

**Respondent Number:** 2429 **Comment Number:** 13 **Respondent Name:** Mr Nicholas Stubbs

**Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP23

### Part2b: Comments on sites or policy areas

A network of safe, interconnected and extensive cycle routes around the city should be promoted. A policy for the shared

use of footpaths should be developed and the cycling and walking communities be encouraged to develop mutual usage protocols (walking groups to be be mindful of not blocking the entire width, cyclists to give way to pedestrians since they have the greater potential to cause injury). Cycle paths painted at the edge of carriageways are universally ignored by drivers parking over them (eg through Widcombe) and a better solution needs to be implemented.

**Site/Discussion Point: DP24**

**Respondent Number:** 102    **Comment Number:** 34    **Respondent Name:** Federation of Bath Residents' Associations    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP24

**Part2b: Comments on sites or policy areas**

As part of the wider debate on the lowering of car parking levels in some areas, FoBRA feels that visitor parking in the city centre should be reduced as new P&R capacity becomes available, otherwise traffic will continue to flow into the city in search of parking spaces. Provision of new parking in the city centre should be discouraged.

**Respondent Number:** 819    **Comment Number:** 26    **Respondent Name:** Paulton Parish Council    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP24

**Part2b: Comments on sites or policy areas**

Agrees with all the discussion points.

**Respondent Number:** 837    **Comment Number:** 30    **Respondent Name:** Mr David Redgewell    **Respondent Organisation:** South West Transport Network / Railfuture

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP24

**Part2b: Comments on sites or policy areas**

DP24 Welcome the need for high parking standards to reduce car use and improve public transport  
Car free and car share schemes should be supported in Bath City Centre and Keynsham

**Respondent Number:** 1556 **Comment Number:** 24 **Respondent Name:** Strategic Land Partnerships **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP24**Part2b: Comments on sites or policy areas**

There certainly should not be stronger policy to minimise reliance on the car. If people feel the need for a car they will have a car and they will park it somewhere else, probably clogging up someone else's street unless adequate provision is made on site whether that be at the workplace or at home. The policy and the Council is certainly able to improve public transport which may improve choices.

As far as parking standards are concerned the Council should always seek the most up to date information.

**Site/Discussion Point: DP25**

**Respondent Number:** 95 **Comment Number:** 3 **Respondent Name:** The Coal Authority **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP25**Part2b: Comments on sites or policy areas**

As previously identified, there are coal resources capable of extraction using surface mining methods within parts of Bath and North East Somerset. These resources are located in the central part of the LPA area between Keynsham to the north and Midsomer Norton to the south.

The Coal Authority has previously provided Bath and North East Somerset Council with GIS data illustrating the spatial extent of the surface coal resource, and would expect this area to form part of the defined Minerals Safeguarding Area (MSA) on the Proposals Map. The Coal Authority considers it important that the entire spatial extent of the surface coal resource is safeguarded and that urban/built-up areas are not excluded from the MSA, as opportunities for prior extraction of the resource before commencement of non-mineral development would be lost. Where mining legacy poses a potential risk to land stability, prior extraction can also prove to be a more viable method of site stabilisation than grout filling of shallow voids.

The Coal Authority would recommend that the Council utilises the methodology for defining MSAs as set out in the BGS/Coal Authority publication "Mineral Safeguarding in England: Good Practice Advice" (2011).

Reason – In order to ensure that surface coal resources are not unnecessarily sterilised by non-mineral development, in line with the requirements of paragraphs 143 and 144 of the NPPF.

**Respondent** 819 **Comment** 27 **Respondent** Paulton Parish Council  
**Number:** **Number:** **Name:**

**Respondent**  
**Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP25

#### Part2b: Comments on sites or policy areas

Agrees with the discussion point.

### Site/Discussion Point: DP26

**Respondent** 224 **Comment** 31 **Respondent** Ms Caroline Kay  
**Number:** **Number:** **Name:**

**Respondent** Bath Preservation Trust  
**Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP26

#### Part2b: Comments on sites or policy areas

We agree that Upper Lawn Quarry and Stoke Hill Mine should continue to be allocated for mineral extraction.

**Respondent** 281 **Comment** 10 **Respondent** Amanda Grundy  
**Number:** **Number:** **Name:**

**Respondent** Natural England  
**Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP26

#### Part2b: Comments on sites or policy areas

Natural England does not have sufficient environmental information to comment on the specific quarries mentioned in DP26 discussion points; however a criteria based policy to deal with any future mineral proposals would appear sensible. We would also encourage the Council to consider developing policy guidance regarding the restoration of quarries once they have been worked out or minerals activities cease, to ensure opportunities for environmental and other enhancements are identified and secured for the benefit of people and wildlife.

**Respondent Number:** 819 **Comment Number:** 28 **Respondent Name:** Paulton Parish Council

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Respondent Organisation:**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP26

**Part2b: Comments on sites or policy areas**

No comment

**Site/Discussion Point: DP27**

**Respondent Number:** 224 **Comment Number:** 32 **Respondent Name:** Ms Caroline Kay

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Respondent Organisation:** Bath Preservation Trust

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP27

**Part2b: Comments on sites or policy areas**

DP27 and the preceding paragraph implies that the use of the Former Fullers Earth Works site for aggregate recycling and related activities is permitted activity. It should be noted that some of the activities on and around that site are currently subject to high court and enforcement proceedings. The Council should take legal advice as to the wording of this section to ensure that it does not over commit the Council to this site. It may be worth emphasising that the Council's current understanding of the site is that only 'area A' of the site has legal B2/B8 use.

**Respondent Number:** 819 **Comment Number:** 29 **Respondent Name:** Paulton Parish Council

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Respondent Organisation:**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP27

**Part2b: Comments on sites or policy areas**

Agrees with the discussion point.

**Respondent Number:** 2429 **Comment Number:** 14 **Respondent Name:** Mr Nicholas Stubbs **Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP27**Part2b: Comments on sites or policy areas**

We strongly SUPPORT the continued extraction of Bath Stone at the Limpley Stoke Mine. This is an essential local material for the maintenance of the heritage of the World Heritage Site.

**Site/Discussion Point: DP28**

**Respondent Number:** 819 **Comment Number:** 30 **Respondent Name:** Paulton Parish Council **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP28**Part2b: Comments on sites or policy areas**

No comment

**Site/Discussion Point: DP29**

**Respondent Number:** 23 **Comment Number:** 10 **Respondent Name:** Dr Lucy Rogers **Respondent Organisation:** Avon Wildlife Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

The Trust agrees that a precautionary approach should be applied to all proposals for shale gas exploration and extraction within the Plan area.

**Respondent Number:** 95    **Comment Number:** 4    **Respondent Name:** The Coal Authority    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

The Coal Authority would support the inclusion of a locally distinctive policy addressing new energy technologies, such as Coal Bed Methane (CBM), Abandoned Mine Methane (AMM), and Underground Coal Gasification (UCG).

However, given the introduction to this discussion point on page 65 of the Draft Placemaking Plan, the Council needs to be careful that it does not confuse CBM extraction with “fracking” for shale gas. Whilst CBM involves the drilling of a deep borehole into coal seams, the methods employed for CBM extraction are not the same as fracking for shale gas. The concerns set out in DP29 regarding the impact of fracking on the Bath Hot Springs should not therefore automatically be applied to CBM.

Reason – To ensure that the Placemaking Plan does not confuse CBM with fracking for shale gas.

**Respondent Number:** 98    **Comment Number:** 8    **Respondent Name:** Mark O'Sullivan    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

I agree with the proposal at DP29 that the precautionary principle should be applied to any fracking development which might have the potential of adversely affecting the Hot Springs.

**Respondent Number:** 102    **Comment Number:** 35    **Respondent Name:** Federation of Bath Residents' Associations    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

FoBRA is in agreement with these proposals. Moreover, the Council should lobby central Government to apply this policy in neighbouring Authorities where there could be an impact on the Hot Springs.

**Respondent Number:** 224 **Comment Number:** 33 **Respondent Name:** Ms Caroline Kay **Respondent Organisation:** Bath Preservation Trust

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

We strongly agree that a precautionary approach must be adopted to shale gas exploration and extraction (DP29)

**Respondent Number:** 279 **Comment Number:** 4 **Respondent Name:** Rohan Torkildsen **Respondent Organisation:** English Heritage

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

Mindful of the association of the hot springs to the history of Bath and the Outstanding Universal Value of the World Heritage Site, it is reasonable for the City Council to be minded to apply the 'precautionary principle' to future shale gas exploration and extraction. Should it be clearly and convincingly demonstrated that the hot water springs can be assured, any such policy would, I presume, be reconsidered?

**Respondent Number:** 819 **Comment Number:** 31 **Respondent Name:** Paulton Parish Council **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

It is absolutely essential that BANES are able to use every means at their disposal to diligently examine every proposal for shale gas exploration and extraction to ensure that such proposals have zero impact on communities and the environment in general. Protection of the Bath Hot Springs is of paramount importance. This should also apply equally to springs that are currently, or could possibly be used in the future to provide drinking water.

**Respondent Number:** 2429 **Comment Number:** 15 **Respondent Name:** Mr Nicholas Stubbs **Respondent Organisation:** Stubbs Rich Architects

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

Citing the Bath Hot Springs as a precautionary reason to resist shale gas exploration is too onerous. A reasonable, independent and professional assessment of the risk should suffice.

**Respondent Number:** 4807    **Comment Number:** 6    **Respondent Name:** Mr Phil Baker    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP29**Part2b: Comments on sites or policy areas**

There needs to be provision to take a very cautious approach to fracking, as the EIA provision seems to be an ineffective way of safeguarding the future water supply

**Site/Discussion Point: DP30**

**Respondent Number:** 23    **Comment Number:** 11    **Respondent Name:** Dr Lucy Rogers    **Respondent Organisation:** Avon Wildlife Trust

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP30**Part2b: Comments on sites or policy areas**

The Trust agrees with the first bullet point.

**Respondent Number:** 95    **Comment Number:** 5    **Respondent Name:** The Coal Authority    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP30

**Part2b: Comments on sites or policy areas**

As previously identified, there is a legacy of past coal mining activity within Bath and North East Somerset, which poses a potential risk to the stability of new development. These coal mining legacy hazards, which include approximately 567 recorded mine entries, are broadly located in the central part of the LPA area, reflecting the presence of surface coal resources across this area.

The Coal Authority therefore considers it important that this locally distinctive issue of mining legacy is highlighted and that an appropriate policy is included in the Placemaking Plan regarding the need for developers to afford due consideration to unstable land as part of their proposals.

Reason – In order to ensure that the locally distinctive issue of unstable land and mining legacy is afforded due consideration in the Placemaking Plan, in line with the requirements of paragraphs 109, 120, 121 and 166 of the NPPF.

**Respondent Number:** 102    **Comment Number:** 37    **Respondent Name:** Federation of Bath Residents' Associations    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP30

**Part2b: Comments on sites or policy areas**

Pollution, Health & Safety - Some Overarching Principles: Add new bullet 5: "As road transport is the biggest source of air pollution, introduce a Transport Strategy for Bath which reduces this to safe and legal levels."

**Respondent Number:** 245    **Comment Number:** 26    **Respondent Name:** Andy Reading    **Respondent Organisation:** Environment Agency

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP30

**Part2b: Comments on sites or policy areas**

We understand the majority of policies in these topic areas were 'saved' from the Local Plan 2007 by the Core Strategy. Given the time that has passed since the adoption of the 2007 Local Plan we would therefore strongly support a review of the policies to ensure their wording is updated to take into account latest best practice and guidance. These updated policies can then be taken forward in the placemaking plan. We are satisfied with the different topic areas listed as needing review.

**Respondent Number:** 263    **Comment Number:** 3    **Respondent Name:** Wessex Water    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

<b>Site or Discussion Point:</b>	DP30
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## Part2b: Comments on sites or policy areas

DP30 suggests potential topics for the placemaking plan framework. We agree that the following items require relevant policies;

- Foul & Surface water drainage
- Pollution & nuisance
- Air quality
- Groundwater protection

We have previously considered a range of policies that we are promoting throughout the Wessex region. In view of the recent withdrawal of planning guidance and replacement with NPPF we have drafted the following policies for local planning authorities to consider;

### Summary of Proposed Wessex Water Planning Policies

#### 1. Proximity Consultation Zones

##### 1.1 Outline Policy Suggestion:

Development proposals in close proximity to existing operational wastewater or water supply infrastructure should be subject to consultation with the infrastructure provider to ensure that the residential or commercial amenity of the proposed development will not be adversely affected by the continued operation of the existing wastewater or water supply infrastructure.

In particular, development proposals which are sensitive to unpleasant odour emissions within 400m of sewage treatment works or 25m of sewage pumping stations will be subject to consultation with Wessex Water to ensure that the proposed development can reasonably co-exist. Within the 400m and 25m consultation zones, development proposals will be assessed against the potential for odour emissions from the facilities and where such emissions would have an unacceptable detrimental impact on the amenity of the proposed development, development will not be permitted unless adequate mitigation is agreed.

Where necessary the applicant will agree arrangements with Wessex Water to prepare and complete supporting impact assessments to demonstrate that development proposals are unaffected from odour emissions, noise or vibration with or without mitigation.

#### 2. Utility Infrastructure Policy

##### 2.1 Outline Policy Suggestion:

“Applications for new sites, extensions or significant development to existing sites required to provide public water supplies or process sewage and waste water will be permitted providing that they do not give rise to significant adverse effect to environmental features, local amenity or landscape”.

#### 3. Wastewater Infrastructure Policy

##### 3.1 Outline Policy Suggestion:

Development proposals will only be permitted where:

- Adequate sewage treatment facilities are available or where suitable arrangements are made for their provision. Developments which may result in increased nutrient load to sensitive watercourses should incorporate adequate mitigation measures agreed with Wessex Water and the Environment Agency/Natural England so as to secure compliance with the requirements of the EU Water Framework & Habitats Directives.
- Adequate surface water disposal systems are available or where suitable arrangements are made for their provision. Development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Urban Drainage Systems have been incorporated where appropriate. Separate systems of drainage with points of connection or outfalls should be agreed with Wessex Water.
- Adequate foul drainage/sewerage facilities are available or where suitable arrangements are made for their provision.

New developments will be expected to connect to the public sewer system. New sewers and associated infrastructure will be constructed to a standard adoptable by Wessex Water.

#### 4. Water Resources Policy

##### 4.1 Outline Policy Suggestion:

- Development proposals will not be permitted which would adversely affect the quality or quantity of water resources. Robust assessments should be carried out to support applications affecting Groundwater Source Protection Zones, Safeguard Zones and Drinking Water Protection Areas, as defined by the Environment Agency.
- Development should explore the potential to implement water efficiency measures in all developments to reduce demand on water resources. (To be expanded).

We will be pleased to discuss these matters further with planning officers and if any further information is required at this stage please contact our strategic planning team.

**Respondent Number:** 819 **Comment Number:** 32 **Respondent Name:** Paulton Parish Council

**Respondent Organisation:**

**Agent ID:** **Agent Name:**

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP30

#### Part2b: Comments on sites or policy areas

- Do you agree that it would be useful to review the Local Plan policies listed above to ensure that our health, safety, amenity and well-being are safeguarded, also taking into account the impacts on the built and natural environment?  
Yes

- Are there any other topic areas that should be included within this policy framework?  
None at the present time.

**Respondent Number:** 4798 **Comment Number:** 9 **Respondent Name:** Paulton Builders' Merchants Ltd

**Respondent Organisation:**

**Agent ID:** 183 **Agent Name:** Colliers International

**Further Information available in the original comment?**

#### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP30

#### Part2b: Comments on sites or policy areas

Pollution, health and safety – DP 30 – it would be appropriate for a review of foul and surface water policy and contaminated land to take place. Such a review should ensure that the policies respond positively to technical solutions that can be applied to resolve any potential surface water/foul water or site contamination/remediation matters. Such an approach will encourage investigations into development sites, notably those within settlement boundaries that might otherwise be ignored or not pursued with commitment.

**Site/Discussion Point: DP31**

**Respondent Number:** 102    **Comment Number:** 36    **Respondent Name:** Federation of Bath Residents' Associations    **Respondent Organisation:**

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP31

**Part2b: Comments on sites or policy areas**

FoBRA is in agreement with these proposals. Moreover, the Council should lobby central Government to apply this policy in neighbouring Authorities where there could be an impact on the Hot Springs.

**Respondent Number:** 224    **Comment Number:** 34    **Respondent Name:** Ms Caroline Kay    **Respondent Organisation:** Bath Preservation Trust

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP31

**Part2b: Comments on sites or policy areas**

We agree that the PMP should maintain the Local Plan's policy approach of protecting the Hot Springs which are the first mentioned item in the OUV and are of course the source of all of Bath's history. All developers must be made fully aware of the implications of the County of Avon Act 1982. (reference to the 'Avon Act 1983' in the document is incorrect)

**Respondent Number:** 279    **Comment Number:** 5    **Respondent Name:** Rohan Torkildsen    **Respondent Organisation:** English Heritage

**Agent ID:**    **Agent Name:**

**Further Information available in the original comment?**

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP31

**Part2b: Comments on sites or policy areas**

Mindful of the association of the hot springs to the history of Bath and the Outstanding Universal Value of the World Heritage Site, it is reasonable for the City Council to be minded to apply the 'precautionary principle' to future shale gas exploration and extraction. Should it be clearly and convincingly demonstrated that the hot water springs can be assured, any such policy would, I presume, be reconsidered?

**Respondent Number:** 819 **Comment Number:** 33 **Respondent Name:** Paulton Parish Council **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP31

**Part2b: Comments on sites or policy areas**

Protection of the Bath Hot Springs is of paramount importance.

**Respondent Number:** 4787 **Comment Number:** 26 **Respondent Name:** Cllr Brian Webber **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP31

**Part2b: Comments on sites or policy areas**

Emphatically, yes.

**Site/Discussion Point: DP32**

**Respondent Number:** 102 **Comment Number:** 38 **Respondent Name:** Federation of Bath Residents' Associations **Respondent Organisation:**

**Agent ID:** **Agent Name:**

Further Information available in the original comment?

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP32

**Part2b: Comments on sites or policy areas**

Other Issues and Policies: This section implies that only selected existing Local Plan policies will be saved. Surely the principle should be that they are all saved unless there is a case for modifying or deleting them? For example, none of the points on this list will protect residents from the impact of new licensed premises in their area (and yet there must be a policy for this, retained or established anew).

<b>Respondent Number:</b> 154	<b>Comment Number:</b> 10	<b>Respondent Name:</b> Mrs Jane Hennell	<b>Respondent Organisation:</b> Canal & River Trust
<b>Agent ID:</b>	<b>Agent Name:</b>		

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP32**Part2b: Comments on sites or policy areas**

Additional Policy

Finally we would advocate that a specific policy is provided to deal with development affecting the canal/river corridor. The Canal & River corridor is now recognised as an important asset and there are several key development areas adjacent to the river. We would suggest that a policy is included which specifies how development on and adjacent to the river and canal corridor will be considered. This policy could recognise the multi- functional nature of the waterspace and bankside area and cover moorings and boating facilities as well as the interaction between development and the waterspace. The Canal & River Trust would be happy to assist in providing possible text for this policy based on examples of best practice used by other local planning authorities.

To assist local planning authorities in assessing the appropriateness and impacts of new development upon the waterway infrastructure, facilities and environs, a development control checklist of issues to be considered has been developed, and is included within Appendix 2

Of the 2009 Town & Country Planning Association Policy Advice Note 'Unlocking the Potential and Securing the Future of Inland Waterways 'through the Planning System'.

This document was produced in conjunction with British Waterways (as the Canal & River Trust was then) and it provides advice on policies for waterside development. This document may be of assistance to you in considering whether existing policies are adequate to cover the particular issues relating to this type of development. [www.tcpa.org.uk/pages/inland-waterways.html](http://www.tcpa.org.uk/pages/inland-waterways.html)

<b>Respondent Number:</b> 281	<b>Comment Number:</b> 11	<b>Respondent Name:</b> Amanda Grundy	<b>Respondent Organisation:</b> Natural England
<b>Agent ID:</b>	<b>Agent Name:</b>		

Further Information available in the original comment?

**Part 2a: Comments on scope and content****Site or Discussion Point:** DP32**Part2b: Comments on sites or policy areas**

Soil is a finite resource and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably.

The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity.

Plan policies could refer to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.

Best and most versatile land: The Council may be faced with difficult choices in order to secure the most sustainable outcomes. Government Policy (paragraph 112 of the NPPF) states that „local planning authorities should take into account the economic and other benefits of BMV land“. The includes ensuring that the value of BMV land as a resource, part of our „natural capital“, with many potential uses (including recreation, biomass, forestry, biodiversity and leisure uses) and as a provider of ecosystem services is not overlooked. The policy is consistent with and helps underpin the principles of sustainable development and sustainable farming together delivering the Government’s wider aspirations for soil protection and the adoption of an „ecosystem services approach,“ as set out in the Natural Environment White Paper, for example:

- A Vision for Nature: „We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely“ (Para 2.5)
- Safeguarding our Soils: „Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife“ (Para 2.60)
- Protect best and most versatile“ agricultural land“ (Para 2.35)

The Council may wish to consider Natural England’s publication: Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049) when developing relevant Placemaking Plan policy guidance. This can be found on our website: <http://nepubprod.appspot.com/publication/35012>

<b>Respondent Number:</b> 819	<b>Comment Number:</b> 34	<b>Respondent Name:</b> Paulton Parish Council	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP32

**Part2b: Comments on sites or policy areas**

Land ownership issues on potential development sites need to be addressed and resolved. No further comments.

<b>Respondent Number:</b> 837	<b>Comment Number:</b> 5	<b>Respondent Name:</b> Mr David Redgewell	<b>Respondent Organisation:</b> South West Transport Network / Railfuture
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP32

**Part2b: Comments on sites or policy areas**

DP31/DP32 retained from the Local Plan which need new policy

Allocation of land for primary school

Allocation of land for cemeteries

Commercial riding establishments?

Please expand this box or attach a separate sheet if you require more space.

Which development site or policy area are you commenting on? Please use the relevant reference number from the Launch Document for each comment.

Retention of rail freight facilities at Westmoreland Station Road for general rail freight

Policy need developing for boat people and mooring on the River Avon and Kennet and Avon Canal

<b>Respondent Number:</b> 1346	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mono Consultants Limited	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

### Part 2a: Comments on scope and content

**Site or Discussion Point:** DP32

### Part2b: Comments on sites or policy areas

Thank you for your recent consultation on the above. We have considered the proposal relevant to the Mobile Operators Association and would offer the following comment on their behalf.

We have no comments to make in respect of any specific policies within the Placemaking Plan however we would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging Local Development Framework. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of national Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.

The National Planning Policy Framework (NPPF) at paragraph 42 confirms that "advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services." Paragraph 43 confirms that "in preparing local plans, local planning authorities should support the expansion of telecommunications networks", but should also "aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."

Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (July 2013). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process.

As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that within the Local Development Framework there should be a concise and flexible telecommunications policy contained within one of the statutory Documents. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads;

"Proposals for telecommunications development will be permitted provided that the following criteria are met: -

- (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;
- (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;
- (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.
- (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate Supplementary Planning Document. This could then be read with the guidance in NPPF and the Code of Best Practice to Mobile Phone Network Development to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following;

“Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.....”

In summary, we are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the authority’s policy aims. We have suggested text for both above. In keeping with the aims and objectives of the legislation any background information should be contained within a separate non- statutory LDD which would not need to go through the same consultation process.

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

<b>Respondent Number:</b> 1556	<b>Comment Number:</b> 25	<b>Respondent Name:</b> Strategic Land Partnerships	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP32

**Part2b: Comments on sites or policy areas**

Please see the answer to DP8 above:  
There seems to be a total silence in relation to the identification and provision of land required to provide suitable facilities for the aging population to include sheltered housing, age restricted housing, extra care apartments, care homes, dementia care facilities. There is overwhelming evidence of a substantial increase in the population of elderly people within the district that this seems to be a major oversight.

<b>Respondent Number:</b> 4311	<b>Comment Number:</b> 1	<b>Respondent Name:</b> Mono Consultants Limited	<b>Respondent Organisation:</b>
<b>Agent ID:</b>	<b>Agent Name:</b>		
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP32

**Part2b: Comments on sites or policy areas**

Thank you for your recent consultation on the above. We have considered the proposal relevant to the Mobile Operators Association and would offer the following comment on their behalf. We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan.

It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: “Supporting high quality communications infrastructure” of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.

The National Planning Policy Framework (NPPF) at paragraph 42 confirms that;

“advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services.”

Paragraph 43 of NPPF confirms that;

“in preparing local plans, local planning authorities should support the expansion of telecommunications networks”,

but should also;

“aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified.”

As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads;

“Proposals for telecommunications development will be permitted provided that the following criteria are met: -

(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;

(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;

(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

We would consider it appropriate to introduce the policy and we would suggest the following;

“Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting

equipment on existing tall structures and buildings.”

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

<b>Respondent Number:</b> 4798	<b>Comment Number:</b> 10	<b>Respondent Name:</b> Paulton Builders' Merchants Ltd	<b>Respondent Organisation:</b>
<b>Agent ID:</b> 183		<b>Agent Name:</b> Colliers International	
<b>Further Information available in the original comment?</b> <input type="checkbox"/>			

**Part 2a: Comments on scope and content**

**Site or Discussion Point:** DP32

**Part2b: Comments on sites or policy areas**

Other issues and policies – DP32 – it would be helpful for The Placemaking Plan to explain more fully and justify the inclusion of the development sites. There is little by way of explanation as to why they have been selected and their broad boundaries/extents defined (albeit indicatively). Other opportunity sites coming out of this consultation event should be considered and reviewed.