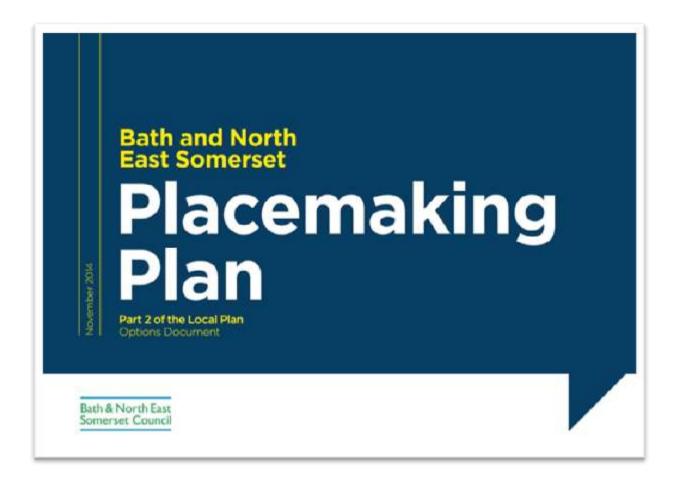
## **Placemaking Plan Options**



# Schedule of Public Consultation Comments

Bath & North East Somerset Council

## Placemaking Plan Options Schedule of Public Consultation Comments

Public consultation on the Placemaking Plan Options document took place from 27<sup>th</sup>

November 2014 to 30<sup>th</sup> January 2015. This schedule sets out the comments received on the Options document.

The comments have been categorised and grouped by plan reference i.e. site number, policy number or paragraph number. Comments relating to more than one site/policy or a place in general have been categorised accordingly. Those comments putting forward alternative development sites have been categorised as 'Unallocated Site'. Similarly, those comments suggesting additional green spaces for designation as a Local Green Space have been categorised as 'Unallocated Green Space'. No comments were received in relation those parts of the Plan (sites, policies or paragraphs) not listed in this schedule.

The comments received on the Options document will be considered by the Council in preparing the pre-submission Draft Plan. The issues raised in the comments and the Council's response will be set out in the Consultation Report which it is anticipated will be published alongside the Draft Plan.

Please note that every effort has been made to correctly categorise all of the numerous comments received. Any errors in categorising do not impact on the Council considering the comments in preparing the Draft Plan.

Planning Policy, Planning Services
Place Directorate
Bath & North East Somerset Council
Lewis House
Manvers Street
Bath, BA1 1JG

01225 477548 planning policy@bathnes.gov.uk

| Chapter                                   | Plan<br>Order | Sub-Chapter   | Paragraph / Policy / Site<br>Reference    | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|---|---|------------------------|---------------------------------------|
| Introduction                              | 1             | Placemaking   | Introduction - Paragraph<br>1             | 1                      | 1 to 1                                |
| Introduction                              | 14            | Placemaking Plan<br>Preparation   | Introduction - Paragraph<br>14            | 3                      | 2 to 4                                |
| Introduction                              | 18            | Sustainability Appraisal and Habitat Regulations Assessment                                       | Introduction - Paragraph<br>18            | 3                      | 5 to 6                                |
| Section 1:<br>Development Sites           | 20            | Comment on Unallocated Sites  | Unallocated Site                          | 6                      | 7 to 101                              |
| Section 1:<br>Development Sites           | 28            | Why these sites and not others?   | Paragraph 1.009                           | 7                      | 102 to 102                            |
| Section 1:<br>Development Sites           | 32            | Comment on Local Green<br>Spaces  | General Local Green<br>Space Comment      | 7                      | 103 to 104                            |
| Section 1:<br>Development Sites           | 33            | Nominated Local Green<br>Space  | Nominated Local Green<br>Space            | 7                      | 105 to 110                            |
| Section 1:<br>Development Sites           | 34            | Nominated Local Green<br>Space  | General Sites Comment -<br>Multiple Areas | 9                      | 111 to 113                            |
| Section 1:<br>Development Sites -<br>Bath | 35            | Bath General Comments   | Bath General Comments                     | 9                      | 114 to 120                            |
| Section 1:<br>Development Sites -<br>Bath | 44            | Placemaking Plan Bath:<br>The Evidence Base   | Paragraph 1.021                           | 9                      | 121 to 121                            |
| Section 1:<br>Development Sites -<br>Bath | 53            | Emerging Design Values  | Emerging Design Values                    | 11                     | 122 to 122                            |
| Section 1:<br>Development Sites -<br>Bath | 60            | The Central Area and<br>River Corridor - Context  | Paragraph 1.035                           | 13                     | 123 to 123                            |
| Section 1:<br>Development Sites -<br>Bath | 61            | The Central Area and<br>River Corridor - Bath City<br>Riverside Enterprise Area<br>and Masterplan | Paragraph 1.036                           | 13                     | 124 to 124                            |
| Section 1:<br>Development Sites -<br>Bath | 79            | Emerging land use Options and Design Principles for Enterprise Area Development Sites             | Enterprise Area<br>Development Sites      | 17                     | 125 to 129                            |
| Section 1:<br>Development Sites -<br>Bath | 86            | Walcot Street / Cattle<br>Market Site (SB1) -<br>Emerging Development<br>and Design Principles    | SB1                                       | 21                     | 130 to 135                            |
| Section 1:<br>Development Sites -<br>Bath | 94            | Central Riverside & Recreation Ground (SB2) - Emerging Development and Design Principles          | SB2                                       | 24                     | 136 to 141                            |

| Chapter                                   | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|--|--|------------------------|---------------------------------------|
| Section 1:<br>Development Sites -<br>Bath | 100           | Manvers Street (SB3) -<br>Emerging Development<br>and Design Principles                            | SB3                                    | 26                     | 142 to 148                            |
| Section 1:<br>Development Sites -<br>Bath | 107           | North Quays (SB4) -<br>Emerging Development<br>and Design Principles                               | SB4                                    | 30                     | 149 to 152                            |
| Section 1:<br>Development Sites -<br>Bath | 118           | South Quays & Riverside<br>Court (SB5a) - Emerging<br>Development and Design<br>Principles         | SB5a                                   | 32                     | 153 to 157                            |
| Section 1:<br>Development Sites -<br>Bath | 124           | South Bank (SB5b) -<br>Emerging Development<br>and Design Principles                               | SB5b                                   | 34                     | 157 to 159                            |
| Section 1:<br>Development Sites -<br>Bath | 135           | Green Park Station West<br>& Sydenham Park (SB6) -<br>Generic Development<br>and Design Principles | SB6                                    | 38                     | 160 to 173                            |
| Section 1:<br>Development Sites -<br>Bath | 142           | Bath Riverside: Core Area<br>(SB19) - Land Use Options   | SB19                                   | 40                     | 174 to 175                            |
| Section 1:<br>Development Sites -<br>Bath | 147           | Bath Riverside: North Bank (SB13) - Emerging Development and Design Principles                     | SB13                                   | 41                     | 176 to 178                            |
| Section 1:<br>Development Sites -<br>Bath | 152           | The Bath Press (SB7) -<br>Emerging Development<br>and Design Principles                            | SB7                                    | 43                     | 179 to 180                            |
| Section 1:<br>Development Sites -<br>Bath | 160           | Roseberry Place (SB8) -<br>Emerging Development<br>and Design Principles                           | SB8                                    | 45                     | 181 to 183                            |
| Section 1:<br>Development Sites -<br>Bath | 175           | Locksbrook Road and<br>Brassmill Lane (SB11) -<br>Emerging Development<br>and Design Principles    | SB11                                   | 48                     | 184 to 187                            |
| Section 1:<br>Development Sites -<br>Bath | 179           | Twerton Park (SB15) -<br>Emerging Development<br>and Design Principles                             | SB15                                   | 49                     | 188 to 188                            |
| Section 1:<br>Development Sites -<br>Bath | 182           | Former Transport Depot,<br>Brougham Hayes (SB14) -<br>Design Principles                            | SB14                                   | 50                     | 189 to 189                            |
| Section 1:<br>Development Sites -<br>Bath | 186           | Hartwells Garage,<br>Newbridge (SB18b) -<br>Design Principles                                      | SB18b                                  | 51                     | 190 to 191                            |
| Section 1:<br>Development Sites -<br>Bath | 188           | Former Ministry of<br>Defence Sites: Foxhill<br>(SB27) and Warminster<br>Road (SB25)               | Paragraph 1.132                        | 52                     | 192 to 194                            |

| Chapter                                       | Plan<br>Order | Sub-Chapter   | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|---|--|------------------------|---------------------------------------|
| Section 1:<br>Development Sites -<br>Bath     | 197           | The University of Bath at<br>Claverton Down (SB26) -<br>Emerging Policy Approach<br>and Options       | Paragraph 1.14                         | 54                     | 195 to 195                            |
| Section 1:<br>Development Sites -<br>Bath     | 200           | The University of Bath at<br>Claverton Down (SB26) -<br>Emerging Policy Approach<br>and Options       | Paragraph 1.143                        | 55                     | 196 to 196                            |
| Section 1:<br>Development Sites -<br>Bath     | 201           | The University of Bath at<br>Claverton Down (SB26) -<br>Emerging Policy Approach<br>and Options       | Paragraph 1.144                        | 55                     | 197 to 197                            |
| Section 1:<br>Development Sites -<br>Bath     | 202           | The University of Bath at<br>Claverton Down (SB26) -<br>Emerging Policy Approach<br>and Options       | Paragraph 1.145                        | 55                     | 198 to 198                            |
| Section 1:<br>Development Sites -<br>Bath     | 205           | The University of Bath at<br>Claverton Down (SB26) -<br>Other Emerging Policy<br>Approach and Options | Paragraph 1.148                        | 55                     | 199 to 199                            |
| Section 1:<br>Development Sites -<br>Bath     | 206           | The University of Bath at<br>Claverton Down (SB26) -<br>Other Emerging Policy<br>Approach and Options | Paragraph 1.149                        | 55                     | 200 to 200                            |
| Section 1:<br>Development Sites -<br>Bath     | 209           | The University of Bath at<br>Claverton Down (SB26) -<br>Emerging Policy Approach                      | SB26                                   | 56                     | 201 to 215                            |
| Section 1:<br>Development Sites -<br>Bath     | 219           | Bath Spa University at<br>Newton Park (SB31) -<br>Emerging Policy Approach                            | SB31                                   | 58                     | 216 to 219                            |
| Section 1:<br>Development Sites -<br>Bath     | 225           | Royal United Hospital<br>(SB28) - Emerging Policy<br>Approach   | SB28                                   | 59                     | 220 to 223                            |
| Section 1:<br>Development Sites -<br>Bath     | 226           | Local Green Space in Bath   | Paragraph 1.160                        | 60                     | 224 to 224                            |
| Section 1:<br>Development Sites -<br>Bath     | 227           | Local Green Space in Bath   | Paragraph 1.161                        | 60                     | 225 to 225                            |
| Section 1:<br>Development Sites -<br>Keynsham | 236           | Comment on sites in<br>Keynsham   | Keynsham General Sites<br>Comment      | 63                     | 226 to 227                            |
| Section 1:<br>Development Sites -<br>Keynsham | 246           | Somerdale (SK2) -<br>Emerging Development<br>and Design Principles                                    | SK2                                    | 66                     | 228 to 231                            |

| Chapter   | Plan<br>Order | Sub-Chapter   | Paragraph / Policy / Site<br>Reference  | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|---|---|------------------------|---------------------------------------|
| Section 1:<br>Development Sites -<br>Keynsham     | 253           | Ashton Way Car Park<br>(SK3) - Emerging Policy<br>Approach                                | SK3                                     | 68                     | 232 to 239                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 264           | Riverside Offices and Fire<br>Station (SK4) - Context                                     | Paragraph 1.190                         | 70                     | 240 to 240                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 267           | Riverside Offices and Fire<br>Station (SK4) - Emerging<br>Policy Approach                 | SK4                                     | 71                     | 241 to 242                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 271           | Pixash Lane Waste Site<br>(SK8) - Context   | Paragraph 1.194                         | 72                     | 243 to 243                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 275           | Pixash Lane Waste Site<br>(SK8) - Emerging Policy<br>Approach                             | SK8                                     | 73                     | 244 to 252                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 278           | Keynsham - Proposed<br>Green Space (GR5)<br>Boundary Map                                  | GR5                                     | 73                     | 253 to 253                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 282           | Keynsham - Proposed<br>Green Space (GR18)<br>Boundary Map                                 | GR18                                    | 75                     | 254 to 255                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 299           | Policy HG4: Local Plan<br>Policy HG.4 - Emerging<br>Policy Approach                       | HG4                                     | 78                     | 256 to 263                            |
| Section 1:<br>Development Sites -<br>Keynsham     | 300           | Comment on sites in the Somer Valley  | Somer Valley - General<br>Sites Comment | 79                     | 264 to 275                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 314           | South Road Car Park<br>(SSV2) - Boundary Map  | SSV2                                    | 81                     | 276 to 276                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 320           | Central High Street Core, including the Palladium and Brewery Sites (SSV1) - Boundary Map | SSV1                                    | 82                     | 277 to 277                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 327           | Welton Bag Factory<br>(SSV4) - Site Boundary  | SSV4                                    | 84                     | 278 to 282                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 328           | Welton Bag Factory<br>(SSV4) - Context  | Paragraph 1.241                         | 84                     | 283 to 283                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 329           | Welton Bag Factory<br>(SSV4) - Context  | Paragraph 1.242                         | 84                     | 284 to 284                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 330           | Welton Bag Factory<br>(SSV4) - Context  | Paragraph 1.243                         | 85                     | 285 to 285                            |

| Chapter   | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|--|--|------------------------|---------------------------------------|
| Section 1:<br>Development Sites -<br>Somer Valley | 331           | Welton Bag Factory<br>(SSV4) - Context                                     | Paragraph 1.244                        | 85                     | 286 to 286                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 332           | Welton Bag Factory<br>(SSV4) - Context                                     | Paragraph 1.245                        | 85                     | 287 to 287                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 335           | Midsomer Norton Town<br>Park (SSV3) - Boundary<br>Map                      | SSV3                                   | 86                     | 288 to 288                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 348           | Former Sewage Works,<br>Welton Hollow (SSV10) -<br>Boundary Map            | SSV10                                  | 88                     | 289 to 289                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 384           | Charlton Timber Yard<br>(SSV14) - Emerging Policy<br>Approach              | SSV14                                  | 95                     | 290 to 291                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 395           | Ryman Engineering<br>Services (SSV16) -<br>Emerging Policy Approach        | SSV16                                  | 98                     | 292 to 292                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 402           | Radstock County Infants<br>(SSV17) - Emerging Policy<br>Approach           | SSV17                                  | 100                    | 293 to 293                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 404           | Coomb End (SSV6) -<br>Context  | SSV6                                   | 101                    | 294 to 296                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 422           | Former St Nicholas Infant<br>School (SSV20) - Emerging<br>Policy Approach  | SSV20                                  | 104                    | 297 to 299                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 434           | Radstock College (SSV18) - Emerging Policy Approach                        | SSV18                                  | 108                    | 300 to 301                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 442           | St Peter's Factory /<br>Cobblers Way (SSV11) -<br>Emerging Policy Approach | SSV11                                  | 111                    | 302 to 303                            |
| Section 1:<br>Development Sites -<br>Somer Valley | 452           | Old Mills Industrial Estate<br>(SSV9) - Emerging Policy<br>Approach        | SSV9                                   | 114                    | 304 to 307                            |
| Section 1:<br>Development Sites -<br>Rural Areas  | 456           | Rural Areas - Context  | Paragraph 1.343                        | 117                    | 308 to 308                            |
| Section 1:<br>Development Sites -<br>Rural Areas  | 469           | Comment on sites in rural areas  | Rural - General Sites<br>Comment       | 119                    | 309 to 316                            |
| Section 1:<br>Development Sites -<br>Rural Areas  | 476           | Batheaston (SR16) -<br>Emerging Policy Approach                            | SR16                                   | 120                    | 317 to 321                            |
| Section 1:<br>Development Sites -                 | 482           | Bathampton - Proposed<br>Local Green Space (GR17)                          | GR17                                   | 124                    | 322 to 323                            |

| Chapter  | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Rural Areas                                      |               |  |  |                        |                                       |
| Section 1:<br>Development Sites -<br>Rural Areas | 485           | Bathampton - Proposed<br>Local Green Space (GR16)                              | GR16 / Paragraph 1.364                 | 122                    | 324 to 324                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 500           | Compton Martin (SR17) -<br>Emerging Policy Approach                            | SR17                                   | 127                    | 325 to 325                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 509           | East Harptree (SR6) -<br>Emerging Policy Approach                              | SR6                                    | 130                    | 326 to 345                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 513           | East Harptree (SR5) -<br>Emerging Policy Approach                              | SR5                                    | 131                    | 346 to 349                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 517           | East Harptree (SR7) -<br>Emerging Policy Approach                              | SR7                                    | 132                    | 350 to 352                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 519           | East Harptree - Proposed<br>Local Green Space (GR1)                            | GR1 / Paragraph 1.385                  | 133                    | 353 to 356                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 522           | High Littleton - Context   | Paragraph 1.388                        | 134                    | 357 to 257                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 531           | Hallatrow (SR22) -<br>Emerging Policy Approach                                 | SR22                                   | 138                    | 358 to 360                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 535           | Hallatrow (SR21):<br>Alternative Option Site -<br>Suggested Policy<br>Approach | SR21                                   | 138                    | 361 to 362                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 540           | Hinton Blewett (SR8) -<br>Context  | SR8                                    | 139                    | 363 to 366                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 544           | Hinton Blewett (SR9) -<br>Vision   | SR9                                    | 141                    | 367 to 369                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 547           | Hinton Blewett -<br>Proposed Local Green<br>Space (GR2)                        | GR2                                    | 142                    | 370 to 371                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 549           | Hinton Blewett -<br>Proposed Local Green<br>Space (GR3)                        | GR3                                    | 142                    | 372 to 373                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 551           | Hinton Blewett -<br>Proposed Local Green<br>Space (GR4)                        | GR4                                    | 142                    | 374 to 379                            |

| Chapter  | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Section 1:<br>Development Sites -<br>Rural Areas | 564           | Temple Cloud (SR23) -<br>Emerging Policy Approach                | SR23                                   | 146                    | 380 to 384                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 567           | Temple Cloud (SR24) -<br>Emerging Policy Approach                | SR24                                   | 147                    | 385 to 389                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 575           | Timsbury (SR14) -<br>Emerging Policy Approach                    | SR14                                   | 151                    | 390 to 403                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 581           | Timsbury (SR15) -<br>Emerging Policy Approach                    | SR15                                   | 152                    | 404 to 428                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 585           | Timsbury (SR13) - Vision   | Paragraph 1.417                        | 153                    | 429 to 429                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 586           | Timsbury (SR13) -<br>Emerging Policy Approach                    | SR13                                   | 153                    | 430 to 465                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 588           | Timsbury - Proposed<br>Local Green Space<br>(GR15): Option 1 Map | GR15                                   | 154                    | 466 to 478                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 592           | Timsbury - Proposed<br>Local Green Space (GR14)                  | GR14 / Paragraph 1.421                 | 155                    | 479 to 480                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 595           | Timsbury - Proposed<br>Local Green Space (GR13)                  | GR13 / Paragraph 1.424                 | 155                    | 481 to 482                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 597           | Timsbury - Proposed<br>Local Green Space (GR12)                  | GR12 / Paragraph 1.426                 | 155                    | 483 to 483                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 599           | Timsbury - Proposed<br>Local Green Space (GR11)                  | GR11 / Paragraph 1.428                 | 155                    | 484 to 485                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 601           | Timsbury - Proposed<br>Local Green Space (GR10)                  | GR10 / Paragraph 1.43                  | 156                    | 486 to 487                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 603           | Timsbury - Proposed<br>Local Green Space (GR9)                   | GR9 / Paragraph 1.432                  | 156                    | 488 to 488                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 605           | Timsbury - Proposed<br>Local Green Space (GR8)                   | GR8 / Paragraph 1.434                  | 156                    | 489 to 489                            |
| Section 1:<br>Development Sites -<br>Rural Areas | 608           | Timsbury - Proposed<br>Local Green Space (GR7)                   | GR7 / Paragraph 1.437                  | 156                    | 490 to 490                            |
| Section 1:<br>Development Sites -                | 613           | West Harptree - Site<br>Allocation Options                       | Paragraph 1.442                        | 158                    | 491 to 493                            |

| Chapter  | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference        | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|---|------------------------|---------------------------------------|
| Rural Areas  |               |  |   |                        |                                       |
| Section 1:<br>Development Sites -<br>Rural Areas                     | 619           | West Harptree (SR1) -<br>Emerging Policy Approach  | SR1   | 160                    | 494 to 499                            |
| Section 1:<br>Development Sites -<br>Rural Areas                     | 623           | West Harptree (SR2) -<br>Emerging Policy Approach  | SR2   | 161                    | 500 to 506                            |
| Section 1:<br>Development Sites -<br>Rural Areas                     | 627           | West Harptree (SR3) -<br>Emerging Policy Approach  | SR3   | 162                    | 507 to 508                            |
| Section 1:<br>Development Sites -<br>Rural Areas                     | 631           | West Harptree (SR4) -<br>Emerging Policy Approach  | SR4   | 163                    | 509 to 511                            |
| Section 1:<br>Development Sites -<br>Rural Areas                     | 632           | Housing Development<br>Boundaries  | Paragraph 1.448                               | 164                    | 512 to 520                            |
| Section 2: Development Management Policies                           | 643           | General Policies<br>Comment  | General Policies<br>Comment                   | N/A                    | 521 to 530                            |
| Section 2: Development Management Policies                           | 645           | Additional Development<br>Management Policies  | Additional Development<br>Management Policies | N/A                    | 531 to 531                            |
| Section 2: Development Management Policies - Residential Development | 648           | Residential Development - Aims   | Paragraph 2.006                               | 173                    | 532 to 532                            |
| Section 2: Development Management Policies - Residential Development | 658           | Policy H1: Housing and Facilities for the Elderly, housing for people with other Supported Housing or Care Needs | 2.016   | 175                    | 533 to 533                            |
| Section 2: Development Management Policies - Residential Development | 659           | Policy H1: Emerging<br>Policy Approach   | H1  | 176                    | 534 to 538                            |
| Section 2: Development Management Policies - Residential Development | 664           | Policy H2: Emerging<br>Policy Approach   | H2  | 177                    | 539 to 544                            |
| Section 2: Development Management Policies - Residential             | 671           | Policy H3: Emerging<br>Policy Approach   | Н3  | 178                    | 545 to 548                            |

| Chapter  | Plan<br>Order | Sub-Chapter                            | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Development  |               |  |  |                        |                                       |
| Section 2: Development Management Policies - Residential Development | 673           | Policy H4: Student<br>Accommodation    | Paragraph 2.025                        | 179                    | 549 to 550                            |
| Section 2: Development Management Policies - Residential Development | 678           | Policy H4: Emerging<br>Policy Approach | H4                                     | 179                    | 551 to 562                            |
| Section 2: Development Management Policies - Residential Development | 683           | Policy H5: Emerging<br>Policy Approach | H5                                     | 180                    | 563 to 565                            |
| Section 2: Development Management Policies - Residential Development | 687           | Policy H6: Emerging<br>Policy Approach | H6                                     | 181                    | 566 to 567                            |
| Section 2: Development Management Policies - Residential Development | 689           | Space and Access<br>Standards          | Paragraph 2.035                        | 181                    | 568 to 568                            |
| Section 2: Development Management Policies - Residential Development | 690           | Space and Access<br>Standards          | Paragraph 2.036                        | 181                    | 569 to 569                            |
| Section 2: Development Management Policies - Residential Development | 691           | Space and Access<br>Standards          | Paragraph 2.038                        | 181                    | 570 to 570                            |
| Section 2: Development Management Policies - Residential Development | 692           | Space and Access<br>Standards          | Paragraph 2.038                        | 181                    | 571 to 571                            |
| Section 2: Development Management Policies - Residential             | 693           | Space and Access<br>Standards          | Paragraph 2.039                        | 181                    | 572 to 572                            |

| Chapter   | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|--|--|------------------------|---------------------------------------|
| Development   |               |  |  |                        |                                       |
| Section 2: Development Management Policy - Economic Development | 705           | Policy H7: Boat Dwellers -<br>Emerging Policy Approach   | H7                                     | 183                    | 573 to 575                            |
| Section 2: Development Management Policy - Economic Development | 714           | Office Development (B1a and B1b uses classes) - Bath Core Office Employment Area (Policy ET.2 of the B&NES Local Plan) | Paragraph 2.056                        | 186                    | 576 to 576                            |
| Section 2: Development Management Policy - Economic Development | 716           | Policy ED1A: Emerging<br>Policy Approach   | ED1A                                   | 186                    | 577 to 577                            |
| Section 2: Development Management Policy - Economic Development | 728           | Policy ED1B: Emerging<br>Policy Approach   | ED1B                                   | 188                    | 578 to 578                            |
| Section 2: Development Management Policy - Economic Development | 733           | Policy ED1C: Emerging<br>Policy Approach   | ED1C                                   | 190                    | 579 to 579                            |
| Section 2: Development Management Policy - Economic Development | 745           | Policy ED2A: Emerging<br>Policy Approach   | ED2A                                   | 191                    | 580 to 581                            |
| Section 2: Development Management Policy - Economic Development | 746           | Policy ED2B: Emerging<br>Policy Approach   | ED2B                                   | 192                    | 582 to 583                            |
| Section 2: Development Management Policy - Economic Development | 752           | Policy RE1: Emerging<br>Policy Approach  | RE1                                    | 193                    | 584 to 585                            |
| Section 2:<br>Development<br>Management Policy -                | 760           | Policy RE2: Emerging<br>Policy Approach  | RE2                                    | 194                    | 586 to 587                            |

| Chapter  | Plan<br>Order | Sub-Chapter                             | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|---|--|------------------------|---------------------------------------|
| Economic<br>Development  |               |   |  |                        |                                       |
| Section 2: Development Management Policy - Economic Development  | 766           | Policy RE3: Emerging<br>Policy Approach | RE3                                    | 195                    | 588 to 589                            |
| Section 2: Development Management Policy - Economic Development  | 770           | Policy RE4: Emerging<br>Policy Approach | RE4                                    | 196                    | 590 to 591                            |
| Section 2: Development Management Policy - Economic Development  | 777           | Policy RE5: Emerging<br>Policy Approach | RE5                                    | 197                    | 592 to 595                            |
| Section 2: Development Management Policy - Economic Development  | 782           | Policy RE6: Emerging<br>Policy Approach | RE6                                    | 198                    | 596 to 597                            |
| Section 2: Development Management Policy - Economic Development  | 789           | Visitor Accommodation -<br>Options      | Visitor accommodation                  | 199                    | 598 to 598                            |
| Section 2: Development Management Policy - Centres and Retailing | 800           | Policy CR1: Emerging<br>Policy Approach | CR1                                    | 203                    | 599 to 602                            |
| Section 2: Development Management Policy - Centres and Retailing | 805           | Policy CR2: Emerging<br>Policy Approach | CR2                                    | 204                    | 603 to 604                            |
| Section 2: Development Management Policy - Centres and Retailing | 813           | Policy CR3: Emerging<br>Policy Approach | CR3                                    | 206                    | 605 to 606                            |
| Section 2: Development Management Policy - Centres and Retailing | 817           | Policy CR4: Emerging<br>Policy Approach | CR4                                    | 207                    | 607 to 608                            |
| Section 2:<br>Development<br>Management Policy -                 | 820           | Policy CR5: Emerging<br>Policy Approach | CR5                                    | 208                    | 609 to 611                            |

| Chapter  | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference       | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Centres and Retailing  |               |  |  |                        |                                       |
| Section 2: Development Management Policy - Centres and Retailing | 823           | Fast Food Outlets  | Paragraph 2.139                              | 210                    | 612 to 612                            |
| Section 2: Development Management Policy - Centres and Retailing | 827           | Markets  | Paragraph 2.142                              | 210                    | 613 to 613                            |
| Section 2: Development Management Policy - Centres and Retailing | 827           | Markets  | Paragraph 2.142                              | 210                    | 614 to 614                            |
| Section 2:<br>Development<br>Management Policy -<br>Green Belt   | 841           | Detailed Green Belt<br>Boundary                              | Paragraph 2.153                              | 213                    | 615 to 624                            |
| Section 2: Development Management Policy - Green Belt            | 843           | Detailed Green Belt<br>Boundary                              | Paragraph 2.155                              | 213                    | 625 to 625                            |
| Section 2: Development Management Policy - Green Belt            | 852           | Previously developed sites in the Green Belt                 | Paragraph 2.164                              | 215                    | 626 to 626                            |
| Section 2:<br>Development<br>Management Policy -<br>Green Belt   | 853           | Previously developed<br>sites in the Green Belt -<br>Options | Previously developed sites in the Green Belt | 215                    | 627 to 631                            |
| Section 2:<br>Development<br>Management Policy -<br>Green Belt   | 856           | Visual amenities of the<br>Green Belt                        | Paragraph 2.167                              | 215                    | 632 to 632                            |
| Section 2:<br>Development<br>Management Policy -<br>Green Belt   | 857           | Policy GB1: Emerging<br>Policy Approach                      | GB1  | 215                    | 633 to 636                            |
| Section 2:<br>Development<br>Management Policy -<br>Green Belt   | 864           | Policy GB2: Emerging<br>Policy Approach                      | GB2  | 216                    | 637 to 640                            |
| Section 2:<br>Development<br>Management Policy -<br>Green Belt   | 870           | Extensions to buildings in the Green Belt - Options          | Extensions to buildings in the Green Belt    | 217                    | 640 to 642                            |

| Chapter  | Plan<br>Order | Sub-Chapter                                       | Paragraph / Policy / Site<br>Reference    | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|---|---|------------------------|---------------------------------------|
| Section 2: Development Management Policy - Green Belt            | 873           | Replacement buildings in the Green Belt - Options | Replacement buildings in the Green Belt   | 212                    | 643 to 643                            |
| Section 2: Development Management Policy - Urban Design          | 877           | Urban Design - Context                            | Paragraph 2.182                           | 219                    | 644 to 644                            |
| Section 2: Development Management Policy - Urban Design          | 882           | Urban Design - Local<br>Evidence                  | Paragraph 2.187                           | 220                    | 645 to 645                            |
| Section 2: Development Management Policy - Urban Design          | 889           | Policy UD1: Emerging<br>Policy Approach           | UD1                                       | 221                    | 646 to 653                            |
| Section 2: Development Management Policy - Urban Design          | 892           | Policy UD2: Emerging<br>Policy Approach           | UD2                                       | 222                    | 654 to 658                            |
| Section 2: Development Management Policy - Urban Design          | 894           | Policy UD3: 5merging<br>Policy Approach           | UD3                                       | 223                    | 659 to 663                            |
| Section 2: Development Management Policy - Urban Design          | 896           | Policy UD4: Emerging<br>Policy Approach           | UD4                                       | 224                    | 664 to 670                            |
| Section 2: Development Management Policy - Urban Design          | 898           | Policy UD5: Emerging<br>Policy Approach           | UD5                                       | 225                    | 671 to 674                            |
| Section 2: Development Management Policy - Urban Design          | 900           | Policy UD6: Emerging<br>Policy Approach           | UD6                                       | 225                    | 675 to 678                            |
| Section 2:<br>Development<br>Management Policy -<br>Urban Design | 904           | Policy UD7: Emerging<br>Policy Approach           | UD7                                       | 226                    | 679 to 680                            |
| Section 2:<br>Development<br>Management Policy -<br>Urban Design | 910           | Policy UD8: Emerging<br>Policy Approach           | UD8                                       | 228                    | 681 to 683                            |
| Section 2:<br>Development<br>Management Policy -                 | 925           | Green Infrastructure -<br>Options                 | Green Infrastructure<br>Checklist options | 231                    | 684 to 684                            |

| Chapter   | Plan<br>Order | Sub-Chapter   | Paragraph / Policy / Site<br>Reference    | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|---|---|------------------------|---------------------------------------|
| Natural Environment   |               |   |   |                        |                                       |
| Section 2: Development Management Policy - Natural Environment                          | 926           | Policy NE1: Emerging<br>Policy Approach                   | NE1                                       | 231                    | 685 to 690                            |
| Section 2: Development Management Policy - Natural Environment                          | 938           | Policy NE2: Emerging<br>Policy Approach                   | NE2                                       | 234                    | 691 to 694                            |
| Section 2: Development Management Policy - Natural Environment                          | 946           | Policy NE3: Emerging<br>Policy Approach                   | NE3                                       | 237                    | 695 to 697                            |
| Section 2: Development Management Policy - Natural Environment                          | 951           | Policy NE4: Emerging<br>Policy Approach                   | NE4                                       | 238                    | 698 to 700                            |
| Section 2: Development Management Policy - Natural Environment                          | 956           | Policy NE5: Emerging<br>Policy Approach                   | NE5                                       | 239                    | 701 to 704                            |
| Section 2: Development Management Policy - Natural Environment                          | 964           | Policy NE6: Emerging<br>Policy Approach                   | NE6                                       | 241                    | 705 to 709                            |
| Section 2: Development Management Policy - Historic Environment                         | 980           | Policy HE1: Emerging<br>Policy Approach                   | HE1                                       | 244                    | 710 to 714                            |
| Section 2: Development Management Policy - Historic Environment                         | 982           | Somersetshire Coal Canal and the Wansdyke                 | Paragraph 2.259                           | 246                    | 715 to 715                            |
| Section 2: Development Management Policy - Historic Environment                         | 986           | Somersetshire Coal Canal<br>and the Wansdyke -<br>Options | Somersetshire Coal Canal and the Wansdyke | 246                    | 716 to 716                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 994           | Policy LCR1: Emerging<br>Policy Approach                  | LCR1                                      | 249                    | 717 to 720                            |

| Chapter   | Plan<br>Order | Sub-Chapter                              | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|--|--|------------------------|---------------------------------------|
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 998           | Public Houses - Options                  | Public houses                          | 250                    | 721 to 721                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1003          | Policy LCR2: Emerging<br>Policy Approach | LCR2                                   | 251                    | 722 to 725                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1009          | Policy LCR3: Emerging<br>Policy Approach | LCR3                                   | 253                    | 726 to 728                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1018          | Policy LCR5: Emerging<br>Policy Approach | LCR5                                   | 255                    | 729 to 731                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1023          | Policy LCR6: Emerging<br>Policy Approach | LCR6                                   | 256                    | 732 to 733                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1032          | Policy LCR7: Emerging<br>Policy Approach | LCR7                                   | 257                    | 734 to 735                            |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1036          | Telecommunications Development - Options | Telecommunications<br>Development      | 258                    | 736 to 737                            |
| Section 2: Development Management Policy - Meeting Local Community &                    | 1050          | Policy LCR8: Emerging<br>Policy Approach | LCR8                                   | 261                    | 738 to 744                            |

| Chapter   | Plan<br>Order | Sub-Chapter  | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|---|---------------|--|--|------------------------|---------------------------------------|
| Recreational Needs  |               |  |  |                        |                                       |
| Section 2: Development Management Policy - Meeting Local Community & Recreational Needs | 1051          | Policy LCR9: Emerging Policy Approach - Provision of New Allotments and Community Food Growing Space | LCR9                                   | 262                    | 745 to 749                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1053          | Sustainable Transport -<br>Context   | Paragraph 2.306                        | 263                    | 750 to 750                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1054          | Sustainable Transport -<br>Context   | Paragraph 2.307                        | 263                    | 751 to 751                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1057          | Promoting Sustainable<br>Travel  | Paragraph 2.309                        | 264                    | 752 to 752                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1058          | Promoting Sustainable<br>Travel  | Paragraph 2.310                        | 264                    | 753 to 735                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1059          | Policy ST1: Emerging<br>Policy Approach  | ST1                                    | 264                    | 754 to 758                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1063          | Policy ST2: Emerging<br>Policy Approach  | ST2                                    | 265                    | 759 to 759                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1066          | Public Rights of Way -<br>Options  | Public Rights of Way                   | 265                    | 760 to 760                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1067          | Transport Infrastructure   | Paragraph 2.316                        | 266                    | 761 to 761                            |
| Section 2: Development Management Policy - Sustainable Transport                        | 1071          | A37 Bypass at<br>Whitchurch and<br>Clutton/Temple Cloud  | Paragraph 2.320                        | 267                    | 762 to 762                            |

| Chapter  | Plan<br>Order | Sub-Chapter   | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|---|--|------------------------|---------------------------------------|
| Section 2: Development Management Policy - Sustainable Transport | 1076          | A37 Bypass at<br>Whitchurch and<br>Clutton/Temple Cloud | Paragraph 2.325                        | 267                    | 763 to 763                            |
| Section 2: Development Management Policy - Sustainable Transport | 1081          | Policy ST3: Emerging<br>Policy Approach                 | ST3                                    | 268                    | 764 to 767                            |
| Section 2: Development Management Policy - Sustainable Transport | 1084          | Policy ST4: Emerging<br>Policy Approach                 | ST4                                    | 269                    | 768 to 768                            |
| Section 2: Development Management Policy - Sustainable Transport | 1086          | Rail Station at Saltford                                | Paragraph 2.330                        | 269                    | 769 to 769                            |
| Section 2: Development Management Policy - Sustainable Transport | 1090          | Managing Traffic  | Paragraph 2.333                        | 270                    | 770 to 770                            |
| Section 2: Development Management Policy - Sustainable Transport | 1091          | Managing Traffic  | Paragraph 2.334                        | 270                    | 771 to 771                            |
| Section 2: Development Management Policy - Sustainable Transport | 1092          | Policy ST5: Emerging<br>Policy Approach                 | ST5                                    | 270                    | 772 to 774                            |
| Section 2: Development Management Policy - Sustainable Transport | 1094          | Park & Ride   | Paragraph 2.335                        | 271                    | 775 to 775                            |
| Section 2: Development Management Policy - Sustainable Transport | 1097          | Policy ST6: Emerging<br>Policy Approach                 | ST6                                    | 271                    | 776 to 779                            |
| Section 2: Development Management Policy - Sustainable Transport | 1099          | Coach Parking   | Paragraph 2.338                        | 272                    | 780 to 780                            |
| Section 2: Development Management Policy - Sustainable Transport | 1105          | Policy ST7: Emerging<br>Policy Approach                 | ST7                                    | 273                    | 781 to 784                            |
| Section 2:<br>Development<br>Management Policy -                 | 1120          | Parking Standards:<br>Residential Parking -<br>Options  | Parking Standards                      | 276                    | 785 to 787                            |

| Chapter  | Plan<br>Order | Sub-Chapter                              | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Sustainable Transport  |               |  |  |                        |                                       |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1149          | Policy SCR1: Emerging<br>Policy Approach | SCR1                                   | 281                    | 788 to 790                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1154          | Policy SCR2: Emerging<br>Policy Approach | SCR2                                   | 282                    | 791 to 793                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1159          | Policy SCR3: Emerging<br>Policy Approach | SCR3                                   | 283                    | 794 to 794                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1163          | Policy SCR4: Emerging<br>Policy Approach | SCR4                                   | 284                    | 795 to 798                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1167          | Policy SCR5: Emerging<br>Policy Approach | SCR5                                   | 285                    | 799 to 800                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1174          | Ground Mounted Solar<br>Arrays           | Paragraph 2.399                        | 286                    | 801 to 801                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1175          | Policy SCR6: Emerging<br>Policy Approach | SCR6                                   | 287                    | 802 to 804                            |

| Chapter  | Plan<br>Order | Sub-Chapter                              | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1180          | Policy SCR7: Emerging<br>Policy Approach | SCR7                                   | 288                    | 805 to 806                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1185          | Policy SCR8: Emerging<br>Policy Approach | SCR8                                   | 289                    | 807 to 808                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1188          | Policy SCR9: Emerging<br>Policy Approach | SCR9                                   | 290                    | 809 to 811                            |
| Section 2: Development Management Policy - Sustainable Construction & Renewable Energy | 1195          | District Heating - Options               | District Heating                       | 291                    | 812 to 812                            |
| Section 2: Development Management Policy - Sustainable Drainage Systems (SuDS)         | 1210          | Policy SU1: Emerging<br>Policy Approach  | SU1                                    | 296                    | 813 to 817                            |
| Section 2: Development Management Policy - Pollution, Contamination & Safety           | 1216          | Policy PCS1: Emerging<br>Policy Approach | PCS1                                   | 298                    | 818 to 818                            |
| Section 2: Development Management Policy - Pollution, Contamination & Safety           | 1222          | Policy PCS2: Emerging<br>Policy Approach | PCS2                                   | 299                    | 819 to 819                            |
| Section 2: Development Management Policy - Pollution, Contamination & Safety           | 1230          | Policy PCS3: Emerging<br>Policy Approach | PCS3                                   | 300                    | 820 to 821                            |

| Chapter  | Plan<br>Order | Sub-Chapter                              | Paragraph / Policy / Site<br>Reference | PMP<br>Options<br>Page | Schedule of<br>Comments<br>Page Range |
|--|---------------|--|--|------------------------|---------------------------------------|
| Section 2: Development Management Policy - Pollution, Contamination & Safety | 1241          | Policy PCS5: Emerging<br>Policy Approach | PCS5                                   | 302                    | 822 to 822                            |
| Section 2: Development Management Policy - Pollution, Contamination & Safety | 1247          | Policy PCS6: Emerging<br>Policy Approach | PCS6                                   | 303                    | 823 to 823                            |
| Section 2: Development Management Policy - Pollution, Contamination & Safety | 1257          | Policy PCS7: Emerging<br>Policy Approach | PCS7                                   | 305                    | 824 to 824                            |
| Section 2: Development Management Policy - Pollution, Contamination & Safety | 1264          | Policy PCS8: Emerging<br>Policy Approach | PCS8                                   | 306                    | 825 to 825                            |
| Section 2:<br>Development<br>Management Policy -<br>Minerals                 | 1274          | Policy M1: Emerging<br>Policy Approach   | M1                                     | 308                    | 826 to 827                            |
| Section 2:<br>Development<br>Management Policy -<br>Minerals                 | 1303          | Policy M5: Emerging<br>Policy Approach   | M5                                     | 313                    | 828 to 829                            |
| Section 2: Development Management Policy - CIL / Planning Obligations        | 1310          | CIL / Planning Obligations<br>- Options  | CIL / S106                             | 315                    | 830 to 830                            |

## Placemaking Plan Options Document Schedule of Comments in Plan Order

Placemaking Ontions Plan Reference: Introduction - Paragraph 1

Bath & North East Somerset Council

Plan Order

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

| ridemaking options ridirectered. Introduction range   | Number: 1  |  |  |  |  |  |
|---|--|--|--|--|--|--|
| Respondent 1566 Comment 1 Respondent Number: Number: Name:  | Respondent Strategic Land Organisation: Partnerships |  |  |  |  |  |
| Agent ID: 128 Agent Name: Peter Brett Associates  Further Information available in the original comment?   Attachments sent with the comment? |  |  |  |  |  |  |
| Placemaking Options Plan Reference: Introduction - Paragraph 1  |  |  |  |  |  |  |

#### Comment on the Site:

General comments

Proceeding with the plan in the context of and by reference to the Core Strategy is highly misleading (as well as a great waste of resources) because the Core Strategy is out of date, as it is not based on a full assessment of the housing requirement for the Housing Market Area using up to date information and specifically it is not compliant with the National Planning Policy Framework or Planning practice Guidance. The Strategic Planning process for the whole of the West of England is progressing and is likely to provide the relevant and necessary information on which to plan for places within BANES before the Placemaking plan is formally put in place.

In addition it is recognised by the Core Strategy Inspector at paragraph 136 of his report that an early review of the strategy for B&NES would be triggered either by its inclusion in the outputs of the West of England SHMA or by any unmet housing needs of the sub-region. Indeed the Council acknowledge that that the first review will be timed to co-ordinate with the review of the West of England Core Strategies. The NPPF is very clear about the need to plan positively. Paragraph 14 states that Local Plans should positively seek opportunities to meet the development needs of their area and meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.

Relying on the housing number set out in the existing Core Strategy as a proper and robust figure up to 2029 is wrong, this level of provision will not meet the needs that exist and will certainly fail to deliver the essential affordable housing required. Reliance on previously developed land to deliver this housing puts further pressure on the numbers and means even less affordable units will be delivered. Consequently, the numbers should be acknowledged as only an interim figure, which are minimum and the plan should provide more flexibility to deal with this know update in evidence and imminent review. Consequently progressing this Placemaking plan on the basis of the out of date Core Strategy and evidence is ludicrous and exceptionally short sighted.

#### **Change requested:**

The plan should be more flexible to take account of the new information emerging from the West of England wide SHMA

Placemaking Options Plan Reference: Introduction - Paragraph 14

Plan Order Number: 14

| Respondent 102 Comment 4 Resp<br>Number: Number: Nan   |  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |  |
|--|--|---|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |  |   |  |  |  |
| Placemaking Options Plan Reference: Introduction - Paragraph 14  |  |   |  |  |  |

#### **Comment on the Site:**

Para 1 of the introduction states that Placemaking is concerned with..."the protection and enhancement of existing assets", as well as development sites. The most important existing asset in B&NES is the Bath World Heritage Site (WHS), particularly its historic core; but the draft Plan contains no policy for the central area of Bath considered as a whole, or for the wider urban landscape within the WHS. The centre of Bath is treated as no more than a series of new development sites. Keynsham, Midsomer Norton and Radstock town centres are treated as a whole (paras 1.169, para 1.225, 1.272, Strategic Policy Context), and so should Bath. The centre of Bath requires a holistic approach. Part 1 page 6 goes straight into development sites, with no mention of a policy for existing assets such as central Bath (para 1.13 onwards). In doing so, it fails to provide a context and vision for development within the centre, which is essentially not treated as a 'Place' at all. In fact, the treatment of Bath City Centre in this document lacks the visionary touch of an architect or an architectural committee, such as the Urban Regeneration Panel, now sadly disbanded. FoBRA recommends that it, or something like it, be reinstated, especially at such an important time for development in the centre of this WHS.

#### **Change requested:**

Insert after para 1.14–Strategic policy context

- 1. The City of Bath is a place of global importance, a fact recognised by its inscription as a UNESCO World Heritage Site (WHS) having attributes of Outstanding Universal Value. The City of Bath World Heritage Site Management Plan [link] explains the significance of the WHS and addresses the management, pressures and challenges facing the site. The WHS designation also stresses the fundamental interrelationship between the historic architecture throughout the city and the green spaces which interpenetrate it.
- 2. The central area of Bath (broadly the area between Julian Road to the north and the river on the south, the A36 Bathwick Street to the east and Charlotte Street on the west) contains the historic core of the Bath World Heritage Site as well as the commercial heart of the city and is the most significant cultural, historical and commercial asset within B&NES. No fewer than 9 of the 12 Key Elements of the Site identified in the WHS Management Plan lie within the central area of the city, and two of the others are close by. This section sets out to provide a context and vision for the protection of this vital asset and for development within the central area.
- 3. Under Policy B2 of the Core Strategy, the role of the central area 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.
- 4. The B&NES Public Service Board has the vision that "Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of wellbeing, where everyone is invited to think big a 'connected' area ready to create an extraordinary legacy for future generations."
- 5. In this spirit, and in order to achieve the aspirations set out in the Core Strategy, our policies for central Bath include the following:

- •The Public Realm and Movement Strategy (PRMS) [link], which is at the heart of the vision for central Bath. The PRMS is an incremental plan to transform streets and spaces across the centre and to create the canvas for a more animated and inclusive public life. The strategy aims to:
- o Rebalance the movement hierarchy giving priority to pedestrians, cyclists and public transport;
- o Refashion the public realm, creating a lattice of connected streets and spaces, utilising high quality materials, bespoke furniture and exceptional landscape and lighting design;
- o Reveal the city through the introduction of a new multi-channel information and wayfinding system for all modes of movement;
- o Reanimate the city centre through an imaginative and pioneering programme of public art, events and activities.
- Creation of a city centre that is free of all but essential traffic, and which provides an environment that is attractive for the visitors on which the city's economy relies, as well as for those who live and work in Bath. Currently, central Bath suffers from serious traffic congestion, which 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. Air pollution and vibration from traffic are damaging the very fabric of the historic city.
- Good air quality an essential element of this improved environment. Air pollution, which is due almost entirely to road traffic, is at levels well above safe health limits set out in EU and English law and must be brought down to safe and healthy levels (see Bath Air Quality Action Plan).
- Reduction of traffic and improvement of air quality. These will be achieved through the Bath Transport Strategy, which complements the Placemaking Plan, and contains the Vision that "Bath will enhance its unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core". The measures required to achieve this include:
- o A walking/cycling strategy to make Bath the UK's most walkable city;
- o Improved accessibility for people with mobility impairments;
- o A parking strategy to support the economic growth but at the same time reducing the amount of off-street spaces within the city centre;
- o A traffic management plan for the city;
- o Support for more use of public transport to reduce the number of cars entering the city;
- o A new Park-and-Ride to the east of Bath, and continuing expansion of the existing Park & Ride (P&R) sites, which can to help reduce the demand for parking spaces within the city;
- o Better management of Heavy Goods Vehicles within the city;
- o Finding a new location for coaches to park once they have dropped visitors off in the city centre.

The Placemaking Plan will need to ensure that the infrastructure necessary to implement the transport strategy is delivered in a timely manner. The transport strategy also includes work with the Highways Agency, Wiltshire and other authorities to develop proposals and strategies to remove through traffic and HGVs, in particular, from Bath which may generate a requirement for new infrastructure.

- The prosperity of Bath depends on maintaining the city as a place which draws visitors who are attracted by the mix of shops, restaurants, and cultural and heritage facilities. We aim to ensure that Bath promotes a distinctive shopping experience at the leading edge of retail development, and that Bath is seen as the place for high quality, locally produced goods and foods. (From The Future for Bath Vision)[Is ever-increasing retail the way forward or should we aim for a more varied economy in the city centre?][Role of non-retail businesses in the centre?]
- Promoting Bath as a 'Spa' City; providing a high quality tourist experience where visitor stay is extended; enhancing the cultural and visitor offering; and promoting the City as a world class venue for sport and recreation. (From The Future for Bath Vision)
- Central Bath is unusual in that it is home to a large number of residents as well as shops, businesses and heritage sites. Some ten thousand people, including many families, live in central Bath. This large number of residents contributes to the vitality and vibrancy of Bath, day and night; and to the special character of the city centre. Owner-occupiers care for the historic Georgian houses at their own expense. We will encourage and support residents in central Bath.
- 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. Hotel visitors should be encouraged to use the P&Rs, but this will require the P&Rs to be open later and to have secure overnight parking. Consideration should be given to a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses.

- 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. [We will...]
- Large numbers of city centre houses have been turned over to be Houses in Multiple Occupation (HMOs) or short-term rental properties (such as hen party venues). The former add to housing pressure in the already densely populated centre, and are often less well maintained. Change of use from residential to HMO now requires planning permission across Bath. The latter can often be noisy and increasing numbers of such establishments add to the pressures felt by city centre residents. [Our policy is...]
- 6. Within the city (which is coterminous with the WHS), but outside the central area, there are many important architectural features (including two of the Key Elements of the WHS (Lansdown Crescent and Prior Park)), together with parks and other open green spaces such as Sydney Gardens, another Key Element. These are also important to the character and feel of Bath and require protection.

#### Plan Order Placemaking Options Plan Reference: Sustainability Appraisal / Paragraph 18 Number: 18 Respondent 95 **Comment** 2 **Respondent** Chris MacArthur for and on **Respondent** The Coal Authority Number: Number: behalf of Miss Rachael A Bust Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Sustainability Appraisal / Paragraph 18 Comment on the Site: Object - The Coal Authority has no specific recommendations as to where the Plan ought to allocate land for whatever use, this is a matter for local determination. However, The Coal Authority would wish to make the following comments which should be borne in mind. As you will be aware, coal measures are present within Bath and North East Somerset, and the area has been subjected to coal mining which will have left a legacy. By way of illustration, within Bath and North East Somerset there are approximately 570 mine entries. The Coal Authority is therefore disappointed to note, that whilst Section 2 of the Plan (Development Management Policies) incorporates policies relevant to mineral safeguarding and unstable land, we remain unclear as to what site selection methodology is being used. In particular whether land instability and mineral sterilisation considerations have and/or will form part of the site selection process. The Sustainability Appraisal fails to identify, what The Coal Authority consider to be key issues that should form an integral part of the Sustainability Appraisal Process and Methodology. It is also noted that the SHLAA Methodology does not include reference to either ground conditions or mineral resources. The Coal Authority obviously supports in principle the desire to ensure that development is implemented safely and that surface coal resources are safeguarded. However, the methodology through which the Plan seeks to achieve this appears to be potentially unsound. The Coal Authority therefore suggests that it is necessary to include a criterion within the Sustainability Appraisal Process and Methodology which assesses all proposed site allocations against the Coal Authority defined Development High Risk Area and the Surface Coal Resource plans provided to the LPA. This would be a due diligence check to ensure that potential development sites do not contain mine entries or other coal related hazards which would require remediation or stabilisation prior to development.

The best method of achieving this could be an Allocations Methodology, which as part of the process for selecting sites, and as well as the key issues identified in Section 2.3.3 of the Sustainability Appraisal Amended Scoping Report, should consider coal mining legacy hazards. Former mining activities and related hazards are certainly a potential site constraint

Finally, and in terms of the GIS data which was provided to the LPA, which illustrates the spatial extent of coal mining legacy, it is important to use the latest data set to ensure that the allocations are informed by a robust evidence base in order that new development will be safe and stable in accordance with National Planning Policy Framework and National

and can affect factors such as layout, capacity assumptions and deliverability due to remediation costs.

**Change requested:** 

Planning Practice Guidance.

| Schedule of Comments on the Placemaking Plan Opt  | ions Document in Plan Order   |
|---|---|
| Respondent 245 Comment 2 Respondent Mr Andy Reading Number: Name:   | Respondent Environment Agency Organisation:   |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachmen   | nts sent with the comment? $\Box$   |
| Placemaking Ontions Plan Reference: Sustainability Appraisal / Paragra  | nh 10   |
| Placemaking Options Plan Reference: Sustainability Appraisal / Paragra  | pn 18   |
| Comment on the Site:  |   |
| We understand the Environment Agency site assessments have also been his options consultation. We have reviewed this and in general are happy hroughout the report and appraisal matrices (Annex A). Following review comments to make on the SA document:  | y with the scoring and commentary included  |
| and Use Options City Riverside Enterprise Area (EA), Page 2 of Annex A - he Placemaking Plan continues to apply a sequential approach to uses wi isk across the area. This requirement was discussed in detail at the Core shrough the evidence base for the Placemaking Plan.  | ithin the Enterprise Area, given the varying flood  |
| ocksbrook Road and Brassmill Lane SB11, page 32 of Annex A - The commother the modelling work that has been undertaken (B&V, Bath Quays Water an provide improved conveyance (channel reprofiling), to deliver offsite the addressed through the Placemaking Plan policy wording.   | rside Phase 2). This earmarked this as a site that  |
| Welton Bag Factory SSV4, page 85 of Annex A - In relation to objective 8 (learning of this site to be a significant benefit in relation to orward include deculverting of the Wellow Brook. This should be a key page happy with the commentary in relation to SA objective 10 and the need iver and includes appropriate on site mitigation. | to this SA objective if the proposals that come olicy requirement of the Placemaking Plan. We |
| Coomb End SSV6, page 109 of Annex A - The commentary for objective 10 inancial contributions from development towards ongoing maintenance of discussed in the EA site assessment table for SSV6. This would apply for opplan consultation.  | of the newly refurbished culvert. This was  |
| Change requested:   |   |
|   |   |

Placemaking Options Plan Reference: Unallocated Site - Bath Equestrian

Centre, Weston

Plan Order Number: 20

| Respondent 300 Comment 4 Re<br>Number: Number: Na  | spondent Mr James Read<br>ame:              | Respondent Curo Group Organisation: |  |
|--|---|-------------------------------------|--|
| Agent ID: 171 Agent Name: Stride Treglown  Further Information available in the original comment?   Attachments sent with the comment? |   |                                     |  |
| Placemaking Options Plan Reference:  | : Unallocated Site - Bath Equestrian Centre | e, Weston                           |  |

#### Comment on the Site:

Supporting/Further information: In addition to our specific comments on the Placemaking Plan, we would like to take this opportunity to provide an update on the status of land at the Bath Equestrian Centre, Weston.

Land at the Equestrian Centre was promoted through the Core Strategy examination as part of a wider strategic allocation in the Weston locality. In his Report in to the soundness of the Core Strategy, the Inspector determined that the release of land from the green belt in the form of this strategic allocation would be inappropriate, electing instead to release land in other locations within the authority area.

In reaching this conclusion the Inspector made a number of observations specifically relating to the Equestrian Centre. Firstly, in paragraph 177 he noted that development of the lower slope [of the Equestrian Centre] would be more inward facing that elsewhere and abut existing development on two sides. In relation to the general local designation of the Bath Conservation Area, he noted in paragraph 181 that the impact on this would affect only a very small part of the conservation area and therefore the harm would be less than substantial.

In concluding on the wider strategic allocation, the Inspector noted that there are not the exceptional circumstances to justify removing the land from the Green Belt (paragraph 184).

However, the report continues beyond this point to refer explicitly to the potential for development on land on the lower slopes of the Equestrian Centre; this is the land now identified on the accompanying site plan. In paragraph 186 of the report it is noted that development on this part of the site would have much less harm than I have identified [elsewhere]. Whilst this point was not discussed further, in light of the need to consider strategic sites, rather than smaller land parcels, it is clear that the Inspector was in large part convinced of the potential opportunities for development on the lower slopes of the Equestrian Centre and that the impacts of development in this location could be acceptable.

It is in this context that we propose that further consideration should be given to the potential for the lower slopes of the Equestrian Centre to be removed from the Green Belt through the correction of a minor anomaly in the boundary. This is proposed in the context of the Inspectors Report, as set out above, and the potential which this site has to deliver small, but significant numbers of housing (30 units plus) in a sustainable location on previously developed land. It is this final point, which should be noted within the context of the NPPF, that is considered most relevant. Specifically, paragraph 89 of the NPPF notes that the exception to development being considered to be inappropriate in the Green Belt, is where:

limited infilling or the partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

We would welcome the opportunity for continued engagement on this matter and to contribute to discussions on the potential for the amendment of the Green Belt boundary to remove the lower slopes of the Equestrian Centre site from the Green Belt.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |
|---|--|
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

Placemaking Options Plan Reference: Unallocated Site - Bath Racecourse,

Lansdown, Bath

Plan Order Number: 20

| Respondent 6447<br>Number:   | Comment 1 Res Number: Na | spondent<br>me: | Respondent<br>Organisation: | Arena Racing Company |
|--|--------------------------|-----------------|-----------------------------|----------------------|
| Agent ID: 234 Agent Name: V Signet Planning  Further Information available in the original comment?   Attachments sent with the comment? |                          |                 |                             |                      |
| Placemaking Options Plan Reference: Unallocated Site - Bath Racecourse, Lansdown, Bath   |                          |                 |                             |                      |

#### **Comment on the Site:**

We are instructed by Arena Racing Company (ARC) to make representations in relation to your draft Placemaking Plan. As you are aware ARC owns the Bath Racecourse at Lansdowne and wishes to have the opportunity during the Plan period to consider an overall masterplan for the racecourse that could result in additional development that is related to its continued role as a major sporting and tourism venue in the City of Bath. The potential development on the racecourse could involve new spectator accommodation, supporting facilities and a hotel. Having gone through the Placemaking Plan we would request that at appropriate points in the next draft of the Plan there is reference made to a mechanism for future development on the racecourse to be covered by more specific policies. Whilst it is agreed that NPPF paragraph 89 - in dealing with developed sites in the Green Belt - applies certain criteria it would be helpful, given the prominence of the racecourse and its status within the city, for there to be more of a Plan-led approach to setting a framework to look at future development notwithstanding the location of the racecourse in the Green Belt.

There appear to be several ways to do this in the context of the current framework proposed in the Placemaking Plan.

- 1.To regard the racecourse (or the main developed part of it) as being as a major developed site in the Green Belt so that it can be added to the list of sites contained in section 2.160 of the Plan. We would support option 3 that is proposed in the Plan which is to specify such sites and then to agree parts of the racecourse as being major developed for the purpose of future policy.
- 2. Given the potential for the racecourse to provide for visitor accommodation we would also suggest that the policy framework emerging in the Placemaking Plan document takes option 2 in its approach to visitor accommodation, ie allowing in certain circumstances for new visitor accommodation to be provided rather than examining the conversion of existing houses.
- 3.An alternative to the identification of the site as being major developed in Green Belt policy would be to specifically allocate a part of the racecourse for future development in the Development Sites Allocated in Rural Areas section of the Placemaking Plan. In that regard (as with the major developed sites option) it would not be proposed to remove any of the racecourse from the Green Belt, the Green Belt would remain as washing over the site but there will be a specific development allocation.

The reason for ARC making such representations is it wishes to discuss with the Council as part of the emerging Placemaking Plan potential redevelopment options for the racecourse that could form part of a masterplan that could then find itself referred to in the relevant policy designation in the Placemaking Plan. Further development of the racecourse (which ARC would clearly want to agree with the Council in its role in both planning and economic/tourism terms) would add to the local economy and provide a long term basis for the development of the racecourse. ARC'S ideas are being formulated and it may be helpful as part of the policy making process for a meeting to be held to talk about those matters.

In this regard perhaps when these representations have been registered a meeting can be arranged to discuss future action.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |
|---|--|
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

**Placemaking Options Plan Reference:** Unallocated Site - Bloomfield Nurseries, Timsbury

Plan Order Number: 20

| Respondent 6431 Commo<br>Number: Number   | ent 1 Respondent Mr & Mrs Roger Champion er: Name:     | Respondent Bloomfield Nursery Organisation: |  |  |
|---|--|---|--|--|
| Agent ID: 243 Agent Nan   | ne: Martin Parish Associates                           |   |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |  |   |  |  |
|   |  |   |  |  |
| Placemaking Options Plan  | <b>Reference:</b> Unallocated Site - Bloomfield Nurser | ries, Timsbury                              |  |  |
| Comment on the Site:  |  |   |  |  |
| We would like the site outlin commercial use.   | ned in red at Bloomfield Nurseries, Timsbury to b      | e considered for residential and/or         |  |  |
| Change requested:   |  |   |  |  |
| The inclusion of this site wit  | thin the site allocations options for Timsbury         |   |  |  |

#### Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Unallocated Site - Camelot, Camerton Number: 20 Respondent 6425 Comment 2 Respondent Mr P Jones Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Unallocated Site - Camelot, Camerton **Comment on the Site:** As discussed with yourself, and the basis for the whole placmaking process, I thought, there is no plots in the housing developement boundary suitable and so other sites were needed. Any limited plots adjacent to the HDB's were only going to be crowded, an eyesore, in the flood area or right next to or in conservation areas, etc. Hence the Parish of Camerton deemed the Camelot site to be the best. As discussed with yourself also, we stated that as the HDB's of Camerton are spaced apart due to the Cam Valley devide, the Camelot site was practically the same distance from one as the others are to each other and along the same road with hardly any breaks to the frontage. You asked us to respond and note our reasons why we believe there should be provision for extra properties in Camerton, if not now but in the future as well. But I am unsure where this response needs to go and to whom, please provide details as pointing to the Comments on placemaking just goes round in circles., as there is no provision to comment on Camerton.

**Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Unallocated Site - Compton Martin Number: 20 Respondent 6480 Comment 1 Respondent Mr Simon Chamberlain Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Unallocated Site - Compton Martin **Comment on the Site:** In spring of last year I submitted an application for a site in Compton Martin for consideration within the place making To date I have had no formal response to my submission. Therefore I object to the proposals for Compton Martin as I believe it does not consider all appropriate sites. **Change requested:**

Placemaking Options Plan Reference: Unallocated Site - Elm Farm, Stanton

Drew

Plan Order Number: 20

| · ·   | Respondent<br>Organisation:         |
|---|-------------------------------------|
| Agent ID: Agent Name:   |                                     |
| Further Information available in the original comment? $\Box$ Attachments sent v  | with the comment? 🗹                 |
| Placemaking Options Plan Reference: Unallocated Site - Elm Farm, Stanton Drew   |                                     |
| Comment on the Site:  |                                     |
| With reference to our telephone conversation earlier this afternoon we would like HDB in STANTON DREW (Elm Farm) extended to include the red highlighted small p                | • •                                 |
| We feel this plot of land would be an ideal site for small dwellings (bungalows).   |                                     |
| There is a need for this type of dwelling in our village as we are an ageing population down size but still live in the village. At present the HDB does not leave room for the |                                     |
| This proposed site, if inside the HDB, could easily be classified as infill and would no  | ot overwhelm the nearby neighbours. |
| We hope you will give this proposal due consideration and we look forward to hear   | ring from you in the near future.   |
| Change requested:   |                                     |

Placemaking Options Plan Reference: Unallocated Site - Former Garden

Nursery site, Cholwell, Temple Cloud

Plan Order Number: 20

Respondent 6411 Comment 2 Respondent Respondent Emergy Ltd
Number: Name: Organisation:

Agent ID: 32 Agent Name: Barton Willmore

Further Information available in the original comment? □ Attachments sent with the comment? ✓

Placemaking Options Plan Reference: Unallocated Site - Former Garden Nursery site, Cholwell, Temple Cloud

#### Comment on the Site:

This letter and enclosures make representations in response to the BANES Placemaking Plan (Part 2 of the Local plan) Consultation made on behalf of Emergy Ltd, in respect of a site at Temple Cloud.

We welcome the opportunity to comment on the potential site allocations in Temple Cloud and recognise that it is an RA1 village which is required to accommodate approximately 50 dwellings over the plan period.

We make the case in this letter for the inclusion of an allocation for development of land at the Former Garden Nursery Site, adjacent to the A37, in Cholwell, Temple Cloud and argue that this site is preferable to proposed allocations SR23 and SR24. The site location plan is enclosed. We also consider that the process of selecting sites for allocation has not been based on the consideration of reasonable alternatives in a fair and comparable manner and is not justified.

Officers will be familiar with the Former Garden Nursery Site. An application was submitted for outline planning permission 'for the erection of 10 affordable dwellings, with associated landscaping and infrastructure' (ref:14/00725/OUT). The application was refused 20th June 2014. The application was refused for two reasons for refusal: Failed to identify a demonstrable need for affordable housing; and the proposed development would harm the semi-rural character of the area.

Temple Cloud Proposed Site Allocations

We recognise that the Placemaking Plan should identify site allocations to deliver 50 dwellings in Temple Cloud.

Two allocations are proposed for Temple Cloud:

-SR23: 20-25 dwellings;

-SR24: 20-25 dwellings.

We understand that both sites have been resisted by the local community. Part of proposed allocation 'SR24' is currently subject to an appeal:

APP/F0114/A/14/228577. Outline planning permission was refused on 1st September 2014 for the development of 70 dwellings. The decision to refuse the application was made by Local Members. The Parish Council, neighbouring parish councils and the local residents group strongly objected to the development of that site.

Paragraph 1.8 of the consultation document states that the sites presented as potential allocations have come from a number of sources. These include the SHLAA and sites suggested by town and parish councils. We understand that sites SR23 and SR24 are from the SHLAA process. However, the process for identifying the proposed allocations SR23 and SR24 does not appear justified in that the evidence base does not identify and assess potential alternatives.

The importance of considering reasonable alternatives is illustrated, for example, by the Inspector's 10th procedural letter (dated 2nd December 2013) on the Wiltshire Core Strategy examination, where he stated (at pages 6-7): "it is important for reasons of robustness and legal compliance, that the SAprocess dealswithreasonablealternativesinafairand comparablema enclosed).

We consider these shortcomings should be addressed now by reviewing the selection of sites based on a call for sites and consideration of reasonable alternatives in a fair and comparable manner.

We set out the merits of our client's site at the former garden nursery, Cholwell below. We consider that our site is preferable to and has fewer negative impacts than sites SR23 and SR24 and should be identified as a proposed allocation.

Land at the Former Garden Nursery

The Placemaking Plan should identify land at the Former Garden Nursery site in Temple Cloud as an allocation for residential development. The site covers an area of approximately 0.49 ha and comprises of areas of hardstanding and shrubbery. The hardstanding is what remains of the former garden nursery. Because of this history, the site is perceived by local residents as being a brownfield site.

The site that is supported for development is a rectangular shaped flat area of 0.48 hectares adjacent to the A37 with areas of hard standing and some shrubbery. In the past it has been used as a garden nursery. It is heavily enclosed by vegetation resulting in restricted views in and out. A development of 10 dwellings on the former garden nursery site would give rise to 21 dwellings per hectare.

The western site boundary is adjacent to the A37 (connecting Wells and Bristol). Opposite the site (the other side of the A37) there are existing residential dwellings. To the north is an existing residential dwelling and to the east and south grassland. The site is enclosed and screened by the mature hedgerows and trees on the site boundaries.

The site is well served by frequent bus services (376 and 379) to Bristol and Wells. The north and south bound bus stops are within a 350 metre walk from the site.

The Environment Agency Flood Risk Map indicated the site is within flood zone 1.

Significant technical studies were undertaken in 2014 in respect of the former garden nursery. The following technical studies have been undertaken:

• Phase 1 Ecological Assessment by Ecology Solutions;

These studies demonstrated that:

- -The existing access is able to provide a safe access and egress to serve potential development;
- -There are no significant ecological constraints that are likely to affect the principle of development;
- -The area identified for development is within Flood Zone 1 (low risk of flooding).

Potential Capacity of the Site

The developable area has the capacity for 15 dwellings at an approximate density of 30 dph. However, given the location and context the sketch layout enclosed illustrates a layout for 10 dwellings. This layout was submitted in support of the application for outline planning permission ref: 14/00725/OUT.

The density of the proposed development is considered low and suitable for this location at 21 houses per hectare to respond to the density of surrounding development and village location. The proposed development would provide for a good mix of small to medium sized family dwellings, including up to 35% affordable housing, to meet the affordable housing need for the local community. We understand that there are currently 70 people registered for housing claiming a Parish link. Of the 70 people requiring a home, 49% are single people or those requiring a 1 bedroom property. The sites currently identified in the Placemaking Plan, will not fulfil this need alone.

As part of the application for outline planning permission, the proposal was well received by the Parish Council in respect of the architectural quality. However, they did not feel that they could support development of the site, as on the day Councillors discussed the application, the application for 70 dwellings was approved at Temple Inn Lane (part of Proposed Site Allocation SR24) and they did not want to support further housing.

The Former Garden Nursery site is separated from the Housing Development Boundary of Temple Cloud. However, it is located adjacent to the A37, opposite a cluster of existing buildings in the area known as Cholwell. The proposed development of 10 dwellings will add to this cluster of dwellings and the site is well related to Temple Cloud being less than a 350 metre walk to the centre of the village.

The indicative sketch enclosed demonstrates how the development would relate to the surrounding architecture in terms of materials and scale. Development of the site could provide much needed affordable housing for the village.

The land is available for development immediately and as such, should be considered as a site to be identified in the Placemaking Plan as an allocation.

Recommendations

The two proposed Temple Cloud allocations identified in the draft have not been based on consideration of reasonable alternatives in a fair and comparable manner and are opposed by the local community.

To address these shortcomings the selection of sites should be reviewed based on a call for sites and consideration of reasonable alternatives in a fair and comparable manner. The Former Garden Nursery site should be considered as part of that process. We have outlined the merits of that site above and consider that it compares favourably to the currently proposed allocations and should be allocated for residential development.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

# Placemaking Options Plan Reference: Unallocated Site - High Littleton

Plan Order Number: 20

| Respondent ( Number: | 6419 Comment<br>Number: | 1 Respondent Geraint Jones Name:           | Respondent Organisation:      |
|----------------------|-------------------------|--|-------------------------------|
| Agent ID:            | Agent Name:             |  |                               |
| Further Inforn       | nation available ii     | n the original comment? $\square$ Attachmo | ents sent with the comment? 🗹 |
|                      |                         |  |                               |
| Placemaking (        | Options Plan Refe       | rence: Unallocated Site - High Littleton   |                               |

#### Comment on the Site:

Thank you for the opportunity to provide comments on the above consultation document. The comments below are made on behalf of Mr Martin Pera.

Mr Pera wishes to comment on the Placemaking Plan in relation to the village of High Littleton, and specifically Paragraphs 1.386-1.388.

Paragraph 1.386 confirms that High Littleton has been identified as a RA1 Settlement and will need to identify site(s) to accommodate approximately 50 dwellings. This is considered a proportionate and suitable level of growth for the village over the plan period and is supported by Mr Pera.

Paragraph 1.387 confirms that there are current capacity issues at High Littleton Church of England Primary School and that these will need to be overcome before any development can be brought forward. Furthermore, Paragraph 1.388 confirms that the Local Education Authority has not programmed the schools' expansion and that, for any development proposal to be deliverable, additional land adjoining the school would need to be available to facilitate the school's expansion. The paragraph also confirms that further investigation is needed to determine whether this issue can be resolved in preparing the Draft Plan and that, therefore, at this stage no site allocations are put forward.

Mr Pera contends Bath & North East Somerset Council need to determine suitable sites to meet the housing demand in High Littleton so to avoid an under-supply in the village and resultant associated adverse social impacts.

Mr Pera notes that 'additional land adjoining the school would need to be available to facilitate the school's expansion.' Mr Pera controls land adjacent to the school. Enclosed is a plan showing the extent of Mr Pera's ownership, marked by a blue line. This land represents the only reasonable option for the expansion for the school in its current location. Preliminary discussions have been held with the Local Education Authority, representatives of the school and local Members regarding the potential of this land. Mr Pera proposes to continue these discussions to evidence that suitable land is available to facilitate the expansion of the school, which would in turn allow High Littleton to meet its demand for housing.

Mr Pera is open to discussing the most pragmatic way of delivering the expansion to the school and the residential allocations at High Littleton. The precise distribution of land uses can be a matter for detailed discussion with officers having regard to the land identified and Mr Pera's other landholding to the south of Aumery Gardens, which is shown on the attached plan with the site area edged in red. This land can provide a high quality residential development of approximately 30 dwellings in a sustainable location and can therefore make a significant contribution to meeting the housing requirements for High Littleton.

On the basis that Mr Pera controls sufficient suitable land to deliver the necessary school expansion, and further negotiations establish that an appropriate scheme can be facilitated to the satisfaction of the school and the Local Education Authority, it is considered suitable to put forward land south of Aumery Gardens for a residential allocation.

I trust these representations are of assistance to the Council in preparing the next stage of the Placemaking Plan: Part 2 of the Local Plan and we hope to be able to provide officers with further details regarding a proposal for an expanded school shortly. In the interim, please do not hesitate to contact me should you wish to discuss the matters raised in this submission.

| Change requested: | <b>.</b> |  |
|-------------------|----------|--|
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |
|                   |          |  |

# Plan Order Placemaking Options Plan Reference: Unallocated Site - Hinton Blewett Number: 20 Respondent 1253 Comment 5 Respondent Emily Merko **Respondent** Hinton Blewett Parish Number: Number: Name: **Organisation:** Council Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Unallocated Site - Hinton Blewett **Comment on the Site:** However, the Parish Council would like serious consideration to be given to the other four sites as detailed in the Hinton Blewett Placemaking Plan Stage 1. The Parish Council would like the opportunity to discuss the other four sites further with the Placemaking Plan Officers.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

**Change requested:** 

**Placemaking Options Plan Reference:** Unallocated Site - King George's Road Allotments

Plan Order Number: 20

Respondent 300 Comment 1 Respondent Craig MacDonald Respondent Curo
Number: Name: Organisation:

Agent ID: Agent Name:

Further Information available in the original comment? <a> Attachments sent with the comment?</a>

Placemaking Options Plan Reference: Unallocated Site - King George's Road Allotments

#### Comment on the Site:

The Placemaking Plan options document contains provisions for the potential allocation of Local Green Space within the district. Introduced by the NPPF (paragraph 76), Local Green Space should identify special protection green areas to "rule out development other than in very special circumstances".

The NPPF indicates that for a proposed designation, a site must meet the following criteria;

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife and;
- where the green area concerned is local in character and is not an extensive tract of land.

King Georges Road Allotments

'Appendix 2 - Green spaces in Bath, South-west section' of the options document (see Appendix A) identifies the King George's Road allotments as existing green space. The area includes both the existing, cultivated allotment plots and the adjacent Council-owned land directly to the west.

The western part of the site, together with land in private ownership, has been subject to a recent planning application (13/03835/FUL) which was dismissed at appeal in September 2014. However, the principle of development in this location was supported by the Appeal Inspector who concluded that the scheme 'may yet be capable of further refinement' (paragraph 46, APP/14/2218830 dated 22/09/2014). The reasons for dismissal largely concerned the perceived design flaws; no conclusions were drawn which suggested the site should be protected as green space. The western section of the area of green space does not, therefore, pass the NPPF test for designated Local Green Space. Through the determination of planning application 13/03835/FUL, it was not judged to be 'demonstrably special' or of 'particular local significance' by the Planning Inspectorate or the Council.

Although we acknowledge that the designation of green space does not necessarily require a site to be publicly accessible, it is worth noting that the allotments at King George's Road can only be accessed by the eight plot holders and therefore the uncultivated area of land has limited benefit to the wider local community.

Statutory Allotment Designation - The Allotments Act 1925

The site is designated as statutory allotment land, although there are no cultivated plots or communal facilities located on the area which forms part of the proposed development site. An application, submitted by the Council, to formally release the designation on land relevant to the development proposal was refused by the Secretary of State (SoS) in September 2014; despite evidence confirming site contamination, availability of alternative allotment plots and the fact that there were no plot holders requiring displacement. It is our understanding that should an alternative site be identified for the purposes of allotment re-provision, it will be possible to meet the statutory criteria set by the SoS and for the relevant part of the site to be released from designation in accordance with the provisions of the 1925 Act.

**Current Position** 

There is ongoing dialogue between Curo and the Council to identify a suitable replacement allotment site. We are attempting to address the design issues that, currently, would result in an unacceptable impact on the residential amenity of neighbouring properties according to the Planning Inspector and we believe that both of these matters can be overcome.

The suitability of the site for development was considered in the SHLAA (November 2013), reference WES12, which identified that the existing cultivated allotments required protection, however the land to the west was assessed as suitable for development.

The proposed development site currently forms part of the Council's five-year land supply as referenced in the SHLAA Housing Trajectory 2011-20129 (December 2014) and consequently to allocate the open space as designated green space would would compromise the Council's housing delivery and wider land disposal plans.

#### Summary

The Placemaking Plan Options document identifies the King George's Road allotment site as green space. It is clear that there is a distinction between the land currently cultivated as allotments, to the east, and the unused allotments to the west.

The western section of the green space does not meet the NPPF test for successful designation as green space and its designation would prevent the delivery of a suitable development; as identified by the Council and Planning Inspectorate.

Whilst the site is designated as statutory allotment land, the area forming part of the development is not used for allotments and re-provision ought to satisfy the statutory criteria for disposal (Section 8, The Allotments Act 1925).

Consequently, whilst we have no objection to the designation of the land forming part of the cultivated allotment plots, we ask for the western area (specifically identified at Appendix B) to be removed from further consideration as possible designated Local Green Space.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Unallocated Site - Kingswood School, Bath

Plan Order Number: 20

| Respondent 4719<br>Number:               |                   | espondent<br>lame:                           | <b>Respondent</b> Kingswood Foundation <b>Organisation:</b> |
|--|-------------------|--|---|
| Agent ID: 221 Age<br>Further Information |                   | original comment? $\square$ Attachments sent | with the comment? $\Box$                                    |
| Placemaking Option                       | ns Plan Reference | : Unallocated Site - Kingswood School, Bat   | h   |

#### **Comment on the Site:**

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) Options Document (November 2014). This follows on from our previous letter of representation made on behalf of the Kingswood Foundation to the PMP Launch document.

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 Estate portfolio, some of which are considered to have good potential for development.

#### **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. Whilst this has been previously described within our original representations to the PMP Launch Document and a pre-application enquiry upon the overall estate strategy options, we have here reiterated the objectives and outputs of the Strategy.

The Foundation has set two overarching objectives for the Strategy:

- i) 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.
- ii) 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:

- i) 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.
- ii) The designation of the main campus as a 'major existing developed site in the Green Belt'.
- iii) The inclusion of Areas 1-6 in any review of land available for potential residential development, and their subsequent removal from the Green Belt

A pre-application enquiry regarding a draft Estate Strategy was submitted to B&NES in October 2013, though 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 Options Document

These comments are provided in relation to the different discussion points and development areas identified by the document. This draws upon the previous comments and representations submitted:

• Development Potential of Upper School Playing Fields: Paragraphs 1.132-1.134 of the Options Document discusses the Former Ministry of Defence sites, including MoD Ensleigh and the Royal High School land, with the intention that the sites would be specifically allocated for development, unless substantially developed by the point of approval by Cabinet.

In our previous letter of representation to the LPA regarding the PMP Launch document, we highlighted Areas 1-6 (indicated within the attached drawings) as having potential to deliver residential development, or other alternative uses. Following pre-application discussions and a review of the Foundation's long-term development and enhancement strategy, areas 1-4 are no longer being presented as options for disposal and development. However, Areas 4-6, which cover the Upper Playing Fields, are still presented as options for residential development, or other alternative uses.

Overall, there are strategic advantages to delivering housing upon the Upper Playing Fields, with few planning and environmental constraints that could not be avoided or mitigated against through a sensitive scheme. The land is not located within the Green Belt, relieving it of the most significant constraint upon the principle of future development. The site sits within the boundary of the World Heritage Site, though at its northernmost edge. It also sits at the outside edge of the Cotswolds Area of Outstanding Natural Beauty (AONB).

Though currently identified as a protected recreational space through the 2007 Local Plan, the emerging approach (Emerging Policy LCR5) suggests that protection of sports facilities may not be site specific (in line with national policy). Should residential development be brought forward upon this site, there is ample space within the Foundation's estate to accommodate compensatory provision.

With a new primary school and local convenience store to be delivered at MoD Ensleigh, immediately adjacent to the site, and good public transport links, there are also clear sustainability advantages to delivering further residential development at this location.

#### **RECOMMENDATIONS:**

We request that the LPA give consideration to the Foundation's land interests in any further reviews of this designation and the requirement for additional land.

In summary, following a review of the PMP Options Document, the Kingswood Foundation believes there remain some significant changes that ought to be made before the document reaches a draft stage. We have outlined above those opportunities and alterations that are salient to the Foundation's Estate Strategy, which has been discussed with the LPA. The Foundation remains keen to engage with the LPA in the continued drafting of this document, particularly to ensure that it can align with the Foundation's objectives expressed within their Estate Strategy. These include improvements to its teaching, boarding and sports facilities and the exploration of alternative uses of any sites that are no longer required in order to support local policy objectives.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

**Placemaking Options Plan Reference:** Unallocated Site - Land adjacent to Holly Bush Farm, Temple Cloud

Plan Order Number: 20

|   | pondent Mr Ian Lapraik<br>me:  | Respondent Organisation:   |
|---|--|--|
| Agent ID: Agent Name:   |  |  |
| Further Information available in the or   | riginal comment? $\square$ Attachments sent  | t with the comment? $\square$  |
| Placemaking Options Plan Reference:   | Unallocated Site - Land adjacent to Holly  | Bush Farm, Temple Cloud  |
| Comment on the Site:  |  |  |
| possible alternative development site w<br>Please find attached a document which<br>this stage. I would very much welcome | on and guidance you provided to me around<br>within Temple Cloud, as part of the Placem<br>sets out my proposal, which I hope will co<br>a meeting to discuss the merits of the pro-<br>te point. I look forward to hearing from y | naking Plan consultation process.  ontain all the information you need at oposal, and any feedback or concerns |
| Change requested:   |  |  |

Placemaking Options Plan Reference: Unallocated Site - Land adjacent to Old

Mills Industrial Estate, Midsomer Norton

Plan Order Number: 20

| Respondent 6395 Comment 1 Res   | spondent Mr Jonathan Amos                          | Respondent                               |
|---|--|--|
| Number: Number: Na  | me:  | Organisation:                            |
| Agent ID: 218 Agent Name: Peter Br<br>Further Information available in the or | rett Associates riginal comment?  Attachments sent | t with the comment? $\Box$               |
| Placemaking Options Plan Reference:   | Unallocated Site - Land adjacent to Old N          | Mills Industrial Estate, Midsomer Norton |

#### **Comment on the Site:**

The Allocation identified as Old Mills Industrial Estate is included in the PlaceMaking Plan Options documents as it is in Adopted Local plan from 2007. Indeed it was allocated in the two Wansdyke Local plans before that. There must be a question, therefore, as to the delivery of the site and it may be that it is the scale of the site, and therefore the investment required to bring it forward, that is inhibiting its delivery. The PlaceMaking Plan document seeks alternatives to the allocation of the previously allocated site and we have been asked to put forward such an alternative.

The land in question is immediately adjacent to the existing Old Mills Industrial Estate, representing an obvious extension to this established employment area. The land is approximately 10 acres and is bounded by the industrial estate to the east, Langley's Lane to the north and Wellows Brook to the south and west. The land might be accessed from the existing industrial estate, or directly from Langley's Lane, it will be less prominent in the landscape than the existing allocation as it is lower on the valley slopes and it is anticipated that masterplanning will enable the existing watercourse and hedges to be retained and enhanced to support the wider green infrastructure.

#### **Change requested:**

| and | off | Langley | r's I | ane | he | allocated | d for | emple | ovment | uses. |
|-----|-----|---------|-------|-----|----|-----------|-------|-------|--------|-------|
|     |     |         |       |     |    |           |       |       |        |       |

Placemaking Options Plan Reference: Unallocated Site - Land adjacent to the

former Somerset Inn, New Pit, Paulton

Plan Order Number: 20

| Respondent 6399<br>Number: | Comment 1 Number: | -              | Owners of land adjacent to the former Somerset Inn, New | Respondent Organisation: |
|----------------------------|-------------------|----------------|---|--------------------------|
| Agent ID: 219 Age          | ent Name: Plar    | nningSphere    |   |                          |
| Further Information        | n available in tl | he original co | mment?  Attachments sent                                | with the comment? 🗹      |

**Placemaking Options Plan Reference:** Unallocated Site - Land adjacent to the former Somerset Inn, New Pit, Paulton

#### Comment on the Site:

- 1.0 Introduction
- 1.1 PlanningSphere has been instructed to make representations to the emerging Bath and North East Somerset (BANES) Placemaking Plan on behalf of owners of land adjacent to the Former Somerset Inn, New Pit, Paulton. These representations are submitted to BANES consultation on its Placemaking Plan Options Document in accordance with the consultation timetable.
- 1.2 The representations should also be read in conjunction with the following enclosed documentation:
- PDAS for associated live outline application PlanningSphere
- •Transport Study FMW Consultancy
- Landscape and Visual Impact Assessment NPA
- Planning appeal decision letter (PINS Ref: 2161715)
- Site Location Plan
- 1.3 The site comprises an agricultural paddock of 0.69 hectares to the rear of the former Somerset Inn on the eastern edge of Paulton adjacent to the settlement boundary. The site is bounded to the north, north west, west and south west by residential development and a public footpath runs around the periphery of the site joining Bath Road with Britten's Hill. Open countryside lies to the south and south east of the site.
- 1.4 It is proposed that Paulton's settlement boundary is redrawn to include the whole application site and/or the site is allocated for residential development in the Placemaking Plan.
- 2.0 Relevant background information
- 2.1 The land at the Former Somerset Inn, Paulton was the subject of an outline planning application (ref 13/04606/OUT) in November 2013, which proposed the development of the site for up to 22 no. dwellings including details of access with all other matters reserved. The application was refused permission by BANES on 24th January 2014 under officer's delegated powers. The site was also the subject of an appeal APP/F0114/A/14, which was withdrawn in July 2014. The site is now being promoted for a 16-unit self-build/custom-build scheme and a planning application has been submitted to BANES for the erection of up to 16 dwellings (5 affordable and 11 self-build/custom build plots) and associated works. This application submission also follows the approval of the change of use of the former Somerset Inn to a single residential unit at appeal in September 2014 (PINS Ref: 2219373). This appeal decision, together with the planning issues raised in respect of the previous outline housing applications at the site, has enabled the applicant and its consultants to formulate an innovative new application proposal.
- 2.2 The application proposal comprises a scheme of 16 dwellings comprising 5 no. affordable housing units, and 11 self-build/custom-build plots for people who wish build their own homes, or commission a builder to do so on their behalf. This is a form of development that is being strongly encouraged by central government and National Planning Policy Framework (NPPF) which places an explicit requirement on Councils to facilitate the delivery of self-build/custom-build plots. This support has been recently re-iterated in the House of Commons Written Statement (HCWS50) made by the

Minister of State for Housing and Planning (Brandon Lewis) on 28 November 2014, which sets out the government's support for small scale developers, custom and self-builders.

- 2.3 The self-build / custom-build model of development differs from the traditional 'top-down' model operated by volume house builders. The custom build philosophy that underpins this application seeks to offer customer involvement and choice, to engender a strong sense of belonging and ownership and could also apply to the proposed affordable units.
- 2.4 The Placemaking Plan is intended to complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the detailed housing and employment requirements established in the Core Strategy and its strategic objectives. By allocating the site at Paulton for housing, this contributes to meeting the strategic objectives set out in the Core Strategy, particularly with respect to meeting housing needs and delivering well connected places accessible by sustainable means of transport.
- 3.0 Response to the Place Making Plan Options Document

#### **General Comments**

- 3.1 The role of the Placemaking Plan is outlined in the Introduction to the Options Document. It is the Council's intention that the Placemaking Plan will complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the housing and employment requirements established in the Core Strategy and its strategic objectives. It should be noted that for some locations the Placemaking Plan will be complemented by more detailed neighbourhood planning initiatives.
- 3.2 Section 1 of the Options Document provides a context to the allocation of specific sites for development.

#### **National Policy Context**

- 3.3 The National Planning Policy Framework, (NPPF) together with the more technical advice found in National Planning Practice Guidance (NPPG) sets the context for both the overall development plan and more specifically policies to support the delivery of housing. Key to the NPPF is the emphasis on delivering sustainable development, based on the five guiding principles of the UKs Sustainable Development Strategy Securing the Future. The NPPF definition of sustainable development as set out at Paragraph 7 defines sustainable development as having three dimensions; Economic, Social and Environmental. This commitment is implemented through the document's presumption in favour of sustainable development, set out in Paragraph 14 of the NPPF. For plan making this means that:
- "Local planning authorities should positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless: Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or Specific policies in this framework indicate development should be restricted .... "
- 3.4 Paragraph 47 clearly sets out the government's key planning objectives to boost significantly the supply of all sources of housing. This includes the requirement for local authorities to meet local housing requirements through its Local Plan by identifying objectively assessed need, and by being able to demonstrate a 5 year supply of deliverable housing sites.
- 3.5 Given our more detailed comments set out below we contend that because of its lack of flexibility the Placemaking Plan will not be able to be in compliance with the adopted Core Strategy as it will not enable the delivery of the required level of housing across the plan period, nor will it be able to maintain a five year supply of housing as required by the NPPF and NPPG. We therefore consider that as drafted the Placemaking Plan would not be in accordance with national policy, and as such could not be found sound.

#### The Development Plan

3.6 The Development Plan for BANES consists of the adopted Core Strategy (July 2014) which includes policies saved from the 2007 Local Plan. The intention is that these policies will be replaced on adoption of the Placemaking Plan.

The Somer Valley

- 3.7 Page 78 of the Options Document sets out an overview of development sites in the Somer Valley, which covers the urban areas of Midsomer Norton, Westfield and Radstock together with a rural hinterland containing the principle villages of Peasedown St John and Paulton. Paragraph 1.208 of the Options Document states that "the local population identifies itself as separate small communities, mainly based on the former mining settlements. However, residents also recognize that new opportunities and projects need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole."
- 3.8 Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Midsomer Norton town centre will continue to be the principle centre for the Somer Valley, with Radstock town centre providing a smaller scale but important focal point for neighbouring communities. Amongst a series of requirements in Policy SV1 is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.
- 3.9 However paragraph 1.212 of the Options Document states that "the majority of these dwellings have either been built since the start of the Plan period, or are existing commitments" and paragraph 1.213 states that "additional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement." This approach is reinforced through proposed detailed Policy HG.4 in the Options Document that continues to rely on the development boundaries identified in the 2007 BANES Local Plan. Whilst there is a recognition that these boundaries will need review as part of the development of the Placemaking Plan, paragraph 1.213 is clear that this would only be in relation to sites which lie outside existing development boundaries but now have planning permission. Furthermore this paragraph asserts that "Additional greenfield sites in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan."
- 3.10 We consider that this approach is clearly overly restrictive and inflexible. Such an approach would result in an unsound Placemaking Plan which would not be in conformity with the Core Strategy as it would not be capable of delivering the required minimum level of dwellings for the Somer Valley Area identified in Core Strategy Policy SV1 within the Plan period. Furthermore it is very unlikely that any shortfall in this location could met elsewhere in the District outside the Somer Valley. We therefore consider that the need for a more flexible approach in the Placemaking plan is justified for the following reasons:
- Historically BANES has had a very low housing delivery rate, which has been considerably beneath required Local Plan delivery rates. We are not aware that the Local Authority are taking any steps to accelerate this build rate, both by means of additional resources to its planning team or engagement with developers to enable faster delivery.
- Many of the sites in the Somer Valley and the wider district are located on previously developed land and may have high associated remediation costs involved. This may result in both delays to the delivery of these sites and in some cases their unviability in current market conditions. In addition this may further impact on other plan considerations such as the provision of affordable housing. Many of the sites in the Somer Valley, and the wider district do not benefit from any form of planning permission and indeed may also be subject to competing land uses which may provide land owners with additional value.
- Overly optimistic assumptions have been made about the delivery of sites with existing planning permission.
- 3.11 We set out the reasons for our view in more detail below.

**Housing Delivery Rates** 

3.12 The Core Strategy identifies a total minimum housing requirement of 13,000 dwellings between 2011 and 2029. The Core Strategy at paragraph 1.33 recognises that this represents a significant uplift in delivery rates from historic levels of around 380 dwellings pa (2001 -2011) to an average annualised level of around 720 dwellings across the whole plan period. The Core Strategy also acknowledges that there has already been a shortfall in completions between 2011 and 2013 and that an additional 20% buffer of identified sites needs to be added in the first five years to take past poor performance into account. This equates, as identified in the most recent iteration of the Council's SHLAA (Dec.2014), as 1012 dwellings per annum over the next five years, with a forecast of peak delivery level of 1701 dwellings in 2017/18.

- 3.13 Whilst recognising that the Council's housing trajectory at the moment identifies lower levels of housing delivery towards the later part of the Plan period, it is very clear that to even achieve the simple annualised housing target (720 dwellings) would require a marked step change in housing delivery in the District. Historically, it is clear that this level of delivery has never been achieved, even in periods where the housing market and public finances have been very buoyant, peaking at 662 dwellings pa in 1998/99 and 554 dwellings pa in 2007/8. Delivery of housing at a rate that would meet expectations of a five year housing land supply (currently 1012 dwellings pa) would require an even more significant rise in delivery levels.
- 3.14 Clearly achieving such a step change in housing delivery levels to even the annualised rate is going to be very challenging, and would require a proactive response from the Council. Ideally this would entail a commitment from the Council to ensure the necessary resources to enable the timely assessment of relevant planning applications for housing are present; a commitment to reducing lead time though proactive engagement with developers; and a commitment to help enable the delivery of necessary associated infrastructure to support housing development.
- 3.15 However all of these matters would require significant capital and revenue resources which is challenging in the current public spending round and as such the Council has not developed a coherent approach to supporting these high levels of housing delivery. Whilst the Council has developed an Infrastructure Delivery Programme which does help in supporting elements of key infrastructure, and identifying some funding resources through that programme, given the level of change that needs to be achieved in BANES to meet its high aspirations this is simply not enough.
- 3.16 Furthermore it is questionable if the local housing market could support some of the very high projected levels of housing delivery in the next five years (for example, 1701 dwellings in 2017/18), given both levels of demand for property and availability of the necessary levels of skilled contractors and plant. It would be unlikely that discounting such housing to achieve sales in this period would be practical as this would have a knock on effect on the viability necessary to the support CIL and Section 106 contributions required by the Council and would delay or stifle development.

#### Site Constraints

- 3.17 The concern we outline above is exacerbated by the fact that many of the sites identified in the Placemaking plan still require planning permission and are highly constrained. The precise nature of these constraints varies between the locations but they are particularly acute for locations on previously developed land. In terms of the Somer Valley, of the sites identified as being potentially suitable for housing in the Placemaking Plan but that have not been granted planning permission, the Placemaking Plan recognises that "these are mainly brownfield sites that are within or adjacent to the town centres of the towns of Midsomer Norton and Radstock and within Westfield".
- 3.18 Development of sites on previously developed land have greater start-up costs due to site clearance and possible decontamination/remediation, and at the start of the development process higher levels of uncertainty about development feasibility and viability require. This means that considerably more survey work and due diligence on the part of developers is necessary than is generally expected for greenfield sites, leading to longer lead in times. Furthermore the planning application process can be more complex with the potential for considerable supporting information to accompany such applications. These factors when taken in the context of the relatively modest housing market in the Somer Valley, are likely to result in costs which may amount to a development never being viable unless market conditions altered radically and it is possible that without the confidence of detailed viability work, many of the sites identified by the Council in the Placemaking Plan will simply never be developed.
- 3.19 Whilst estimates in recent iterations of the SHLAA have been made about the level of delivery that these sites can provide, in many cases this analysis has been at a relatively superficial level and the underlying policy context for many of these sites in the Placemaking Plan is relatively underdeveloped, in comparison to the far more sophisticated approach developed for some sites in Bath. This should be considered in the context of the Council's Housing Trajectory which places considerable reliance on delivery before 2018/19 from sites on previously developed land but not yet in receipt of planning permission. Thus the confidence with which both estimates of the level of housing yield from these sites, and the suggested timescales by which they could start to contribute must be treated with considerable caution. In some cases these sites may not in fact deliver any housing.
- 3.20 Recent work in support of 3 planning appeals (Land at Cappards Road, Bishop Sutton: APP/F0114/A/14/2217216;

Land at Boxbury Hill, Midsomer Norton: APP/F0114/A/14/2215930 and Land at Abbotts Farm Close, Paulton: APP/F0114/A/14/2214596) has analysed a number of proposed timescales for sites that form part of the latest iteration of the SHLAA and concludes that in both the District as a whole and the Somer Valley, delivery levels have been seriously over estimated. The consultant Savills, seriously questions the identified level of delivery in the next five years of the Plan period from both the Welton Bibby Baron Site (Welton Bag Factory) and St Peter's Factory/Cobblers Way. Savills estimate that the expected contribution from these two sites needs to be reduced from 170 dwellings in the next five years to just 30 dwellings. The Welton Bibby Baron site will not be able to deliver any housing in the next five years. In addition it should be remembered that the proposed allocations in both Midsomer Norton and Radstock are both subject to the further Neighbourhood Planning process, which will add a further level of delay to the identification of these sites.

Sites in receipt of planning permission

- 3.21 There is also a considerable element of supply in the Somer Valley from sites that are in receipt of at least outline planning permission but have not yet started. The SHLAA identifies that a considerable proportion of these sites will start in the coming year (2015/16) but it is unclear on the basis by which this assumption has been made, especially as many of these sites suffer from constraints that need to be satisfactorily overcome and no attempt has been made to estimate likely non implementation of these sites or potential delays to start times. The local authority has not considered the effect of changing levels of housing supply in local markets, and the effect this may have on build out rates and viability, and also have not considered the reselling of land with permission to other developers who may wish to alter approved schemes. The Savills report also calls into question the assumptions made in assessing the speed at which these sites will deliver, considering them to be overly optimistic.
- 3.22 The Savills report seriously questions the deliverability of a number of permissioned sites on these grounds. In particular it highlights the issues that have arisen on the Old Pit Yard site in Clandown, both in terms of developer readiness and the need for further studies to ensure the safe development of a contaminated and unstable site.

Conclusions on Land Supply Issues

- 3.23 It is clear that the BANES Core Strategy and associated Housing Trajectory set an extremely challenging target to meet, even if this simply looks at a flat annualized rate. In order to achieve the levels of supply to be able to continue to demonstrate a five year land supply (with a 20% poor performance allowance) the authority would need to be very proactive in engaging with developers to ensure prompt delivery of sites and also to carefully manage the supply of developable land in the District. However BANES is overly reliant on previously developed, or otherwise constrained land, and is overly optimistic projections for the delivery of sites with planning permission. The implementation of the Core Strategy, as articulated in the Placemaking Plan, is not sufficiently flexible to be able to manage both 5 year land supply and overall delivery.
- 3.24 This situation is particularly acute in the Somer Valley, where there is an over reliance on previously developed land much of which is not in the state of readiness necessary to enable these sites to deliver in the next five years, or in some cases ever delivery housing. Furthermore the authority's assumptions on delivery from sites that have planning permission are again overly optimistic and have failed to take into account some of the significant constraints and issues these sites are affected by.
- 3.25 In order to overcome these concerns, and meet the Core Strategies housing target in the Somer Valley, we suggest that BANES needs to allocate a number of relatively unconstrained greenfield sites across the Somer Valley that are otherwise sustainably located, in order to give themselves the necessary flexibility to achieve both an ongoing five year land supply and the overall Core Strategy Housing Target.
- 3.26 Given this, we consider that Paulton is a highly suitable location for the allocation of unconstrained sites such as the land adjacent to the former Somerset Inn, Paulton. Paulton is a large village and a well-balanced settlement with a good level of services and community facilities. Unlike many other settlements in the BANES rural area Paulton is not constrained by the Green Belt, or protected landscape designations. The role of Paulton is recognised in paragraph 1.337 of the Placemaking Plan Options Document, as the settlement has accommodated significant growth in the past given its strong sustainability credentials and links with nearby Midsomer Norton.

However, this has not been translated into the Placemaking Plan which effectively restricts all new development in this

location to that which is either already permissioned or is within existing housing development boundaries. We therefore consider that Paulton is an appropriate settlement to accommodate part of the Core Strategy's unmet housing requirement and increase flexibility, both in terms of the Somer Valley requirement set out in Policy SV1 of the adopted Core Strategy and the overall housing requirement for the Plan area.

- 3.27 Furthermore the allocation of the site for custom-build/self-build units would provide an innovative and flexible solution for meeting diverse housing needs both in the Somer Valley and the wider district. This approach has strong policy backing through the NPPF both in terms of paragraph 50 and would further support the NPPF's commitment to sustainable development particularly with respect to the "social" role contained in its definition of sustainable development since the custom build philosophy engenders a strong sense of belonging and ownership, which will help to embed such sustainability goals.
- 4.0 Suitability of Land at Paulton for Development
- 4.1 The land identified in the Site Location Plan (Drg. No. 127/S201) comprises an agricultural paddock of 0.69 hectares to the rear of the Former Somerset Inn on the eastern edge of Paulton adjacent to the settlement boundary. The site is bounded to the north, north west, west and south west by residential development and a public footpath runs around the periphery of the site joining Bath Road with Britten's Hill. Open countryside lies to the south and south east of the site.
- 4.2 Outline planning permission is currently being sought for the development of the site for up to 16 residential units. An illustrative masterplan has been prepared for the application which shows how the proposed affordable and self-build/custom-build plots could be accommodated on the site. The affordable plots will be offered to Registered Providers as potential 'affordable' custom-build units.
- 4.3 We contend that the site could therefore clearly provide an innovative and diverse solution to the accommodation of open market and affordable housing need, both in the Somer Valley and the wider district. The site is easily developable and given the nature of the proposed development, it would be easily implementable and would not suffer from the time constraints that would hamper delivery of standard volume house building. This would help in giving the Placemaking Plan both greater flexibility and certainty in housing delivery, and would thus ensure that it was in compliance with the strategic objectives in the Core Strategy.

#### Transport and Access

4.7 The site is directly accessed off Bath Road which is a single carriageway road and running east- west past the site. The footpath which runs around the periphery of the site joining Bath Road with Britten's Hill provides a direct and convenient route to the village centre for pedestrians. Whilst the site is found at the edge of Paulton, the site has good accessibility to community facilities, employment opportunities and public transport being within walking distance of the site. Further information is included in the FMW Report enclosed with this representation.

#### Flood Risk and Drainage

4.9The site is entirely within Flood Zone 1 based on the EA's Flood Mapping and therefore has no constraints in this respect.

#### Sustainability

- 4.10 The site is adjacent to the settlement boundary of Paulton which has been clearly identified in the Core Strategy as a settlement that is expected to contribute to the Somer Valley's housing needs under Policy SV1. Other settlements in the Somer Valley are expected to be assessed under Policies RA1 and RA2. Given this, locating new residential development in Paulton would be sustainable given the services, employment and public transport links that it benefits from.
- 4.11 In terms of the presumption in favour of sustainable development set out in paragraph 7 of the NPPF, the site at Paulton meets all three of the strands of sustainable development test described in this document.

- 4.12 In terms of test 1 economic sustainability the proposed development will generate significant local economic activity through both the construction phase following completion by generating additional demand for existing local services within Paulton. Paulton also has a relatively strong employment base for a rural location, with reasonable access to employment opportunities in the Somer Valley and BANES rural area and beyond. Locating development in Paulton would also accord with paragraph 55 of the NPPF, which states that housing in rural areas should be located where it will enhance or maintain the vitality of rural communities.
- 4.13 In terms of test 2 social sustainability the level of affordable housing need in the Bath and North East Somerset (BANES) administrative area was 12,800 households as at February 2012.

Including the site in the Placemaking Plan would enable provision of up to 5 No. units of affordable housing. Furthermore the open market element of the proposals will also meet an unmet need and demand for self-build/custom-build plots which on the basis of our local knowledge is not being planned for, or provided elsewhere, in the BANES administrative district. This support has been recently re-iterated by the Housing and Planning Minister Brandon Lewis (HCWS50) and in paragraph 50 of the NPPF which requires local planning authorities to:

"plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)". (our emphasis in bold)

- 4.14 In terms of test 3 environmental sustainability the application site is not constrained by local or national landscape designations; Green Belt; ecology designations; or heritage designations. On the basis of baseline surveys undertaken to support application proposals the potential environmental constraints can be mitigated subject to the imposition of appropriately worded planning conditions.
- 4.15 The impact upon the spatial character of this part of Paulton has been carefully considered in formation of the application proposals following input from the project architect and landscape consultants. It is noted that subject site is generally contained largely by defensible boundaries and the impact the proposals upon the wider landscape has been judged to be potentially acceptable on the basis that proposed development will be viewed in the context of the existing settlement (as set out in the NPA Landscape and Visual Appraisal enclosed with this representation).
- 4.16 Having regard to the 3-diminsional sustainable development tests, as set out above, it is concluded that the proposals are demonstrable compliance with the NPPF's presumption in favour of sustainable development.

#### 5.0Conclusions

- 5.1 In order to continue to demonstrate a five year land supply and achieve delivery of the overall housing numbers set out in the Core Strategy there must be a step change in housing delivery in the authority area. Whilst BANES has made some limited efforts through its Infrastructure Delivery Programme to achieve this, we contend that they have not made sufficient progress in proactively addressing many of the planning and lead in time issues that apply to sites identified in the housing trajectory and the Placemaking Plan Options Document. This challenge is further exacerbated by the Council's reliance on delivery of a significant number of sites on previously developed land or that suffer from other constraints. Furthermore, BANES' assumptions on the delivery of sites with the benefit of planning permission are also overly optimistic and BANES is also overly reliant on development through the volume housing building model.
- 5.2 Given this BANES needs to have additional flexibility built into its Placemaking Plan and other delivery documents. However, the approach taken in the Placemaking Plan Options Document particularly for locations in the Somer Valley is both highly overly optimistic, not grounded in a clear understanding of the constraints and difficulties of taking sites forward in the current market and is highly inflexible given its reluctance to identify new greenfield sites that could contribute to housing in sustainable locations. We therefore consider that the Placemaking Plan should identify a range of additional sites in the Somer Valley to give the Plan the necessary degree of flexibility that is required to conform with the Core Strategy objectives.
- 5.3 The land adjacent to the former Somerset Inn in Paulton is capable of fulfilling this need for flexibility being a viable and unconstrained site in a sustainable location that offers an innovative opportunity that can be delivered quickly and avoids the delivery constraints of the standard house building model as well as meeting the sustainability requirements of

| nge requested: |  |  |  |
|----------------|--|--|--|
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |
|                |  |  |  |

5.4 We therefore respectfully request Paulton's settlement boundary is redrawn to include the whole application site

and/or the site is allocated for residential development in the Placemaking Plan.

the NPPF.

Placemaking Options Plan Reference: Unallocated Site - Land Adjoining Oaklea,

Sleep Lane, Whitchurch

Plan Order Number: 20

| Respondent 6318<br>Number:  | S Comment<br>Number:  | 1 Respondent Helen Andrews Name:  | Respondent Organisation:  |  |
|---|---|---|---|--|
| Agent ID: A   | gent Name:  |   |   |  |
| Further Information   | on available ir   | n the original comment? $\Box$ Attach   | nments sent with the comment? 🗹   |  |
| Placemaking Opti  | ons Plan Refe   | rence: Unallocated Site - Land Adjoin   | ning Oaklea, Sleep Lane, Whitchurch   |  |
| Comment on the  | Site:   |   |   |  |
| years now I have co<br>to enquire whethe<br>I was refused plans<br>within the greenbe   | ontacted the print the boundaring ten years elt and also ou | planning office at Bath and North East<br>ies have or will be changed. Your repl<br>ago (application ref: 05/02763/FUL)<br>tside the development area for White | excluded from the release of the green belt. For ten to Somerset Council pretty much on a monthly basis ly is always "not at this time".  for a logical infill on the grounds that my land was church, so I am sure you can imagine my surprise ectly opposite my house and land, which is also |  |
| within the green belt and outside the development area for Whitchurch,  The Horseworld land, which is directly behind my house and land, has also been removed from the green belt and has planning permission to build 200 houses. |   |   |   |  |
| basis that their land<br>lane was never info  | d was not incliormed that the                               | uded in the allocation at the time of t   | nd owners here were objecting to the this on the the hearings. I along with all the residents of sleep ng as, I have contacted the B&NES council planning entioned this to me.  |  |

I would like you to consider removing my land from the green belt. I attach a site plan showing in the red area where my land sits. I would like to develop my land. There would be very little or no change to the appearance of the landscape and

visual impact. I already have an entrance to the site (when planning was refused there was no objection from the

Highways Department).

Placemaking Options Plan Reference: Unallocated Site - Land at Bath Old Road,

Radstock

Plan Order Number: 20

| Number:   | Number:     | Respondent Name: | Respondent Linden Homes Strategic Organisation: Land |  |
|---|-------------|------------------|--|--|
| Agent ID:   | Agent Name: |                  |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |             |                  |  |  |
|   |             |                  |  |  |

#### Comment on the Site:

Linden Homes has acquired an interest in the site known as Land at Bath Old Road, North Radstock ("the site").

Placemaking Options Plan Reference: Unallocated Site - Land at Bath Old Road, Radstock

The 155 acre site is located on the north side of Radstock adjoining the residential area of Tyning. The site comprises agricultural land on either side of Bath Old Road and Trinity Primary School is located to the south.

The site is identified within the 2013 SHLAA under references 16a and 16c. The BANES Local Plan 2007 Proposals Map identifies the site as lying outside of the settlement boundary. No designations apply to the site apart from the Forest of Avon (Policy NE.5) designation, which is a saved Local Plan policy.

We note the main aim of the Placemaking Plan is to help to deliver "high quality, sustainable and well located development for the period up to 2029".

The Placemaking Plan is intended to complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the detailed housing and employment requirements established in the Core Strategy and its strategic objectives.

By allocating the site at Bath Old Road for high quality housing, this contributes to meeting the strategic objectives set out in the Core Strategy, particularly with respect to meeting housing needs and delivering well connected places accessible by sustainable means of transport.

We believe that development of Land at Bath Old Road, North Radstock could deliver a high quality residential extension to the settlement of Radstock that would be sustainably located and deliver much needed new homes.

Page 78 of the Options Document sets out an overview of development sites in the Somer Valley, which covers the urban areas of Midsomer Norton, Westfield and Radstock together with a rural hinterland containing the principle villages of Peasedown St John and Paulton.

Paragraph 1.208 of the Options Document states that "the local population identifies itself as separate small communities, mainly based on the former mining settlements. However, residents also recognize that new opportunities and projects need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole."

Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Midsomer Norton town centre will continue to be the principle centre for the Somer Valley, with Radstock town centre providing a smaller scale but important focal point for neighbouring communities. Para 1.209 of the Options Plan states "Midsomer Norton, Westfield and Radstock are very closely connected, both physically and economically; although the settlements are independent and distinct, it can be difficult for those not familiar with the area to establish precisely where the boundaries between the three lie". Amongst a series of requirements in Policy SV1 is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.

However paragraph 1.212 of the Options Document states that "the majority of these dwellings have either been built

since the start of the Plan period, or are existing commitments" and paragraph 1.213 states that "additional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement." This approach is reinforced through proposed detailed Policy HG.4 in the Options Document that continues to rely on the development boundaries identified in the 2007 BANES Local Plan. Whilst there is a recognition that these boundaries will need review as part of the development of the Placemaking Plan, paragraph 1.213 is clear that this would only be in relation to sites which lie outside existing development boundaries but now have planning permission. Furthermore this paragraph asserts that "Additional greenfield sites in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan."

We consider that this approach is restrictive and inflexible. Such an approach would result in an unsound Placemaking Plan which would not be in conformity with the Core Strategy as it would not be capable of delivering the required minimum level of dwellings for the Somer Valley Area identified in Core Strategy Policy SV1 within the Plan period. Furthermore it is very unlikely that any shortfall in this location could be met elsewhere in the District outside of the Somer Valley due to Green Belt constraints. We therefore consider that the need for a more flexible approach in the Placemaking Plan.

We object to Policy HG.4 on the basis that there is a need for housing to be located outside settlement boundaries at Radstock and that this should be the subject of positive and proactive planning for sustainable development.

Many of the sites identified in Radstock and the wider district are located on previously developed land and may have high associated remediation costs involved. This may result in both delays to the delivery of these sites and in some cases their unviability in current market conditions. In addition this may further impact on other plan considerations such as the provision of affordable housing.

We suggest that BANES needs to allocate a number of relatively unconstrained greenfield sites such as the land at Bath Old Road, North Radstock, that are otherwise sustainably located, in order to give themselves the necessary flexibility to achieve both an ongoing five year land supply and the overall Core Strategy Housing Target.

At Para. 1.281 of the Options document it states that the consultation will provide the opportunity to highlight to the Council any other potential development sites that are not currently included.

Linden Homes proposes that the Council consider Land at Bath Old Road, North Radstock for allocation as part of the Place Making site selection process that is extended in scope to include greenfield land at Radstock and as part of a settlement boundary review. There is intrinsic merit of development in this location and the quality of development that Linden would bring to the site.

Footnote 11 (to paragraph 47) of the NPPF requires that, to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that the development of the site is viable. The Bath Old Road site meets these requirements as follows:

- "Available now" Linden controls the land through an agreement with a single landowner to bring the site forward for development. The site is therefore available now.
- "Offer a suitable location for development" Radstock is a sustainable town which includes key community facilities the site is suitable to create a sustainable urban extension to the town of Radstock.
- "A realistic prospect that housing will be delivered on the site within 5 years" Linden is committed to bringing forward the site for development and to deliver a first phase of housing completions within five years
- "Development of the site is viable" there are no viability constraints to the delivery of the site.

We should point out that this is not an all or nothing approach. The site is approximately 155 acres so our site could provide 100 - 500 houses and anything in between. So it should not be assumed that the site can only be built out in its entirety.

Linden Homes has an interest in the site and will be looking to engage with the local community and key stakeholders including the Council to initially prepare a development framework masterplan document. The development framework

document would provide details of emerging proposals which will emerge as the project progresses and key stakeholders such as the local community are consulted. The document would give confidence to the Council that the site is a deliverable and desirable development that would have a positive impact on the existing settlement.

Linden's commitment:

- We will seek to directly engage with the local planning authority as is progresses the Bath and North East Somerset Placemaking Plan.
- We will submit evidence and representations at the appropriate time.
- We will take the opportunity to explain our approach to stakeholders and to the local community where possible.
- We will continue to undertake our preparatory work and to develop our master planning to demonstrate a deliverable and desirable high quality residential scheme.
- Linden and its consultancy team will seek a meeting with the Council's Development Management and Policy officers to discuss the principles and details of an emerging scheme.

We therefore respectfully request that the site should be allocated for residential development in the Draft Placemaking Plan on the basis that the subject site is suitable for new housing development, and is viable and therefore deliverable.

Linden Homes will also be submitting representations to the Joint Strategic Planning Strategy: Call for Sites as part of the review process, and the Councils HELAA.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Unallocated Site - Land at Bridge Place

Farm, Camerton

Plan Order Number: 20

| Respondent 6401 Comment 1 R<br>Number: Number: N | espondent<br>Name:                            | Respondent Rigg Construction Organisation: Southern Ltd |
|--|---|---|
| Agent ID: 219 Agent Name: Plann                  | ingSphere                                     | •   |
| Further Information available in the             | original comment?   Attachments sent          | : with the comment? 🔽                                   |
| Placemaking Options Plan Reference               | e: Unallocated Site - Land at Bridge Place Fa | arm, Camerton   |

#### Comment on the Site:

- 1.0 Introduction
- 1.1 PlanningSphere has been instructed to make representations to the emerging Bath and North East Somerset (BANES) Placemaking Plan on behalf of owners of land at Bridge Place Farm, Camerton, BA2 OPS. This representation is submitted to BANES consultation on its Placemaking Plan Options Document in accordance with the consultation timetable.
- 1.2 The representations should also be read with the following enclosed documentation:
- •Site Location Plan.
- Annotated Photographs
- Environment Agency Flood Map
- 1.3 The 0.54ha site is located in the village of Camerton off of Camerton Hill to the east of the residential development known as The Daglands and to the south of the Cam Brook and Bridge Place Road. The site comprises a parcel of grazing land situated between a public footpath and track to the north and the Cam Brook to the south. Bridge Place Farm and associated outbuildings and menage lie to the south east of the site.
- 1.4 The site is being promoted for a self-build/custom-build scheme for up to 4-5 units.
- 1.5 It is proposed that Camerton's settlement boundary is redrawn to include the whole site and/or the site is allocated for small-scale residential development in the Placemaking Plan.
- 2.0 Relevant background information
- 2.1 The land at Bridge Place Farm, Camerton is being promoted for up to 4-5 self-build/custom-build plots for people who wish build their own homes, or commission a builder to do so on their behalf. This is a form of development that is being strongly encouraged by central government and National Planning Policy Framework (NPPF) places an explicit requirement on Councils to facilitate the delivery of self-build/custom-build plots. This support has been recently reiterated in the House of Commons Written Statement (HCWS50) made by the Minister of State for Housing and Planning (Brandon Lewis) on 28 November 2014, which sets out the government's support for small scale developers, custom and self-builders.
- 2.2 The self-build / custom-build model of development differs from the traditional 'top-down' model operated by volume house builders. The custom-build philosophy that underpins the site promotion seeks to offer customer involvement and choice, to engender a strong sense of belonging and ownership and could also apply to the proposed affordable units.
- 2.3 The Placemaking Plan is intended to complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the detailed housing and employment requirements established in the Core Strategy and its strategic objectives. By allocating the site at Camerton for housing, this contributes to meeting the strategic objectives set out in the Core Strategy, particularly with respect to meeting

housing needs in the District. Additional housing in this location will also support existing rural services and facilities.

3.0 Response to the Place Making Plan Options Document

#### **General Comments**

- 3.1 The role of the Placemaking Plan is outlined in the Introduction to the Options Document. It is the Council's intention that the Placemaking Plan will complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the housing and employment requirements established in the Core Strategy and its strategic objectives. It should be noted that for some locations the Placemaking Plan will be complemented by more detailed neighbourhood planning initiatives.
- 3.2 Section 1 of the Options Document provides a context to the allocation of specific sites for development.

#### National Policy Context

3.3 The National Planning Policy Framework, (NPPF) together with the more technical advice found in National Planning Practice Guidance (NPPG) sets the context for both the overall development plan and more specifically policies to support the delivery of housing. Key to the NPPF is the emphasis on delivering sustainable development, based on the five guiding principles of the UKs Sustainable Development Strategy Securing the Future. The NPPF definition of sustainable development as set out at Paragraph 7 defines sustainable development as having three dimensions; Economic, Social and Environmental. This commitment is implemented through the document's presumption in favour of sustainable development, set out in Paragraph 14 of the NPPF. For plan making this means that:

"Local planning authorities should positively seek opportunities to meet the development needs of their area;

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless:

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

Specific policies in this framework indicate development should be restricted .... "

- 3.4 Paragraph 47 clearly sets out the government's key planning objectives to boost significantly the supply of all sources of housing. This includes the requirement for local authorities to meet local housing requirements through their Local Pan by identifying objectively assessed need, and by being able to demonstrate a 5 year supply of deliverable housing sites.
- 3.5 Given our more detailed comments set out below we contend that because of its lack of flexibility the Placemaking Plan will not be able to be in compliance with the adopted Core Strategy as it will not enable the delivery of the required level of housing across the plan period, nor will it be able to maintain a five years supply of housing as required by the NPPF and NPPG. We therefore consider that as drafted the Placemaking Plan would not be in accordance with national policy, and as such could not be found sound.

The Development Plan

3.6 The Development Plan for BANES consists of the adopted Core Strategy (July 2014) which includes policies saved from the 2007 Local Plan. The intention is that these policies will be replaced on adoption of the Placemaking Plan.

The Somer Valley

3.7 Page 78 of the Options Document sets out an overview of development sites in the Somer Valley, which covers the urban areas of Midsomer Norton, Westfield and Radstock together with a rural hinterland containing the principle villages of Peasedown St John and Paulton. Paragraph 1.208 of the Options Document states that "the local population identifies itself as separate small communities, mainly based on the former mining settlements. However, residents also recognize that new opportunities and projects need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole."

3.8 Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Midsomer Norton town centre will continue to be the principle centre for the Somer Valley, with Radstock town centre providing a smaller scale but important focal point for neighbouring communities. Amongst a series of requirements in Policy SV1 is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.

Development in other settlements in the Somer Valley will be assessed under the criteria set out in Core Strategy Policies RA1 and RA2.

3.9 However paragraph 1.212 of the Options Document states that "the majority of these dwellings have either been built since the start of the Plan period, or are existing commitments" and paragraph 1.213 states that "additional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement." This approach is reinforced through proposed detailed Policy HG.4 in the Options Document that continues to rely on the development boundaries identified in the 2007 BANES Local Plan. Sites in the Somer Valley including Camerton are not identified in the Placemaking Plan other than where these reflect already permissioned development. Camerton has been identified as a RA2 settlement in the BANES Core Strategy. Paragraph 1.369 of the Placemaking Plan Options Document states that:

"There are no proposed options for site allocations or local green space designations within Camerton due to landscape and highways issues that cannot be satisfactorily mitigated. During the Placemaking Plan period development could come forward. Any potential site would be considered on its individual merits against national and local planning policy."

- 3.10 We consider that this approach is clearly overly restrictive and inflexible by placing too much reliance on a limited number of sites in only a few locations. Such an approach would result in an unsound Placemaking Plan which would not be in conformity with the Core Strategy as it would not be capable of delivering the required minimum level of dwellings for the Somer Valley Area identified in Core Strategy Policy SV1 within the Plan period. Furthermore it is very unlikely that any shortfall in this location could met elsewhere in the District outside the Somer Valley. We therefore consider that the need for a more flexible approach in the Placemaking plan is justified for the following reasons:
- •Historically BANES has had a very low housing delivery rate, which has been considerably beneath required Local Plan delivery rates. We are not aware that the Local Authority are taking any steps to accelerate this build rate, both by means of additional resources to its planning team or engagement with developers to enable faster delivery.
- •Many of the sites in the Somer Valley and the wider district are located on previously developed land and may have high associated remediation costs involved. This may result in both delays to the delivery of these sites and in some cases their unviability in current market conditions. In addition this may further impact on other plan considerations such as the provision of affordable housing. Many of the sites in the Somer Valley, and the wider district do not benefit from any form of planning permission and indeed may also be subject to competing land uses which may provide land owners with additional value.
- •Overly optimistic assumptions have been made about the delivery of sites with existing planning permission.
- 3.11 We set out the reasons for our view in more detail below.

**Housing Delivery Rates** 

- 3.12 The Core Strategy identifies a total minimum housing requirement of 13,000 dwellings between 2011 and 2029. The Core Strategy at paragraph 1.33 recognises that this represents a significant uplift in delivery rates from historic levels of around 380 dwellings pa (2001-2011) to an average annualised level of around 720 dwellings across the whole plan period. The Core Strategy also acknowledges that there has already been a shortfall in completions between 2011 and 2013 and that an additional 20% buffer of identified sites needs to be added in the first five years to take past poor performance into account. This equates, as identified in the most recent iteration of the Council's SHLAA (Dec.2014), as 1012 dwellings per annum over the next five years, with a forecast of peak delivery level of 1701 dwellings in 2017/18.
- 3.13 Whilst recognising that the Council's housing trajectory, at the moment identifies lower levels of housing delivery towards the later part of the Plan period, it is very clear that to even achieve the simple annualised housing target (720 dwellings) would require a marked step change in housing delivery in the District. Historically, it is clear that this level of

delivery has never been achieved, even in periods where the housing market and public finances have been very buoyant, peaking at 662 dwellings pa in 1998/99 and 554 dwellings pa in 2007/8. Delivery of housing at a rate that would meet expectations of a five year housing land supply (currently 1012 dwellings pa) would require an even more significant rise in delivery levels.

- 3.14 Clearly achieving such a step change in housing delivery levels to even the annualised rate is going to be very challenging, and would require a proactive response from the Council. Ideally this would entail a commitment from the Council to ensure the necessary resources to enable the timely assessment of relevant planning applications for housing are present; a commitment to reducing lead time though proactive engagement with developers and a commitment to help enable the delivery of necessary associated infrastructure to support housing development.
- 3.15 However all of these matters would require significant capital and revenue resources which is challenging in the current public spending round and as such the Council has not developed a coherent approach to supporting these high levels of housing delivery. Whilst the Council has developed an Infrastructure Delivery Programme which does help in supporting elements of key infrastructure, and identifying some funding resources through that programme, given the level of change that needs to be achieved in BANES to meet its high aspirations this is simply not enough.
- 3.16 Furthermore it is questionable if the local housing market could support some of the very high projected levels of housing delivery in the next five years (for example, 1701 dwellings in 2017/18), given both levels of demand for property and availability of the necessary levels of skilled contractors and plant. It would be unlikely that discounting such housing to achieve sales in this period would be practical as this would have a knock on effect on the viability necessary to the support CIL and Section 106 contributions required by the Council and would delay or stifle development.

#### Site Constraints

- 3.17 The concern we outline above is exacerbated by the fact that many of the sites identified in the Placemaking plan still require planning permission and are highly constrained. The precise nature of these constraints varies between the locations but they are particularly acute for locations on previously developed land. In terms of the Somer Valley, of the sites identified as being potentially suitable for housing in the Placemaking Plan but that have not been granted planning permission, the Placemaking Plan recognises that "these are mainly brownfield sites that are within or adjacent to the town centres of the towns of Midsomer Norton and Radstock and within Westfield".
- 3.18 Development of sites on previously developed land have greater start-up costs due to site clearance and possible decontamination/remediation, and at the start of the development process higher levels of uncertainty about development feasibility and viability require. This means that considerably more survey work and due diligence on the part of developers is necessary than is generally expected for greenfield sites, leading to longer lead in times. Furthermore the planning application process can be more complex with the potential for considerable supporting information to accompany such applications. These factors when taken in the context of the relatively modest housing market in the Somer Valley, are likely to result in costs which may amount to a development never being viable unless market conditions altered radically and it is possible that without the confidence of detailed viability work, many of the sites identified by the Council in the Placemaking Plan will simply never be developed.
- 3.19 Whilst estimates in recent iterations of the SHLAA have been made about the level of delivery that these sites can provide, in many cases this analysis has been at a relatively superficial level and the underlying policy context for many of these sites in the Placemaking Plan is relatively underdeveloped, in comparison to the far more sophisticated approach developed for some sites in Bath. This should be considered in the context of the Council's Housing Trajectory which places considerable reliance on delivery before 2018/19 from sites on previously developed land but not yet in receipt of planning permission. Thus the confidence with which both estimates of the level of housing yield from these sites, and the suggested timescales by which they could start to contribute must be treated with considerable caution. In some cases these sites may not in fact deliver any housing.
- 3.20 Recent work in support of 3 planning appeals (Land at Cappards Road, Bishop Sutton: APP/F0114/A/14/2217216; Land at Boxbury Hill, Midsomer Norton: APP/F0114/A/14/2215930 and Land at Abbotts Farm Close, Paulton: APP/F0114/A/14/2214596) has analysed a number of proposed timescales for sites that form part of the latest iteration of the SHLAA and concludes that in both the District as a whole and the Somer Valley, delivery levels have been seriously over estimated. The consultant Savills, seriously questions the identified level of delivery in the next five years of the Plan

period from both the Welton Bibby Baron Site (Welton Bag Factory) and St Peter's Factory/Cobblers Way. Savills estimate that the expected contribution from these two sites needs to be reduced from 170 dwellings in the next five years to just 30 dwellings. The Welton Bibby Baron site will not be able to deliver any housing in the next five years. In addition it should be remembered that the proposed allocations in both Midsomer Norton and Radstock are both subject to the further Neighborhood Planning process, which will add a further level of delay to the identification of these sites.

Sites in receipt of planning permission

- 3.21 There is also a considerable element of supply in the Somer Valley from sites that are in receipt of at least outline planning permission but have not yet started. The SHLAA identifies that a considerable proportion of these sites will start in the coming year (2015/16) but it is unclear on the basis by which this assumption has been made, especially as many of these sites suffer from constraints that need to be satisfactorily overcome and no attempt has been made to estimate likely non implementation of these sites or potential delays to start times. The local authority has not considered the effect of changing levels of housing supply in local markets, and the effect this may have on build out rates and viability, and also have not considered the reselling of land with permission to other developers who may wish to alter approved schemes. The Savills report also calls into question the assumptions made in assessing the speed at which these sites will deliver, considering them to be overly optimistic.
- 3.22 The Savills report seriously questions the deliverability of a number of permissioned sites on these grounds. In particular it highlights the issues that have arisen on the Old Pit Yard site in Clandown, both in terms of developer readiness and the need for further studies to ensure the safe development of a contaminated and unstable site.

Conclusions on Land Supply Issues

- 3.23 It is clear that the BANES Core Strategy and associated Housing Trajectory set an extremely challenging target to meet, even if this simply looks at a flat annualized rate. In order to achieve the levels of supply to be able to continue to demonstrate a five year land supply (with a 20% poor performance allowance) the authority would need to be very proactive in engaging with developers to ensure prompt delivery of sites and also to carefully manage the supply of developable land in the District. However BANES is overly reliant on previously developed, or otherwise constrained land, and is overly optimistic projections for the delivery of sites with planning permission. The implementation of the Core Strategy, as articulated in the Placemaking Plan, is not sufficiently flexible to be able to manage both 5 year land supply and overall delivery.
- 3.24 This situation is particularly acute in the Somer Valley, where there is an over reliance on previously developed land much of which is not in the state of readiness necessary to enable these sites to deliver in the next five years, or in some cases ever delivery housing. Furthermore the authority's assumptions on delivery from sites that have planning permission are again overly optimistic and have failed to take into account some of the significant constraints and issues these sites are affected by.
- 3.25 In order to overcome these concerns, and meet the Core Strategy's housing target in the Somer Valley including its rural areas, we suggest that BANES needs to allocate a number of relatively unconstrained greenfield sites such as the land at Bridge Farm Place, Camerton, in order to give themselves the necessary flexibility to achieve both an ongoing five year land supply and the overall Core Strategy Housing Target. Additional housing growth in Camerton will also assist in sustaining local facilities such as the primary school.
- 4.0 Suitability of Land at Camerton for Development
- 4.1 The land at Bridge Place Farm, Camerton is identified in the accompanying Site Location Plan. It is proposed that the site could comfortably support between 4-5 self-build/custom-build dwellings on the southern part of the site.

**Transport and Access** 

4.2 The site is accessed off Camerton Hill via an existing priority junction. The landowner controls land either side of the existing access which would enable the remodeling of the existing access bellmouth to achieve 2.4 x 43m visibility splays in each direction. There is also an opportunity to provide footways.

- 4.3 The site lies centrally within Camerton in close proximity to the primary school. There is also bus access to Bath, which is approximately 10km from Camerton
- 4.4 There is an existing public footpath that runs around the site that could be retained in situ as part of any development proposal.

**Utilities and Services** 

4.5 The site benefits from full mains utilities including foul drainage, gas, electricity and telecoms.

Flood Risk

4.9 The Environment Agency Indicative Flood Map indicates that only a relatively small area of the northern part of the site directly adjacent to the Cam Brook is within Flood Zone 3 and therefore not suitable for development. There is sufficient land available for up to 4-5 dwellings in the remainder of the site which is not affected by any flood risk constraints.

**Ecology and Biodiversity** 

- 4.10 The application site is grazed and managed, and there are no known protected species present. The site is open with tree root protection zones only affecting part of the site boundary.
- 4.11 The Cam Brook and surrounding vegetation may function as a bat commuting corridor. This will be established by an ecology walkover survey in due course, however, on the basis of an initial site inspection the site is relatively unconstrained.

Landscape

- 4.12 The Bath / Bristol Green Belt terminates to the north of the Cam Brook. The site is not subject to any landscape or other site specific designations. The site lies within the Cam Brook valley floor and is well contained in landscape terms. Development could be absorbed into the wider landscape, subject to appropriate design and landscaping mitigation.
- 5.0 Conclusions
- 5.1 In order to continue to demonstrate a five year land supply and achieve delivery of the overall housing numbers set out in the Core Strategy there must be a step change in housing delivery in the authority area. Whilst BANES has made some limited efforts through its Infrastructure Delivery Programme to achieve this, we contend that they have not made sufficient progress in proactively addressing many of the planning and lead in time issues that apply to sites identified in the housing trajectory and the Placemaking Plan Options Document. This challenge is further exacerbated by the Council's reliance on delivery of a significant number of sites on previously developed land or that suffer from other constraints. Furthermore, BANES' assumptions on the delivery of sites with the benefit of planning permission are also overly optimistic and BANES is also overly reliant on development through the volume housing building model.
- 5.2 Given this BANES needs to have additional flexibility built into its Placemaking Plan and other delivery documents. However, the approach taken in the Placemaking Plan Options Document particularly for locations in the Somer Valley is both highly overly optimistic, not grounded in a clear understanding of the constraints and difficulties of taking sites forward in the current market and is highly inflexible given its reluctance to identify new greenfield sites that could contribute to housing in sustainable locations. We therefore consider that the Placemaking Plan should identify a range of additional sites in the Somer Valley, including its rural areas, to give the Plan the necessary degree of flexibility that is required to conform with Core Strategy objectives.
- 5.3 The land is at Bridge Place Farm, Camerton is capable of fulfilling this need for flexibility being an unconstrained site that offers an innovative opportunity that can be delivered quickly and avoids the delivery constraints of the standard house building model as well as meeting the sustainability requirements of the NPPF.
- 5.4 We therefore respectfully request that Camerton's settlement boundary is redrawn to include the whole application

site and/or the site is allocated for residential development in the Placemaking Plan. The site also presents an opportunity for the Council to help meet the requirement set out in paragraph 50 of the NPPF to provide sites for people who wish to build their own homes in a sustainable location.

| Respondent 6439 Comment 1 Respondent Phil Rigg Number: Name:   | <b>Respondent</b> Rigg Construction <b>Organisation</b> :  |
|--|--|
| Agent ID: Agent Name:  | _  |
| Further Information available in the original comment? $\Box$ A  | ttachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Unallocated Site - Land a  | at Bridge Place Farm, Camerton   |
| Comment on the Site:   |  |
| understand that the areas of land that were offered to BANES b   | y the parish council were all rejected.  |
| We live at Bridge Place Farm and we were never asked or knowing reement.   | ngly considered for inclusion of the place making  |
| We have a paddock between the existing footpath and the streamousing boundary which would unobtrusive and close to the exist vould be needed to service both the existing and the new house as they consider that visibility is an issue with the current drive a  | ting services such as bus stops and school. A new drive s, but highways and the parish should not object to this |
| Could you advise me how this is put forward for inclusion in the contract of t | core strategy as we assume Camerton is obliged to put  |

Placemaking Options Plan Reference: Unallocated Site - Land at Cappards Road,

Bishop Sutton; Land south of the A39, High Littleton; and Land at Maynards

Terrace, Cluton

Plan Order Number: 20

| Respondent 219<br>Number: | Comment 2<br>Number: | Respondent Name:             | Respondent<br>Organisation:   | Edward Ware Homes Ltd |
|---------------------------|----------------------|------------------------------|-------------------------------|-----------------------|
| Agent ID: 175 Ag          | ent Name: la         | n Jewson Planning Ltd        |                               |                       |
| Further Informatio        | n available in       | the original comment? $\Box$ | Attachments sent with the com | ment? $\square$       |

Placemaking Options Plan Reference: Unallocated Site - Land at Cappards Road, Bishop Sutton; Land south of the A39,

#### Comment on the Site:

The Core Strategy set a minimum housing requirement of 1,120 dwellings for the period 2011 to 2029. Policies RA1 and RA2 of the Core Strategy advise that this required will be achieved in the following manner:

- Housing developments of around 50 dwellings at each of the villages which meet the criteria of Policy RA1. Sites must be within the housing development boundaries (HDB's) of the villages, or allocated within the Placemaking Plan or a Neighbourhood Plan.
- •Housing developments of around 15 dwellings at each of the villages which do not meet the criteria of Policy RA1. Sites must be within the HDB's of the villages.

The recently published Strategic Housing Land Availability Assessment (SHLAA) Housing Trajectory 2011 to 2029 (December 2014) suggests that 1,159 dwellings will be delivered in the Rural Areas during the plan period (2011 to 2029), 39 dwellings in excess of the housing requirement. This comprises the following:

**Dwellings** 

Completions between 1st April 2011 and 31st March 2014 145
Predicted Supply between 1st April 2014 and 31st March 2029 1,014
Total 1,159

However, a review of the sites that make up the predicted supply indicates that only 432 of the 1,014 dwellings have planning permission. While the number of dwellings that have been allocated in the Placemaking Plan is not fixed for each site, it is clear that not enough sites are being proposed to meet the minimum target of 1,120 dwellings set by the Core Strategy. The emerging policy approach is therefore currently unsound as it has not been 'positively prepared' or 'justified', two of four tests of soundness set out at paragraph 182 of the NPPF.

#### **Change requested:**

In order to remedy the above issue and ensure that the Placemaking Plan is sound it is necessary to allocate additional greenfield sites adjacent to the HDBs of the various RA1 settlements. Our client proposes the allocation of the sites listed in the table below. All of the sites have been subject to planning applications, with some currently subject to appeals. The applications were accompanied by a range of supporting documents which confirm that the sites are sustainable locations for development and that there are no technical issues that would preclude development. Copies of the relevant Site Location Plans and Illustrative Site Layouts are included for reference.

SiteCapacityApplication

ReferenceDrawings

Residual Land at Cappards Road, Bishop Sutton32 dwellings13/04975/OUTSite Location Plan and Illustrative Site Layout (Appendix 5)

Land South of the A39, High Littleton71 dwellings14/00038/OUTSite Location Plan and Illustrative Site Layout (Appendix 6)

Maynards Terrace, Clutton (Site B)36 dwellings14/00039/OUTSite Location Plan and Illustrative Site Layout (Appendix 7)

Maynards Terrace, Clutton (Site C)37 dwellings14/00041/OUTSite Location Plan and Illustrative Site Layout (Appendix 8)

It is acknowledged that some of the above settlements have already got commitments in excess of 50 dwellings for the plan period. However, it should be noted that Policy RA1 does not set 50 dwellings as a maximum limit, it is the supporting text which indicates that that 'around' 50 dwellings will be delivered at each of the villages. This is in recognition that some settlements are better placed to accommodate more development than others.

Placemaking Options Plan Reference: Unallocated Site - Land at Church Farm,

Clutton

Plan Order Number: 20

| Respondent 64   | 52 Comment 1 Re       | espondent              | Respondent Littfield Land Limited |  |  |
|---|-----------------------|------------------------|-----------------------------------|--|--|
| Number:   | Number: Na            | ame:                   | Organisation:                     |  |  |
| Agent ID: 236 Agent Name: Tim Roberts Planning  Further Information available in the original comment?   Attachments sent with the comment? |                       |                        |                                   |  |  |
| Placemaking Op  | tions Plan Reference: | : Unallocated Site - L | and at Church Farm, Clutton       |  |  |

#### Comment on the Site:

I am instructed by Litfield Land Limited and make the following comments in respect of Paragraphs 1.370 and 1.371 (Clutton)

Ref: Clutton (Paragraphs 1.370 and 1.371)

We note that the Placemaking Plan proposes that "the Clutton Neighbourhood Development Plan will be used to set out more detailed priorities for development at a local level, consistent with the more strategic vision for the wider area set in the adopted Core Strategy."

We are nevertheless concerned that The Neighbourhood Development Plan as published in draft form is not consistent with vision and objectives set out in the adopted Core Strategy or Policy RA1 and reiterated at Paragraph 1.345 of the draft Placemaking Plan. This makes it clear that villages such as Clutton will each accommodate approximately 50 dwellings over the Core Strategy period of 2014 to 2029 in addition to development already committed and small scale windfall sites (including in-fill development) within the existing settlement boundary.

Limiting any new housing development to the limited opportunities for infill within the existing development boundaries would not assist in sustaining the existing level of services necessary to support the vision of a thriving community which we understand underpins the purpose of preparing the Neighbourhood Plan. It would also, in our view, be contrary to the vision and objectives and Policy RA1 of The Core Strategy.

We note the findings of the Clutton Parish Council Housing Need Survey (January 2013) which was responded to by 29% of households in the parish. This should not, however, be confused with an objective assessment of need for market and affordable housing as referred to in the NPPF (paragraph 47).

Targeted small scale development for housing in reasonably accessible village communities is clearly appropriate if related to local need (market, affordable and specialist elderly accommodation). Clutton is just one such village. The 2011 census records it as having a population of 2,537 and 962 households. It also benefits from a bus service.

Even on a net-nil migration scenario (i.e. balance between in-migration and out-migration), Clutton will need more housing development over the period to 2029 in order to sustain current population levels and, crucially, the proportion of those living within the community being within an age range that would be economically active.

On any analysis, however, new residential development is clearly needed in order to sustain the current range and choice of services currently enjoyed and the thriving village community envisaged in the draft Neighbourhood Plan.

Moreover, in seeking to meet newly arising housing need (affordable and market), it would be more sustainable to accommodate that which is, and will continue to arise in and around the village, where it arises i.e. in and around the village and not to the west of A37 as has been suggested as a future possibility in the draft Neighbourhood Plan.

Paragraph 5.09 of the adopted Core Strategy recognises that: "In the central part of the District, the extensive plateau from Hinton Blewett to Newton St Loe includes the key villages of Clutton, Temple Cloud, High Littleton, Timsbury and

Farmborough. The form of the villages in this area tends to be either centred around a village core (such as Clutton) or in linear form (such as Temple Cloud). Edge of settlement development during the post war period lacked the well-integrated characteristic of the original villages and has had a significant impact on views." Development on land to the north of the farmstead at Church Farm, Clutton would integrate well with the core of the village.

Policy RA1 of the adopted Core Strategy is clear that in respect of villages such as Clutton "development sites will also be identified in the Placemaking Plan and the housing development boundary will be reviewed accordingly to enable delivery during the Plan period of the 1,120 dwellings identified on the Key Diagram. Residential development on sites outside the Green Belt adjoining the housing development boundary at these villages will be acceptable if identified in an adopted Neighbourhood Plan." The settlement boundary at Clutton does not, however appear to have been reviewed with a view to delivering the development identified in the Core Strategy.

Paragraph 1.345 of the draft Placemaking Plan is clear that villages such as Clutton will each accommodate approximately 50 dwellings over the Core Strategy period of 2014 to 2029 in addition to development already committed and small scale windfall sites (including in-fill development) within the existing settlement boundary.

Land to the north of the farmstead at Church Farm, Clutton is available, accessible, unconstrained, developable, and deliverable and is situated in a sustainable location.

We are seeking the allocation of land at Church Farm, Clutton.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Unallocated Site - Land at Norton Lane,

Whitchurch

Plan Order Number: 20

Placemaking Options Plan Reference: Unallocated Site - Land at Norton Lane, Whitchurch

#### Comment on the Site:

These representations have been prepared by Indigo Planning on behalf of Lands Improvement Holdings (LIH) in respect of Bath and North East Somerset's (BANES) Placemaking Plan options consultation (November 2014).

LIH welcomes the opportunity to comment upon the policies and allocations set out in the Placemaking Plan. In particular, LIH is keen to ensure that the policies and allocations contained in the Plan are flexible and realistic to assist in meeting the housing needs of the district.

LIH owns land at Norton Lane, Whitchurch. The site is 8.421 ha in size and comprises three fields that are currently in agricultural use. A site location plan is enclosed with this correspondence.

## Background

The site has previously been promoted as part of a wider site by Taylor Wimpey and Bovis Homes commonly referred to as Whitchurch Development Area.

The council will be aware that the Draft RSS for the South West required an urban extension of 6,000 homes to the South East of Bristol, within an area of search that included the environs of Whitchurch and the A37. The EiP Panel's Report endorsed this level of development, but the SoS Proposed Modifications document increased the requirement to 9,500 homes (comprising 8,000 within Bath and North East Somerset (BANES) and 1,500 within Bristol). However, before the RSS could be adopted it was revoked by the SoS in July 2010.

Throughout the preparation of the draft South West RSS and BANES Core Strategy a number of areas were promoted by landowners and developers within the former RSS area of search.

The site and surrounding land around Whitchurch were promoted by Taylor Wimpey and Bovis Homes. A vision and concept masterplan for a Whitchurch Development Area was prepared and submitted in response to the BANES Core Strategy. The masterplan promoted an area capable of delivering a mixed use urban extension of about 3,500 homes.

As part of the council's evidence base informing the Core Strategy, the council appointed Arup to investigate development concept options for ten locations to inform the consideration of additional housing led development in the district. With regard to development at Whitchurch, the 'Land at Whitchurch Development Concept Options Report' (March 2013) concluded that:

- •The site was previously promoted as an urban extension in the Draft Regional Spatial Strategy (now abolished);
- •The site has been promoted in the refresh of the council's Strategic Housing Land Availability Assessment (SHLAA) (2013), therefore it can be considered available;
- •There is significant developer interest, demonstrating deliverability despite identified transport constraints; and
- •It is considered that a viable housing scheme could be delivered in this location.

However despite this assessment, the council elected to allocate only 200 homes at Whitchurch (to the east on the Horseworld site) in the Core Strategy.

Placemaking Plan Options (November 2014)

Whilst it is recognised that the council's Core Strategy sets out the broad and strategic approach to the level and location of new development throughout Bath and North East Somerset, the Placemaking Plan still proposes to allocate sites to meet the aspirations of the Core Strategy.

The sites presented as potential allocations in the document have come from a number of sources, including sites identified:

- •In the SHLAA;
- By town and parish councils as part of collaborative work on the Placemaking Plan; and
- •In other council strategies/plans.

However, no potential options in and around Whitchurch have been included in the options document. This is despite the land at Norton Lane, as part of a wider urban extension site, being considered as an available and viable opportunity by the council in its evidence base.

We consider that the submitted site and the adjoining land to the south of Whitchurch represents a viable opportunity to assist the council in meeting its housing needs and should be considered as a potential option in the Placemaking Plan.

West of England Joint Planning Strategy

We are aware that the four authorities comprising the West of England area, namely Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council intend to prepare a Joint Planning Strategy.

This will provide a strategic planning framework for the West of England and will identify the overall quantum of housing and jobs within the West of England to be planned for and their distribution across the sub-region.

As part of this the West of England authorities will need to prepare new evidence including a joint Strategic Housing Market Assessment which we understand is currently being prepared. This is likely to identify an increased housing need for the district over and above that identified in the adopted Core Strategy. When the housing needs of Bristol are taken into account, this is likely to result in the surrounding authorities such as Bath and North East Somerset having to provide sufficient land adjoining the city to allow Bristol to grow.

We remain of the opinion that land around Whitchurch represents a viable opportunity to provide a sustainable urban extension to Bristol and LIH intends to work with the adjoining landowners to promote housing growth in this area through the West of England Joint Planning Strategy.

We trust that the representations outlined in the submitted documents will be taken into consideration by the council. If you wish to discuss any of the comments made in further detail please do not hesitate to contact me.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

Placemaking Options Plan Reference: Unallocated Site - Land at Staddlestones,
Midsomer Norton

Plan Order Number: 20

| Respondent 64<br>Number: | 00 Comment<br>Number: |                   | Matt Bourne-Jones, Allayne<br>Bourne and Lorraine | Respondent Organisation:    |
|--------------------------|-----------------------|-------------------|---|-----------------------------|
| Agent ID: 219            | Agent Name: F         | PlanningSphere    |   |                             |
| Further Informa          | tion available i      | n the original co | mment?  Attachments sent                          | with the comment? $\square$ |
|                          |                       |                   |   |                             |

**Placemaking Options Plan Reference:** Unallocated Site - Land at Staddlestones, Midsomer Norton

#### Comment on the Site:

- 1.0 Introduction
- 1.1 PlanningSphere has been instructed to make representations to the emerging Bath and North East Somerset (BANES) Place Making Plan (PMP) on behalf of Matt Bourne-Jones, Allayne Bourne and Lorraine Woodhatch, owners of land at Staddlestones, Midsomer Norton. This representation is submitted to BANES consultation on its Place Making Plan Options Document in accordance with the consultation timetable.
- 1.2 The representation should also be read with the following enclosed documentation:
- Location Plan and Proposed Site Plan Della Valle Architects
- Flood constraints map Environment Agency
- 1.3 The site is located on the southern edge of Midsomer Norton, in the Somer Valley and comprises a small infill plot of undeveloped greenfield land accessed off of Staddlestones, an estate road to the east of the Chilcompton Road.
- 2.0 Relevant background information
- 2.1 The site comprises a small parcel of land to the south of Staddlestones on the southern edge of Midsomer Norton. The River Somer lies to the west of the site and the existing Staddlestones residential development lies to the east of the site. The BANES Local Plan 2007 Proposals Map (Inset 19 West) identifies the site as lying outside of, but adjoining the settlement boundary. The Environment Agency Indicative Flood Map indicates that the site is within Flood Zone 1 and therefore flooding is not a constraint to development. No designations apply to the site apart from the Forest of Avon (Policy NE.5) designation a saved Local Plan policy.
- 2.2 PlanningSphere is making representations directly on behalf of the landowners of this site whose intention is to fully promote this site as a modest sustainable and readily deliverable infill site in Midsomer Norton meeting an identified housing need through the allocation of the site in the Placemaking Plan. Following this, the landowners would move swiftly to identifying a suitable development partner and submitting a planning application to enable prompt delivery.
- 2.3 The Placemaking Plan is intended to complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the detailed housing and employment requirements established in the Core Strategy and its strategic objectives. By allocating the site at Staddlestones for housing, this contributes to meeting the strategic objectives set out in the Core Strategy, particularly with respect to meeting housing needs and delivering well connected places accessible by sustainable means of transport.
- 3.0 Response to the Place Making Plan Options Document

**General Comments** 

3.1 The role of the Placemaking Plan is outlined in the Introduction to the Options Document. It is the Council's intention that the Placemaking Plan will complement the strategic planning framework provided in the Council's Core Strategy

which was formally adopted by BANES in July 2014 and will deliver the housing and employment requirements established in the Core Strategy and its strategic objectives. It should be noted that for some locations the Placemaking Plan will be complemented by more detailed neighbourhood planning initiatives.

3.2 Section 1 of the Options Document provides a context to the allocation of specific sites for development.

## **National Policy Context**

3.3 The National Planning Policy Framework, (NPPF) together with the more technical advice found in National Planning Practice Guidance (NPPG) sets the context for both the overall development plan and more specifically policies to support the delivery of housing. Key to the NPPF is the emphasis on delivering sustainable development, based on the five guiding principles of the Uks Sustainable Development Strategy Securing the Future. The NPPF definition of sustainable development as set out at Paragraph 7 defines sustainable development as having three dimensions; Economic, Social and Environmental. This commitment is implemented through the document's presumption in favour of sustainable development, set out in Paragraph 14 of the NPPF. For plan making this means that:

"Local planning authorities should positively seek opportunities to meet the development needs of their area;

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless:

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

Specific policies in this framework indicate development should be restricted .... "

- 3.4 Paragraph 47 clearly sets out the government's key planning objectives to boost significantly the supply of all sources of housing. This includes the requirement for local authorities to meet local housing requirements through their Local Pan by identifying objectively assessed need, and by being able to demonstrate a 5 year supply of deliverable housing sites.
- 3.5 Given our more detailed comments set out below we contend that because of its lack of flexibility the Placemaking Plan will not be able to be in compliance with the adopted Core Strategy as it will not enable the delivery of the required level of housing across the plan period, nor will it be able to maintain a five years supply of housing as required by the NPPF and NPPG. We therefore consider that as drafted the Placemaking Plan would not be in accordance with national policy, and as such could not be found sound.

The Development Plan

3.6 The Development Plan for BANES consists of the adopted Core Strategy (July 2014) which includes policies saved from the 2007 Local Plan. The intention is that these policies will be replaced on adoption of the Placemaking Plan.

The Somer Valley

- 3.7 Page 78 of the Options Document sets out an overview of development sites in the Somer Valley, which covers the urban areas of Midsomer Norton, Westfield and Radstock together with a rural hinterland containing the principle villages of Peasedown St John and Paulton. Paragraph 1.208 of the Options Document states that "the local population identifies itself as separate small communities, mainly based on the former mining settlements. However, residents also recognize that new opportunities and projects need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole."
- 3.8 Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Midsomer Norton town centre will continue to be the principle centre for the Somer Valley, with Radstock town centre providing a smaller scale but important focal point for neighbouring communities. Amongst a series of requirements in Policy SV1 is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.
- 3.9 However paragraph 1.212 of the Options Document states that "the majority of these dwellings have either been

built since the start of the Plan period, or are existing commitments" and paragraph 1.213 states that "additional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement." This approach is reinforced through proposed detailed Policy HG.4 in the Options Document that continues to rely on the development boundaries identified in the 2007 BANES Local Plan. Whilst there is a recognition that these boundaries will need review as part of the development of the Placemaking Plan, paragraph 1.213 is clear that this would only be in relation to sites which lie outside existing development boundaries but now have planning permission. Furthermore this paragraph asserts that "Additional greenfield sites in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan."

- 3.10 We consider that this approach is clearly overly restrictive and inflexible. Such an approach would result in an unsound Placemaking Plan which would not be in conformity with the Core Strategy as it would not be capable of delivering the required minimum level of dwellings for the Somer Valley Area identified in Core Strategy Policy SV1 within the Plan period. Furthermore it is very unlikely that any shortfall in this location could met elsewhere in the District outside the Somer Valley. We therefore consider that the need for a more flexible approach in the Placemaking plan is justified for the following reasons:
- Historically BANES has had a very low housing delivery rate, which has been considerably beneath required Local Plan
  delivery rates. We are not aware that the
  Local Authority are taking any steps to accelerate this build rate, both by means of additional resources to its planning
  team or engagement with developers to enable faster delivery.
- •Many of the sites in the Somer Valley and the wider district are located on previously developed land and may have high associated remediation costs involved. This may result in both delays to the delivery of these sites and in some cases their unviability in current market conditions. In addition this may further impact on other plan considerations such as the provision of affordable housing. Many of the sites in the Somer Valley, and the wider district do not benefit from any form of planning permission and indeed may also be subject to competing land uses which may provide land owners with additional value.
- •Overly optimistic assumptions have been made about the delivery of sites with existing planning permission.
- 3.11 We set out the reasons for our view in more detail below.

**Housing Delivery Rates** 

- 3.12 The Core Strategy identifies a total minimum housing requirement of 13,000 dwellings between 2011 and 2029. The Core Strategy at paragraph 1.33 recognises that this represents a significant uplift in delivery rates from historic levels of around 380 dwellings pa (2001-2011) to an average annualised level of around 720 dwellings across the whole plan period. The Core Strategy also acknowledges that there has already been a shortfall in completions between 2011 and 2013 and that an additional 20% buffer of identified sites needs to be added in the first five years to take past poor performance into account. This equates, as identified in the most recent iteration of the Council's SHLAA (Dec.2014), as 1012 dwellings per annum over the next five years, with a forecast of peak delivery level of 1701 dwellings in 2017/18.
- 3.13 Whilst recognising that the Council's housing trajectory, at the moment identifies lower levels of housing delivery towards the later part of the Plan period, it is very clear that to even achieve the simple annualised housing target (720 dwellings) would require a marked step change in housing delivery in the District. Historically, it is clear that this level of delivery has never been achieved, even in periods where the housing market and public finances have been very buoyant, peaking at 662 dwellings pa in 1998/99 and 554 dwellings pa in 2007/8. Delivery of housing at a rate that would meet expectations of a five year housing land supply (currently 1012 dwellings pa) would require an even more significant rise in delivery levels.
- 3.14 Clearly achieving such a step change in housing delivery levels to even the annualised rate is going to be very challenging, and would require a proactive response from the Council. Ideally this would entail a commitment from the Council to ensure the necessary resources to enable the timely assessment of relevant planning applications for housing are present; a commitment to reducing lead time though proactive engagement with developers and a commitment to help enable the delivery of necessary associated infrastructure to support housing development.

- 3.15 However all of these matters would require significant capital and revenue resources which is challenging in the current public spending round and as such the Council has not developed a coherent approach to supporting these high levels of housing delivery. Whilst the Council has developed an Infrastructure Delivery Programme which does help in supporting elements of key infrastructure, and identifying some funding resources through that programme, given the level of change that needs to be achieved in BANES to meet its high aspirations this is simply not enough.
- 3.16 Furthermore it is questionable if the local housing market could support some of the very high projected levels of housing delivery in the next five years (for example, 1701 dwellings in 2017/18), given both levels of demand for property and availability of the necessary levels of skilled contractors and plant. It would be unlikely that discounting such housing to achieve sales in this period would be practical as this would have a knock on effect on the viability necessary to the support CIL and Section 106 contributions required by the Council and would delay or stifle development.

#### Site Constraints

- 3.17 The concern we outline above is exacerbated by the fact that many of the sites identified in the Placemaking plan still require planning permission and are highly constrained. The precise nature of these constraints varies between the locations but they are particularly acute for locations on previously developed land. In terms of the Somer Valley, of the sites identified as being potentially suitable for housing in the Placemaking Plan but that have not been granted planning permission, the Placemaking Plan recognises that "these are mainly brownfield sites that are within or adjacent to the town centres of the towns of Midsomer Norton and Radstock and within Westfield".
- 3.18 Development of sites on previously developed land have greater start-up costs due to site clearance and possible decontamination/remediation, and at the start of the development process higher levels of uncertainty about development feasibility and viability require. This means that considerably more survey work and due diligence on the part of developers is necessary than is generally expected for greenfield sites, leading to longer lead in times. Furthermore the planning application process can be more complex with the potential for considerable supporting information to accompany such applications. These factors when taken in the context of the relatively modest housing market in the Somer Valley, are likely to result in costs which may amount to a development never being viable unless market conditions altered radically and it is possible that without the confidence of detailed viability work, many of the sites identified by the Council in the Placemaking Plan will simply never be developed.
- 3.19 Whilst estimates in recent iterations of the SHLAA have been made about the level of delivery that these sites can provide, in many cases this analysis has been at a relatively superficial level and the underlying policy context for many of these sites in the Placemaking Plan is relatively underdeveloped, in comparison to the far more sophisticated approach developed for some sites in Bath. This should be considered in the context of the Council's Housing Trajectory which places considerable reliance on delivery before 2018/19 from sites on previously developed land but not yet in receipt of planning permission. Thus the confidence with which both estimates of the level of housing yield from these sites, and the suggested timescales by which they could start to contribute must be treated with considerable caution. In some cases these sites may not in fact deliver any housing.
- 3.20 Recent work in support of 3 planning appeals (Land at Cappards Road, Bishop Sutton:

APP/F0114/A/14/2217216; Land at Boxbury Hill, Midsomer Norton: APP/F0114/A/14/2215930 and Land at Abbotts Farm Close, Paulton: APP/F0114/A/14/2214596) has analysed a number of proposed timescales for sites that form part of the latest iteration of the SHLAA and concludes that in both the District as a whole and the Somer Valley, delivery levels have been seriously over estimated. The consultant Savills, seriously questions the identified level of delivery in the next five years of the Plan period from both the Welton Bibby Baron Site (Welton Bag Factory) and St Peter's Factory/Cobblers Way. Savills estimate that the expected contribution from these two sites needs to be reduced from 170 dwellings in the next five years to just 30 dwellings. The Welton Bibby Baron site will not be able to deliver any housing in the next five years. In addition it should be remembered that the proposed allocations in both Midsomer Norton and Radstock are both subject to the further Neighbourhood Planning process, which will add a further level of delay to the identification of these sites.

Sites in receipt of planning permission

3.21 There is also a considerable element of supply in the Somer Valley from sites that are in receipt of at least outline

planning permission but have not yet started. The SHLAA identifies that a considerable proportion of these sites will start in the coming year (2015/16) but it is unclear on the basis by which this assumption has been made, especially as many of these sites suffer from constraints that need to be satisfactorily overcome and no attempt has been made to estimate likely non implementation of these sites or potential delays to start times. The authority has not considered the effect of changing levels of housing supply in local markets, and the effect this may have on build out rates and viability, and also have not considered the reselling of land with permission to other developers who may wish to alter approved schemes. The Savills report also calls into question the assumptions made in assessing the speed at which these sites will deliver, considering them to be overly optimistic.

3.22 The Savills report seriously questions the deliverability of a number of permissioned sites on these grounds. In particular it highlights the issues that have arisen on the Old Pit Yard site in Clandown, both in terms of developer readiness and the need for further studies to ensure the safe development of a contaminated and unstable site.

Conclusions on Land Supply Issues

- 3.23 It is clear that the BANES Core Strategy and associated Housing Trajectory set an extremely challenging target to meet, even if this simply looks at a flat annualized rate. In order to achieve the levels of supply to be able to continue to demonstrate a five year land supply (with a 20% poor performance allowance) the authority would need to be very proactive in engaging with developers to ensure prompt delivery of sites and also to carefully manage the supply of developable land in the District. However BANES is overly reliant on previously developed, or otherwise constrained land, and is overly optimistic projections for the delivery of sites with planning permission. The implementation of the Core Strategy, as articulated in the Placemaking Plan, is not sufficiently flexible to be able to manage both 5 year land supply and overall delivery.
- 3.24 This situation is particularly acute in the Somer Valley, where there is an over reliance on previously developed land much of which is not in the state of readiness necessary to enable these sites to deliver in the next five years, or in some cases ever delivery housing. Furthermore the
- local authority's assumptions on delivery from sites that have planning permission are again overly optimistic and have failed to take into account some of the significant constraints and issues these sites are affected by.
- 3.25 In order to overcome these concerns, and meet the Core Strategy's housing target in the Somer Valley, we suggest that BANES needs to allocate a number of relatively unconstrained greenfield sites such as the land at Staddlestones, Midsomer Norton, that are otherwise sustainably located, in order to give themselves the necessary flexibility to achieve both an ongoing five year land supply and the overall Core Strategy Housing Target.
- 4.0 Suitability of Land at Staddlestones, Midsomer Norton for Development
- 4.1 The land is located in the Riverside residential area of Midsomer Norton. The site is identified in the accompanying Location Plan by Della Valle Architects and consists of a roughly rectangular parcel of land between the River Somer, to the west of the site and the existing Staddlestones residential development to the east. The site is accessed off the existing estate road serving Staddlestones. The site is on the southern boundary of the town, approximately 1,300 metres from the town centre. The site currently in use as grazing land. The site is bounded by hedgerow on all sides and there is a belt of mature trees adjoining the River Somer to the west.
- 4.2 The site lies within the following approximate walking distances of key facilities:
- •Long Vernal Primary School = 1,450 metres
- •Somervale School = 1,500 metres
- •St John's Primary School = 1,550 metres
- 4.3 This representation includes a concept layout plan for the site which demonstrates that the site can accommodate up to 6 dwellings. No significant environmental or other constraints have been identified for the site including flood risk.
- 4.4 We contend that the site could therefore clearly accommodate a significant contribution to open market and affordable housing need, both in the Somer Valley and the wider district. The site is developable and viable, and it is the landowners' intention to find a development partner to take the proposed development forward. This would help in

giving the Placemaking Plan both greater flexibility and certainty in housing delivery, and would thus ensure that it was in compliance with the strategic objectives in the Core Strategy.

**Transport and Access** 

- 4.5 Staddlestones and the wider Riverside area is accessed via the Chilcompton Road, a two-way single carriageway road running on a north-south alignment through the west of Midsomer Norton to the village of Chilcompton approximately half a mile to the south.
- 4.6 Whilst the site lies on the edge of Midsomer Norton, it is still relatively easy to access the high levels of services found in the town either through public transport links or by walking or cycling along relatively flat safe pavemented roads. Furthermore, public transport links to both Bristol, Bath and Frome can be accessed from the town centre.

Flood Risk and Drainage

4.7 The site slopes gently towards the River Somer. The Environment Agency Flood Map shows that none of the site lies within Flood Zones 2 or 3 and therefore no part of the site need be excluded from the area proposed for development. The concept layout allows for a 10m buffer zone between the River Somer and the proposed residential development.

### Sustainability

- 4.8 The site is adjacent to the settlement boundary of Midsomer Norton which has been clearly identified as an important market town/ local service centre in the Core Strategy. Locating new residential development at Midsomer Norton would be sustainable given the services, employment and public transport links that it provides. Midsomer Norton Town Centre and its immediate environs contain a high level of services, including primary and secondary school, supermarkets, medical facilities, vets and specialist shops, as well as access to convenient public transport services to a wide range of local towns and villages including Bristol, Bath, Radstock, Trowbridge, Wells and Frome.
- 4.9 In view of the wide range of pedestrian, cycle and public transport facilities provided within the local area, it is considered that the site is readily accessible by a range of travel modes and non-car modes of travel which will represent a viable travel choice for many residents.

Landscape

4.10 No significant landscape constraints exist in relation to the development of this site.

Public Rights of Way

- 4.11 OS Maps identify that a public right of way runs along the adjacent bank of the River Somer, leading into the centre of Midsomer Norton known as 'Riverside Walk'. There would be no need to divert the existing footpath and it does not impact or constrain the proposed residential development.
- 5.0 Conclusions
- 5.1 In order to continue to demonstrate a five year land supply and achieve delivery of the overall housing numbers set out in the Core Strategy there must be a step change in housing delivery in the authority area. Whilst BANES has made some limited efforts through its Infrastructure Delivery Programme to achieve this, we contend that they have not made sufficient progress in proactively addressing many of the planning and lead in time issues that apply to sites identified in the housing trajectory and the Placemaking Plan Options Document. This challenge is further exacerbated by the Council's reliance on delivery of a significant number of sites on previously developed land or that suffer from other constraints. Furthermore, BANES' assumptions on the delivery of sites with the benefit of planning permission are also overly optimistic.
- 5.2 Given this BANES needs to have additional flexibility built into its Placemaking Plan and other delivery documents. However, the approach taken in the Placemaking Plan Options Document particularly for locations in the Somer Valley is

both highly overly optimistic, not grounded in a clear understanding of the constraints and difficulties of taking sites forward in the current market and is highly inflexible given its reluctance to identify new greenfield sites that could contribute to housing in sustainable locations. We therefore consider that the Placemaking Plan should identify such sites in the Somer Valley to give the Plan the necessary degree of flexibility that it requires to conform with the Core Strategy objectives.

- 5.3 The site at Staddlestones, Midsomer Norton is capable of fulfilling this need for flexibility being a relatively unconstrained site in a sustainable location that can be delivered quickly and reliably in line with the sustainability requirements of the NPPF.
- 5.4 We therefore respectfully request that the site should be allocated for residential development and/or the settlement boundary be amended to include the site in the Draft Placemaking Plan.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Unallocated Site - Land either side of

Chilcompton Road, Midsomer Norton

Plan Order Number: 20

| Respondent 6400<br>Number: | Comment 1 Number:  | -              | Matt Bourne-Jones, Allayne<br>Bourne and Lorraine | Respondent Organisation:  |
|----------------------------|--------------------|----------------|---|---------------------------|
| Agent ID: 219 Ag           | gent Name: Plar    | nningSphere    |   |                           |
| Further Information        | on available in th | ne original co | mment?   Attachments sent                         | with the comment? <a></a> |

**Placemaking Options Plan Reference:** Unallocated Site - Land either side of Chilcompton Road, Midsomer Norton

#### Comment on the Site:

- 1.0 Introduction
- 1.1 PlanningSphere has been instructed to make representations to the emerging Bath and North East Somerset (BANES) Place Making Plan (PMP) on behalf of Matt Bourne-Jones, Allayne Bourne and Lorraine Woodhatch, owners of land at Chilcompton Road, Midsomer Norton, BA3 2NL. These representations are submitted to BANES consultation on its Place Making Plan Options Document in accordance with the consultation timetable.
- 1.2 The representations should also be read with the following enclosed documentation:
- •Site Location Plan FMW consultancy
- Access Feasibility & Accessibility Report FMW
- Landscape Report Tisdale Associates
- 1.3 The site is located on the south western edge of Midsomer Norton, in the Somer Valley and comprises two large plots of undeveloped greenfield land on either side of Chilcompton Road. The smaller of the two sites, Plot 1, located on the north-western side of the road and the larger Plot 2 located on the south-eastern side of the road.
- 1.4 Plot 1 is a broadly rectangular parcel of land extending to approximately 1.59 ha. It is situated abutting residential properties to the north and main road access of Chilcompton Road to the east. To the immediate north is a public right of way (outside of the site's boundaries). To the south is open countryside. To the south is also the edge of the BANES administrative boundary, shared with Mendip District Council. The topography is generally level and the land is currently used for grazing.
- 1.5 Plot 2 is situated to the east of Chilcompton Road and extends behind houses fronting Riverside Gardens and further south, towards the disused railway line. The land extends to approximately 11.09 ha with approximately 2.96 ha of that being within the BANES local authority area. The remainder is situated within Mendip District Council's catchment. The topography is relatively level, however the land slopes gradually towards the River Somer (to the east). The land is currently used for grazing and comprises a mixture of open pasture land, hedgerows and wooded areas. There is a small cluster of dilapidated agricultural outbuildings to the western boundary, with access off Chilcompton Road.
- 2.0 Relevant background information
- 2.1 The land at Chilcompton Road comprising Plots 1 and 2 as described in Section 1.0 was submitted for consideration as a potential housing site in the BANES March 2013 SHLAA (reference MSN 38). The BANES Local Plan 2007 Proposals Map identifies the site as lying outside of, but adjoining the settlement boundary. No designations apply to the site apart from the Forest of Avon (Policy NE.5) designation, which is a saved Local Plan policy.
- 2.2 The site was originally promoted on behalf of Barratt Homes. Representations were submitted in response to the Place Making Plan Launch Document published for consultation in July 2013. As well as focusing on the town of Midsomer Norton and the land lying adjacent to its southern edge at Chilcompton Road, the representations focused on district wide housing land supply and delivery issues with specific reference to the Somer Valley. Our representations seek to build on

those submitted by Grassroots Planning. Barratt Homes are no longer involved in the promotion of the site and PlanningSphere is now making representations directly on behalf of the landowners. It is the landowner's intention to fully promote this site as a sustainable and readily deliverable extension to Midsomer Norton meeting an identified housing need through the allocation of the site in the Placemaking Plan. Following this, the landowners would move swiftly to identifying a suitable development partner to progress a planning application and the delivery of the site.

- 2.3 The Placemaking Plan is intended to complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the detailed housing and employment requirements established in the Core Strategy and its strategic objectives. By allocating the site at Chilcompton Road for housing, this contributes to meeting the strategic objectives set out in the Core Strategy, particularly with respect to meeting housing needs and delivering well connected places accessible by sustainable means of transport.
- 3.0 Response to the Place Making Plan Options Document

#### General Comments

- 3.1 The role of the Placemaking Plan is outlined in the Introduction to the Options Document. It is the Council's intention that the Placemaking Plan will complement the strategic planning framework provided in the Council's Core Strategy which was formally adopted by BANES in July 2014 and will deliver the housing and employment requirements established in the Core Strategy and its strategic objectives. It should be noted that for some locations the Placemaking Plan will be complemented by more detailed neighbourhood planning initiatives.
- 3.2 Section 1 of the Options Document provides a context to the allocation of specific sites for development.

# National Policy Context

3.3 The National Planning Policy Framework, (NPPF) together with the more technical advice found in National Planning Practice Guidance (NPPG) sets the context for both the overall development plan and more specifically policies to support the delivery of housing. Key to the NPPF is the emphasis on delivering sustainable development, based on the five guiding principles of the Uks Sustainable Development Strategy Securing the Future. The NPPF definition of sustainable development as set out at Paragraph 7 defines sustainable development as having three dimensions; Economic, Social and Environmental. This commitment is implemented through the document's presumption in favour of sustainable development, set out in Paragraph 14 of the NPPF. For plan making this means that:

"Local planning authorities should positively seek opportunities to meet the development needs of their area;

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless:

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

Specific policies in this framework indicate development should be restricted .... "

- 3.4 Paragraph 47 clearly sets out the government's key planning objectives to boost significantly the supply of all sources of housing. This includes the requirement for local authorities to meet local housing requirement through their Local Pan by identifying objectively assessed need, and by being able to demonstrate a 5 year supply of deliverable housing sites.
- 3.5 Given our more detailed comments set out below we contend that because of its lack of flexibility the Placemaking Plan will not be able to be in compliance with the adopted Core Strategy as it will not enable the delivery of the required level of housing across the plan period, nor will it be able to maintain a five years supply of housing as required by the NPPF and NPPG. We therefore consider that as drafted the Placemaking Plan would not be in accordance with national policy, and as such could not be found sound.

# The Development Plan

3.6 The Development Plan for BANES consists of the adopted Core Strategy (July 2014) which includes policies saved from the 2007 Local Plan. The intention is that these policies will be replaced on adoption of the Placemaking Plan.

## The Somer Valley

- 3.7 Page 78 of the Options Document sets out an overview of development sites in the Somer Valley, which covers the urban areas of Midsomer Norton, Westfield and Radstock together with a rural hinterland containing the principle villages of Peasedown St John and Paulton. Paragraph 1.208 of the Options Document states that "the local population identifies itself as separate small communities, mainly based on the former mining settlements. However, residents also recognize that new opportunities and projects need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole."
- 3.8 Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Midsomer Norton town centre will continue to be the principle centre for the Somer Valley, with Radstock town centre providing a smaller scale but important focal point for neighbouring communities. Amongst a series of requirements in Policy SV1 is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.
- 3.9 However paragraph 1.212 of the Options Document states that "the majority of these dwellings have either been built since the start of the Plan period, or are existing commitments" and paragraph 1.213 states that "additional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement." This approach is reinforced through proposed detailed Policy HG.4 in the Options Document that continues to rely on the development boundaries identified in the 2007 BANES Local Plan. Whilst there is a recognition that these boundaries will need review as part of the development of the Placemaking Plan, paragraph 1.213 is clear that this would only be in relation to sites which lie outside existing development boundaries but now have planning permission. Furthermore this paragraph asserts that "Additional greenfield sites in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan."
- 3.10 We consider that this approach is clearly overly restrictive and inflexible. Such an approach would result in an unsound Placemaking Plan which would not be in conformity with the Core Strategy as it would not be capable of delivering the required minimum level of dwellings for the Somer Valley Area identified in Core Strategy Policy SV1 within the Plan period. Furthermore it is very unlikely that any shortfall in this location could met elsewhere in the District outside the Somer Valley. We therefore consider that the need for a more flexible approach in the Placemaking plan is justified for the following reasons:
- Historically BANES has had a very low housing delivery rate, which has been
  considerably beneath required Local Plan delivery rates. We are not aware that the
  Local Authority are taking any steps to accelerate this build rate, both by means of additional resources to its planning
  team or engagement with developers to enable faster delivery.
- •Many of the sites in the Somer Valley and the wider district are located on previously developed land and may have high associated remediation costs involved. This may result in both delays to the delivery of these sites and in some cases their unviability in current market conditions. In addition this may further impact on other plan considerations such as the provision of affordable housing. Many of the sites in the Somer Valley, and the wider district do not benefit from any form of planning permission and indeed may also be subject to competing land uses which may provide land owners with additional value.
- •Overly optimistic assumptions have been made about the delivery of sites with existing planning permission
- 3.11 We set out the reasons for our view in more detail below.

## **Housing Delivery Rates**

3.12 The Core Strategy identifies a total minimum housing requirement of 13,000 dwellings between 2011 and 2029. The Core Strategy at paragraph 1.33 recognises that this represents a significant uplift in delivery rates from historic levels of around 380 dwellings pa (2001-2011) to an average annualised level of around 720 dwellings across the whole plan period. The Core Strategy also acknowledges that there has already been a shortfall in completions between 2011 and 2013 and that an additional 20% buffer of identified sites needs to be added in the first five years to take past poor performance into account. This equates, as identified in the most recent iteration of the Council's SHLAA (Dec.2014), as

1012 dwellings per annum over the next five years, with a forecast of peak delivery level of 1701 dwellings in 2017/18.

- 3.13 Whilst recognising that the Council's housing trajectory, at the moment identifies lower levels of housing delivery towards the later part of the Plan period, it is very clear that to even achieve the simple annualised housing target (720 dwellings) would require a marked step change in housing delivery in the District. Historically, it is clear that this level of delivery has never been achieved, even in periods where the housing market and public finances have been very buoyant, peaking at 662 dwellings pa in 1998/99 and 554 dwellings pa in 2007/8. Delivery of housing at a rate that would meet expectations of a five year housing land supply (currently 1012 dwellings pa) would require an even more significant rise in delivery levels.
- 3.14 Clearly achieving such a step change in housing delivery levels to even the annualised rate is going to be very challenging, and would require a proactive response from the Council. Ideally this would entail a commitment from the Council to ensure the necessary resources to enable the timely assessment of relevant planning applications for housing are present; a commitment to reducing lead time though proactive engagement with developers and a commitment to help enable the delivery of necessary associated infrastructure to support housing development.
- 3.15 However all of these matters would require significant capital and revenue resources which is challenging in the current public spending round and as such the Council has not developed a coherent approach to supporting these high levels of housing delivery. Whilst the Council has developed an Infrastructure Delivery Programme which does help in supporting elements of key infrastructure, and identifying some funding resources through that programme, given the level of change that needs to be achieved in BANES to meet its high aspirations this is simply not enough.
- 3.16 Furthermore it is questionable if the local housing market could support some of the very high projected levels of housing delivery in the next five years (for example, 1701 dwellings in 2017/18), given both levels of demand for property and availability of the necessary levels of skilled contractors and plant. It would be unlikely that discounting such housing to achieve sales in this period would be practical as this would have a knock on effect on the viability necessary to the support CIL and Section 106 contributions required by the Council and would delay or stifle development.

#### Site Constraints

- 3.17 The concern we outline above is exacerbated by the fact that many of the sites identified in the Placemaking plan still require planning permission and are highly constrained. The precise nature of these constraints varies between the locations but they are particularly acute for locations on previously developed land. In terms of the Somer Valley, of the sites identified as being potentially suitable for housing in the Placemaking Plan but that have not been granted planning permission, the Placemaking Plan recognises that "these are mainly brownfield sites that are within or adjacent to the town centres of the towns of Midsomer Norton and Radstock and within Westfield".
- 3.18 Development of sites on previously developed land have greater start-up costs due to site clearance and possible decontamination/remediation, and at the start of the development process higher levels of uncertainty about development feasibility and viability require. This means that considerably more survey work and due diligence on the part of developers is necessary than is generally expected for greenfield sites, leading to longer lead in times. Furthermore the planning application process can be more complex with the potential for considerable supporting information to accompany such applications. These factors when taken in the context of the relatively modest housing market in the Somer Valley, are likely to result in costs which may amount to a development never being viable unless market conditions altered radically and it is possible that without the confidence of detailed viability work, many of the sites identified by the Council in the Placemaking Plan will simply never be developed.
- 3.19 Whilst estimates in recent iterations of the SHLAA have been made about the level of delivery that these sites can provide, in many cases this analysis has been at a relatively superficial level and the underlying policy context for many of these sites in the Placemaking Plan is relatively underdeveloped, in comparison to the far more sophisticated approach developed for some sites in Bath. This should be considered in the context of the Council's Housing Trajectory which places considerable reliance on delivery before 2018/19 from sites on previously developed land but not yet in receipt of planning permission. Thus the confidence with which both estimates of the level of housing yield from these sites, and the suggested timescales by which they could start to contribute must be treated with considerable caution. In some cases these sites may not in fact deliver any housing.

3.20 Recent work in support of 3 planning appeals (Land at Cappards Road, Bishop Sutton:

APP/F0114/A/14/2217216; Land at Boxbury Hill, Midsomer Norton: APP/F0114/A/14/2215930 and Land at Abbotts Farm Close, Paulton: APP/F0114/A/14/2214596) has analysed a number of proposed timescales for sites that form part of the latest iteration of the SHLAA and concludes that in both the District as a whole and the Somer Valley, delivery levels have been seriously over estimated. The consultant Savills, seriously questions the identified level of delivery in the next five years of the Plan period from both the Welton Bibby Baron Site (Welton Bag Factory) and St Peter's Factory/Cobblers Way. Savills estimate that the expected contribution from these two sites needs to be reduced from 170 dwellings in the next five years to just 30 dwellings. The Welton Bibby Baron site will not be able to deliver any housing in the next five years. In addition it should be remembered that the proposed allocations in both Midsomer Norton and Radstock are both subject to the further Neighbourhood Planning process, which will add a further level of delay to the identification of these sites.

Sites in receipt of planning permission

- 3.21 There is also a considerable element of supply in the Somer Valley from sites that are in receipt of at least outline planning permission but have not yet started. The SHLAA identifies that a considerable proportion of these sites will start in the coming year (2015/16) but it is unclear on the basis by which this assumption has been made, especially as many of these sites suffer from constraints that need to be satisfactorily overcome and no attempt has been made to estimate likely non implementation of these sites or potential delays to start times. The authority has not considered the effect of changing levels of housing supply in local markets, and the effect this may have on build out rates and viability, and also have not considered the reselling of land with permission to other developers who may wish to alter approved schemes. The Savills report also calls into question the assumptions made in assessing the speed at which these sites will deliver, considering them to be overly optimistic.
- 3.22 The Savills report seriously questions the deliverability of a number of permissioned sites on these grounds. In particular it highlights the issues that have arisen on the Old Pit Yard site in Clandown, both in terms of developer readiness and the need for further studies to ensure the safe development of a contaminated and unstable site.

Conclusions on Land Supply Issues

- 3.23 It is clear that the BANES Core Strategy and associated Housing Trajectory set an extremely challenging target to meet, even if this simply looks at a flat annualized rate. In order to achieve the levels of supply to be able to continue to demonstrate a five year land supply (with a 20% poor performance allowance) the authority would need to be very proactive in engaging with developers to ensure prompt delivery of sites and also to carefully manage the supply of developable land in the District. However BANES is overly reliant on previously developed, or otherwise constrained land, and is overly optimistic projections for the delivery of sites with planning permission. The implementation of the Core Strategy, as articulated in the Placemaking Plan, is not sufficiently flexible to be able to manage both 5 year land supply and overall delivery.
- 3.24 This situation is particularly acute in the Somer Valley, where there is an over reliance on previously developed land much of which is not in the state of readiness necessary to enable these sites to deliver in the next five years, or in some cases ever delivery housing. Furthermore the authority's assumptions on delivery from sites that have planning permission are again overly optimistic and have failed to take into account some of the significant constraints and issues these sites are affected by.
- 3.25 In order to overcome these concerns, and meet the Core Strategy's housing target in the Somer Valley, we suggest that BANES needs to allocate a number of relatively unconstrained greenfield sites such as the land at Chilcompton Road, Midsomer Norton, that are otherwise sustainably located, in order to give themselves the necessary flexibility to achieve both an ongoing five year land supply and the overall Core Strategy Housing Target.
- 4.0 Suitability of Land at Chilcompton Road, Midsomer Norton for Development
- 4.1 The land identified in the enclosed Site Location Plan consists of two plots of land located on opposite sides of Chilcompton Road in Midsomer Norton. The site lies on the southern boundary of the town adjoining the existing residential area approximately 1,300 metres from the town centre.

- 4.2 Plot 1 which lies to the north-west of Chilcompton Road comprises one field surrounded on all sides by hedgerows and semi-mature and mature trees, measuring 1.59 hectares. In particular, its southern and northern boundaries are heavily vegetated.
- 4.3 Plot 2 lies to the south-east of Chilcompton Road and comprises two fields that are both bounded by hedgerows, again interspersed by trees. A small yard accommodating two agricultural buildings also lies within this parcel with access into this yard taken directly off Chilcompton Road. The developable area in BANES administrative area in Plot 2 measures 2.96 hectares.
- 4.4 The accompanying Access Feasibility and Accessibility study undertaken by FMW Consultancy provides an objective assessment of the site's accessibility. The report confirms the accessible location of the site, which lies within the following approximate walking distances of key facilities:
- •Long Vernal Primary School = 1,200 metres
- Somervale School = 1,250 metres
- •Local Convenience Store = 900 metres
- •Bus Stop = 50 and 80 metres

A full table of walking distances to local key facilities is attached in paragraph 2.10 of the accompanying FMW report. Whilst the site as a whole is already very accessible to local services, additionally there are further opportunities to increase pedestrian linkages to the site by improving links to the nearby PROW network.

- 4.5 Local bus services also provide a circular bus link between the site and the town centre throughout the day and are timed such that they are suitable for employment and retail type trips. The journey time to the town centre is approximately 4 minutes. Local services in the town centre are all readily accessible by cycling.
- 4.6 The previously submitted 2013 representations included a concept layout plan for the site which demonstrated that the site has capacity to accommodate up to 129 dwellings. This was informed by a landscape appraisal of the site, preliminary walkover survey, Environment Agency Flood Mapping and an initial assessment of potential access points. No significant environmental or other constraints were identified through the 2013 SHLAA process.
- 4.7 We contend that the site could therefore clearly accommodate a significant contribution to open market and affordable housing need, both in the Somer Valley and the wider district. The site is readily developable and it is the landowners' intention to swiftly commission a development partner to take the proposed development forward. This would help in giving the Placemaking Plan both greater flexibility and certainty in housing delivery, and would thus ensure that it was in compliance with the strategic objectives in the Core Strategy.

### **Transport and Access**

- 4.8 The site is accessed off the Chilcompton Road, a two-way single carriageway road running on a north-south alignment through the west of Midsomer Norton to the village of Chilcompton approximately half a mile to the south. At present, Chilcompton Road in the vicinity of the site is approximately 5.5m in width and has no footways along either side of the carriageway. However, footways are provided on both sides of Chilcompton Road up to the site boundary from the adjacent Riverside Gardens roundabout junction.
- 4.9 Section 4 of the FMW report confirms that both plots could be safely accessed through either T junctions or a mini roundabout. Traffic generation from the site would not have a significant impact on the capacity or operation of the local highway network.

## Flooding and Drainage

4.10 The site slopes gently towards the River Somer and the eastern periphery of Plot 2 lies adjacent to this watercourse. The Environment Agency Flood Map shows that a small part of the fringe of Plot 2 lies within either flood zone 1 or 2 and should therefore be excluded from the area proposed for development. The proposed layout put forward in the original representation by Grassroots Planning acknowledged this constraint when assessing the developable area of the site and

the potential yield of housing. The concept layout allowed for a buffer between the identified flood zone and the proposed residential development.

4.11 The remainder of Plot 2 and the whole of Plot 1 lies within Flood Zone 1 and is not subject to any flooding constraints. No constraints in relation to groundwater protection or surface water flooding issues have been identified from EA mapping and the BANES Local Plan 2007 Proposals Map.

### Sustainability

- 4.12 The site is adjacent to the settlement boundary of Midsomer Norton which has been clearly identified as an important market town/ local service centre in the Core Strategy. Locating new residential development at Midsomer Norton would be sustainable given the services, employment and public transport links that it provides. Midsomer Norton Town Centre and its immediate environs contain a high level of services, including primary and secondary school, supermarkets, medical facilities, vets and specialist shops, as well as access to convenient public transport services to a wide range of local towns and villages including Bristol, Bath, Radstock, Trowbridge, Wells and Frome.
- 4.13 In view of the wide range of pedestrian, cycle and public transport facilities provided within the local area, it is considered that the site is readily accessible by a range of travel modes and non-car modes of travel which will represent a viable travel choice for many residents. It should also be highlighted that the Oliver Brooks Road residential estate just to the north of the Chilcompton Road site is a relatively recent development (00/00316/FUL). The Local Planning Authority was therefore clearly of the view that this recent development was in a sustainable location and given its close proximity, there is no reason why the same should not apply to the site that is the subject of this representation.

## **Ecology and Biodiversity**

4.14 The landscape evidence provided by Tisdale Associates notes that generally, apart from hedgerow and trees, the site consists of open agricultural fields with little biodiversity value. The concept layout included in the 2013 representations retained a large majority of these hedgerows retained and re-enforced with the central layout in Plot 2 being retained in part and compensatory planting provided on its southern boundary or within the proposed areas of public open space, more than compensating for their loss. With suitable mitigation in the form of new planting and landscaped public areas, there would be no adverse impact on ecology and biodiversity in the area would actually be enhanced.

#### Landscape

- 4.15 Tisdall Associates were originally instructed to undertake a preliminary visual assessment of the site in August 2013, and the key findings of this report, are 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 that the site abuts the existing urban area;
- •View from within the ZTV are restricted by existing hedgerow and rivers planting and the site is well visually constrained;
- •The development of the site would represent a natural extension to the existing urban edge;
- •Without mitigation some views of development in plot 2 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.
- 4.16 It was concluded that no significant landscape constraints exist in relation to the development of this site.

## Heritage

4.17 The site does not lie within or near to any conservation areas, listed buildings or other heritage assets.

## Public Rights of Way

4.18 OS Maps identify that a public right of way runs along part of plot 2's boundary. This was taken into consideration in the original concept layout made in support of the representations to the Issues Paper of the Placemaking Plan. There would be no need to divert the existing footpath and it does not impact or constrain the proposed residential development.

#### 5.0 Conclusions

- 5.1 In order to continue to demonstrate a five year land supply and achieve delivery of the overall housing numbers set out in the Core Strategy there must be a step change in housing delivery in the authority area. Whilst BANES Council has made some limited efforts through its Infrastructure Delivery Programme to achieve this, we contend that they have not made sufficient progress in proactively addressing many of the planning and lead in time issues that apply to sites identified in the housing trajectory and the Placemaking Plan Options Document. This challenge is further exacerbated by the Council's reliance on delivery of a significant number of sites on previously developed land or that suffer from other constraints. Furthermore, BANES' assumptions on the delivery of sites with the benefit of planning permission are also overly optimistic.
- 5.2 Given this BANES needs to have additional flexibility built into its Placemaking Plan and other delivery documents. However, the approach taken in the Placemaking Plan Options Document particularly for locations in the Somer Valley is both highly overly optimistic, not grounded in a clear understanding of the constraints and difficulties of taking sites forward in the current market and is highly inflexible given its reluctance to identify new greenfield sites that could contribute to housing in sustainable locations. We therefore consider that the Placemaking Plan should identify such sites in the Somer Valley to give the Plan the necessary degree of flexibility that it requires to conform with the Core Strategy objectives.
- 5.3 The two plots of land that comprise the site at Chilcompton Road, Midsomer Norton are capable of fulfilling this need for flexibility being relatively an unconstrained site in a sustainable location that can be delivered quickly and reliably in line with the sustainability requirements of the NPPF.
- 5.4 We therefore respectfully request that the site should be allocated for residential development in the Draft Place Making Plan on the basis that the subject site is a suitable for new housing development, and is viable and therefore deliverable.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Unallocated Site - Land in Saltford Number: 20 Respondent 6444 Comment 1 Respondent Grenville Nash Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Unallocated Site - Land in Saltford **Comment on the Site:** Here in Saltford we have a demand from our residents via our Saltford Parish Plan, for housing to be built. We also have a small 9 acre site available to be built on,but because it has been deemed to be green belt, plans have been rejected. Until the powers that be recognise the difference between a small odd bit of land, no longer used for agriculture, and a 250 acre green belt field still used to grow crops, there is no chance that Banes will ever find enough area to fulfill their housing targets. Please, please, please Banes Get Real! **Change requested:**

Placemaking Options Plan Reference: Unallocated Site - Land off Tyning Hill,

Plan Order Number: 20

Radstock

| Respondent 6434<br>Number: | Comment 1 Number: | Respondent<br>Name:         | Respondent David Webb Organisation: Management Ltd. |  |
|----------------------------|-------------------|-----------------------------|---|--|
| Agent ID: 229 Ag           | ent Name: Pho     | enix Land Solutions Ltd     |   |  |
| Further Informatio         | n available in th | ne original comment? $\Box$ | Attachments sent with the comment? ✓                |  |

Placemaking Options Plan Reference: Unallocated Site - Land off Tyning Hill, Radstock

#### Comment on the Site:

- 1.Introduction
- 1. This document responds to Bath and North East Somerset Council's request for comments on the Options Consultation of the Placemaking Plan. It has been prepared by Phoenix Land Solutions Ltd in conjunction with the Team (as set out in Section 6 of this document) on behalf of the client David Webb Management Ltd.
- 2. The site in question is outlined in red on the site location plan with blue land indicating other land in the client's control.
- 2. Also enclosed within this document is:
- •an Opportunities and Constraints Plan (prepared by EDP February 2015); and
- •a Concept Masterplan (prepared by EDP February 2015).
- 3. This document should be read in in conjunction with the outline planning application for the site which will follow shortly. The outline planning application is supported by a suite of documents to include a heritage and archaeological assessment, ecological assessment, landscape and visual impact assessment, flood risk assessment, transport assessment, ground investigation study, odour assessment, planning statement and design and access statement.
- 4. Section 2 of this report provides background to the site and evolvement of the opportunities and constraints plan. Section 3 sets out the vision for the site and benefits proposed through the proposals highlighting how placemaking in this area can be supported.
- 6. Section 4 of the report outlines the historical promotion of the site together with the issue of previously developed land.
- 7. Section 5 provides information on the Team committed to progressing the site and their experience in relevant fields.
- 8. Section 6 provides a summary of the proposals with Appendix A setting out detailed representations to Policy HG.4 of the Placemaking document.
- 2. Background
- 1. The site is privately owned land and is served by road via Tyning Hill. It is located 900m metres from the town centre and is in very close proximity to the Academy of Trinity Primary School (600metres), the Whisty Community Centre (480 metres) and the Tyning Inn at the same distance.
- 2. The land sits outside but at the edge of the Conservation Area. The site is partially screened through existing trees to the north, east and west of the site. A public footpath runs through the site and links to the south with the walk down Whitelands hill to the cycle path and town centre. To the north the footpath links with Woodborough Road.
- 3. The land is located adjacent to two terraces of three storey former miners cottages, Lower Whitelands. This area of

housing sits below the site. Associated with the housing at Whitelands is unauthorised parking along the southern part of the site. This area is narrow and results in parking being unsightly and reflects a poor approach to the former miners cottages and this part of the Conservation Area. The existence of unauthorised parking is clearly due to the fact that the terraces were never designed to accommodate parking associated with todays living patterns.

- 4. The site previously housed terraces on the land which many local people remember together with the various forms of residential development and associated uses to include a playground. The use of the land over the years is evidenced by a number of hardstandings together with an estate road. There is limited contamination on the site (see ground investigation assessment as part of the outline application). On the southern part of the land is a electricity substation and services with street lighting running along the north side of the road all of which highlight the urban nature of the site.
- 5. Whilst the land clearly has urban characteristics it should be noted that growth on the site has occurred overtime which has been managed over the years. An ecological assessment of the site was carried out in 2014 (the scope of which having been agreed with the ecologist at BANES). This study established that the site supports grassland and scrub habitats that support slow-worm and four notable invertebrate specifies. Details are provided in the Ecological Assessment that accompanies the outline planning application (a summary of which is contained in Section 4 of this document) together with measures to ensure an overall biodiversity gain.
- 6. At the time of writing this document some residents have highlighted fears over the ecological value of the site and its loss. Specifically concerns were raised in respect of maintenance of the site that took place in November 2014. Works carried out in were in accordance with guidance provided by the Teams ecological consultant. Consultation occurring on 9th February is an opportunity to address any concerns that local interests may have with the Teams ecological consultant who will be attending. The ecological importance of the land is an area that has been addressed within the proposal's and the opportunity to liaise with Council officers will naturally follow.
- 7. What is clear from visiting the site and historical records is that Lower Whitelands was never built or intended to be a standalone development in the area. The loss of Upper Whitelands and other uses of the site has left this end of Tyning Hill somewhat disjointed with a physical void between it and the rest of the nearby community. It is recognised that Lower Whitelands is a close community especially given the isolated nature of the terraces. The aim of the proposals to to respect and enhance this asset but to create a physical link through development of the site connecting it back to the wider community and providing a distinct sense of place.

The Opportunities and Constraints Plan

- 8. Proposals for the site have been formed in response to a number of factors listed below.
- •The location of the site being 900m from the town centre, 600m to the primary school and 480m to the community centre.
- •The site's landscape value and contribution to the immediate and wider area.
- •The ecological value of the site and the wider area.
- •The historical context of the site and its immediate area.
- •The capacity of the existing road network.
- •The lack of a turning circle at Tyning Hill.
- •The fact that existing development at Whitlelands is physically separated as a community from the rest of the Tyning and Woodborough area.
- •There being no obvious public focal point along Tyning Hill that supports a sense of place and connection to the wider community.
- •Unauthorised parking at the approach to Whitelands and along Tyning Hill which undermines and devalues the area ascetically having regard to heritage, the Conservation Area and public routes past and through the land.
- •The opportunity to create an enhanced route of the current public footpath to add value to the route from Whitelands hill and Woodborough road.
- 9. The above factors and characteristics have formed the basis upon which the Concept Plan was born and the vision for the site developed. This is addressed in more detail in the next section of this document.
- 3. Vision for the site

- 1. The approach to the proposal is to work with the land and the heart of the proposal is to create a distinctive sense of place supported by a hub area. The principles that have guided the development of the proposals and in particular the hub area is:
- •the promotion of human contact and social activities.
- •the space being safe, welcoming, and accommodating for all users.
- •design and architectural features that are visually interesting.
- •the promotion of community involvement.
- reflection of the local history.
- •a good relationship with bordering uses.
- •a well maintained space.
- •that the area has a unique or special character.
- 2. It is appreciated that many of these principles are points that a reserved matters application would address, however outlining these principles is essential in explaining the vision for the site.
- 3. Having regard to the context outlined above and the previous section of this report, the proposals specifically seek to:
- •To create and enhance wildlife habitats of value that would lead to an overall biodiversity gain.
- •Introduce allocated parking to address the unauthorised parking near Whitelands.
- Widen the roads along the length of Tyning Hill to 5.5m together with a pedestrian footway.
- Provide open play space on the south west part of the land fronting onto Tyning Hill.
- Provide a small local shop/cafe/space facing out toward Tyning Hill and the open play space.
- •Introduce public art with the specific aims of giving homage to he mining heritage of the area and site. This again would be located on or near the open play space and the local shop/cafe/ space facing onto Tyning Hill.
- •Introduce a local community bus-stop on Tyning Hill in respect of the existing Dial-a-Ride service.
- •Introduce an interpretation board to further enhance mining heritage of the site together with the ecological and landscape value of the wider site and area. The location of this would be tied into the open space area, public art and local shop/cafe/space.
- •Up to fifty five homes to include a small element of live work units.
- •To provide 30% of affordable homes.
- •A diverted footpath to allow for the proposals and to enhance the pedestrian connectively of the site to the wider area and to support the new hub area that contains the open play space, public art, interpretation board, community bus top and local shop/cafe/space.
- 4. It should be noted in respect of the proposed hub the inclusion of a local shop/cafe/space has been broadly defined. This could be connected to a community enterprise or private venture. The main aim is to enhance facilities and an additional opportunity to connect in the area. The existing Whisty Community centre is well used and is managed by appointed local residents. The introduction of the proposed hub area is intended to support the community centre rather than compete with it. The intention is to add value to the existing community infrastructure and the possibility of the proposed local shop/cafe/space is being sounded out with the local residents at the public consultation event on 9th February together with the members that run the Whisty Community hall.
- 5. Consultation on the Concept Plan is taking place on 9th February at the Whisty Community Centre. The results of the consultation will be fed back to: the Radstock Town Council on 16th February; into the Statement of Community Involvement for the planning application; and separately to the Placemaking team at BANES.
- 6. Summaries of supporting studies to the outline planning application are provided in the following section. All studies accompany the Outline Planning Application.
- 4. Summary of supporting studies
- 1. This section provides summaries of supporting studies.

Landscape - The Landscape and Visual Impact Assessment considers the potential effects of the proposed development on the landscape character of the local context and on views and visual amenity and has fed back the findings of the appraisal into the development of the concept masterplan for the site.

As a consequence of the minor effects on the landscape and limited effects on visual receptors, in combination with the mitigation proposed, the assessment finds the development to be acceptable in both landscape and visual terms and in compliance with relevant local policy.

The proposed development offers the opportunity to enhance the landscape quality of this settlement edge site which is assessed to be of very low landscape value and possesses none of the Paulton & Peasedown St John Ridge LCA distinctive characteristics of its hillside setting. The concept masterplan illustrates how appropriate detailed design will respect the built heritage of Lower Whitelands miner terraces and successfully assimilate the proposed development into its wooded and rural edge hillside context.

Transport and highways. The Transport Assessment confirms the site is well positioned in relation to the local highway network and represents a sustainable location with local facilities and services with a walkable distance. Vehicle access to the site will be taken via two new priority junctions with Tyning Hill. These will include 5.5m carriageway widths into the site as well as widening the road at Tyning Hill in this location also to 5.5m. New 2.0m footways are proposed together with street lighting, adequate visibility splays and additional parking to improve the uncontrolled parking in this location currently arising from existing residential development at Lower Whitelands.

The provision of a new footway linking the site to the existing footways on Tyning Hill will ensure that access is achievable by walking. This will also provide benefits for the existing residents of Lower Whitelands who currently have to walk in the carriageway to access the town centre. Vehicle and cycle parking for the development will be provided in accordance with the relevant standards.

The trip generation exercise identified the expected number of peak hour vehicle movements associated with the development proposal. The PICADY assessment of the Waterloo Road junction with the A367 shows no capacity problems at this location with the additional development trips included.

The Radstock PARAMICS model has been utilised to assess the impacts of the development scheme on the improved Radstock Road network as a whole. Although the PARAMICS model identified that the proposal would contribute to slight increase in journey times, especially for southbound traffic on the A367 (i.e. increases of 37 and 66 seconds for AM and PM respectively), the increases are considered to be minimal with journey times remaining well below those observed with the unimproved road network layout. As such the proposed development would not adversely impact the local highway network. Accordingly the proposal is acceptable in highway terms.

Ecology. An ecological assessment report has been prepared and will be submitted with the application. The key findings are as follows. The proposed development would not impact on any protected sites.

There would be a loss of low value grassland, scrub and pioneer vegetation in the footprint of the development. This supports four notable species of invertebrates and reptiles, and some birds of conservation concern. Bats may commute through the site, but would not roost, and the habitat is sub-optimal for foraging.

The development provides opportunities to create and enhance wildlife habitats of value that would lead to an overall biodiversity gain, and avoid impacts to offsite habitats, including:

- •Offsetting development from adjacent woodland of value to the southwest at Tyning Tip to avoid disturbance, with the protective buffer planted up to create a woodland 'ecotone' of value to flora and fauna;
- Planting of native hedgerows at the site's boundaries, which would compensate in part for loss of scrub used by nesting birds;
- Designing drainage features to maximise their biodiversity potential, with wet or marshy areas likely to encourage a range of flora and fauna;
- •Management of other land adjacent to the site and in the developer's ownership. This supports low value dense scrub and could be managed to encourage more valuable grassland that would also provide replacement habitat for reptiles, invertebrates and other fauna;
- Avoiding design of gardens backing on to retained or newly created wildlife habitats.

An Ecological Management Plan (EcMP) would ensure that proposed habitat creation and enhancement to compensate for losses and replacement opportunities for fauna would be successful.

As is usual best practice, prior to construction an update survey for nesting birds and badgers would be undertaken to ensure that, if necessary, appropriate mitigation can be devised. The mitigation and enhancement could be controlled by appropriately worded planning conditions.

Conservation Area. The land within the application site boundary makes a neutral contribution to the wider setting of the Radstock Conservation Area, as a designated heritage asset, and equally the locally listed Lower Whitelands terraces. A sensitive and sympathetic design approach will be required relating to layout, scale, massing, density, story height, materials, open space and detailing to reflect the character and appearance of built form and landscape in the immediate locality will be produced and agreed at reserved matters stage.

Heritage. An archaeological and heritage assessment has been undertaken in relation to the site and confirms that the application site does not contain any designated heritage assets. The assessment has also established that there are no previously identified non-designated heritage assets. Notwithstanding this the former miners cottages at Lower Whitelands do reflect the local heritage of the area.

In this respect there is scope within the reserved matters stage of planning to tie in materials reinforcing the relationship and distinctiveness of Lower Whitelands with proposed development. Furthermore, proposed at the hub is public art that reflects the mining heritage together with an interpretation board to further reinforce local distinctiveness.

In addition the above are proposals to address the unauthorised parking at the approach to Whitelands through allocated parking. This allows for enhanced and improved views and the approach to Lower Whitelands.

Archaeology. Analysis of historical maps and aerial photographs show 19th century terraced housing existed on the eastern part of the site, but demolished in the 1960s. Parts of the footings are still visible on the ground. These are of local significance and their surviving remains could be recorded as a scheme of archaeological works secured by a condition if deemed necessary. The remains of housing on the site dating from the 1960s are of no significance and do not warrant any further archaeological investigation or recording.

The assessment establishes that the potential for Iron Age to Romano-British activity to be present on the site is low with subsequent activity on the site consisting of the construction of housing in the 19th and 20th centuries and previous levelling/grading, likely to have greatly disturbed (if not destroyed) any archaeological remains.

Design of housing. Whilst the proposed detailed design and layout is subject to reserved matters, the accompanying indicative concept plan indicates that the development will be up to 55 dwellings made up of a mixture of 70% open market and 30% affordable units. The dwellings are intended to be a range between 2 to 5 bedrooms with the majority at 2 storeys with some dwellings able to function as live-work units.

The gross development area is circa 2ha (deducting land included within the red line area for highways works). The density would therefore equate to 27-28 dwellings per hectare, a density considered appropriate to both the current market for family homes and the location. A density of this nature demonstrates that there will be clear scope to accommodate the public open space policy requirements.

The proposed development would promote and reinforce local distinctiveness by following the traditional form of the existing cottage style dwellings using locally sourced materials. The proposed development would remain in keeping with the existing proportions, design, scale, massing and grain of the existing development in close proximity.

The proposal aims to provide lifetime homes which offer flexibility to adapt through the course of a lifetime. They will be built to a minimum of Code Level 3 and have the ability to accommodate solar panels (given the southerly orientation of the majority of properties) and rainwater harvesting.

Drainage. The topographical survey confirms that the site falls towards Tyning Hill. Specific mitigation measures will be introduced into the detailed design to capture any overland surface water run-off from leaving the development site. The proposed development is not at risk of flooding and will not increase flooding to surrounding catchments. The development will use a combination of traditional piped drainage systems and sustainable drainage techniques Wessex Water confirms that sufficient capacity is available at the public foul sewer near the sewage treatment works to the south east to receive the flows from this development. For further details please see the full the Flood Risk

Assessment and Drainage Strategy accompanying the Outline Planning Application.

Odour. The assessment has been completed using information provided by Wessex Water and information gathered during an accompanied site visit. All impacts at this location are a small proportion (less than 15%) of those currently experienced at Lower Whitelands. The proposed development will be outside of the odour impact limit regarded in the UK as being sufficient to safeguard residential amenity and the proposal is acceptable in this regard. The Outline Planning Application is accompanied by a detailed odour impact assessment (OIA) of the Radstock Wastewater Treatment Works (WwTW), in relation to the potential for impact at occupiers of the proposed development.

Contamination. The Outline Planning Application is accompanied by a Ground Investigation Report. This confirms that there is limited contamination on the site but that there is no threat to human health or the environment.

Land Stability - The Coal Authority has confirmed that the site is in an area not used for mineral extraction. The Coal Authority also confirms that a Coal Mining Risk Assessment is not required for the planning application.

## Summary

The proposals for the site are based on robust studies that have fed into the concept for the land. The Concept Plan clearly shows how identified constraints have been addressed in a positive manner whilst working with the characteristics of the land and area to maximise the opportunities to create a positive sense of place. We are confident that the proposals are not just aspirational but can work on ground.

- 5. Previous consideration of the land
- 1. The site to realise the vision totals approximately 2.2 hectares. A larger site of 8.3 hectares was promoted through the two previous Plan reviews and considered as RAD19. in the BANES's Strategic Housing Land Availability Assessment (SHLAA) in respect of the Core Strategy.
- 2.In 2013 pre-application advice was sought for the larger site which was later reduced to encompass the site now considered. The response largely depended on Inspectors comments from the last two Local Plan Inquiries and did not benefit from a site visit.
- 3. There are are number of distinct material differences between the RAD. 19 site and the one now proposed which represents approximately 25% of the area. This highlights the need for a fresh approach. In particular:
- •The land lies outside the Conservation Area. The previous site included large areas of land within the Conservation Area.
- •The land is screened by woodland to the west, with differing degrees of screening to the north and east and residential development to the south. The previous site being larger did not benefit from such screening.
- •The land is considered to be previously developed land. The previous larger site was considered as a whole with the proposed site only representing approximately 25% of that proposal.
- 4.In addition to the above material points it is important to understand the context of comments made by Local Plan Inspectors in respect of the wider site.
- 5.Comments from the Inspector of the Wansdyke Local Plan make clear that a larger area of land was initially promoted, but that this area was later reduced during the Plan Inquiry. The Inspectors introduction to site highlights this change. However, on reading specific references to the site and its characteristics the Inspectors comments clearly relate to the larger site and not the reduced area. (See paragraphs 9.26.1-9.26.4 of the Inspectors Report to the Wansdyke Local Plan). This is evidenced from the description of the site. At paragraph 9.26.4 it states, " In my view there is little to distinguish the two wooded and open land on the objection site from nearby fields and woods, and they appear to be part of the countryside which encloses and penetrates into this part of the town".
- 6. The site now proposed and the reduced site during that Plan Inquiry did not include wooded land. Clearly the reference to the site was based on the wider site and not 25% of the site which is also now being considered.
- 7.It should further be noted that since the first Local Plan Inquiry the definition of Previously Development Land (PLD) has changed three times (Annex C to PPG3, PPS3 and the NPPF).

8.In respect of previous Local Plan Inquiries, the definition used was taken from PPG3 Annex C and included a line at the end of the definition which was "to the extent that it can reasonably be considered as part of the natural surroundings". This is an important point again highlighting the context of the site's consideration by Inspectors. The larger site was compared to the wider natural surroundings. The smaller site (also now proposed) was not compared with the wider site where characteristics were and still remain very different. It is a detailed point but an important one to give context to the Inspectors comments.

9.It is also now the case now that in determining PDL, comparison of a site's characteristics with the wider area has been removed from the Government's definition. Therefore material changes have occurred in terms of the site area considered and its relationship to its context.

10.In terms of blending back into the landscape, this has not been the case. Ariel pictures show this but more importantly it is clear when on site. In this respect it should be noted that; there are hard standings on the site which was acknowledged by the Inspector in 2006; an estate road still exists on site which shows up on BANES's proposals maps and on ariel photos; and an electricity sub station exists on site together with street lights that line the frontage of the site. All of these characteristics are clearly ones of previously developed land.

11. It is noted that in the glossary of the adopted BANES Core Strategy, the definition of previously developed land differs slightly from provisions contained in the NPPF. Here the position in summary is that a brownfield site does not automatically mean it is acceptable for development. Accordingly, this document and the Outline Planning Application provide the sustainability credentials of the site, how constraints and opportunities have been addressed, together with the placemaking vision for the that provides numerous benefits.

#### 6. The Team

In order to understand and the site and seek a way to balance competing issues the following team were assembled. Many of the team members have worked with BANES in different capacities and are available at request to assist the progression of the proposals.

- Kay Mann, Director of Phoenix Land Solutions Ltd. Kay acts as the agent for the site. She has a wide range of experience in a planning, regeneration and development capacity. Her planning experience spans 17 years having worked for large private sector consultancies, development company's and local authorities.
- •Balanced with her planning knowledge is her work in regeneration in both a pubic and private capacity. She is experienced in working with strategic partners through to the community level. Her experience spans the areas of partnership and community development, bid writing to secure funding at a central and local level, appraising the implementation and success of regeneration projects in a quantative and qualitative capacity, public consultation and the development of froward strategies. She has acted as the Programme Manager on two Single Regeneration Budget schemes (SRB) 3 and 6, which have involved projects totalling £23m of public funding.
- •Given her wide range of experience her approach is firmly rooted in making places that work on a number of levels with both strategic and local partners. The ethos of her company is about identifying and unlocking barriers to create sustainable usable spaces for people, encompassing the existing, future and wider community.
- •PLANNING Simon Fitton Partner at Alder King. Simon has wide experience in all levels of planning from development plan promotion through to submission of major planning applications and appeals. He specialises in the promotion of residential and mixed use strategic land, acting as lead consultant in the coordination of EIA, and negotiation through the development management process.
- •Genevieve Tuffnell Alder King. Genevieve is a Chartered Town Planner, based in Bristol, with over six years' experience. She worked on a broad range of projects gaining experience on various forms of development across the public and private sectors including: residential, commercial, mixed use, educational and rural. Key elements of experience and skills include the following: providing specialist planning advice, managing planning applications, Environmental Impact Assessment, strategic site promotion, planning obligation negotiations, appeals, and enforcement.

- •LANDSCAPE Julia Mussett from the Environmental Design Partnership (EDP). Julia is a Chartered Landscape Architect with 17 years' experience working in private landscape consultancies. She has worked in the residential sector in the Midlands and South West where she gained extensive experience in the detailed design of housing development strategic landscape schemes, including play areas and recreational public open space. She was involved in contract administration for the implementation and maintenance of public open space up to adoption by local authorities.
- •She has experience in the preparation of Landscape & Visual Impact Assessments in sensitive an designated landscapes including National Park, AONB and Green Belt. She is now specialising in this area of work at EDP.In the last year she has gained public inquiry experience, standing alandscape witness for B&NES Council on two occasions at planning appeals in Midsomer Norton and Peasedown St John.
- •MASTER PLANNING Tom Joyce from the Environmental Design Partnership (EDP).

  Tom joined EDP in May 2014 as a Principal Masterplanner. He completed his Part I & II degree in Architecture at the Welsh School of Architecture in Cardiff and since graduating has specialised in the fields of Urban Design and Masterplanning. He achieved RIBA chartered professional status in 2010.
- •During his time in practice Tom has played a lead role on a large range of projects including high profile Masterplanning competitions, town centre expansions and large scale residential and mixed use planning applications. Tom has also worked on a number of planning application sites within BANES, of a similar scale to this site including sites at Clutton and Temple Cloud.
- •Tom was previously employed as a senior Architect and Urban Designer at Pad Design in Bristol and previous to this worked for O'Mahony Pike in Dublin as an Architect and Urban Designer.
- •HERITAGE AND ARCHAEOLOGY Dr Ed Oakley from the Environmental Design Partnership (EDP) specialises in research and the production of archaeology and heritage assessments and ES chapters. He has successfully completed assessments for a wide variety of projects, including large scale renewable, residential and commercial developments. His key skills include: Archaeology and Cultural Heritage Assessment, Setting Assessment, Historic Building Appraisal, Environmental Impact Assessment, Historic Landscape Assessment, Negotiation with statutory organisations and planning authorities, Archaeological fieldwork management.
- •Ed also specialises in built heritage, providing assessments and advice regarding impacts upon developments involving listed buildings and their settings and has contributed to the success listed building consent applications. Additionally, Ed has successfully negotiated investigation strategies with local authorities and guided clients to achieve the best resolutions to manage the archaeological risk. In doing so, providing solutions which strikes a successful balance between development and preserving significant archaeological remains.
- •Ed has over ten years' experience in archaeological research and fieldwork, and has experience of a wide range of archaeological prospection and excavation projects. Ed has worked on a wide range of projects from the prehistoric to industrial periods, and has experience of running fieldwork projects ranging from small scale works to co-directing a series of excavations at a multi-period site in the north of Scotland. Ed also has experience in the role of local authority archaeological advisor.
- •Ed's research background has given him a wide ranging knowledge of archaeology from a number of periods and regions, in particular in relation to landscape archaeology. This has given Ed an excellent set of research skills which enables him to rapidly research sites and also to quickly establish the archaeological issues for any particular site. The landscape approach also allows Ed to appreciate the complexities of setting assessments. Ed's academic background has also led him to lecture at the University of Nottingham and also present at conferences both in the UK and abroad.
- •ECOLOGY Julian Arthur is a Partner of Tyler Grange LLP, a practice specialising in technical planning solutions in relation to arboriculture, ecology, landscape, and townscape and visual impacts.
- •Julian has more than 16 years experience as a professional ecologist. He holds an Honours Degree in zoology and a Masters Degree in ecology. He is a member of the Chartered Institute of Ecology and Environmental Management and is Co-Convenor of their south-west region committee. He is also a Chartered Environmentalist.

- •Julian is a highly experienced ecologist and has advised on a wide variety of projects requiring land-use change, from residential and commercial developments, to renewables and parkland plans, funded by stewardship agreements. He is expert in the planning system as it relates to ecology and nature conservation, along with the various international and UK legal instruments that are designed to protect wildlife during land use change. He works as part of the project team, contributing to site promotion, scheme design, external consultations, the EIA (if needed), the planning application, and negotiation of planning controls. He is also well versed in the BREEAM family of assessment methods. If the need arises, Julian is an experienced witness at both Development Plan and Section 78 Inquiries.
- •Julian is an experienced field surveyor and holds surveyor licences for all species of bat, great crested newt, dormouse, barn owl and white-clawed crayfish.
- •As well as that for Tynings Hill, Radstock, Julian has undertaken ecological assessments of several similar development sites that have been consented in Bath and Northeast Somerset and in nearby authorities. A selection of these is as follows:
- -Land at Monger Lane, Midsomer Norton,
- -BANES; Land at Verwood, East Dorset;
- -Land at Harry Stoke, Stoke Gifford, South Gloucestershire;
- -Land at Brynards Hill, Wootton Bassett, Wiltshire
- •TRANSPORT AND HIGHWAYS Brian Condon, Technical Director, FMW Consultancy Ltd. Brian joined FMW Consultancy in August 2006 as an Associate. He holds a BSc in Civil Engineering from the University of Plymouth and is a Chartered Member of the Chartered Institute of Logistics and Transport and a Member of the Institute of Highways and Transportation. Brian has 17 years' experience in transport planning and highway engineering and he is particularly skilled in traffic modelling and highway design. Brian has experience of a variety of development projects across the UK and abroad including large residential developments, commercial, employment and urban regeneration schemes providing input into planning policy as well as supporting planning applications.
- •Brian's core proficiencies include transportation assessments, trip generation and comparison, junction and network modelling, access strategies, parking assessments, and the application of Manual for Streets to site layouts and masterplans.
- •TRANSPORT AND HIGHWAYS Matthew Jewell, Principal Engineer, FMW Consultancy Ltd. Matt joined FMW Consultancy in April 2013 and has over 8 years' experience in Transport Planning working for both the public and private sectors in the South West of England and South Wales. He holds a BSc (Honours) in City and Regional Planning and an MSc in Transport Planning from Cardiff University and is a member of the Institute of Highways and Transportation, the Institute of Logistics and Transport, and the Royal Town Planning Institute.
- •Matt's core proficiencies include undertaking transportation assessments, developing travel plans, and transport modelling techniques using specialist software such as ARCADY, PICADY, LINSIG, TRICS, Autotrack, Paramics and Vissim. This includes transport modelling work for B&NES including the Radstock Paramics Model, the Rossiter Road Paramics Model, and the Keynsham Town Centre Paramics model. Other project work in the B&NES area includes Travel Plan work for the University of Bath, traffic improvement schemes within Bath City, and various other development projects in and around the Bath area.
- •TRANSPORT AND HIGHWAYS Alex Welch, Principal Engineer, FMW Consultancy
  Ltd. Alex is a Transport Planner with over 12 years' experience within Consultancy, Local Authority Government and
  National Government throughout the UK, Bahrain and the United Arab Emirates. He holds an MSc in Transportation
  Planning & Engineering from the University of Southampton and is a Chartered Member of the Chartered Institute of

Logistics and Transport and a Member of the Chartered Institute of Highways and Transportation.

•He has significant experience in both the preparation of studies related to the planning of developments ranging from a single dwelling to major masterplans with due regard to the engineering, environmental, social and economic aspects of the individual project and the review of such documents on behalf of local and national government.

•In a past role working for Bath and North East Somerset as a Senior Transport Planner, Alex undertook the day to day project management of a number of key strategic transport projects within the region. These included the project

management of the Keynsham Regeneration Project Paramics Model, The Midsomer Norton Regeneration Project, the Radstock Paramics Model and the Rossiter Road (Bath) Paramics Model. All of the BANES projects also involved the accessibility planning of the area and liaison with all stakeholders.

#### 7.Conclusions

- 1. The proposals for the site represent an integrative and comprehensive approach to land. The concept masterplan demonstrates that positive regeneration of the site is possible to create a sense of place respecting its location, designations and characteristics of the land and the wider area.
- 2.Previous consideration of the wider site by Inspectors and Officers raised a number of issues. These have been assessed in relation to this site and its relationship to the wider site and area. In particular the issues of previously developed land, landscape impact, the conservation area and highways are addressed.
- 3. This document together with the Outline Planning Application (which is accompanied by supporting studies) demonstrates that the proposal is in accordance with policies in the Core Strategy and with the Development Plan as a whole. It also accords with other material considerations including the National Planning Policy Framework and accompanying National Planning Practice Guidance.
- 4. The lands progression through the Placemaking Plan should be supported as it represents a site that is suitable, achievable and available for development. The proposal offers windfall development on a brownfield site in a sustainable location with significant additional economic, social and environmental benefits.
- 5. The Team for the site welcome the opportunity to work with the Council to bring forward this land and are available to respond to any questions.

## **Change requested:**

We seek an extension of the Housing Development Boundary (HDB) around the Site at Tyning Hill, Radstock (see attached site plan with site outlined in red)

**Placemaking Options Plan Reference:** Unallocated Site - Land south of Highbury Road, Hallatrow

Plan Order Number: 20

| Respondent 6424 Comment 1 Respondent Mrs Sally Wyatt Number: Name:  | Respondent Organisation:    |
|---|-----------------------------|
| Agent ID: Agent Name:   |                             |
| Further Information available in the original comment? $\Box$ Attachments se  | nt with the comment? 🗹      |
| Placemaking Options Plan Reference: Unallocated Site - Land south of Highbo   | ury Road, Hallatrow         |
| Comment on the Site:  |                             |
| *site address land to south and west of Highbury road bs396ef title number st1 *use of land is agriculture/storage * landscape consists of trees form a line south of the boundary with houses bel line parts land filled around 2005 | ·                           |
| Change requested:   |                             |
| Respondent 6424 Comment 2 Respondent Mrs Sally Wyatt Number: Number: Name:  Agent ID: Agent Name:   | Respondent Organisation:    |
| Further Information available in the original comment?   Attachments se   | nt with the comment? $\Box$ |
| Placemaking Options Plan Reference: Unallocated Site - Land south of Highbo   | ury Road, Hallatrow         |
| Comment on the Site:  |                             |
| Re telephone call about the land submitted at Hallatrow south of Highbury road  | d.                          |

We submitted this land to the core strategy as we think this would be the ideal site for affordable homes as the houses at Highbury road are the only council houses in hallatrow.

We thought it would be the perfect site to build like for like opposite.

We are not isolated from the the village as stated by banes, There has been two large builds in Hallatrow since we moved here thirty years ago, But none of the property's were affordable to the younger generation, Neither did they supply a much needed play area.

We have stated that we have more land available for a play area and also good access to the woods.

And for banes to state that we are dissociated from the village implies that we are classed a different status to others with their own properties in Hallatrow and seems very prejudiced to council tenants.

The stratergy was intended to build on brown field sites first and to build affordable homes.

So I feel this is the perfect brown field site to do this.

I look forward to meeting you on the 12 January.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |   |
|---|---|
| Change requested:   |   |
|   |   |
|   | _ |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |

Placemaking Options Plan Reference: Unallocated Site - Land to the north of

Kilmersdon Road, Manor Farm, Haydon,

Radstock

Plan Order Number: 20

| Respondent 4532 Comment 1 Respondent Number: Number: Name:    | <b>Respondent</b> The Silverwood <b>Organisation:</b> Partnership |
|---|---|
| Agent ID: 36 Agent Name: D2 Planning                          |   |
| Further Information available in the original comment? $\qed$ | Attachments sent with the comment? $\square$                      |

Placemaking Options Plan Reference: Unallocated Site - Land to the north of Kilmersdon Road, Manor Farm, Haydon, R

#### Comment on the Site:

Objections are lodged to the non-allocation for residential purposes of land North of Kilmersdon Road, Manor Farm, Haydon, Radstock.

The site is located adjacent to the development boundary relating to Haydon, as shown on the proposals map which accompanies the adopted Bath and North East Somerset Local Plan (2007). The Councils SHLAA (2013) identifies the site (RAD 31c) as having potential to deliver a yield of about 100 dwellings. The site was rated as being moderate/high suitability for development.

#### It states:

In respect of the smaller area only (RAD 31c), development would have a low to moderate impact on landscape character. Whilst it would be seen from a distance, it would relate well to the rest of Haydon village on the ridge top.

The site is suitable for development and can be delivered immediately after planning permission is granted. The objectors have carried out all the necessary technical and environmental surveys. There are no access constraints and the site can be adequately drained. Furthermore, there are no issues of ecological importance on the site. In all there are no constraints to residential development coming forward on the site. It is sustainable, suitable and deliverable.

A Planning Application for the development of the site for up to 100 dwellings has already been considered by the Local Planning Authority. The reasons for refusal can be overcome and there are no technical objections to the development of the site for residential development. The site could deliver up to 100 dwellings and all of these would be delivered within 5 years following the granting of planning permission.

Furthermore, Richard Walker (Planning Policy Officer) recently confirmed at a Public Inquiry that the housing numbers for the Somer Valley ar flexible. This is also demonstrated by the fact the deliverable SHLAA numbers for the Somer Valley differ from the housing number identified for the Somer Valley in the Core Strategy.

| Allocate the site for residential development. |
|--|
|  |

Placemaking Options Plan Reference: Unallocated Site - Land to the rear of Writhlington Court (RAD23)

Plan Order Number: 20

| Respondent<br>Number: | 300 Comment Number:   | 2 Respondent Craig MacDo Name: | nald Respondent Curo Organisation: |  |
|-----------------------|---|--------------------------------|------------------------------------|--|
| Agent ID:             | Agent Name:   |                                |                                    |  |
| Further Infor         | t ID: Agent Name:  er Information available in the original comment?   Attachments sent with the comment? |                                |                                    |  |

**Placemaking Options Plan Reference:** Unallocated Site - Land to the rear of Writhlington Court (RAD23)

#### Comment on the Site:

The Placemaking Plan will prescribe the 'vision and design principles' for key development sites across Bath & North East Somerset (B&NES) and will include a new set of updated planning policies. As part of the current consultation on the options document, the Council is inviting comments on the suggested allocations and will consider the submission of further details concerning 'reasonable alternative options'.

This representation concerns the promotion of a proposed development site at 'Land to the rear of Writhlington Court, Writhlington, Bath & N E Somerset' otherwise known as 'RAD23' (SHLAA Dec 14 reference, Appendix C). The site does not currently form part of the proposed site allocations contained within the Placemaking Plan Options document. This, we believe, is due to a lack of adequate promotion thus far as opposed to the site being discounted on the grounds of unsuitability. We have been informed that this submission will automatically result in the site being included within the West of England Joint Strategic Planning Strategy: Housing and Economic Land Availabilit Assessment.

Please note that we have not included any comments in respect of the proposed design principles and updated planning policies covered within the options document and therefore it should not be presumed that Curo is in agreement with these simply due to the absence of any objections contained herein.

Overview of Objectively Assessed Housing Need and Future Housing Targets

The Core Strategy was formally adopted on 10th July 2014 and together with the emerging Placemaking Plan, the Joint Waste Core Strategy (2011) and the Local Plan (2007) saved policies, they make up the planning framework for the determination of planning applications which are to be submitted within the district up to 2029. Paragraph 1.213 of the options document states there is no need to allocate further greenfield sites within the Somer Valley in the Placemaking Plan in order to meet the Core Strategy housing requirement. However, this requirement currently stands at 13,000 for the district as a whole and there is a heavy reliance on strategic sites coming forward in order to fulfil the Council's five-year land supply obligation as referenced in the SHLAA Housing Trajectory 2011-2029 (December 2014).

RAD23 is a suitable, 'reasonable alternative' to those sites forming part of the current Housing Trajectory and/or the Placemaking Plan Options document and may assist the Council in meeting its five-year land supply obligation should a proportion of these sites not come forward (or be delayed) for development. Furthermore, whilst the site is formally classed as greenfield, its development would effectively provide 'infilling' of the existing settlement boundary rather than contribute toward the extension of an urban environment. Consequently, development of the site would comply with Emerging Policy Approach HG.4 - definition 'c'.

In addition, whilst we do not wish to scrutinise the current position regarding the West of England Strategic Housing Market Assessment (SHMA) within this representation, it is worth highlighting what is known thus far. The SHMA is due for publication in June 2015; delayed, in part, due to the lack of updated household projection figures. It is understood that this iteration of the SHMA will concentrate only on the Bristol Housing Market Area (HMA) and that part of Bristol's expected unmet need may be mitigated through the delivery of sites in B&NES. It is unclear whether such delivery would be restrained to the Bristol HMA area of the B&NES district. We have not been able to ascertain when B&NES Council intend to review its current SHMA (2013), although it has been suggested that the current version has a five-year lifespan. In any event, it is likely that the Council's housing need may rise in the short to medium term.

With this in mind, RAD23 is being promoted not only as a 'reasonable alternative' but also as an additional allocation to assist the Council in meeting any future increase in need.

Site Location and Description

RAD23 is located in Writhlington, B&NES and is approximately 1.3ha in size, comprising of gently sloping pasture land. The SHLAA states that the area is capable of delivering approximately 35 homes which is equivalent to 35 dwellings per hectare assuming a net developable area of 70%. A red line boundary of the site is included at Appendix B.

The site is bordered on three sides by the housing development boundary, along which there are existing residential settlements, with open views to the north. Due to the orientation of existing dwellings along Magdalene Road and the uninterrupted tree cover to the southern and western boundaries, development of the site would have a limited impact on the views from neighbouring properties. Furthermore, given the 'infill' type characteristics of the site, its development would comply with Emerging Policy Approach: NE2 - Landscape. This opinion is corroborated within the SHLAA which reads;

'Development would have a low to moderate impact on landscape character because the area is well enclosed by tall hedges and views to the area are restricted' (SHLAA Dec 14).

#### Access

Access to the site is currently gained from the unmetalled track directly to the west of the site and running parallel to this is a well-matured tree line. The SHLAA states that 'it would not be possible to mitigate for the loss of rural character if the track were used for access'. The SHLAA refers to the most obvious point of access coming from Magdalene Road however the document concedes that there is 'significant on street parking thereby reducing the available capacity on the carriageway' (see photographs within Appendix F). The issue is compounded by the 'complicated' junction where Manor Road meets Knobsbury Lane and Old Road.

A much preferred access point has been identified to the south of the site by Writhlington Court leading directly onto the A362, avoiding the need to navigate through the congested streets of Manor Road and Magdalene Road (Appendix E). In addition, there is ample visibility splay at the junction of Writhlington Court and the A362, providing a safe means of access onto the main highway network. Although the adopted highway at Writhlington Court does abut the site, a small section of Curo-owned land would be required to facilitate development in order to provide a sufficient width of new highway.

# Tree Protection Order

An area close to the proposed access point is covered by The Town and Country Planning (Tree Preservation) (England) Regulations 2012, specifically Tree Preservation Order (TPO) No 533/27. Within the TPO, the schedule of trees is referred to as 'Broadleaf woodland predominantly Horse Chestnut, Lime and Ash'. The designation of the TPO appears to have been arbitrarily applied rather than as a result of the identification of specific specimens worthy of protection. In particular, the eastern part of the TPO is made up of limited canopy overhang and low level shrubs (see Appendix D/F) and it is envisaged that access into the site can be gained with only minimal disruption caused to this area of woodland. Whilst further investigative works are required, it is expected that an application for consent would be needed to enable any tree works to take place in order to facilitate development. It is perceived that any loss of vegetation can be mitigated through sensitive replanting on-site.

## Availability

Initial negotiations have taken place between the interested parties and the site is available immediately to come forward for development.

We would welcome the opportunity for engagement with Policy Officers regarding this representation prior to the preparation of the Draft Plan which is due for publication later this year.

#### **Change requested:**

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |  |  |  |  |  |
|---|--|--|--|--|--|--|
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
|   |  |  |  |  |  |  |

**Placemaking Options Plan Reference:** Unallocated Site - Land to the south of Manor Road, Saltford

Plan Order Number: 20

| Number: Number: Na  | pondent Mr David Hawkes<br>me:   | Respondent Organisation:  |  |  |  |
|---|----------------------------------|---|--|--|--|
| Agent ID: Agent Name:   |                                  |   |  |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |                                  |   |  |  |  |
| Placemaking Options Plan Reference:   | Unallocated Site - Land to the s | south of Manor Road, Saltford   |  |  |  |
| Comment on the Site:  |                                  |   |  |  |  |
| •   |                                  | nent. Planning for 99 houses was approved by an ently suitable and ready to go. Please keep this site |  |  |  |
| Application was limited parcel 8966.  |                                  |   |  |  |  |
| Planning appeal 12/05315/OUT  |                                  |   |  |  |  |
| Land Registry title number ST 168481  |                                  |   |  |  |  |
| Change requested:   |                                  |   |  |  |  |
|   |                                  |   |  |  |  |

Placemaking Options Plan Reference: Unallocated Site - Land to the south of

Uplands, Keynsham

Plan Order Number: 20

| Respondent 114<br>Number: | Comment 1 Number:    | Respondent<br>Name:         | Respondent Society of Merchant Organisation: Venturers   |
|---------------------------|----------------------|-----------------------------|--|
| Agent ID: 150 Ag          | <b>ent Name:</b> Smi | iths Gore                   |  |
| Further Informatio        | n available in t     | he original comment? $\Box$ | Attachments sent with the comment? <a> Image: Image</a> |
|                           |                      |                             |  |

Placemaking Options Plan Reference: Unallocated Site - Land to the south of Uplands, Keynsham

#### Comment on the Site:

- 1.On behalf of the Society of Merchant Venturers, Smiths Gore Planning responds to the consultation on the Placemaking Plan Options Document.
- 2.Land to the south of Keynsham at Uplands was one of four study areas selected by the Council for consideration to identify viable potential development capacity. Whilst not included within the Core Strategy, we consider that the site should still be considered for allocation in the Placemaking Plan. The Land at Uplands Development Concept Options report March 2013 by ARUP comments that;
- •land is well contained and could be designed to have limited impact on the wider landscape,
- •it is close to an existing employment site to the south,
- •the B3116 provides good access to the A4 and town centre and industrial estate to the north,
- •the area is adjacent to an established residential area and as such is a complementary use with socially sustainable benefits,
- the Manor Road Community Woodland is a major Community Asset lying nearby,
- •the land identified is all within Flood Zone 1,
- •the land immediately south of the existing residential development would form a natural extension and could deliver in the region of 350 dwellings,
- the site is available,
- •the site is in single ownership, and
- •a viable housing scheme could be delivered on the site.
- 3. The Council's Green Belt Review Stage 1 report April 2013 evaluates a broad land parcel to the south of Keynsham including the village of Chewton Keynsham. It is commented at page 32 that, 'It is considered that the Green Belt directly to the south of Keynsham is not of importance for preventing the merger of Bristol and Keynsham'. The report identifies that the Green Belt in this location preforms the role more of a countryside designation in preserving the countryside for its own sake and safeguarding the countryside from encroachment.
- 4. The only aspect on which the Uplands land does not score highly is in terms of its distance from the town centre and access to services and facilities. However, the Core Strategy Transport Assessment (February 2013) indicates that walking linkages could be improved via new pedestrian footways along Wellsway with potential for a link to Hardington Drive. In addition cycling into central Keynsham is possible within a 20 minute journey time. As regards public transport a number of services already exist along the B3116 Wellsway including the No. 178 service which could serve further development to the south at Uplands. The report further comments that in highway terms traffic increase from the development is likely to be manageable. (Transport Evaluation, Page G7).
- 5. There is also scope at the Uplands site to include local services and facilities as part of a development proposal. These could serve a wider area supporting the sustainability and access to services and facilities for the southern residential estates of Keynsham. The allocation of development in the Uplands area could also offer the opportunity for a primary school site. The development of East Keynsham for 250 houses and Uplands at 250 houses could together contribute (either financially of by land provision) to a new primary school. From a sustainability perspective if a new primary school is required then a site to the south of Keynsham would be preferable in terms of spreading accessibility, rather than

concentrating primary education to the north of Keynsham where Chandag Primary and Infant schools already exist close to the East of Keynsham proposed allocation. The ARUP Development Concept Options report for Uplands identifies at page 16 that there are advantageous opportunities for developing the two areas of East Keynsham and Uplands in tandem to create a more comprehensive and sustainable solution.

- 6.The accompanying plan shows a concept plan for potential development of land at Uplands. This provides for some 250 dwellings together with a neighbourhood centre providing local services and facilities for the development and which could serve a wider, area improving sustainability locally. The land can also provide open space and a link through to the residential development to the north as well as footways along the Wellsway fronting the site (as suggested by the ARUP Transport Evaluation). Highway infrastructure to provide access into the site could also act as a traffic calming/slowing measure into the urban area from the faster rural section of the B3116, managing the flow of traffic into the town. The site could also provide for a primary school site to further aid sustainable access to educational facilities in the southern part of Keynsham.
- 7.The land at Uplands is well related to the existing urban area. It would involve the rolling back of the Green Belt in an area where the Green Belt serves no strategic purpose, in an area which is well-contained visually and would have minimal impact on the landscape as acknowledged by the Land at Uplands Development Concept Options report March 2013 by ARUP and the SA/SEA Annex L.
- 8. The development is accessible to the large employment/industrial estate to the North and by public transport provision to the town centre. Unlike the sites at Keynsham East and the Somerdale factory site none of the land at Uplands is within Flood Zones 2 or 3.
- 9. The site is well contained to the south by the range of Uplands Farm buildings for which the barns have residential conversion consent. Whilst Uplands Farm House is listed development of the Uplands site would not prejudice or detract from its setting.
- 10. The land at Uplands, has been assessed by the Council, but has been wrongly rejected as a potential development site to deliver housing for Keynsham. Its suitability for development is demonstrated above and the site is in single ownership and has the opportunity to come forward rapidly.
- 11. The site should be identified as an allocated housing site to provide certainty of delivery of housing at Keynsham and to provide much needed flexibility in delivery should other sites fail to come forwards as anticipated. The site should be allocated as an additional to the sites already proposed.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: Unallocated Site - Old Pit Yard, Clandown

Plan Order Number: 20

| Respondent 6459 Comment 1 Respondent Number: Number: Name:   | <b>Respondent</b> Old Pit Yard Clandown <b>Organisation</b> :  |
|--|--|
| Agent ID: 155 Agent Name: Aspect360 Planning Consultants   |  |
| Further Information available in the original comment? $\Box$ Attac  | hments sent with the comment? $lacksquare$   |
| Placemaking Options Plan Reference: Unallocated Site - Old Pit Ya  | rd, Clandown   |
| Comment on the Site:   |  |
| We note that the Old Pit Yard site has not been included as a key depreviously had planning permission under reference 09/02612/OUT (Universal Properties) currently has an application submitted with thunder L.P.A Ref: 14/02889/OUT. This site cannot therefore be consiplanning permission but not yet built). | for 31 live/work units but this has expired. Our client e Local Planning Authority for upto 47 dwellings |
| The site is previously developed land which is in an accessible location permission, the support of the current planning application by the Constitution SHLAA.  |  |
| The current application demonstrates that all of the environmental i addressed, and the site can support the delivery of both market and   |  |
| Our comment is an Objection to Emerging Policy HG.4 as set out on included within the BATHNES Placemaking Plan for the Somer Valley dwellings as shown in the attached presentations.  | - ,  |
| Change requested:  |  |
|  |  |
| Respondent 6459 Comment 2 Respondent Mr D Shah Number: Name:  Agent ID: #### Agent Name: Aspect360 Planning consultants  Further Information available in the original comment?   Attack   | Respondent Universal Properties Organisation:  chments sent with the comment?                            |
| Placemaking Options Plan Reference: Unallocated Site - Old Pit Ya  | rd, Clandown   |

#### **Comment on the Site:**

#### **Change requested:**

Old Pit Yard Clandown BATHNES PLACEMAKING PLAN OPTIONS CONSULTATION

We write in response to the Councils consultation on the Councils Placemaking Plan. Please accept this e-mail as a formal response to the consultation.

We note that the Old Pit Yard site has not been included as a key development site in the Placemaking Plan. The site previously had planning permission under reference 09/02612/OUT for 31 live/work units but this has expired. Our client (Universal Properties) currently has an application submitted with the Local Planning Authority for upto 47 dwellings under L.P.A Ref: 14/02889/OUT. This site cannot therefore be considered as an existing commitment ((having gained planning

permission but not yet built).

The site is previously developed land which is in an accessible location as proven by the previous grant of planning permission, the support of the current planning application by the Council and by the inclusion of the site in the SHLAA.

The current application demonstrates that all of the environmental issues, including ground remediation have been addressed, and the site can support the delivery of both market and social housing.

Our comment is an Objection to Emerging Policy HG.4 as set out on page 80 and a request that the Old Pit Yard Clandown site is included within the BATHNES Placemaking Plan as a development site for upto 47 residential dwellings.

Placemaking Options Plan Reference: Unallocated Site - Silver Street, Midsomer

Norton

Plan Order Number: 20

| Respondent 15 | 556 <b>Comment</b> 9 <b>Re</b> s             | spondent             | Respondent                     | Strategic Land |
|---------------|--|----------------------|--------------------------------|----------------|
| Number:       | Number: Na                                   | ame:                 | Organisation                   | : Partnerships |
| _             | Agent Name: Peter B ation available in the o |                      | Attachments sent with the com  | ment?          |
|               |  |                      |                                |                |
| Placemaking O | ptions Plan Reference:                       | Unallocated Site - S | Silver Street, Midsomer Norton |                |

#### Comment on the Site:

Housing and Facilities for the Elderly, housing for people with other Supported Housing or Care Needs

In paragraph 2.8 the figures used only go to 2021 as it says The number of people of retirement age is predicted to increase by nearly 6,000 (18.3%) by 2021. This is important but is only part of the story. The data in the table supporting this section is out of date, uses the interim population data and only goes to 2021. Given that the Placemaking Plan goes to 2029, it is essential that the information used is as up to date as possible and properly attempts to predict what the change is likely to be at the end of the plan period. The latest full set of Population Projections are the 2012 based sets which have been available since June 2014 and go beyond the end of the plan period. Consequently, these figures should be used to inform the policies, options and strategy within the Placemaking Plan. It should be noted that the new 2012 based household projections are due next month and also that the West of England are embarking on a proper strategic planning review which will include a comprehensive assessment of the whole area and its needs through the SHMA. This up to date and emerging evidence must be assessed and used to inform this Plan.

Using the most up to date 2012 based population projections to update the information on the growth in elderly demonstrates that there is going to be a far greater increase in the number of people at retirement age than set out currently in the plan. This is demonstrated by the figures below:

Age 201 12029% increase 65-7415,92821,59235 75-8410,98117,93563.3 85+4,90810,819120.4

It is essential that the Placemaking Plan uses the most up to date information to provide a true picture of what is likely to happen by the end of the plan period. This may change the strategy and in this instance may mean than more provision for elderly care should be made.

#### Policy H1

While this policy makes some positive provision for new extra care accommodation, it includes reference to including storage for bikes, at a level which is entirely inappropriate. Obviously some bike provision in terms of storage and parking may be appropriate to encourage visitors to use this form of transport, however, the reality of residents being able to cycle on a regular basis and owning a bicycle is highly unlikely.

It is entirely appropriate to identify specific sites for this use and as such a new allocation should be identified at Silver Street, Midsomer Norton as shown on the attached plan at Appendix B. This site is entirely suitable the development of a high quality, sustainable low carbon retirement village and care facilities. We understand that the permitted care home on the committed site West of Fosseway is unlikely to be delivered. The site has been marketed to numerous potential operators with no success, however, interest has been expressed in the land either side of Silver Street which offers much more scope to offer higher quality more spacious care facilities and a greater range of them potentially as part of a retirement village. The land along Silver Street also provides opportunities to provide a number of other community facilities such as allotments and a community garden of remembrance, as well as the opportunity to improve accessibility and connectivity into the town centre with the provision of a cycle and footway, and improve bus circulation and

permeability by linking into the existing commitment as well as improving safety by moving the 30mph limit south to the BANES/MENDIP boundary. There are other benefits which could also be achieved including the improvement in broadband speeds, provision of additional parking for the rugby club and the opportunity to link into the railway line footpath and improve the use of this recreational resource.

#### **Change requested:**

New Site SSVX Land off Silver Street

It is therefore suggested that a new site, as identified on the attached plan at Appendix B is included within the Placemaking Plan and that the policy states:

The land identified at Silver Street is allocated for mixed use residential development catering primarily for the elderly to include a retirement village, with affordable housing and care home, including a small number of high quality residential dwellings in keeping with the character and form of this part of Silver Street. The western part of the site will be laid out as open space, including either allotments and/or a community garden of remembrance. The development of this site will be dependent on the delivery of pedestrian and cycle links along Silver Street to increase accessibility and connectivity with Midsomer Norton Town Centre, as well as with other residential development and public footpaths surrounding the sites. Proposals will be developed to the highest standard and incorporate latest low carbon technology, and should respond to the needs of the town as identified in the neighbourhood development plan.

Placemaking Options Plan Reference: Unallocated Site - St John's School, 33-34

Pulteney Road, Bath

Plan Order Number: 20

| Respondent 6406 Comment 4 Respondent             | <b>Respondent</b> Student Castle                               |
|--|--|
| Number: Number: Name:                            | Organisation:  |
| Agent ID: 222 Agent Name: Nathaniel Lichfie      | ld & Partners  |
| Further Information available in the original co | omment? $\square$ Attachments sent with the comment? $\square$ |
|  |  |
| Placemaking Options Plan Reference: Unalloc      | ated Site - St John's School, 33-34 Pulteney Road, Bath        |

#### Comment on the Site:

On behalf of our client, SC Pulteney Road Ltd (Student Castle), we are pleased to submit representations to the Bath and North East Somerset Placemaking Plan Options Document "(the Options Document"). The comments outlined in these representations are also supported by The Sisters of La Sainte Union (SoLSU).

Whilst these representations relate to the key concerns of Student Castle (namely the allocation of the site and the treatment of student housing within the document) they reserve their position to comment on more detailed development management issues within subsequent iterations of the Options Document, as their proposal progresses.

#### Background

Student Castle recently acquired the former St John's School at 33 - 34 Pulteney Road, Bath ('the Site') and are at the initial stage of working up proposals for a student accommodation scheme that befits its setting within a UNESCO World Heritage Site, a Conservation Area and close to listed buildings. Student Castle is keen to work with the Local Planning Authority to develop its proposals and will soon be arranging a pre-application meeting.

The Site comprises:

.33 - 34 Pulteney Road which are a pair of Victorian semi-detached houses that were opened up into one building for LSU's use;

. The main building of the former St John's School, which lies behind 33 - 34 and was purpose built in the 1950's; and . The former playgrounds to the School.

The Site was previously owned by the SoLSU who established St John's 1950's. The School relocated a few years ago to another site in Bath and then RC Primary School in the main school building.

The Site backs onto The Recreation Ground (where Bath RFC plays rugby) and it has frontage and vehicular access to Pulteney Road. The former playground to the School has frontage to North Parade but is a couple of metres below North Parade and only has pedestrian access to it. The SoLSU Convent is adjacent to the Site at 28 - 29 Pulteney Road and will remain in this location following the redevelopment of the former St John's School site.

The Site was initially identified in the Draft Core Strategy as being within the boundary of the Central Area. The boundary was, however, amended through Main Modifications following comments from the Inspector that the alignment should follow the riverside walk of the River Avon between North Parade and Pulteney Bridge rather than encompassing the Recreation Ground/North Parade Road. The Site is, therefore, outwith the Central Area and in a location where off-campus student accommodation is not restricted by planning policy.

Our Clients will present their case, through the pre-application and planning application process, confirming both the appropriateness of their design proposals and of this location for student housing in the context of current national and development plan policy. Therefore in due course, notwithstanding future discussions, it may be appropriate for subsequent versions of the Options Document to be amended to allocate the site for such a use.

Central Riverside & Recreation Ground: paragraphs 1.61 -1.64, corresponding plan at p23 and Emerging Development and Design Principles: SB2, Riverside East

The focus of the 'Central Riverside & Recreation Ground' allocation is the River Avon and The Recreation Ground where the aspirations and requirements for development centre on developing the existing green infrastructure and enhancing the leisure offer. The area is described (para 1.62) as comprising "the natural environment of the river corridor and the green spaces associated with it"

Allocation SB2, which encompasses the Site as part of a much wider allocation, sets out a number of aspirations for the wider area including (3) "Option - subject to discussions with landowners, there is the potential to explore options for car and / or coach parking in this area or on adjacent sites such as the former St Johns School site".

We are unclear as to why the former St John's School has been included within the allocation, and suggested for this use "subject to discussions with landowners" for a number of reasons:

- i. it does not form part of the proposals that are currently being worked up by the Recreation Ground Trust for the future of The Rec';
- ii. the Site is on the periphery of the allocation and some distance from the river corridor and green spaces which are considered to form the character of the allocation;
- iii. the reference to the former St Johns School site being "adjacent" [to site SB2] further supports the view that it does not appropriately form part of the wider allocation SB2; and
- iv. Student Castle will shortly be promoting proposals for student accommodation on the Site through the planning process. This is an entirely acceptable use in the context of current national and development plan policy. As such, the Site is not currently and will not be available for car and/or coach parking.

For these reasons our Client, therefore, considers that the site should be removed from draft allocation SB2 and that the boundary is redrawn around The Recreation Ground (which the current wording relating to the allocation suggests that it should be).

It is not considered appropriate for the Placemaking DPD to impose restrictions on the potential development of this site. Such development would not prejudice the objectives and aims of the allocation for Central Riverside & Recreation Ground and therefore there is no justification for potentially restricting development of the St John School site through planning policy, notwithstanding other relevant planning policies and development management criteria. This view is supported through the NPPF which requires Development Plans to 'plan positively' (para 157).

Accordingly reference to the former St John's School Site (even as "an adjacent site") should be deleted from Emerging Development and Design Principles: SB2. In response to the query raised in the Options Document, we confirm that the landowners have no intention of using it for car and/or coach parking.

Residential Development: paragraph 2.6

Our Client supports the aims outlined at paragraph 2.6 but, in addition to those points listed, considers that reference should be made to "encouraging the efficient use of land byreusing land that has previously been developed'. The policy approach would then accord with paragraph 17 of the NPPF.

Student Accommodation: paragraphs 2.25 - 2.26

Paragraph 2.25 states that the strategy for student accommodation is set out in the Core Strategy (adopted 2014) at paragraph 1.26, Policy B1(7a) and Policy B5. The Placemaking Plan Options Document does not, therefore, propose a new policy to supplement that which is contained in the Core Strategy reflecting the fact that the policies contained within the Core Strategy are appropriate for development management purposes.

We are concerned therefore that paragraphs 2.25 - 2.26 of the Options Document seek to provide a summary of the policy context for student accommodation which is inconsistent with, and goes far beyond, the Core Strategy policy requirements. Given that this element of the Options Document is not in conformity with the Core Strategy, it raises questions of Legal Compliance under s20(5)(a) of the Planning and Compulsory Purchase Act 2004.

Specifically, Core Strategy Policy B1(7a) supports off campus student housing subject to complying with policy B5. In turn policy B5 (Strategic Policy for Bath's Universities) simply confirms that proposals for off-campus student accommodation will be restricted in the Central Area, the Enterprise Area and on MoD land - with no such restrictions on unallocated sites outside of these area (i.e. Outwith these areas there is no policy objection for proposals for student accommodation which will be subject to general development management policies).

Despite recognising that the strategy for student accommodation is set out in the Core Strategy, paragraph 2.26 of the Options Document goes on to fundamentally contradict this with a much more prescriptive commentary stating that "off-campus provision should not prejudice the implementation of on-campus capacity if this can be avoided i.e. This would only be acceptable where on-campus delivery cannot demonstrably come forward to keep up with additional demand". It goes on to suggest that "there will be certain sites where the opportunity cost is too great."

The Placemaking Plan should help deliver the development requirements and strategic objectives established in the Core Strategy rather than seek to establish new strategies - especially where these directly conflict with the Core Strategy. Furthermore, when there is no established policy context to differentiate between on and off site campus locations such a distinction risks conflicting with the NPPF (para 46) which states that potential 'competition' should not form a planning issue. Given that the text at paragraph 2.26 is not in accordance with policy in the Core Strategy it should be deleted to ensure that this part of the Options Document is sound.

We trust that the scope of these representations is clear and that our comments will be addressed within the next iteration of DPD. We request that we are kept updated of subsequent stages in the progression the Options Document and if you have any queries, please do not hesitate to contact me.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Unallocated Site - St Mary's Church,

Julian Road, Bath

Plan Order Number: 20

Respondent 6440 Comment 1 Respondent Respondent Clifton Diocese

Number: Name: Organisation:

Agent ID: 232 Agent Name: JLL

Further Information available in the original comment? ✓ Attachments sent with the comment? └

Placemaking Options Plan Reference: Unallocated Site - St Mary's Church, Julian Road, Bath

#### Comment on the Site:

#### INTRODUCTION

These Written Representations are submitted by JLL on behalf of the Clifton Diocese in respect of the emerging Bath and North East Somerset Placemaking Plan.

The Placemaking Plan will form the second part of the new Bath and North East Somerset Local Plan and once adopted will sit under the Core Strategy (Part 1 of the new Local Plan) that was adopted in July 2014.

These Written Representations focus particularly on one of Clifton's Diocese Portfolio Church sites, in this case, St Mary's Church, Julian Road, Bath.

The Written Representations will demonstrate that the existing adopted Local Plan housing allocation affecting the St. Mary's Church Site, saved by the Core Strategy, should remain under the Placemaking Plan. Consequently, current proposals to remove this allocation in the latest consultation draft of the document should be quashed.

Set out below is a description of the site, it's policy context, details of the St Mary's sites current policy allocation and its history, and a case to retain this allocation under the Placemaking Plan.

#### SITE CONTEXT

The St Mary's Church site comprises the Church itself (Grade II Listed), which fronts onto Julian Road, plus a complex of additional buildings and land including a Church Hall, (Harley Street) and a large car park accessed from Burlington Street. Please see Figure 1 for a Site Location Plan.

Figure 1 - Site Location Plan. Red line shows properties in ownership of the church.

The site's current planning designations and allocations are as follows: • Forest of Avon • Bath Conservation Area

- •Bath Hotsprings Protection Area
- •World Heritage Site
- Affordable Housing Zone
- •Tree Preservation Order
- Article 4 Direction Restricting Demolition of Walls, Gates, Fences and other means of enclosure, less than 1 metre in height
- •General Development Site Allocation, Reference B14

The site is in close proximity to the designated Julian Road 'local centre' and the site is a short distance from, but outside of, the designated Bath Central Area.

#### **ALLOCATION B14**

The adopted Local Plan (2007) saved Policy GDS1 lists those sites that are allocated for development during the plan period, with the areas confirmed on the adopted Proposals Maps.

Policy GDS1 lists Allocation B14 as affecting the Former St Mary's School, Burlington Street. The Allocation is written as follows:

'B14 FORMER ST MARY'S SCHOOL, BURLINGTON STREET - SITE AREA 0.16 HECTARES Development Requirements:

- Around 15 dwellings
- Provision of Community Facility
- Protection of Horse Chestnut Tree (TPO)'

The area of the St Mary's Church covered by allocation B14 is shown in Figure 2 below:

Figure 2 - Plan showing the B14 allocation at St. Mary's Church

Allocation B14 was adopted under the Local Plan in 2007. With regard to the anticipated capacity for allocated sites within the Local Plan, Table 7 included under Local Plan Policy HG.1 allocates a potential for 16 dwellings at the former St Mary's School B14 Allocation. Therefore the capacity for dwellings is set at 15-16 under the B14 Allocation.

The Allocation was then subsequently included as a saved policy by Appendix 2 of the adopted Core Strategy and therefore currently remains valid.

The emerging Placemaking Plan sets site specific policies informed by the strategic policy outlook of the adopted Core Strategy, and eventually these policies combined will completely replace the adopted Local Plan. Under the latest version of the Placemaking Plan, the subject of these Written Representations, the B14 Allocation has been listed for deletion and therefore will not be saved or form part of the new Place Making Plan once adopted.

There is no proposed replacement allocation across this site and it is understood from Officers at Bath and North East Somerset Council that the allocation has not been saved because they are not confident that the development linked to the allocation will be fulfilled.

#### CASE TO RETAIN ALLOCATION B14

There is a strong case for Bath and North East Somerset to retain the B14 Allocation at St Mary's Church.

The submission of these Representations themselves indicates that there is an intention for Clifton Diocese and the parish to release the land, at least in part, for development to ensure maximum flexibility in future with regard to their portfolio to enable the charity to draw on additional funds to support the parish and the work of the church in future by generating revenue through the development options open to the site. To this end, the Council have made a unilateral decision to proposed deletion of Allocation B14 without consulting the Clifton Diocese and have therefore failed to plan positively as required by paragraph 157 of the NPPF.

Moreover, there is a strong policy framework to support the allocation of new houses on what is a previously developed site within the built up centre of Bath, a short distance from the designated Bath Central Area boundary. The Core Strategy confirms that there is a housing requirement for 7,020 new homes within Bath (Table 1B) and this feeds into the over-arching District Wide Local Spatial Policy, Policy DW1, which promotes provision of 13,000 new sustainable homes across the District.

More specifically, the agenda set for Bath itself by the Core Strategy states that a vital component of the vision for Bath is to deliver new housing, to make best use of existing resources in an efficient manner and to adapt to a climate change to pursue a reduced carbon economy.

Further, Policy B1 of the Core Strategy sets out the Bath Spatial Strategy and states that of the 7,020 new homes allocated for delivery within Bath, 1,150 will be expected to arise from small scale intensification of sites distributed throughout the existing urban area.

The protection of residential development in Bath is such that there is a policy included in the emerging Placemaking Plan which seeks to retain existing housing. This highlights that every available opportunity to deliver new housing within Bath

on suitable sites should be taken.

It is clear that the thrust of the Adopted Policy Framework, in particular the Core Strategy, and the emerging Placemaking Plan policies is for the delivery of a large number of new dwellings across the plan period within the Bath settlement at suitable and sustainable locations. It stands that the St Mary's Church car park represents an ideal opportunity to provide such housing, evidenced by the original and subsequently saved B14 Allocation and by the extensive planning history that includes several previous applications for residential development there, dating back to 1987 (ref. 14075). A full planning history in respect of the car park is included in figure 3 below.

ReferenceDescriptionDecision

99/00831/RESErection of a three and four storey block of flats comprising WITHDRAWN

9 no in total for Bath University students (Grounds of Former St Mary's School). [Car Park]9 March 2000

99/00782/VARVariation of Condition (i) of outline planning permissionWITHDRAWN

14073-4 to extend the latest date for applying for approval of reserved maters (Ground of Former St Mary's School). [Car Park]13 Jan 2006

97/00294/VARVariation of Condition 01 attached to planning permissionAPPROVED

14073-4 to extend the latest date applying for reserved matters form 1.9.97 to 1.9.99. [Car Park]2 May 1997

96/00081/VARVariation of condition (i) of application 14073-4 granted on APPROVED

1.9.93 relating to reserved maters being extended by one year to 1.9.97. (Grounds of Former St Mary's School) [Car Park]18 Sept 1996

14073-4Erection of a four-storey block of flats with garagesAPPROVED

underneath, incorporating 32 flats and 4 maisonettes alongside 19 Burlington Street (renewal). [Car Park]1 Sept 1993 14073-1Erection of a four-storey block of flats with garagesAPPROVED

underneath, incorporating 32 flats and 4 maisonettes alongside 19 Burlington Street (renewal). [Car Park]23 Jan 1991 14073Erection of a four-storey block of flats with garagesAPPROVED

underneath (Outline)30 December 1987

Figure 3 - St. Mary's Church Car Park Planning History

The residential offer proposed by future redevelopment of the site would be capable of offering a mix, size and type of housing to select local demand (NPPF para 50) and would make effective use of previously developed land (NPPF para 111).

The St Mary's car park represents an ideal opportunity to deliver new housing towards the housing targets required within the Bath area across the plan period and there is no justification to remove the existing allocation across this site. There is market demand for housing development at this land, ensure the viability and ultimately deliverability of a residential scheme.

#### CONCLUSION

These Written Representations are submitted on behalf of the Clifton Diocese and seek to reinstate the existing, adopted B14 Housing Allocation within the emerging Placemaking Plan.

These Written Representations have demonstrated that there is policy framework support to retain housing allocation on land that is suited to delivery of new housing in a sustainable location at the heart of the Bath settlement.

The Council have acted unilaterally by removing this allocation, without acting positively with the landowner by consulting with them first.

The Clifton Diocese have medium term plans to release the land for residential redevelopment and the Allocation should therefore be retained.

There appears therefore to be little justification or merit in deleting the Allocation B14 under the Placemaking Plan and it is respectfully requested that it is retained under the new Local Plan, and no other material considerations suggest otherwise.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                       |
|---|
| Should you wish to discuss matters further, JLL and the Clifton Diocese would be happy to oblige. |
| Should you wish to discuss matters further, ite and the cinton biocese would be happy to oblige.  |
| Change requested:   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |
|   |

**Placemaking Options Plan Reference:** Unallocated Site - The Joinery / Hawker's

Meadow, Batheaston

Plan Order Number: 20

| Respondent 4   | 712 Comment 1 Re       | espondent                   | Respondent                       | <b>Environ Communities Ltd</b> |
|----------------|------------------------|-----------------------------|----------------------------------|--------------------------------|
| Number:        | Number: N              | lame:                       | Organisation                     | :                              |
| Agent ID: 169  | Agent Name: Alder H    | King Planning Consulta      | nts                              |                                |
| Further Inform | ation available in the | original comment? $\square$ | Attachments sent with the com    | ment? 🗹                        |
|                |                        |                             |                                  |                                |
| Placemaking O  | ntions Plan Reference  | · Unallocated Site - Th     | ne Joinery / Hawker's Meadow Bat | heaston                        |

#### Comment on the Site:

Alder King Planning Consultants have been instructed by Environ Communities Ltd to submit representations to the Bath and North East Somerset Place Making Plan consultation. These representations specifically relate to the section on development proposed for Batheaston.

As you may be aware my client has interests in a potential development site in Batheaston at Hawker's Meadow (The Joinery) with aspirations to develop this site for over 55s' residential accommodation. This site was submitted as a potential housing site for inclusion in the Place Making Plan by Batheaston Parish Council and also included in the SHLAA (ref: BES1).

We are promoting the site for a potential over 55s' housing scheme which currently comprises a scheme of one and two bedroom houses, as well as a club house to be used by the residents and potentially opened up to the local residents of the village of Batheaston. The properties would be set around an attractive meadow which would significantly enhance the appearance of the Green Belt compared to the existing situation as well as provide attractive, much needed accommodation. Representations in relation to this site were previously submitted to the 'Core Strategy Proposed Changes' consultation in May 2013.

To give a general overview, the site is located at the northern edge of Northend (Batheaston) adjacent to the settlement boundary and can be accessed from the main road through the settlement. The site is located within the Green Belt, Cotswolds AONB, and part of the site is within flood zones 2 and 3. There is also a grade II listed property (114 Northend) adjacent to the site and across the road to the north west is a grade II\* listed property 'Eagle House'. It is considered that these constraints can be overcome through sensitive and appropriate design which overall will lead to an enhancement in planning terms.

The Core Strategy states that the housing expectations in Rural Areas are to provide around 1,120 dwellings over the plan period. Paragraph 5.21 of the Core Strategy sets out that the strategy for the rural areas (which includes Batheaston) is to enable housing developments of around 50 dwellings at each of the villages which meet the criteria of policy RA1. This is repeated at paragraph 1.345 of the consultation document. Batheaston is identified as an RA1 village.

It also states at paragraph 5.21 that the housing development boundaries will be reviewed as part of the Place Making Plan to incorporate the sites identified and/or enable new sites to come forward.

The only allocation proposed in the Place Making Plan for Batheaston is SR16, the lock-up garages on Coalpit Road which is 0.2 hectares and could accommodate approximately 5-10 dwellings. No other sites are identified for housing development within Batheaston and therefore the number of houses proposed falls significantly below the target of 50 dwellings for each of the RA1 villages.

On page 122 of the consultation document it advises that there are no other options for development in Batheaston as all other sites lie within the Green Belt and would therefore be contrary to Green Belt policy.

The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Once Green Belts have been defined local planning authorities should plan positively to enhance the beneficial use

of the Green Belt, including, to improve damaged and derelict land.

Development is not considered to be inappropriate in the Green Belt where it is for the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

In accordance with this Government guidance therefore the site should not have been excluded from the Place Making Plan due to its location within the Green Belt. As such, sufficient justification for excluding this site as a potential development site has not been provided.

In addition to this the NPPF states that Local Planning Authorities should identify and bring back into residential use empty buildings and normally approve planning applications for change to residential use from commercial buildings where there is an identified need for additional housing in that area. In this instance, there is clearly a shortfall over the policy aspiration.

Furthermore, in relation to housing development in rural areas it states that LPAs should avoid new isolated homes in the countryside unless there are special circumstances such as where the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting. This guidance clearly applies in this case as the emerging proposals, which have been the subject of initial pre-application advice, would represent an enhancement. The SHLAA submission relating to this site (BES1) assesses the suitability for development. Within the assessment it is commented that although it is within the AONB it is on the very edge and makes no contribution to its beauty or nature. It also concludes that in the absence of the artificial AONB and Green Belt designations, an architecturally sensitive housing development might enhance the street scene. In addition, it states that retirement homes would be possible and could be appropriate if a financially viable scheme could be devised.

Redevelopment of this site provides an opportunity to more appropriately use the site to benefit Batheaston and Bath through the delivery of housing for a target group in much demand, whilst also removing the current non-complementary and conforming employment use. It also presents an opportunity to enhance the overall appearance of this part of the village, especially given its location within the AONB.

As provided for in the Core Strategy, the settlement boundary could be amended to include this site, which would be sensible and logical, however this is not essential to allow development for residential as Government policy allows for development of housing outside of settlement boundaries and within the Green Belt in these circumstances. As such it is considered that the Place Making Plan in its current form is not proposing sufficient housing development within Batheaston, contrary to the requirement set out within the adopted Core Strategy. Furthermore it is considered that the reasons for not considering any other alternatives simply because they are located within the Green Belt is not sufficient justification, particularly as the Core Strategy and Government guidance allow for housing development on this particular site.

In support of this representation, below is a summary of the merits of this particular site and its suitability for development. For these reasons the site should be reconsidered for inclusion within the Place Making Plan.

The scheme would provide housing specifically for the over 55s and would form its own neighbourhood whilst integrating within the local village community of Batheaston and helping to sustain existing facilities.

A planning application was made in March 2012 to renew an outline consent granted in 2009 for the redevelopment of the existing site for general industrial use (Use Class B2). This application was refused on 19 December 2012 on ecology grounds because inadequate information had been submitted to fully understand the scale of the presence of protected species (bats) at the site and the potential impact of the development upon them.

The original application (09/00522/OUT) was submitted because the existing buildings on site are in a poor state of repair and not well suited to modern day industrial practices. The existing buildings have been developed in an ad hoc fashion over a number of decades and a re-organisation of the site to make it a viable employment enterprise would need significant investment and it is therefore recommended that a residential use, which creates employment as well as housing through the additional support service and construction work sectors is promoted.

#### Principle of Development

The principle of development within the Green Belt and the impact on the openness was accepted under the original outline application and there has been no material change to policy or circumstances in the adopted Core Strategy that would justify a change from this view. Therefore the principle of developing this site has been established. However, the site would be better suited to sympathetic residential development given its close proximity to Batheaston and thus more sympathetic to the village context.

Furthermore, Batheaston is predominantly residential in character with a large agricultural hinterland with small levels of employment and is served by adequate shopping, social, health and recreational facilities and acts as a hub to the surrounding rural catchment area. It is therefore a suitable place for the development and would help to support the existing services and maintain viability.

#### Green Belt

Core Strategy Policy CP8 (Green Belt) which conforms to the National Planning Policy Framework states that the general extent and detailed boundaries of the Green Belt should be altered only in exceptional circumstances. The existing site constitutes Previously Developed Land (PDL) and has been vacant for some time. Marketing has been carried out on the site since the planning application to renew the B2 consent which was refused due to a lack of ecological survey information. The site remains underutilised and there has been no interest in pursuing a light industrial use at the site and it is currently having a negative impact on the AONB, Listed Buildings and the Green Belt. The joinery yard extends well beyond the buildings and impacts on views from public vantage points. The proposals would consolidate and improve the extent of built form.

As stated above, the site adjoins the settlement boundary of Batheaston and extending the existing settlement boundary to include this previously developed site would be an appropriate and logical extension to the settlement limits for Batheaston. Paragraph 89 of the National Planning Policy Framework states that the construction of new dwellings is, inappropriate development, in the Green Belt unless the proposed development would comprise limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

The proposals include development on the broad footprint of the existing buildings, but also include some development along Northend to provide appropriate response to the street following urban design principles. This change is offset by the significant consolidation of hard standing which currently impacts on the Green Belt and AONB when viewed from public rights of way and along Steway Lane. The proposed meadow in the north east of the site will greatly soften the site and be more appropriate to the current landscape setting providing the opportunity for ecological enhancement.

#### **AONB** and Landscape Impact

The impact of the development on the Area of Outstanding Natural Beauty and the surrounding landscape was accepted under the original outline application above and there has been no material change to policy or circumstances that would justify a change to this view. From within the site, there are glimpses of the river through the dense vegetation with distant views of the rising hills beyond. Looking into the site there are three key views: 1) when approaching the site from the south-west looking towards the listed building and green space; 2) approaching from the north-west looking southeast across the field towards the collection of existing industrial buildings; and 3) the view across the fields from the public rights of way towards the site.

The existing buildings are poorly constructed and have deteriorated significantly over time. The buildings are metal clad and rusting in places and have a generally untidy appearance. Likewise the existing storage yard to the north of the buildings which is hard surfaced and strewn with miscellaneous storage gives the site a poor visual appearance. The removal of the existing buildings and the storage yard would act to significantly enhance the appearance of the site.

#### Listed Buildings

The impact of the development on the character and setting on nearby listed buildings was accepted under the original

outline application and there has been no material change to policy or circumstances that would justify a change to this view. The proposed development would enhance the setting of the existing Listed Buildings. These heritage assets would be incorporated within the proposed scheme and thus an appreciation shown for the asset's significance in the present and the future.

#### **Highway Safety**

The impact of this development on highway safety was accepted under the original outline application for employment use and there has been no material change to policy or circumstances that would justify a change to this view. Furthermore, there is a vehicular access to the south west and south entrance. It is important to note that the Highway Development Team raised no objections to the redevelopment of the site under planning permission 09/00522/OUT and this envisaged larger vehicles using the access associated with an employment (industrial) use. Therefore the type of vehicle using the access will be more of a domestic scale.

#### Neighbouring residential amenity

The site is located within a predominantly residential area and acquired consent for B2 purpose. Therefore the proposed residential use would be less intensive and would not generate comparative noise to a light industrial use which has been considered acceptable previously. Careful consideration would be given to the layout of the proposed housing and ancillary facilities in order to avoid any potential overlooking of neighbouring properties and would not significantly increase nuisance from the site to neighbouring properties. There is likely to be a significant benefit in terms of noise generation resulting from a change of use, due to the current generator noise which can be heard around the wider rural area and general industrial activity.

#### Summary

A proposed residential use would be intended to significantly improve the visual appearance of the site. The existing buildings are in a very poor state of repair and are visually obtrusive. A proposed scheme would be designed carefully within the context of the edge of the settlement site. Furthermore, there would be an opportunity to develop this site more sympathetically and in keeping with the sustainable management of the landscape, maintaining landscape character and preserving or enhancing where possible the natural beauty of the surrounding AONB.

We consider this site would deliver a valuable contribution to the revised number of homes as part of Bath and North East Somerset Council's Core Strategy, in particular those 1,120 homes in rural areas to be delivered through the Place Making Plan. Furthermore this site would help support economic prosperity and provide a choice in the housing market to local people. A number of jobs would be created from both the construction of the development and the management service positions provided as part of the scheme, allowing existing residents to continue to reside in Batheaston.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

Placemaking Options Plan Reference: Why these sites and not others? / Paragraph 1.9

ot others? / Plan Order Number: 28

Respondent 2589 Comment 2 Respondent Dawn Griffiths **Respondent** Bristol City Council Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Why these sites and not others? / Paragraph 1.9 **Comment on the Site:** We further note from paragraph 1.9 that the consultation document does not include the urban extension sites at Keynsham and Whitchurch (which are allocated in the Core Strategy) and that the development of these will be progressed through separate master planning processes by the relevant developers/land owners. Please note that we wish to engage in these future processes in order to be aware of any potential cross boundary implications arising from these significant development sites. **Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: General Local Green Space Comment Number: 32 Respondent 225 Comment 2 Respondent Dr Virginia Williamson **Respondent** Bath & North East Number: Number: Name: **Organisation:** Somerset Allotments Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: General Local Green Space Comment Comment on the Site: Many people may have overlooked these small paragraphs, hence the few number of local green spaces identified in the Options document. Apart from Timsbury's allotments, no local green spaces (e.g. allotments, orchards, community gardens) devoted to food have been included so far. Applications for designation as local green spaces will be submitted. **Change requested:** Respondent 274 **Comment** 2 **Respondent** Gary Parsons **Respondent** Sport England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: General Local Green Space Comment **Comment on the Site:** We are, however, aware that the Council's Leisure Team are working on producing one with adoption of a Playing Pitch Strategy by June 2015. This could influence which sites are designated as 'Local Green Space' as set out in para 1.10. **Change requested:** Respondent 1667 Comment 1 Respondent **Respondent** Widcombe Association

#### **Comment on the Site:**

Number:

Agent ID:

Ref paragraphs 1.10 and 1.161: The WA supports the designation of all the areas within Widcombe which are shown on plan at Appendix 2 of the Options document as Green Spaces in Bath and would wish to see all of these protected as such under the new provisions of the NPPF and NPPG.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

**Agent Name:** 

Name:

Placemaking Options Plan Reference: General Local Green Space Comment

**Organisation:** 

| Schedule of Comments on the Placemaking Plan Option  | ons Document in Plan Order                           |
|--|--|
| Change requested:  |  |
|  |  |
|  |  |
| December 1945  |  |
| Respondent 4815 Comment 1 Respondent Timothy Cantell Number: Number: Name:   | Respondent Bear Flat Association Organisation: (BFA) |
| The state of the s | Organisation: (DFA)                                  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachment   | ts sent with the comment? $\Box$                     |
|  |  |
| Placemaking Options Plan Reference: General Local Green Space Comme  | ent  |
|  |  |
| <b>Comment on the Site:</b> Bath's existing Green Open Spaces previously safeguarded in the Local Plan   | (Appendix 2) should aniou similar protestion         |
| in the Placemaking Plan. BFA wishes to see Bloomfield Green Space and the  |  |
| and the adjacent allotments designated as Local Green Spaces. We endorse   |  |
| Spaces are automatically carried forward into the Placemaking Plan as Loca   |  |
| ,  | '  |
| Change requested:  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6392 Comment 2 Respondent Dr Virginia Williamson  | <b>Respondent</b> Bath Area Growers                  |
| Number: Name:  | Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachment  | ts sent with the comment? $\Box$                     |
|  |  |
| Discomplying Outions Disc Defenses.  | 0.04   |
| Placemaking Options Plan Reference: General Local Green Space Comme  | ent  |
| Comment on the Site:   |  |
| Bath Area Growers is a network of community groups growing fruit and veg   | getables in and around Bath. We feel strongly        |
| that the local green spaces which community groups cultivate such as orch  | ards, community gardens, community support           |
| agriculture projects should be protected.  |  |
| Change requested:  |  |
| We will be submitting applications for designation of the green spaces which   | ch we cultivate communally                           |

### Placemaking Options Plan Reference: Nominated Local Green Space

Plan Order Number: 33

| Respondent 158 Comment 1 Re<br>Number: Number: Na | spondent Mark O'Sullivan<br>ame:             | <b>Respondent</b> Greenway - The Forum <b>Organisation:</b> for residents from |
|---|--|--|
| Agent ID: Agent Name:                             |  |  |
| Further Information available in the c            | original comment? $\square$ Attachments sent | with the comment? 🗹  |
|   |  |  |
| Placemaking Options Plan Reference:               | Nominated Local Green Space                  |  |

#### Comment on the Site:

Following our discussion last June, I am writing to you on behalf of the Greenway Lane Residents' Forum, supported by the Widcombe Association, the Federation of Bath Residents' Associations, the Somerset Playing Fields Association, the Ramblers Association, the Bath Preservation Trust and the National Trust, to request that the lower part of the Beechen Cliff School playing fields be classified in the new Local Plan as Local Green Space (NPPF §§76-77). We presume, as discussed, that the appropriate vehicle would be the Placemaking Plan.

I attach the detailed proposal, set out as discussed along the lines of a form devised by Cotswold District Council, with a schedule setting out the endorsements received and an illustrative set of photographs.

This letter summarises the principal case for designation.

Importance of Beechen Cliff

The Beechen Cliff hilltop as a whole plays a key part in the setting of the City of Bath World Heritage Site, inscribed as such by UNESCO, which declared in the latest revision of a Statement of Significance that its "Georgian buildings ... epitomise the success of architects such as John Woods, Robert Adam, Thomas Baldwin, and John Palmer, in transposing Palladio's ideas to the scale of a complete city, situated in a hollow in the hills and built to a Picturesque landscape aestheticism creating a strong garden city feel". The Statement adds, "Bath's grandiose Neo-classical Palladian crescents, terraces, and squares spread out over the surrounding hills and set in its green valley are a demonstration par excellence of the integration of architecture, urban design, and landscape setting, and the deliberate creation of a beautiful city. Not only are individual buildings ... of great distinction, they are part of the larger overall city landscape that evolved over a century in a harmonious and logical way, drawing together public and private buildings and spaces in a way that reflects the precepts of Palladio tempered with picturesque aestheticism," referring to "a series of interlinked spaces that flow organically, and that visually (and at times physically) draw in the green surrounding countryside to create a distinctive garden city feel".

Hence, in a recent presentation to the Partnership Board for the Setting of Bath, the Council identified as key risks the loss or undervaluing of green spaces, discordant landscape and poverty in the relationship between buildings and open space, and the deterioration of picturesque character and views and the consequential loss of beauty and delight.

Beechen Cliff is one of the most prominent of the green hills surrounding the World Heritage City. It is significant as a scenic backdrop to many of Bath's major historic buildings. However, it is also important in its own right, both as part of the dense patchwork of green spaces which is recognised as a key part of the essential character of the city, and as itself an object of vital heritage interest and meaning. In Northanger Abbey by Jane Austen, for example - one of the recognised triumphs of English literature - a key point in the plot revolves around an excursion to Beechen Cliff, and a walk through its scenery, whose beauty so entrances the heroine that by comparison she "reject[s] the whole city of Bath as unworthy to make part of a landscape".

Rightly, Beechen Cliff has been substantially protected from the ravages of development. Some housing has been put on its western flank, and the school on the south-west. But the park laid out on the summit is verdant, sitting well with the landscape, and much of the unwooded area of the hill remains as fields, where sheep and horses graze. It is still a place where connoisseurs of Bath's heritage may, as Jane Austen herself no doubt did, wander through thickets of briar and groups of oak and ash, in a minute or two passing from a vista of the World Heritage City itself to a view southwards of

the secret valley of

Lyncombe, crowded with mixed woodland and wildlife. Approaching the city from the south along the ancient Fosse Way and then the Georgian turnpike route, when one crosses the Wansdyke and passes down a long hill from Odd Down, the main thing in sight for a good while - the promise of the city - is the green extent of Beechen Cliff, with the school's grassy playing fields and their sylvan setting.

It was to recognise this that, when the Council drew up the 2007 Local Plan, all the open land at Beechen Cliff, including the school's playing fields, was given the new designation of "visually important open space". It is no surprise that in the Council's latest Management Plan for the World Heritage Site, and in the current Local Plan, Beechen Cliff is identified as one of seven "prominent, green hillsides within the built-up area [that] are vital to the City's landscape setting and character", with the remark that it has been "highlighted as crucial to the setting of the city". The Management Plan declares as Issue 27 that "The countryside surrounding Bath and green spaces in Bath are integral to the values of the World Heritage Site and also form the wider setting of the city", identifying seven action points to deal with this challenge. The City of Bath World Heritage Site Setting Supplementary Planning Document, adopted in August 2013, picks up these judgements, and seven pages (pp 100-106) describe in more detail the heritage and aesthetic importance of Beechen Cliff.

Description of land proposed for designation

We believe that all the open land on the Beechen Cliff hilltop, including the school playing fields, the grazing land to their eastward, the allotments, Alexandra Park and the cliff face itself, merits designation as a Local Green Space. However, our present proposal relates only to that part of the Beechen Cliff hilltop used as playing fields by Beechen Cliff School and informally as open space by others, but excludes that northerly part of the playing fields built up by landfill to make formal level sports pitches.

A sketch plan is attached.

Background of land proposed for designation

Along with other fields on the south side of the Beechen Cliff hilltop, a beauty spot celebrated by Jane Austen, this land was pasture until 1932, when the then Bath City Council made it the new site of the Bath Boys' School. This green space remains continuous with pastures to the east used for the grazing of horses and sheep, with Alexandra Park, and with the face of Beechen Cliff which is densely wooded.

The whole of the hilltop, including the green space the subject of this proposal, has long been protected. However, this land is potentially more vulnerable than the rest of the hilltop, as is shown by the planning application for housing development by Beechcroft Developments Ltd which was made in the year 2000, though in the end rejected.

Nevertheless, like other parts of the hilltop, this land was allocated as open space or playing fields in the previously adopted Local Plan (2007), where the Council also set out for it the new special category of Visually Important Open Space designed to protect key parts of the green infrastructure of the World Heritage Site. The new Local Plan process is not yet complete. However, following unsuccessful approaches by housebuilders, the hilltop was rejected and found unsuitable for housing in the B&NES SHLAA (latest revision adopted 2013). It is shown on Maps 3, 4 and 6 of the B&NES Green Infrastructure Strategy (adopted 2012) in the category of "historic parks and gardens/priority habitat/accessible open space". The entire hilltop is clearly delineated on the Bath World Heritage Site Setting Supplementary Planning Document (adopted 2013) among 'Green Hillsides Forming Prominent Features of the Landscape Setting' of the City of Bath World Heritage Site.

Last year, the Inspector's report of the EIP into the draft Core Strategy commented "I attach particular... importance, to the Green Hillsides Forming Prominent Features of the Landscape Setting (Draft SPD, Map 4; adopted SPD, Map 5) as these embody several of the key aspects of the setting of the built city, such as the importance of landform, views from the built-up area to the hills; views from the hills in to the city; and the managed, farmed landscape of much of the setting. These green hillsides include much land within the WHS as well as beyond the boundary." (§122). The hilltop is also on the conservation project list submitted as part of the recent Bathscape Landscape Partnership bid to the HLF, and was selected as a place to be visited by HLF assessors for the bid on 22 July 2014.

Conclusion

# However, under the NPPF other criteria, such as ecology or community use, would be enough in themselves to justify the categorisation of land as Local Green Space. The documents attached demonstrate that every one of these requirements is satisfied in this case. We believe that the case for designation is unanswerable. **Change requested:** Respondent 225 Comment 5 Respondent Dr Virginia Williamson Respondent Bath & North East Number: Number: Name: **Organisation:** Somerset Allotments Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Nominated Local Green Space **Comment on the Site:** Reference is made to possible "allocation at Hallatrow". The SHLAA lists two potential sites (Hal.1 and Hal.2) either side of Highbury Road, which is the location of High Littleton PC allotments. The allotments should be designated as Local Green Space, valued for their biodiversity, tranquillity, as well as community food production. The potential impact of any development on adjacent land would have to be very carefully assessed, over-development avoided and green corridors maintained. **Change requested:** Respondent 239 Comment 5 Respondent **Respondent** Keynsham Civic Society Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Nominated Local Green Space Comment on the Site: The following have been suggested for designation as Green Spaces using the Council 'tool-kit' for submission by 27th February. •The Paddock behind St John's Church. and Charlton Bottom, meadow behind St Francis Road. **Change requested:** Respondent 2663 Comment 3 Respondent Ms Jacky Wilkinson Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment?

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

These are exceptionally powerful planning arguments for the classification of the land in question as Local Green Space.

| Placemaking Options Plan Reference: Nominated Local Green Space   |
|---|
| riacemaking Options rian Reference.   |
| Comment on the Site:  |
| I wish to comment on the Bath Green Spaces Map.   |
| This map should include allotments (which are specfically referred to in the Planning Practice Guidance.) These are clearly local green spaces with special value for the local community.  |
| The land between the MOD site and the Bathampton parish boundary should be included as local green space. It has a very high value to many local people, both as an historical gap between the city and the parish, but as an important "gateway" to Bath. Each time I go past this site I enjoy the fabulous view across the valley and say to myself "I am home". This site has an attractive rural character and natural beauty - all criteria for Local Green Space. It is also accessible by the public on the public footpath. It should not be domesticated or altered from its natural rural state. |
| Finally, I am surprised that the local public garden next to the carpark on the river at Batheaston has not been suggested. Although we are not parish locals, we go there to sit by the river.   |
| I would also like to suggest for similar reasons that the garden land along the north side of Snow Hill is also designated as Local Green Space. This land was once used as an allotment - the old boy even had goats on it. This space does not have public access, but this is not essential for the designation. It is clearly valued by many local people, who responded when the planning appliactions were made to buld on it and it makes an important contribution to the character of the area.  |
| Change requested:   |
|   |
|   |
| Respondent 6368 Comment 2 Respondent Miss Iris Lerpiniere Respondent Organisation:  |
| Agent ID: Agent Name:   |
|   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
|   |
| Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Nominated Local Green Space   |
|   |
| Placemaking Options Plan Reference: Nominated Local Green Space  Comment on the Site:  2. The Paddock a most attractive green triangular space adjacent to St John's Church. This little oasis of trees + wildflowers could be a butterfly haven. The Hawkeswell field between A4175 + A4 needs protection. Was part of the   |
| Placemaking Options Plan Reference: Nominated Local Green Space  Comment on the Site:  2. The Paddock a most attractive green triangular space adjacent to St John's Church. This little oasis of trees + wildflowers could be a butterfly haven. The Hawkeswell field between A4175 + A4 needs protection. Was part of the Abbey estate, floods most window  |
| Placemaking Options Plan Reference: Nominated Local Green Space  Comment on the Site:  2. The Paddock a most attractive green triangular space adjacent to St John's Church. This little oasis of trees + wildflowers could be a butterfly haven. The Hawkeswell field between A4175 + A4 needs protection. Was part of the Abbey estate, floods most window  |
| Placemaking Options Plan Reference: Nominated Local Green Space  Comment on the Site:  2. The Paddock a most attractive green triangular space adjacent to St John's Church. This little oasis of trees + wildflowers could be a butterfly haven. The Hawkeswell field between A4175 + A4 needs protection. Was part of the Abbey estate, floods most window  |
| Placemaking Options Plan Reference: Nominated Local Green Space  Comment on the Site:  2. The Paddock a most attractive green triangular space adjacent to St John's Church. This little oasis of trees + wildflowers could be a butterfly haven. The Hawkeswell field between A4175 + A4 needs protection. Was part of the Abbey estate, floods most window  Change requested:  Respondent 6369 Comment 3 Respondent Mrs Diane Feltham Respondent  |
| Placemaking Options Plan Reference: Nominated Local Green Space  Comment on the Site:  2. The Paddock a most attractive green triangular space adjacent to St John's Church. This little oasis of trees + wildflowers could be a butterfly haven. The Hawkeswell field between A4175 + A4 needs protection. Was part of the Abbey estate, floods most window  Change requested:  Respondent 6369 Comment 3 Respondent Mrs Diane Feltham Respondent Organisation:  |

| Comment on the Site:   |  |
|--|--|
| There is also a small paddock behind St John's Church which is occasionally used                           | as parking by the church. This should be                     |
| planted for bees and butterflies and again protected.  |  |
| Change requested:  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6421 Comment 3 Respondent Joanna Burgess Number: Number: Name:                                  | Respondent Organisation:                                     |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachments sent                                  | t with the comment?  |
| Attachments sem  | t with the comment:  |
| Discounding Outions Disc Defendance Newsignsted Local Consultation   |  |
| Placemaking Options Plan Reference: Nominated Local Green Space  |  |
| Comment on the Site:   |  |
| I cannot find your assessment as to why 'the vegetable garden' is not allocated in                         | the place making plan but understand it                      |
| has been classed as too remote and unable to accommodate more than one hou                                 |  |
| remote from the village than the allocated site but if you are only able to allocate                       | e sites for more than one house, could                       |
| you consider drawing the new boundary to include it.   |  |
| Change requested:  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6435 Comment 1 Respondent Alan Hale (Cllr)  | Respondent   |
| Number: Name:  | Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sen                              | t with the comment? $\Box$                                   |
|  |  |
| Placemaking Options Plan Reference: Nominated Local Green Space  |  |
|  |  |
| Comment on the Site:   |  |
| Re green spaces for Keynsham, I would wish to nominate Kelston Road playing fi                             | elds, basically the land behind Queens                       |
| Road Methodist Church stretching down to St Keyna School.  |  |
|  |  |
| This green space has been available for recreation since the very early 60s and is                         | a lovely facility for the surrounding area                   |
| This green space has been available for recreation since the very early 60s and is which is disadvantaged. | a lovely facility for the surrounding area                   |
| which is disadvantaged.  | a lovely facility for the surrounding area                   |
|  | a lovely facility for the surrounding area                   |
| which is disadvantaged.  | a lovely facility for the surrounding area                   |
| which is disadvantaged.  | a lovely facility for the surrounding area                   |
| which is disadvantaged.  | a lovely facility for the surrounding area  Respondent BANES |

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Agent ID:

| Placemaking Options Plan Reference:       | Nominated Local Green Space   |
|---|---|
| Comment on the Site:                      |   |
| Old Vicarage Green in the green space for | ery east to the rear of the Catholic Church up to the boundary of Pool Barton and or Keynsham. It should be protected because it has an importance in the setting wn and is an area where local people exercise there dogs and us the footpaths |
| Change requested:                         |   |

# Placemaking Options Plan Reference: General Sites Comment - Multiple Areas

Plan Order Number: 34

|  | spondent Sean Walsh<br>Ime:            | Respondent Highways Agency Organisation: |
|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |  |  |
|  | General Sites Comment - Multiple Areas |  |

#### **Comment on the Site:**

The SRN within Bath and North East Somerset runs generally north to south close to the eastern edge of the Council area. The northern section comprises A46 which links the M4 at junction 18 to Batheaston. The southern section, A36 continues southwards from Bathampton to Beckhampton. The SRN is discontinuous through the city with through movements between A46 at Batheaston grade separated junction and the A36 at Bathampton being made via local roads including A4 London Road, Cleveland Bridge, and A36 Warminster Road.

The South West Peninsula Route Strategy Evidence Report published by the HA in April 2014 highlights a range of concerns about the SRN in the Council's area. These include highway capacity, delay at key junctions on the SRN and its interconnecting route, air quality, noise sensitive areas, and geological instability between Bathampton and Limpley Stoke. Looking to the future the report highlights concerns about the transport impact of the very significant scale of potential development within the City of Bath, on the A46 and A36 from M4 to Beckington and on the interconnecting network, particularly Cleveland Bridge.

The developments sites within Bath are of greatest concern because of their scale and proximity to the SRN. Those in the Central Area and Enterprise Zone have the potential to add between 250,000 and 290,000m2 gross of development including between 1100 and 1234 residential units, depending on which development scenario is selected. In addition, other sites in Bath include a number of former MoD sites, one at Warminster Road being located on that section of A36 that is not part of the SRN, University campuses, and the Royal United Hospital. Taken together the proposed sites in Bath have the potential to add significant pressure to the SRN, A46 and A36, and their interconnecting links through the City, and lead to the requirement for some significant works to mitigate their impact.

In this context the Agency is pleased to note the reference in the Introduction to the Placemaking Plan to the Council's Key Strategies, of which Getting Around: Transport Strategy is of vital interest. Similarly the Agency is pleased to note reference to the strategic Objectives set out in the Core Strategy, specifically to "deliver well connected places accessible by sustainable means of transport".

We note that the majority of the housing requirement in the Somer Valley is either built or committed development. The remainder of the development requirements are either brownfield sites that are within or adjacent to the town centres of Midsomer Norton and Radstock, and within Westfield. The Agency generally supports the location of these developments and regards them as being as sustainable as possible given the circumstances. The impacts on the A36 to the east or the M5 to the west are considered to be limited at this stage, particularly given the efforts to become more self-reliant, facilitated by economic led revitalisation alongside local energy production and improved transport connections. Notwithstanding this any planning applications for development will need to be supported by a robust transport evidence base to understand the specific impacts of development, and to identify any mitigation as required.

As previously iterated in responses to the Core Strategy from the Agency, we do not generally object to the development identified in Keynsham and note that a number of the key sites and issues are already addressed through the Core Strategy process. For example the urban extensions are undergoing a master planning process separate from the Placemaking process and the Somerdale redevelopment already has planning permission. The Council has previously acknowledged that there are transport concerns relating to development in Keynsham and that only a moderate level of development can be accommodated before substantial infrastructure upgrading is required. It is therefore imperative that the transport impacts are robustly assessed in order to understand what the network can accommodate before these infrastructure upgrades are required.

# We are encouraged that a number of schemes are identified in the Transport Strategy that will help to deliver development in Keynsham, but would again emphasise the need for a robust transport evidence base to support applications so that necessary mitigation can be identified as required and if necessary development can be programmed to ensure that it does not pre-empt improvements that are already identified as being needed. The development sites within the rural areas as would be expected are much smaller and more dispersed than those identified in the urban areas. Due to the smaller scale of development and the increased distance in general from the SRN the Agency does not have any major concerns at this stage. Pre application discussions and the consultation during application determination supported by a Transport Statement/Transport Assessment with assessments of key junctions will identify specific impacts and allow any necessary mitigation to be identified as required.

| Change requested:   |   |
|---|---|
|   |   |
|   |   |
| Respondent 245 Comment 1 Respondent Mr Andy Reading Number: Name:   | Respondent Environment Agency Organisation:   |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\qed$ Attachments   | sent with the comment? $\Box$   |
|   |   |
| <b>Placemaking Options Plan Reference:</b> General Sites Comment - Multiple Ar  | reas  |
| Comment on the Site:  |   |
| The Environment Agency has recently provided the Council with sites assess provide commentary on environmental issues and opportunities for each site development coming forward. Given that these site assessments were provide understand that they were not used to inform this options stage consultation to inform the preparation of the draft plan. We are happy to work closely with next stages of the Placemaking Plan and the issues outlined in our site assess we have identified environment risks that are likely to have significant implicated development that is capable of being delivered. | e, and what would need to be addressed for ded to BANES relatively recently we n. However we understand they will be used th the Council early in the New Year on the sments document. Particularly for sites where |
| Change requested:   |   |
|   |   |
| Description CARC Control of the Carc Carc Carc Carc Carc Carc Carc Carc   |   |
| Respondent 6426 Comment 1 Respondent Mr Steven Kerry Number: Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley  |
| Agent ID: Agent Name:   | ,   |
| Further Information available in the original comment?   Attachments  | sent with the comment? $\Box$   |
|   |   |
| Placemaking Options Plan Reference: General Sites Comment - Multiple Ar   | reas  |

#### **Comment on the Site:**

The Bath and North-East Somerset Placemaking Plan makes no specific reference to overall housing allocation in the region within the Strategic Policy Context, reference paragraph 1.171 'there is still a need for the Placemaking Plan to identify and allocate some sites for development where no guidance is provided'. We would make a recommendation that more housing be allocated in villages with a healthy supply of key facilities and services such as Temple Cloud, East Harptree and West Harptree, than that indicated in the Placemaking Plan. These service villages are capable of incorporating greater housing numbers without being constrained by the lack of supporting infrastructure.

# numbers than that indicated in the Placemaking Plan. It has the facilities to accommodate an increase in housing allocation and could potentially contribute a sizeable percentage of housing targets for Bath and North East Somerset. With regard to strategic sites in Keynsham, p64, paragraph 1.172 states that 'the scale of some of these means they may be delivered over time'. This is a recurring theme as nowhere does the Placemaking Plan make reference to, or attempt to present an indication of the timescales required to provide development in the plan areas. We appreciate it may not be possible to provide an accurate timescale for the estimated delivery of said sites, however it would be beneficial to have some indication of a delivery date in order to gauge whether there are shortfalls in supply. **Change requested:** Respondent 6576 Comment 1 Respondent Mr Sam Willitts **Respondent** Keynsham Community Number: Number: Name: **Organisation:** Energy Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: General Sites Comment - Multiple Areas Comment on the Site: Keynsham Community Energy submission Keynsham Community Energy (KCE)s purpose is to build a community-owned and financially sustainable enterprise that will deliver affordable energy in the community for the community. We aim to secure investment in renewable local energy generation schemes and help Keynsham residents reduce their energy use and carbon footprint, and save money. KCE submit the following response to Bath and North East Somersets Placemaking plan. Strategic policy context for Keynsham KCE would like to see a clear definition of asustainable town centre.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

In addition, Keynsham could also benefit from, and has the capacity to incorporate, an allocation of increased housing

**Change requested:** 

# Plan Order Placemaking Options Plan Reference: Bath General Comments Number: 35 Respondent 23 Comment 2 Respondent Dr Lucy Rogers Respondent Avon Wildlife Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Bath General Comments **Comment on the Site:** We do have a minor comment on wording as follows. Page 11 of the Plan refers to emerging design values which include the 'Biophilic benefits of enhanced river corridor and other open space/green infrastructure' and '...protect and further enhance biodiversity value'. This recognition of the wider value of biodiversity and ecological networks is most welcome. The Trust also supports the reference to green infrastructure in the Development and Design Principles for the vast majority of the proposed individual development sites. **Change requested:** Respondent 102 Comment 1 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: **Organisation:** Residents' Associations Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Bath General Comments **Comment on the Site:** The need for Central Bath to be treated as a "Place" in its own right. The most important existing asset in B&NES is the historic core of the Bath World Heritage Site; but the draft Plan contains no policy for the central area considered as a whole. Keynsham, Midsomer Norton and Radstock town centres are described this way, and so should Bath. However, the centre of Bath is presently viewed as no more than a series of new development sites. Correlation with the recently approved Transport Strategy. At the 12th Nov Cabinet meeting, when the Placemaking Plan was approved for consultation, the Bath Transport Strategy and the Enterprise Area Masterplan were cited with it as parts of a co-ordinated suite of B&NES strategy and policy. However, the Placemaking Plan presently does not mention the Transport Strategy until page 270, and many parts of the two documents are inconsistent. •The use of Brownfield sites before Greenfield. **Change requested:** Respondent 224 Comment 1 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

Placemaking Options Plan Reference: Bath General Comments

#### Comment on the Site:

**General Comments** 

Bath Preservation Trust is concerned that the Placemaking Plan needs to provide a robust and enforceable policy framework for development in the World Heritage Site. To that end we have the following overall comments to make:

- 1. The Development Plan should comprise of the Core Strategy, The Placemaking Plan, and the West of England Joint Waste Core Strategy. Local Plan Policies should be transferred and modified into where appropriate and the Local Plan (2007) should become obsolete.
- 2. Policy for the Bath Central Area The draft plan should contain a specific and relatively detailed policy for the Central Area as a whole (linked to the Central Area Policy within the Core Strategy). This policy should provide the context and set parameters for a cohesive approach to all development in the city centre as well as the development of the major sites. Absence of such a policy risks risks incoherence of approach and cumulative harm to the OUV.
- 3. An up-to-date Conservation Area Appraisal and Management Plan must provide the evidence base for the Place-Making Plan. The absence of such an up-to-date appraisal was noted in the Inspector's report on the Core Strategy (para 180).
- 4. Locally important heritage assets require identification. A Local List must provide the evidence base for policy.
- 5. Reference to supporting documents should be signposted or linked. For example the Bath Pattern Book is extensively referenced but not accessible. It would be helpful to list all the SPDs which apply to all the policies and to provide easy web access.
- 6. Design Principle Policies the document should present an overarching policy for design principles, applicable to all sites, not just a statement of values. This will allow specific design policies for each site (relating to what is different and distinct) to be much clearer.
- 7. Site ownership in the case of sites wholly in the ownership of B&NES, this should be stated. B&NES ownership is the only way to ensure that some of the higher value aims of the plan are delivered rather than simply best price, which tends to push aspirational placemaking out through viability constraints. For example, the Avon Street Car park development seeks "fine grained" development, but if the whole site were sold off at best price it would be unlikely to achieve this aim. Where B&NES is the landowner they could work with developers to bring a site forward through the provision of roads and through routes and the development of smaller plots, site by site.
- 8. We are concerned about whether the Building Heights Strategy is robust enough, given that it does not have SPD status. We would recommend its adoption as SPD and would also recommend that the LPA abide by its constraints.
- 9. We remain to be convinced of the evidence base for the significant cumulative hotel bed spaces proposed in the options.
- 10. The document reads as though it has been written by several different authors and requires greater consistency. For example listed buildings must be referred to as Grade I, II\*, II throughout.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 224 Comment 73 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Bath General Comments Comment on the Site: Bath Preservation Trust is concerned that the Placemaking Plan needs to provide a robust and enforceable policy framework for development in the World Heritage Site. To that end we have the following overall comments to make: 1. The Development Plan should comprise of the Core Strategy, The Placemaking Plan, and the West of England Joint Waste Core Strategy. Local Plan Policies should be transferred and modified into where appropriate and the Local Plan (2007) should become obsolete. 2. Policy for the Bath Central Area - The draft plan should contain a specific and relatively detailed policy for the Central Area as a whole (linked to the Central Area Policy within the Core Strategy). This policy should provide the context and set parameters for a cohesive approach to all development in the city centre as well as the development of the major sites. Absence of such a policy risks risks incoherence of approach and cumulative harm to the OUV. 3. An up-to-date Conservation Area Appraisal and Management Plan must provide the evidence base for the Place-Making Plan. The absence of such an up-to-date appraisal was noted in the Inspector's report on the Core Strategy (para 180). 4. Locally important heritage assets require identification. A Local List must provide the evidence base for policy. 5. Reference to supporting documents should be signposted or linked. For example the Bath Pattern Book is extensively referenced but not accessible. It would be helpful to list all the SPDs which apply to all the policies and to provide easy web access. 6. Design Principle Policies – the document should present an overarching policy for design principles, applicable to all sites, not just a statement of values. This will allow specific design policies for each site (relating to what is different and distinct) to be much clearer. 7. Site ownership – in the case of sites wholly in the ownership of B&NES, this should be stated. B&NES ownership is the only way to ensure that some of the higher value aims of the plan are delivered rather than simply best price, which tends to push aspirational placemaking out through viability constraints. For example, the Avon Street Car park development seeks "fine grained" development, but if the whole site were sold off at best price it would be unlikely to achieve this aim. Where B&NES is the landowner they could work with developers to bring a site forward through the provision of roads and through routes and the development of smaller plots, site by site. 8. We are concerned about whether the Building Heights Strategy is robust enough, given that it does not have SPD status. We would recommend its adoption as SPD and would also recommend that the LPA abide by its constraints. 9. We remain to be convinced of the evidence base for the significant cumulative hotel bed spaces proposed in the options. 10. The document reads as though it has been written by several different authors and requires greater consistency. For example listed buildings must be referred to as Grade I, II\*, II throughout. A Policy for the Central Area should be included after paragraph 1.14. See general comment 1 and 4 above.

| There needs to be a greater emphasis on building heights as a factor which notity and its landscape setting.  |  |
|---|--|
| This section requires reordering as follows.  |  |
| • 7&8 should be at the top.   |  |
| • 1 is too specific and reference to irregular backs should be removed. 5 & 1   | are too similar,   |
| <ul> <li>The reuse of existing buildings and the longevity of new buildings should be<br/>nnovation</li> </ul>  | e included under Craftsmanship and                             |
| Change requested:   |  |
|   |  |
| Respondent 225 Comment 3 Respondent Dr Virginia Williamson Number: Name:  | Respondent Bath & North East Organisation: Somerset Allotments |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$                                  |
| Placemaking Options Plan Reference: Bath General Comments   |  |
| Comment on the Site:  |  |
| t's important that consultation with stakeholders is more than a mere forma<br>Stakeholders should include community groups and local residents. Develope<br>Stakeholders' comments have been taken into account. | • 1  |
| Change requested:   |  |
|   |  |
| Respondent 279 Comment 1 Respondent Rohan Torkildsen Number: Name:  | Respondent English Heritage Organisation:                      |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment?   Attachments  | sent with the comment? $\Box$                                  |
| Placemaking Options Plan Reference: Bath General Comments   |  |
| Comment on the Site:  |  |
| EH welcomes such a proactive initiative that establishes a series of design prequality contextual development that can sustain, complement and enhance and sandscape, assets and their settings.                  |  |
| Change requested:   |  |

| Schedule of Comments on the Placemaking Plan Option  | ns Document in Plan Order  |
|--|--|
| Respondent 2484 Comment 1 Respondent James Warren Number: Name:  | <b>Respondent</b> Bath Heritage Watchdog <b>Organisation:</b>  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments  | s sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Bath General Comments  |  |
| Comment on the Site:   |  |
| Something that ought to be borne in mind is that the history of Bath is one caused where they were because that was the natural place for them.  | of evolution. Housing and businesses co-   |
| The more recent experiences of forced relocation of business to meet a plan proportion of them did not survive relocation. Their location was as much a they conducted. Others took their trade elsewhere (there are a lot of busing Bristol, Keynsham, Bradford on Avon and Trowbridge) putting value into the Placemaking Plan should recognise that some things don't need fixing because   | a part of their business viability as the business<br>esses that originated in Bath which are now in<br>ose economies rather than Bath's. The  |
| f someone wants to buy a Widget and the best place to supply Widgets move want a Widget will go to Bristol to get one and do their remaining shopping so there would be peripheral damage. Development sites which are already valued for the employment and money put into the local economy, and no amportant exactly where they are; and development options should work roocation on hold until the current occupiers no longer want it.   | there whilst they are in that neighbourhood, y occupied by viable businesses ought to be assumptions should be made that they are not  |
| The emphasis on providing office space for employment is flawed and unsaft developments have either not proceeded or have been replaced by other us accommodation. Existing modern office space sits empty with To Let signs, Bristol. With the cost of commuting increasing annually and steady improve ine is likely to gradually erode the need for office accommodation, especial nigher business rates and limited or costly local parking. The assumption the them needs a radical re-think. Out of town shopping centres are already reconverted to offices instead and Bath's hope of attracting new office employneeds to guard against building the white elephants of the future, and need making Bath a permanent building site will have. | ses because there isn't the demand for office both in Bath and to an even greater extent in ements in internet speeds, home working only city centre accommodation which has lat if offices are provided businesses will fill considering the business model in the light of ermarkets with their acres of free parking to be yment will be sunk. The Placemaking Plan |
| The emphasis in the Placemaking Plan will need to be the more vague 'according the proportion of the cannot be done on-line: personal care, craft prototyping and the like, which are likely to supersede the traditional pen-planning considerations for new developments need to put the emphasis or office accommodation.   | ft workshops, light manufacturing, invention oushing jobs in the need for accommodation.   |
| Change requested:  |  |
|  |  |
| Respondent 3069 Comment 1 Respondent Cllr Anketell Jones Number: Name:   | Respondent<br>Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments  | s sent with the comment? $\Box$  |

Placemaking Options Plan Reference: Bath General Comments

#### **Comment on the Site:**

**Development Sites** 

1.8 Why these sites....

About 15 years ago there was a short consultation on the future of Broad St car park. Alternative uses were being considered as the Council at the time wanted to discourage cars from coming into the city centre. Has this site been considered in the Placemaking process or is it too small?

**Bath Sites** 

1.10 Local Green Space

In my ward, Lansdown, there is a large area of undeveloped land in front of Camden Crescent. It belongs to the Council and is currently managed on an approximate 5 year cycle of cutting back.

Local residents have cultivated the upper part of the site into a wild flower meadow and there is an aspiration to manage the whole site as a wildlife haven.

I believe this would be a suitable piece of land for Green Space designation.

#### 1.24 Design Values

Innovative design within the historic, Georgian parts of Bath should be discouraged. Beyond the city centre there is more scope for diversity. Small sites in the outer areas can be developed with proportionate modern housing and still fit comfortably into their surroundings. The Enterprise Area also has potential to absorb the avant guard.

Strategic/Emerging Design Values

Composition and balance

Bullet point 4. ....approach but with space for the divergent... Can it be changed to read ....but with PLACE for the divergent.....

Using place instead of space implies there will be some control over the "divergent". "Space" is too loose and implies oddities would be welcome.

Design Innovation.

Bullet point 6. .....allow and encourage the quirky, unusual.....etc. Possibly but if in the Georgian centre then ONLY within the spirit of neo-classicism.

Celebrate Bath's Independent Spirit

Bullet point 5. ....entice the radical. ONLY in the out-of-centre areas.

Life Enabling

There is a real danger of diminishing the presence of the river by locating large buildings too close to the river's edge. The river must retain accessibility/visibility and not be developed into a rich man's view. It belongs to the people of Bath.

Looking responsibly to the future,

Bullet point 1.

Living roofs are over-rated. In the lower and more visible parts of the city they could end up looking messy. Best restricted to areas that are not overlooked.

#### **Change requested:**

| Respondent 4794 Comment 1 Respondent Cara and Tara Number: Number: Name:   | Respondent Organisation:                     |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\Box$                  |
| Placemaking Options Plan Reference: Bath General Comments  |  |
| Comment on the Site:   |  |
| One of the things that make Bath special is the number and social diversity of perheart of the City. They play an important role in creating the vibrant community workers and industries to locate here and the maintain many of the Georgian but   | and culture that attracts knowledge          |
| We think it is important that this plan explains how residents will be supported, create for city centre residents and how BANES plans to preserve and maintain  |  |
| We would like to see for all the key sites and areas a statement of what the imp short and long term.  | act on residents is likely to be both in the |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6442 Comment 1 Respondent Mrs M D Gibb Number: Name:  | Respondent<br>Organisation:                  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\Box$                  |
| Placemaking Options Plan Reference: Bath General Comments  |  |
| Comment on the Site:   |  |
| Having been born and bred in Bath I am very distressed by Bath City Councils de student accommodation, the Broad Quay site in the city centre, close to twenty places of interest, shops, railway station could have been flats & maisonettes fo these properties and paid generous rates.   | three would be wide, Georgian Bath           |
| Having been widowed at the age of 30 with five children under years of age I mount University to accommodate students. I was accepted as a landlady and was, for time, although it was my home, some of the students showed little or no respect Broad Quay will be treated with the same disrespect and every year will have to Surely there must be sites close to the University which would be suitable. | six students for over 20 years. In that      |
|  |  |
| I trust as a Bathonian my opinion will be given some consideration.  |  |
| I trust as a Bathonian my opinion will be given some consideration.  Change requested:   |  |

Placemaking Options Plan Reference: Placemaking Plan Bath: The Evidence

Base / Paragraph 1.21

|  | spondent Robin Kerr<br>me:                  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |
|--|---|---|--|
| Agent ID: Agent Name:                  |   |   |  |
| Further Information available in the o | riginal comment? $\square$ Attachments sent | with the comment? $\Box$  |  |
|  |   |   |  |
| Placemaking Options Plan Reference:    | Placemaking Plan Bath: The Evidence Bas     | se / Paragraph 1.21   |  |
| Comment on the Site:                   |   |   |  |
| Change requested:                      |   |   |  |
| Add extra bullet: "Maintain or enhance | movement and accessibility within accept    | able environmental standards".  |  |

# Placemaking Options Plan Reference: Emerging Design Values

| Respondent 224 Comment 3 Respondent Number: Number: Name:  | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |  |  |
|--|--|--|--|
| Agent ID: Agent Name:  |  |  |  |
| Further Information available in the original comment? $\Box$  | Attachments sent with the comment? $\Box$                      |  |  |
| Placemaking Options Plan Reference: Emerging Design Value  | S  |  |  |
| Comment on the Site:   |  |  |  |
| The values are welcomed in principle.  |  |  |  |
| There needs to be a greater emphasis on building heights as a factor which maintains a visual relationship between the city and its landscape setting. |  |  |  |
| Change requested:  |  |  |  |

- This section requires reordering as follows.
- 7&8 should be at the top.
- 1 is too specific and reference to irregular backs should be removed. 5 & 1 are too milar,
- The reuse of existing buildings and the longevity of new buildings should be included under Craftsmanship and Innovation

Placemaking Options Plan Reference: The Central Area and River Corridor - Context / Paragraph 1.35

| Respondent 102 Comment 8 Respondent Robin Kerr Number: Name:   | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|--|---|--|--|
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |  |  |
|  |   |  |  |
| Placemaking Options Plan Reference: The Central Area and River Corridor - Context / Paragraph 1.35   |   |  |  |
| Comment on the Site:   |   |  |  |
| This refers to three areas (the centre, the western riverside and Twertor straight on to the Riverside, without any consideration of the centre as a |   |  |  |
| Change requested:  |   |  |  |

Placemaking Options Plan Reference: The Central Area and River Corridor -

Bath City Riverside Enterprise Area and

Masterplan / Paragraph 1.36

|   | oondent Robin Kerr<br>ne:              | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |
|---|--|---|--|
| Agent ID: Agent Name:   | nc.                                    | Organisation: Residents Associations  |  |
|   |  |   |  |
| Further Information available in the or   | iginal comment? $\sqcup$ Attachments s | sent with the comment? $\square$  |  |
|   |  |   |  |
| Placemaking Options Plan Reference: The Central Area and River Corridor - Bath City Riverside Enterprise Area and Mas |  |   |  |
| Comment on the Site:  |  |   |  |
| The draft should recognise the fundame  | ntal connection between land use and   | d traffic. An integrated plan for the A36   |  |
| south of the river is required to support   | the Enterprise Area development. Cl    | L funds should be earmarked for this.   |  |
| Change requested:   |  |   |  |
|   |  |   |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Enterprise Area Development Sites Number: 79 Respondent 225 **Comment** 4 **Respondent** Dr Virginia Williamson **Respondent** Bath & North East Number: Number: Name: **Organisation:** Somerset Allotments Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Enterprise Area Development Sites Comment on the Site: Options 1-3 indicate the provision of 800-900 new dwellings, yet there is no reference to commensurate provision for allotments. On the basis of 2 persons per dwelling, c.400 allotment plots should be provided. The lack of available, suitable land for allotments in the area may require innovative solutions such as rooftop allotments and access to former private allotment sites (e.g. Lansdown View). **Change requested:** The lack of available, suitable land for allotments in the area may require innovative solutions such as rooftop allotments and use of former private allotment sites Respondent 279 Comment 2 Respondent Rohan Torkildsen Respondent English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Enterprise Area Development Sites **Comment on the Site:** Significant above and below ground archaeology at each of the central area and river corridor sites is perhaps underemphasised. The implications for the principle of development, the form of development and future management of the affected heritage assets (known and unknown) needs to be referred to ensure due consideration. It is vital the planning of these individual sites are coordinated to ensure a coherent and well integrated cityscape as a whole that complements rather than competes for attention. The implications and consequences for the historic environment of each of the Options for each of the development sites is difficult to determine. One assumes that all Options can deliver on the Placemaking Plan's key design principles and guidance. The degree to which each can secure an exemplary scheme in accordance with the design principles and Design values may provide an objective way to define the preferred option?

EH recognises that further evidence will be gathered to inform the preferred options for each site. Our on-going engagement with the council to help inform a coherent and refined series of allocations would be welcomed.

**Change requested:** 

| Respondent 1667<br>Number:  | Comment 10 Res  |  | Respondent Widcombe Association Organisation:  |
|---|---|--|--|
| Agent ID: Ag  | ent Name:   |  |  |
|   |   | riginal comment?   | Attachments sent with the comment? $\Box$  |
|   |   |  |  |
| Placemaking Optio   | ns Plan Reference:  | Enterprise Area Develo   | pment Sites  |
| Comment on the Si   | te:   |  |  |
| 3 The Central Area a  | nd River Corridor   |  |  |
| improvements to th<br>proposal for a River<br>The WA would welc   | e environment and<br>Strategy (para. 1.34<br>ome further consul<br>ombe ward. Howev   | use of the river, its foot<br>4).<br>tation on the options for<br>er, we would hope to se  | city centre and the WA is committed to seeing baths and crossing points. We therefore welcome the development of the Enterprise Area sites, some of which e further information on the transport implications for  |
| 4 Traffic and Transpo   | ort   |  |  |
| Options, set out in s<br>those within the Ent   | ome detail, are put<br>erprise Area stretcl<br>nment cannot be m  | forward for the possible<br>hing along the river corri<br>ade on the options for d   | the Council considers have development potential.<br>mix of uses on these sites. Chief amongst these sites are<br>dor west of the City Centre. The Widcombe Association is<br>evelopment on any of these sites in the absence of   |
| takes any decision o<br>impact of the sites ii<br>in traffic at a time w<br>Widcombe Associati<br>Widcombe, as do a i | In the policies relation aggregate is assest then the Council's Tolon's interest in this number of the majory analysis of traffic | ing to these sites, that the<br>sed. The consequences of<br>ransport Strategy is seek<br>s issue is because the print<br>or radial roads including to<br>and transport impacts s | al issues to address. It is essential that before the Council e transport impact of each option is assessed, and that the of not doing so could lead to unacceptable levels of growth ing to reduce the amount of traffic within the City. Incipal east-west route across the City runs through Wellsway, Lyncombe Hill, Prior Park Road and Widcombe should be made public before the Council makes any |
|   |   |  |  |
|   |   |  |  |
| Respondent 2611<br>Number:<br>Agent ID: Ag  | _   | spondent<br>nme:   | <b>Respondent</b> Transition Bath <b>Organisation:</b>   |
| Further Informatio  | n available in the o  | riginal comment? $\Box$  | Attachments sent with the comment? $\square$   |
| Placemaking Optio   | ns Plan Reference:  | Enterprise Area Develo   | pment Sites  |
| Comment on the Si   |   | e Master Plan Vision rep   | ort  |

These maps indicate 2 edible walls along the river. This is the only reference we could find to locations for informal food

Different types of informal food growing, such as rooftop gardens, edible landscaping and edible walls should be

growing, referred to in pp.260-262

| Schedule of Comments on the Placemaking Plan   | Options Document in Plan Order                 |
|--|--|
| encouraged along the river corridor developments. Cordon fruit trees   | s could provide living 'railings'.             |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 7 Respondent Number: Name:   | Respondent Transition Bath Organisation:       |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\square$         |
| Placemaking Options Plan Reference: Enterprise Area Development  | t Sites  |
| Comment on the Site:  Options 1-3 indicate the provision of 800-900 new dwellings, yet there allotments. On the basis of 2 persons per dwelling, c.400 allotment ple suitable land for allotments in the area may require innovative solution private allotment sites. | ots should be provided. The lack of available, |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 8 Respondent Number: Name:   | Respondent Transition Bath Organisation:       |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\square$         |
| Placemaking Options Plan Reference: Enterprise Area Development  | t Sites  |
| Comment on the Site:   |  |
| Options 1-3 indicate one large retail area, rather than 'daily needs' sho  | opping as indicated by CR5.                    |
| "Daily needs" shopping will be accommodated throughout the River C<br>workers to shop for fresh food on a daily basis. This ties in with our re<br>section'  | · · · · · · · · · · · · · · · · · · ·          |
| Change requested:  |  |
| · ·  |  |
|  |  |
| Respondent 3069 Comment 2 Respondent Cllr Anketell Jones Number: Name:   | Respondent Organisation:                       |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\square$         |
| Placemaking Options Plan Reference: Enterprise Area Development  | t Sites  |

### **Comment on the Site:**

1.33 and 1.34 Trees and Green space should be a dominant feature of the river's edge. Too many buildings close to the edge will have a miniaturising effect on the river.

1.42 - 1.52 Maintaining flexibility for as long as possible may be best. Option 3 but not sure.

1.51 3D model. These are very helpful to residents particularly those who are interested in what is happening but don't have time to read all the published information.

| Change requested:   |   |
|---|---|
| Respondent 6455 Comment 1 Respondent Number: Number: Name:    | Respondent ST8 Limited Organisation:      |
| Agent ID: 205 Agent Name: Rocke Associates Ltd                |   |
| Further Information available in the original comment? $\qed$ | Attachments sent with the comment? $\Box$ |
| Placemaking Options Plan Reference: Enterprise Area Deve      | Ionment Sites                             |

### **Comment on the Site:**

I refer to the above matter, and am writing to make some brief submissions on behalf of my clients, ST8 Limited

Emerging Land Use Options and Design Principles for Enterprise Area Development Sites

In this Section three options are put forward for consideration that have particular implications for the location of additional main town centre uses as defined in the NPPF (Annex 2: Glossary), and in particular the focus for future retail development in the City. On behalf of my clients I set out some brief comments on the identified options below.

Option 1: To focus additional retail floorspace on a new 'destination' away from the primary shopping frontages and disconnected from the main shopping area, would be contrary to the sequential test. Green Park is at best an edge-of-centre location in policy terms, and therefore sequentially inferior to more central sites. Unless there are no suitable, available and viable city centre sites on which additional retail and related floorspace can be accommodated, this option should be eliminated.

To create a new 'destination' detached from the primary shopping area would not be conducive to maintaining the vitality and viability of the city centre as a whole, and ensuring that it functions as a coherent entity. City centres function most effectively and robustly where they are compact (each and every part being within comfortable walking distance), well-integrated (no distinct breaks in shopping frontages between the various parts), and provide a retail circuit (to draw users through the centre in its entirety). One of the weaknesses of Bath City Centre is its linear nature, constituting one principal retail artery. However, this has been counteracted by its inherent strengths which, in addition to its high environmental quality, include its compactness. However, the redevelopment of Southgate with additional critical mass of retail floorspace, including a department store anchor, at the southern end of the primary shopping area, has challenged its cohesion.

The addition of a critical mass of retailing at Green Park, peripheral to the primary shopping area and disconnected from it through interruption of continuous shopping frontages, is unlikely to assist the vitality and viability of the city centre as a whole. As is inherent in the option postulated by the Council, it is likely to be become a destination in its own right, particularly if supported by its own dedicated parking, which supports few linked trips and could divert trade from the remainder of the city centre. Because of the distance and intervening non-retail uses, it would be difficult to integrate this location with the overall centre, and to ensure that they function as a coherent entity.

Option 1 is therefore not considered to be sound, and potentially contrary to the NPPF which requires the priority focus

to be on town centre sites.

Option 3: This option gives rise to some of the same concerns as Option 1 in that the priority focus for retail development on city centre sites remains absent. Moreover, since it plans for only about 40% of the evidenced need for additional retail space, it is inconsistent with the NPPF requirement to meet needs for retail and other main town centre uses 'in full' (para. 23).

Option 2: An option that focuses growth in retail floorspace on sites that lie closest to the primary shopping area, and redirects office floorspace to more peripheral areas, is the only one that is consistent with the sustainable development framework that is set out in the NPPF. This is the option that should guide the allocation of land uses in the city centre in the Placemaking Plan.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (SB1)

Plan Order Number: 86

| Respondent 102 Comment 10 Responden Number: Number: Name:              | t Robin Kerr Respondent Federation of Bath Organisation: Residents' Associations |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original c                        | omment? $\square$ Attachments sent with the comment? $\square$                   |
| Placemaking Options Plan Reference: Walcot                             | Street / Cattle Market Site (SB1)  |
| Comment on the Site:   |  |
| Clearly, car parking at Cattlemarket has not bee                       | en worked out. How does this square with Bath Transport Strategy?                |
| Change requested:  |  |
| Number: Number: Name:  | t Mrs Jane Hennell Respondent The Canal & River Trust Organisation:              |
| Agent ID: Agent Name:  Further Information available in the original c | omment?   Attachments sent with the comment?                                     |
| Placemaking Options Plan Reference: Walcot                             | : Street / Cattle Market Site (SB1)  |

### Comment on the Site:

In an increasingly fast-paced and crowded world, our historic canals and rivers provide a local haven for people and nature. The Canal & River Trust (the Trust) is the charity entrusted with the care of 2,000 miles of waterways in England and Wales. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objects including:

To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;

To protect and conserve objects and buildings of heritage interest;

To further the conservation, protection and improvement of the natural environment of inland waterways; and

To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

Within the Bath & North Somerset district The Canal & River Trust act as Navigation Authority for parts of the River Avon, although in some sections we also own adjoining land which is used as a towpath. We also own and maintain the Kennet & Avon Canal.

Our interest in the river adjoining the various riverside development sites is predominantly in our role as navigation Authority although in some areas we also own land adjoining the river. We have been involved in past stakeholder discussions relating to various sites and hope that this will continue in the future as the council continues to recognise the added value that waterspace can bring to development.

We welcome the emerging design and development values for the various sites, in particular any mention of providing physical and visual links to the river and the use of the riverside to provide a sustainable transport and Green

infrastructure route through the heat of the city. The ecological enhancements along the river edge and improvements to the riverside walkway are also welcomed.

| Change | requested |  |
|--------|-----------|--|
|        |           |  |

The Canal & River trust suggest that the waterspace itself is treated as part of the development site rather than simply an edge or backdrop to it. This will allow the use of the waterspace to also be considered and opportunities explored to better integrate it and encourage more use of it.

| Respondent 224 Comment 4 Respondent Number: Name:  | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachm   | ents sent with the comment? $\square$                          |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market S  | iite (SB1)   |
| Comment on the Site:   |  |
| Walcot Street/Cattlemarket<br>SB1  |  |
| We welcome the repair of historic street pattern.  |  |
| We are concerned about the displacement of the flea market, which is a to the vibrancy and character of the area.  | a long established informal use which contributes              |
| Change requested:  |  |
| We would encourage development pattern which would create space – Walcot Street area, which will allow for a market to be retained. This coand outdoor eating. |  |
| The need to maintain views to Prior Park should be included.   |  |
|  |  |
| Respondent 281 Comment 2 Respondent Alison Howell Number: Name:  | Respondent Natural England Organisation:                       |
| Agent ID: Agent Name:  | Organisation.  |
| Further Information available in the original comment?   Attachm   | ents sent with the comment? $\Box$                             |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market S  | iite (SB1)   |
| Comment on the Site:   |  |
| SB1 paragraph 6: we welcome the requirement to embrace the existing  | ·  |
| and enhance the biodiversity value of the river and to retain the existing   | a doult un tou oo unidou                                       |
| and children the blockversity value of the fiver and to retail the existing  | g dark river corridor.   |

| Schedule of Comments on the Placemaking Plan Options  | Document in Plan Order  |
|---|---|
| Respondent 837 Comment 1 Respondent Mr David Redgewell Number: Name:  | <b>Respondent</b> South West Transport <b>Organisation:</b> Network, Railfuture |
| Agent ID: 56 Agent Name: South West Transport Network   |   |
| Further Information available in the original comment? $\Box$ Attachments se  | ent with the comment? 🔽   |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (SB  | 1)  |
| Comment on the Site:  |   |
| Walcot Street cattle market site - Makes no reference to public transport on the cycling on the adjacent road (Walcot Street)   | ne site or improvements to walking and  |
| Change requested:   |   |
| Because it needs to comply with sustainable transport policies and the joint loo  | cal transport plan.   |
| Respondent 3069 Comment 3 Respondent Clir Anketell Jones Number: Name: Agent ID: Agent Name: Further Information available in the original comment?   Attachments see | Respondent Organisation:  |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (SB  | 1)  |
| Comment on the Site:  | ·   |
| Ideally, the Hilton Hotel should be demolished. The riverside path and access to Cornmarket Building needs to be fully restored.  1.60 Option 3 sounds best.          | o it should be improved and developed.  |
| Change requested:   |   |
|   |   |
| Respondent 4794 Comment 2 Respondent Cara and Tara Number: Number: Name:  | Respondent Organisation:  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments se  | ent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (SB:   | 1)  |

# **Comment on the Site:**

In general TARA supports both the analysis and the proposals that flow from it which are in line with recommendations made by us in September 2013. We endorse, for example, the suggested mix of uses, the need to repair the 'broken frontage' on Walcot Street, preserve views across the site to the east and conserve and find a viable use for the Cornmarket building. We support the emphasis on variety in the form, function and scale of buildings and the need to provide two east-west cross routes to improve vehicular access to the site.

However we notice some confusion and lack of clarity in suggestions for building height restrictions and the river corridor. Limiting building height to that of local Georgian buildings is recommended but this is not typical of Walcot Street where buildings range in height from two to four storeys as well as in date of original construction. Furthermore,

because of the pronounced fall in the site from west to east higher buildings would presumably be acceptable on the east edge of the site. We believe that higher buildings could also be acceptable on the west edge of the site if set back from the building line provided functional continuity is achieved.

The need to extend the riverside pedestrian route northwards from Pulteney Bridge is acknowledged but it is not clear whether continuing this route north of the Cattle Market site is envisaged. If not, then a publically accessible space should be provided as a destination on the river bank adjacent to the Cattle Market possibly incorporating a new pedestrian cross route linking Walcot Street with St John's Road via a new pedestrian bridge across the river. 'Privatization' of the river bank should be avoided at all costs.

| Change requested:   |  |
|---|--|
|   |  |
|   |  |
|   |  |
| Respondent 6389 Comment 5 Respondent  | Respondent Cycle Bath                    |
| Number: Name:   | Organisation:                            |
| Agent ID: Agent Name:   |  |
|   |  |
| Further Information available in the original comment? $\Box$ Attachments                   | sent with the comment? $\square$         |
|   |  |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (SI                  | R1)                                      |
| walcot street / Cattle Warket Site (5)  | БП                                       |
|   |  |
| Comment on the Site:  |  |
| 13. Agree   |  |
|   | Hermater Press                           |
| This area is a highly desirable route for cyclingThat cycling provision should fo           | llow desire lines                        |
| Along highly desirable routes where there is a volume of traffic segregated tra             | acks are provided                        |
| Along highly desirable routes where there is a volume of traffic segregated the             | acks are provided                        |
| That all developments have cycle parking / storage that is well designed appro              | onriate for the development is long term |
| needs covered, secure, convenient and easy to access  | ophate for the development le long term  |
| needs covered, seedre, convenient and easy to decess  |  |
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
| Beenendent CAFF Community 2 7   |  |
| Respondent 6455 Comment 2 Respondent Number: Name:  | Respondent ST8 Limited                   |
| Number: Name:   | Organisation:                            |
| Agent ID: 205 Agent Name: Rocke Associates Ltd  |  |
| Further Information available in the original comment?                                      | sent with the comment?                   |
| Further Information available in the original comment?   Attachments sent with the comment? |  |
|   |  |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (S                   | B1)                                      |
| <u> </u>  |  |

# **Comment on the Site:**

Walcot Street / Cattlemarket Site

This site should be the primary focus for additional retail floorspace within the city. It is ideally located adjacent to the primary shopping area and to provide a counter-balance to the recent redevelopment of Southgate at the southern extremity of the shopping area through strengthening footfall throughout the centre as a whole. The site is ideally positioned to connect the more disparate and peripheral shopping areas, in particular along Walcot Street which performs a niche role with a smaller, specialist retail offer, to the overall centre. Furthermore, it will assist with providing a shopping circuit which is important in terms of distributing footfall throughout the centre.

The options for the site acknowledge the opportunity to add to the diversity of Walcot Street. This is supported, and can be achieved through smaller, ground floor retail units on the Walcot Street frontage. However, there is a wider opportunity available through relocating the Hilton Hotel onto the adjacent Cattlemarket site, relocating the library to an alternative location within the city, and providing significant new retail floorspace, including the possibility of a new department store, on the resultant site that becomes available.

Redevelopment will afford an opportunity to reconnect the city to the riverside, including the creation of a riverside walkway, together with residential uses fronting the river and cloaking the unsightly car park elevations that currently face the river. Removal of the existing Hilton Hotel building, which is widely held to be unsightly, also has the potential the potential to deliver significant environmental improvements. The vision for the site would be a truly mixed use scheme, including shops, cafes, bars and restaurants, a quality public space, residential and perhaps some business floorspace on upper floors. The Cornmarket can be integrated into the scheme, perhaps as an atrium to the hotel incorporating cafe and/or restaurant facilities where residents and visitors alike can meet and relax in an informal and congenial atmosphere.

My clients are currently exploring the opportunity for comprehensive redevelopment of the site, including relocation of the Hilton Hotel. It is too early, as yet, to respond to the detail of the Emerging Development and Design Principles:SB1. However, as is made clear in the introduction to the consultation document, the Council considers that preparation of the Placemaking Plan will be an iterative and collaborative process, with engagement continuing beyond the close of the consultation period. Therefore, if my clients pursue their ambitions for the site further, they envisage working closely with the Council on the detailed development and design principles that will be enshrined in the future policy for one of the key, and most high profile, sites in central Bath.

None of the land use options set out at paragraph 1.60 of the consultation document would satisfactorily accommodate my clients' aspirations. Of the four options identified, Option 3, which includes the relocation of the Hilton Hotel to the Cattlemarket site and redevelopment of their existing site, is the closest fit in terms of development principles. However, to achieve a deliverable and viable scheme, a much greater quantum of retail floorspace should be allowed for on a site which is the most appropriate location for it having regard to its position within the overall shopping centre and its consequent ability to strengthen the retail core of Bath overall.

### Conclusion

The timing of this options consultation coincides with the very early stages in my clients' investigation of the potential and development opportunity for the Cattlemarket site. However, the initial findings have been positive, and there is considerable potential for a scheme that will deliver economic, social and environmental benefits, jointly and simultaneously, for the city, and therefore development that would be sustainable within the terms set out in the NPPF (para. 8). However, if such sustainable development is to be delivered, it is essential that the policy framework is permissive and sufficiently flexible to ensure that a suitable and viable scheme can be procured on a site that gives rise to significant challenges and associated costs. My clients therefore anticipate close collaboration with the Council beyond the expiry of the consultation period on the options that have been canvassed, to devise and agree a preferred and deliverable option, and an associated policy framework that will incorporate the necessary balance of certainty and flexibility.

| lexibility.   | , ,                         |
|---|-----------------------------|
| Change requested:   |                             |
|   |                             |
| Respondent 6465 Comment 1 Respondent Mr Nicholas Chambers Number: Name:         | Respondent Organisation:    |
| Agent ID: Agent Name:   |                             |
| Further Information available in the original comment? $\square$ Attachments se | nt with the comment? $\Box$ |
| Placemaking Options Plan Reference: Walcot Street / Cattle Market Site (SB1     | .)                          |

### **Comment on the Site:**

The changes that are stated about Walcot Street and the surrounding area are great news as it is an area that is not made the most of, but to make the most use of the site the Hilton would have to be redeveloped and not remodelled.

As stated in your 'sb2: Central Riverside & Recreation Ground' you are considering a site for ten pin bowling which is much needed for Bath! It would be wrong to place it near the riverside and recreation ground however as there is not adequate parking and is not near the city centre. It would be better to place a ten pin bowling site underground on the cattle market as it is a central location, has direct and easy access to an already purpose built multi-storey car park and would be a draw for people to use Walcot Street and the area more. The type of ten pin bowling that would be appropriate would be something similar to All Star Lanes, Roxy Lanes or Bloomsbury Bowling which would bring a quality service to Bath and suit the surrounding area.

# **Change requested:**

To have a ten pin bowling site underground on the cattle market rather than near the Recreation Ground.

Plan Order Placemaking Options Plan Reference: Central Riverside & Recreation Ground Number: 94 (SB2) Respondent 102 Comment 11 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: **Organisation:** Residents' Associations **Agent Name:** Agent ID: Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: | Central Riverside & Recreation Ground (SB2) Comment on the Site: Any thought of an option of the Rec's being used for vehicle parking needs to be queried. **Change requested:** Respondent 224 **Comment** 5 **Respondent Respondent** Bath Preservation Trust Number: Number: Organisation: Name: **Agent Name:** Agent ID: Further Information available in the original comment? 

Attachments sent with the comment? Placemaking Options Plan Reference: Central Riverside & Recreation Ground (SB2) Comment on the Site: We do not agree that there is potential for car and coach parking in this area unless concealed underground under any reprovided leisure centre. We do not agree that this location is suitable for 10 pin bowling or a skate park. We consider that for the Grand Parade colonnades scheme to be viable and of real public benefit, pedestrian access through to Parade Gardens should be established first. Public gain should come before commercial interests, and business would be more likely to follow naturally if a through route were established. We have serious concerns about opening up access to Slippery Lane and associated alterations which risk harming the character of surviving historic fabric. If a new building is to be sited in front of Terrace Walk (Bog Island?) it must maintain and repair the vista to Sham Castle. **Change requested:** Respondent 279 **Comment** 3 **Respondent** Rohan Torkildsen **Respondent** English Heritage

Number:

**Agent Name:** 

Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Agent ID:

Organisation:

| Schedule of Comments on the Placemaking Plan Options  | Document in Plan Order                         |
|---|--|
| Placemaking Options Plan Reference: Central Riverside & Recreation Ground   | d (SB2)  |
| Comment on the Site: Perhaps the section might refer to the implication of the site's Covenant on an This commitment should also be made to Boat Stall Lane.  | y "permanent" stadium?                         |
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 281 Comment 3 Respondent Alison Howell Number: Name:   | Respondent Natural England Organisation:       |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments so  | ent with the comment? $\Box$                   |
| Placemaking Options Plan Reference: Central Riverside & Recreation Ground   | d (SB2)  |
| Comment on the Site: SB2, The River: we would suggest that the wording at paragraph 3 needs to rea SMART and designed to achieve improved ecological function of the river corri Change requested:          |  |
| Respondent 3069 Comment 4 Respondent Cllr Anketell Jones Number: Name: Agent ID: Agent Name: Further Information available in the original comment?   Attachments se  | Respondent Organisation: ent with the comment? |
| Placemaking Options Plan Reference: Central Riverside & Recreation Ground   | d (SB2)  |
| Comment on the Site:  1.64 bullet point 6.  This part of Bath is characterised by its openness. No more buildings are needed developed they should be contained within existing buildings or on their footp | •  |
| Riverside West, Parade Gardens/Terrace Walk.  |  |
| 4. Very sensitive site. New building? Needs exceptionally careful consideration   |  |
| Riverside East.   |  |
| Maintain tree lined appearance whatever happens to the playing field.   |  |
| Improve access to Rugby stadium by widening the pavements on Pulteney Brid  | lge.   |

# Change requested: Respondent 4794 Comment 3 Respondent Cara and Tara Respondent Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Central Riverside & Recreation Ground (SB2)

# **Comment on the Site:**

In general TARA supports the analysis and the proposals but we suggest that the following points be taken into account as proposals are finalized.

The Colonnades

The council is currently seeking planning consent for enabling works in relation to the development of the vaults below Grand Parade for high end dining facilities (14/01772/REG03). However, proposals included in the application documents (Design and Access Statement, page 13, Use of the Colonnades) envisage that the public would have no right of access to the south colonnade even during daylight hours when Parade Gardens are open to the public. This effective privatization of part of the Colonnades would be in direct conflict with proposed Development and Design Principals 1 and 3 where the opening up of historic pedestrian routes in the area is rightly emphasised; it would be unacceptable to our members and we believe that, given the substantial expenditure of public funds on the development, the wider public would be likely to share this view.

Pedestrian river crossing

Given that Site SB2 occupies a strategic position between the recreation ground and the city centre we believe that cross-river links, particularly for pedestrians, are insufficiently emphasised. A recent study of the traffic implications of the additional 4,300 supporters likely to converge on the new stadium on busy match days (assuming it is built) concluded that the main impact would be, not in enhanced congestion on city centre streets, but in a marked increase in pedestrian traffic in areas around the stadium. Links to the stadium for pedestrians are currently poor, relying too heavily on flights of narrow, twisting, stone steps leading to the river bank from Argyle Street and North Parade. A new foot and cycle bridge across the river linking the stadium and other recreation facilities with the commercial heart of the city to which many supporters are drawn during their stay should be given serious consideration. This might be provided in conjunction with proposals to provide improved links between Terrace walk and Parade Gardens and between Parade Gardens and the river, or possibly as an extension eastwards from South Parade.

Radial Gate

Whether or not the radial gate is removed or renovated the potential of the island linking the radial gate with Pulteney Weir should have been explored.

Car and/or Coach parking in this area or on adjacent sites

The Rec Trust land is already subject to a number of restrictions and also certain legal challenges, the outcome of which could influence policy. Subject to the resolution of these issues, PERA also has significant concerns about any proposal to put car/coach parking in this area, unless it was underground, as suggested by senior Council officers, as discussed at a meeting on the Placemaking Plan with senior Council officers (working on and responsible for this Plan) as well as both Ward Councillors on 20 January 2015. Even if such a proposal was viable. Great care and consideration would need to be given to reducing the impact of traffic noise, and in particular air pollution in this area, which is already significantly higher than the statutory limits.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Change requested:** Respondent 6389 Comment 6 Respondent **Respondent** Cycle Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: | Central Riverside & Recreation Ground (SB2) Comment on the Site: This area is a highly desirable route for cycling Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided Junction must be improved for priority of cycling over vehicles The east side should be made easily accessible from multiple points to cycling and That cycling provision should be provide following desire lines That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access **Change requested:** Respondent 6406 Comment 1 Respondent Mr Edward Cade **Respondent** Student Castle Number: Number: Name: **Organisation:** Agent ID: 222 Agent Name: Nathaniel Lichfield & Partners Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Central Riverside & Recreation Ground (SB2) **Comment on the Site:**

The focus of the Central Riverside & Recreation Ground allocation is the River Avon and The Recreation Ground where the aspirations and requirements for development centre on developing the existing green infrastructure and enhancing the leisure offer. The area is described (para 1.62) as comprising the natural environment of the river corridor and the green spaces associated with it.

Allocation SB2, which encompasses the Site as part of a much wider allocation, sets out a number of aspirations for the wider area including (3) Option subject to discussions with landowners, there is the potential to explore options for car and / or coach parking in this area or on adjacent sites such as the former St Johns School site.

We are unclear as to why the former St Johns School has been included within the allocation, and suggested for this use subject to discussions with landownrs for a number of reasons:

- i. it does not form part of the proposals that are currently being worked up by the Recreation Ground Trust for the futu of The ec;
- ii. the Site is on the periphery of the allocation and some distance from the river corridor and green spaces which are considered to form the character of the allocation;
- iii. the reference to the former St Johns School site bein adjacent [to site SB2] further supports the view that it does not appropriately form part of the wider allocation SB2; and

iv. Student Castle will shortly be promoting proposals for student accommodation on the Site through the planning process. This is an entirely acceptable use in the context of current national and development plan policy. As such, the Site is not currently and will not be available for car and/or coach parking.

For these reasons our Client, therefore, considers that the site should be removed from draft allocation SB2 and that the boundary is redrawn around The Recreation Ground (which the current wording relating to the allocation suggests that it should be).

It is not considered appropriate for the Placemaking DPD to impose restrictions on the potential development of this site. Such development would not prejudice the objectives and aims of the allocation for Central Riverside & Recreation Ground and therefore there is no justification for potentially restricting development of the St John School site through planning policy, notwithstanding other relevant planning policies and development management criteria. This view is supported through the NPPF which requires Development Plans to plan positively (para 157).

### **Change requested:**

Accordingly reference to the former St Johns School Site (even as an adjacent site) should be deleted from Emerging Development and Design Principles: SB2. In response to the query raised in the Options Document, we confirm that the landowners have no intention of using it for car and/or coach parking.

Please refer to separate letter submitted via e-mail by NLP on behalf of SC Pulteney Road Ltd (Student Castle). (N.B. CANNOT FIND EMAIL AS REFERENCED).

| Respondent 6499 Comment 1 Respondent Mrs Sue Evans Number: Name:   | Respondent Organisation:         |
|--|----------------------------------|
| Agent ID: Agent Name:  |                                  |
| Further Information available in the original comment? $\Box$ Attachments se   | nt with the comment? $\Box$      |
| Placemaking Options Plan Reference: Central Riverside & Recreation Ground  | (SB2)                            |
| Comment on the Site:   |                                  |
| With regard to Riverside West point 5 (Maintain open views from Grand Parade enhance the green and well=treed character) the plans which have been recer Rugby's 'permanent stadium' show a stand which is too high. | • •                              |
| Change requested:  |                                  |
| The maintainance of this area as the city's 'green heart' should be paramount.   |                                  |
|  |                                  |
| Respondent 6527 Comment 2 Respondent Mr Julian Kashdan-Brown Number: Name:   | Respondent KBA Ltd Organisation: |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments se   | nt with the comment? $\Box$      |
| Placemaking Ontions Plan Reference: Control Piverside & Regrestion Cround  | (cp2)                            |

# Comment on the Site:

Reduce the site boundary or mention that loss of the multi-sports facility and basketball and skate ramps need to be considered as part of the proposals.

Change to an alternative site in Batheaston such as the above-mentioned one also in Coalpit Lane.

# Change requested:

Change Design Principles 3 and 5 to suit.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Manvers Street (SB3) Number: 100 Respondent 224 Comment 6 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Manvers Street (SB3) Comment on the Site: **Change requested:** Para 1.65 the correct spelling is Bayntun's. Some capacity for affordable housing should be allocated. 2.b suggest 'but not mimicking' is removed. We welcome the provision of open space in front of South Parade & the church; we wonder whether retention of the underground car park is feasible for local residents/visitors Respondent 281 Comment 4 Respondent Alison Howell **Respondent** Natural England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Manvers Street (SB3) Comment on the Site: SB3: we suggest that paragraph 11 should read, "retaining a dark corridor for bats" in order to recognise the existing use by bats of this important ecological corridor. **Change requested:** Respondent 2484 Comment 2 Respondent James Warren Respondent Bath Heritage Watchdog

# Comment on the Site:

Number:

Agent ID:

The emphasis on providing office space for employment is flawed and unsafe. Planning permissions for new office developments have either not proceeded or have been replaced by other uses because there isn't the demand for office accommodation. Existing modern office space sits empty with To Let signs, both in Bath and to an even greater extent in

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Placemaking Options Plan Reference: Manvers Street (SB3)

**Agent Name:** 

Name:

**Organisation:** 

Bristol. With the cost of commuting increasing annually and steady improvements in internet speeds, home working online is likely to gradually erode the need for office accommodation, especially city centre accommodation which has higher business rates and limited or costly local parking. The assumption that if offices are provided businesses will fill them needs a radical re-think. Out of town shopping centres are already reconsidering the business model in the light of internet ordering and home delivery, and it only takes a couple of such supermarkets with their acres of free parking to be converted to offices instead and Bath's hope of attracting new office employment will be sunk. The Placemaking Plan needs to guard against building the white elephants of the future, and needs to be wary of the impact on tourism that making Bath a permanent building site will have.

The emphasis in the Placemaking Plan will need to be the more vague 'accommodation for employment', to allow for the employment opportunities that cannot be done on-line: personal care, craft workshops, light manufacturing, invention prototyping and the like, which are likely to supersede the traditional pen-pushing jobs in the need for accommodation. Planning considerations for new developments need to put the emphasis on adaptability and longevity rather than just office accommodation.

| Change requested:  |  |
|--|--|
|  |  |
|  |  |
| Respondent 2484 Comment 3 Respondent James Warren Number: Number: Name:  | Respondent Bath Heritage Watchdog Organisation:                              |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\square$  |
|  |  |
| Placemaking Options Plan Reference: Manvers Street (SB3)   |  |
| Comment on the Site:   |  |
| On the Royal Mail site looking out on the river is the original building on the site, then local context, and it remains consistent with the aspiration of buildings that should be a presumption that this building will be reused rather than replaced. It already outside the development boundary, so adjusting the boundary slightly to | are 'more formal or regular'. There abuts the St. John's Presbytery which is |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 9 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:                                     |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Manvers Street (SB3)   |  |

# **Comment on the Site:**

Para 3. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look.

Para 10. Where is the Bath Pattern Book? Is it in draft form, and will there be an opportunity to comment on it? Will it allow multi-purpose roofscapes? It is referred to numerous times in the document, but we can't find an online copy of it?

The Bath Pattern Book should include mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.

### **Change requested:**

Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g. water storage, solar power and edible gardening.

| Respondent 3069 Comment 5 Respondent Cllr Anketell Jones Number: Name:   | Respondent Organisation:                      |
|--|---|
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments  | sent with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Manvers Street (SB3)   |   |
| Comment on the Site:   |   |
| Vision. Bullet point 4. "Buildings should mend the broken landscapeetc. The diversification, innovation or landmark architecture. Underground car parking is nowadays discussed as an ideal solution to urbane at all to the hot springs must be completely eliminated before digging begins | parking problems. In the city centre any risk |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 4794 Comment 4 Respondent Cara and Tara Number: Name:   | Respondent Organisation:                      |
| Agent ID: Agent Name:  | Organisation.                                 |
| Further Information available in the original comment?   Attachments   | sent with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Manvers Street (SB3)   |   |

# **Comment on the Site:**

We accept the analysis but with qualifications. Proposals for the most part consist of options and qualified principles reflecting an inherent, and perhaps justifiable, confusion over the role of the site. Where more definitive guidance is provided, for example over routes serving or crossing the site, there is sometimes confusion over purpose and Intentions. For example Roads and Access

A north-south extension of Duke Street 'must be provided'. This is to be designed as a 'shared space that also potentially allows limited vehicular access to the rail station'. It is not clear what this means. Could a north-south traffic route serving the entire area be upgraded to relieve pressure on Manvers Street? If so could this serve the site with a series of loops which might render the east-west route, which is also proposed, unnecessary?

A new pedestrian and cycle route across the river is proposed. We support this but do not see why it should be 'connected to the existing railway bridge'. Could it not extend eastward from South Parade providing a more direct link between the rugby stadium/recreation facilities and the rail and bus stations which are used by large numbers of fans on busy match days.

Land Use

We agree that the site should be regarded as a 'Gateway', a new commercial quarter linked to Bath's rail/bus hub and

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| consisting of a complex of small industrial units, offices and workshops but we see no reason why other uses such as   |
| residential and local retail should be excluded. Neither do we see why a hotel or major public institution such as an  |
| auditorium would be incompatible with this vision.   |
| Public Spaces and Building Massing   |
| A significant 'public space' is envisaged responding to South Parade, Duke Street and St John's Church. It is not clear what   |
| the function of this space would be and it is arguable that the space between buildings on this site could consist of a finer  |
| grained network of pedestrian and cycle routes providing a chain of more intimate spaces. It is also envisaged that Zone 1 building height limits should be adhered to 'subject to modification' and that Bath stone should be used throughout. We |
| see no justification for imposing such disciplines. The emphasis in our view should be on variety and flexibility in the   |
| form, function and scale of buildings as well as in the materials with which they are finished. And we suggest that more   |
| attention could have been given to the river bank as a green edge and as part of the pedestrian/cycle network serving the  |
| wider area.  |
| For more information about CARA and TARA go to our web sites:  |
| http://carabath.wix.com/carabath   |
| http://www.tarabath.org/   |
| Change requested:  |
| Change requested.  |
|  |
|  |
| Respondent 6389 Comment 7 Respondent Respondent Cycle Bath Number: Name: Organisation:   |
| Agent ID: Agent Name:  |
|  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Manvers Street (SB3)   |
| Comment on the Site:   |
| 8 .Agree   |
| o il igree   |
| This area is a highly desirable route for cycling  |
| That cycling provision should be provided following desire lines   |
| Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be   |
| provided   |
|  |
| Provide good accessible from multiple points for cycling   |
| Change requested:  |
|  |
|  |
|  |

Agent ID: 221 Agent Name: GVA

Number:

Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Organisation:

Placemaking Options Plan Reference: Manvers Street (SB3)

### **Comment on the Site:**

I write to you on behalf of my client, CBRE Global Investment as fund managers for West Midlands Pension Fund, to submit representations to the Bath and North East Somerset Placemaking Plan Options Document consultation.

My client's interest relates to the site at 20 Manvers Street, which lies approximately 200 metres to the north of Bath Spa Railway Station, within the Enterprise Area. Manvers Street is acknowledged by the Council as a key pedestrian route and entrance into the city.

The Council's Masterplan Vision Report also acknowledges that Manvers Street is a key site within the Bath City Riverside Enterprise Area. The Masterplan Vision Report includes an 'Action Plan' (as at November 2014), which refers specifically to Manvers Street; securing 'suitable re-use of 20 Manvers Street' is identified as a next step for the site.

20 Manvers Street comprises an existing office building, which was built in 1972. The building currently provides 5,069 sq.m. of B1 office floorspace (GEA)and benefits from permission to extend this by 577 sq.m. (GEA). It is currently vacant, however, my client is seeking to secure its future occupation through minor alterations to the building that would appeal to, and accommodate, future occupiers.

The existing building falls within Use Class B1 and it is my client's intention to retain employment generating uses at the site. It is, however, considered that the building would benefit from a mix of uses that allow for the inclusion of active frontages at ground level and the enhancement of the public realm along Manvers Street as part of a comprehensive solution. Furthermore, this mix would attract a range of potential occupiers to bring the building back into active use.

With regard to the Placemaking Plan Options Document consultation; we are supportive of the proposed allocation along Manvers Street. However, it is considered that the Council's vision for this area would be enhanced and assisted in facilitating a comprehensive redevelopment option by including 20 Manvers Street within the boundary of the proposed allocation. It is considered the current boundary of the allocation could prejudice such redevelopment.

Site SB3 - Manyers Street

The Council's vision is to create a mixed use destination at Manyers Street is supported.

My client's predominant concern, however, is that site allocation 'SB3, Manvers Street' does not include 20 Manvers Street.

As mentioned above, the Council has already recognised the need to secure suitable re-use of the building, which is one of the main buildings that fronts onto the pedestrian route to the train station. Furthermore, the building represents a prime opportunity for a mix of uses that would complement the Council's vision for the Manvers Street area.

Therefore, this representation strongly encourages the Council to extend the boundary of Site SB3 to include 20 Manvers Street. This would provide certainty that opportunities for mixed uses, with a focus on employment generating uses, at 20 Manvers Street would be supported by the Council and would, therefore, enhance the potential to secure the re-use of the building.

With regard to development principles for the site, the ability to provide flexibility for future occupiers is essential. It is therefore necessary to ensure that any restriction on use classes is not too onerous. We propose that the Council considers a policy wording for the draft Placemaking Plan that does not include specific use classes but supports mixed uses at 20 Manvers Street. In order to retain the commercial aspirations for the site, we recommend that the wording seeks for 'employment-generating uses' that are accompanied by other commercial uses that complement the vision for the site.

Conclusions

My client is keen to secure the future occupation of 20 Manvers Street. To achieve this, and to enhance the future

redevelopment of Manvers Street, the Council is encouraged to include 20 Manvers Street in site allocation SB3. The proposed policy wording should be flexible to encourage a mix of uses, including employment generating uses that complement the commercial aspirations for the site.

We appreciate the opportunity to comment upon the Placemaking Plan Options Document and we look forward to future involvement in the emerging B&NES Local Development Framework.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: North Quays (SB4) Number: 107 Respondent 102 Comment 12 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: **Organisation:** Residents' Associations Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** North Quays (SB4) Comment on the Site: Envisages a lot of basement parking (11,300sqm). Is this a good idea? **Change requested:** Respondent 224 Comment 7 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: North Quays (SB4) **Comment on the Site:** See 2 above – we welcome and applaud an ambition for 'fine-grained' development in this location. This will be best achieved through masterplanning, the division of the site, new streets and routes through and plot by plot development. This is unlikely to be compatible with a purely commercially led development and may need the Council to act as an active partner in the development process. We support the siting of a new footbridge in this location. With reference to the Bath Buildings Height Strategy (paragraph 7 SB4) we query the location of nearby Georgian Buildings? The context which influences heights should be stated. **Change requested:** Respondent 279 Comment 4 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: Organisation:

# Comment on the Site:

Agent ID:

It is not clear why these trees are to be removed and whether they are considered to contribute to the WHS and/or CA.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Placemaking Options Plan Reference: North Quays (SB4)

| Change requested:   |
|---|
|   |
|   |
| Respondent 281 Comment 5 Respondent Alison Howell Respondent Natural England Organisation:  Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: North Quays (SB4)   |
| Comment on the Site:  SB4, paragraph 4: we endorse this policy wording, especially in relation to the requirement to design around the important bat interest.                                |
| Change requested:   |
|   |
| Respondent 837 Comment 3 Respondent Mr David Redgewell Number: Name: Respondent South West Transport Organisation: Network, Railfuture  Agent ID: 56 Agent Name: South West Transport Network |
| Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: North Quays (SB4)   |
| Comment on the Site:  |
| Bath Quays - the lack of coach parking, waiting room and facilities is of major concern in a major tourist city and should be designed within the housing and office development.             |
| Change requested:   |
| Tourism is a major driver in the economy of Bath.   |
|   |
| Respondent 2484 Comment 4 Respondent James Warren Respondent Bath Heritage Watchdog Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: North Quays (SB4)   |

# **Comment on the Site:**

The problem with the expectation to have a 'contemporary identity' for the architecture of this area is that such designs date very quickly. Luder's design for Southgate (the one which was demolished for the current shopping centre) was so 'contemporary' that it won national architectural prizes for it, yet 20 years later it was considered an eyesore. More traditionally designed buildings (the Post Office building and Seven Dials, for instance) can be modern when built yet stand the test of time. Part of Bath's Outstanding Universal Value is a homogeneous character, which doesn't mean Georgian clones, just a similar sense of scale and proportion (for example, Seven Dials is unlike any other building

anywhere in Bath yet it looks as though it belongs) and in the local materials. So a design principle which conflicts with the OUV is entirely wrong, and this aspiration should be omitted.

The other problem is the expectation that a coach drop-off is a substitute for a coach park. Our straw poll among visitors shows that there is a reassurance in being able to see their coach and know that it is still there. Places with just pick-up points leave them nervous because they cannot tell if a coach is late or if they are late and the coach has gone, and such nervousness makes them reluctant to roam. So the loss of the coach park from its current position needs to have a replacement coach park within easy walking distance of attractions or else the news will go round the internet that Bath is a scary place to visit by coach. Amongst the flood protection plans there will be sacrificial land, and that would make an ideal coach park because nobody is going to be on a coach trip to a flooded location, and on other days the land cannot be used for much else.

| Change requested:   |                                     |  |
|---|-------------------------------------|--|
| Respondent 2611 Comment 10 Res<br>Number: Number: Namber: Namber: | •                                   | Respondent Transition Bath Organisation: |
| Agent ID: Agent Name:   |                                     |  |
| Further Information available in the or                           | riginal comment?   Attachments sent | with the comment? $\square$              |
| Placemaking Options Plan Reference:                               | North Quays (SB4)                   |  |
| Comment on the Site:  |                                     |  |
| North Quays 1.72  |                                     |  |
| Agree - Beautiful new pedestrian and cy                           | cling bridge.                       |  |

North Quays SB4

- 3. Agree With being 'pedestrian friendly' and directly connected to the river
- 10. Disagrees
- 10. Strongly Disagree. Providing parking will encourage bring vehicles into the city.
- 5. Strongly Agree

North Quay 1.73

Disagree - No basement parking in any option -this will just generate motor vehicles to enter the city

para 8. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look.

### Change requested:

North Quays 1.72 Also Suggest cutting Green Park road from being a through road to access onl North Quays

- 10. Needs to provide direct, desire line based routes for pedestrians AND cyclists, with separated space for cyclist on the main through routeAs suggested in 1.72 Green park to be cut off
- 5. This needs to include high quality access routes for pedestrians and cyclists
  Para 8 Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |
|--|--|--|
| Respondent 3069 Comment 6 Respondent Clir Anketell Jones Number: Number: Name:   | Respondent Organisation:   |  |
| Agent ID: Agent Name:  |  |  |
| Further Information available in the original comment? $\Box$ Attachn  | nents sent with the comment? $\Box$  |  |
| Placemaking Options Plan Reference: North Quays (SB4)  |  |  |
| Comment on the Site:   |  |  |
| This site will end up being surrounded by a busy road. Getting pedestria<br>placed and reliable crossing points.   |  |  |
| 1.73 9a confident and contemporary identity Because this is suct<br>the quality and style of architecture. The Placemaking Plan needs to set   |  |  |
| Design options. This is a central site and it should take its cues from the  | e character of the city centre, not the river.   |  |
| Large format office development. If limited, better here than Manvers  | St or Cattlemarket.  |  |
| Change requested:  |  |  |
|  |  |  |
|  |  |  |
| Respondent 4815 Comment 4 Respondent Timothy Cantell Number: Name:   | Respondent Bear Flat Association Organisation: (BFA)   |  |
| Agent ID: Agent Name:  |  |  |
| Further Information available in the original comment? $\Box$ Attachn  | nents sent with the comment? $\square$   |  |
|  |  |  |
| Placemaking Options Plan Reference: North Quays (SB4)  |  |  |
| Comment on the Site:   |  |  |
| We welcome the requirement for development to respond positively to of proposed development from Bath's encircling hills, especially Beeche caken into account. The view from Beechen Cliff is a community asset a for visitors. We strongly support SB4, SB5A and SB5B that the design of when seen from Beechen Cliff and from other surrounding hillsides. The excessive lighting can be intrusive. | en Cliff as it is so close to the centre, should be and amenity, both for local and City residents and development must be sensitive to its prominence |  |
| Change requested:  |  |  |
|  |  |  |
|  |  |  |
| Respondent 6389 Comment 8 Respondent Number: Name:   | Respondent Cycle Bath Organisation:  |  |
| Agent ID: Agent Name:  |  |  |
| Further Information available in the original comment? $\Box$ Attachn  | nents sent with the comment? $\Box$  |  |
| Placemaking Options Plan Reference: North Quays (SB4)  |  |  |

### **Comment on the Site:**

| Respondent 6465 Comment 2 Respondent Mr Nicholas Chambers Number: Number: Name:  | Respondent<br>Organisation:              |
|--|--|
|  |  |
| Change requested:  |  |
| That all developments have cycle parking / storage that is well designed approneeds covered, secure, convenient and easy to access | opriate for the development ie long term |
| That cycling provision should be provide following desire lines  |  |
| 5. with good easy to access direct links for cycling   |  |
| 3. Add and cycling friendly environment  |  |
|  |  |

### **Comment on the Site:**

Placemaking Options Plan Reference: North Quays (SB4)

It's good to see a range of options for the development of this site, the best option out of them all is option 1. Why is the University of Bath Carpenter House and other buildings in the area of Corn Street, St James's Parade, Broad Quay, Somerset Street and Ambury not included in this plan? These buildings are ugly and a blight on the city, redeveloping this area could help with the road layout which is already congested and can cause huge delays and back ups of traffic. It would also help make better use of the area.

# **Change requested:**

To add the area of Corn Street, St James's Parade, Broad Quay, Somerset Street and Ambury to the plan to redevelop the North Quays area.

| Placemaking Options Plan Reference: South Quays & Riverside  | e Court (SB5a)                              | Plan Order<br>Number: 118 |  |
|--|---|---------------------------|--|
| Respondent 224 Comment 8 Respondent<br>Number: Number: Name:   | Respondent Bath Pre Organisation:           | servation Trust           |  |
| Agent ID: Agent Name:  |   |                           |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                    |                           |  |
| Placemaking Options Plan Reference: South Quays & Riverside Court (SB5a)   |   |                           |  |
| Comment on the Site:   |   |                           |  |
| Change requested: The policy should set out the requirement for development to ensure that the gro The Foundry and Newark Works) on the site is enhanced. It should be stated that separate development site is unwelcome. |   | ,                         |  |
| We strongly support the intention to allow access through the site and a new foo state that there should be public access to the riverside.  | t bridge in this location.                  | This policy should        |  |
| The description should take account of the flood requirements for an increased we to enable river views (for instance by a raised river walkway behind the flood wal Embankment at Vauxhall)                               | _   |                           |  |
| Respondent 279 Comment 5 Respondent Rohan Torkildsen Number: Number: Name:   | Respondent English F<br>Organisation:       | leritage                  |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |   |                           |  |
| Placemaking Options Plan Reference: South Quays & Riverside Court (SB5a)   |   |                           |  |
| Comment on the Site: Will development retain street furniture and artefacts such as rail tracks, cobbles number of sites in the Plan?  | etc. Perhaps a generic p                    | oint for a                |  |
| Change requested:  |   |                           |  |
|  |   |                           |  |
| Respondent 828 Comment 2 Respondent Number: Name:  | Respondent Deeley F Organisation: Limited a |                           |  |
| Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner  |   |                           |  |
| Further Information available in the original comment?   Attachments sent with the comment?  |   |                           |  |
| Placemaking Options Plan Reference: South Quays & Riverside Court (SB5a)   |   |                           |  |

Site SB5a - South Quays & Riverside Court

**Comment on the Site:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order In the emerging development and design principles (PPOD page 32): Principle No 4 seeks "highly visible tree planting that extends the existing green edge to the riverside". It is likely to be important that this is done in tandem with hard/soft landscape treatment (principle 9) which reflects the industrial heritage of the site, the flood works which the Council plans across the site and the built form appropriate to the site. Principle No 7 is that "a new bridge should be commissioned......" However, the cost of such public infrastructure is to be paid for by the Council using West of England Local Enterprise Partnership funding. That should be made clear. The costs of heritage conservation, decontamination and flood protection at this site are such that inclusion of a bridge to be funded by development proposals would render development unviable and sterilise the site. Principle 9 refers to Bath Pattern Book. That document does not appear to be available. The right is reserved to comment on it when it is. The Table at the foot of the text on page 35 contains floorspace figures for which there is no substantive justification in the text. The figures appear rather unrealistic having regard to known site constraints. **Change requested:** Principle 4 - A wider balance of considerations should be reflected in the principles regarding river edge treatment. Principle 7 could helpfully be supported by some further justification in the plan and the funding arrangements should be made clear. The design principles for the development site could include having regard to the need to link to such a public bridge adjoining it. Clarification and justification of the basis for the floorspace figures given in the Table should be added to the text alongside revision of the contents of the table if necessary. Respondent 2484 Comment 5 Respondent James Warren **Respondent** Bath Heritage Watchdog Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | South Quays & Riverside Court (SB5a) Comment on the Site: This policy does not recognise that the principle building on the former Stothert and Pitt site is listed and is the last UK work of the man who became Canada's National Architect. The extension to the building is curtilage listed with it, and the English Heritage listing text assigns a group value to the other industrial buildings. This area should therefore have a presumption of reuse rather than replacement. In the past, the buildings were successfully used for bulky goods retail and there is no conflict with Southgate shopping if the same use is considered again; and the principle buildings could be made into an enterprise area with minimal interference with the building structure, as the Craneworks proposal shows. The historical importance of this site requires that redevelopment should be limited to the Riverside Court buildings, with the Stothert and Pitt buildings retained and reused.

The idea of a bridge in this location was effectively vetoed by the Rivers Authority when such a structure was proposed as

part of the Dyson development, and the Placemaking Plan should not assume that they will change their mind.

**Change requested:** 

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |  |
|--|--|--|--|
| Respondent 2611 Comment 12 Respondent Number: Name:  | Respondent Transition Bath Organisation: |  |  |
| Agent ID: Agent Name:  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |  |
| Placemaking Options Plan Reference: South Quays & Riverside Court (SB5a)   |  |  |  |
| Comment on the Site:   |  |  |  |
| 7. Stongly Agree   |  |  |  |
| 3. Vehicular access should be minimized to service vehicles and perhaps visitors to reduce congestion in Bath and encourage other modes of transport in the centre of town. We would also like to see pedestrian access all along the river's edge.  |  |  |  |
| l1: Disagree   |  |  |  |
| Paras 5 AND 6. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look. |  |  |  |
| 1.85 – 7000 sq m of parking should not be provided, as it will encourage car use, congestion and pollution   |  |  |  |
| Change requested:  |  |  |  |
| 7. This needs to include high quality access routes for pedestrians and cyclists   |  |  |  |
| Point 8: Could you introduce new text to represent our request than vehicle access to the site is minimised (filtered permeability'), and could you remove the word 'preferably' from the last sentence?   |  |  |  |
| 11. access by walking, cycling, public transport should be encouraged, car parking should only be provided for car share and car club cars only  |  |  |  |
| para 5 AND 6 Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.  |  |  |  |
| Respondent 2911 Comment 11 Respondent Number: Name:  | Respondent Transition Bath Organisation: |  |  |
| Agent ID: Agent Name:  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |  |
| Placemaking Ontions Plan Reference: South Ouays & Riverside Court (SR5a)   |  |  |  |

# **Comment on the Site:**

paras 5 AND 6. Views from Beechen Cliff and Sladebrook Avenue show how monolithic some of the new roofscapes are, e.g. Pineway and Southgate. Roofscapes can be used for rainwater storage and capture, for solar cooling and power and for edible gardening. Mixed use, "patchwork" roofscapes would avoid the monolithic look.

Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.

7. Stongly Agree - This needs to include high quality access routes for pedestrians and cyclists

- 8. Vehicular access should be minimized to service vehicles and perhaps visitors to reduce congestion in Bath and encourage other modes of transport in the centre of town. We would also like to see pedestrian access all along the river's edge.
- 11. Disagree access by walking, cycling, public transport should be encouraged, car parking should only be provided for car share and car club cars only

South Bank - 1.85 – 7000 sq m of parking should not be provided, as it will encourage car use, congestion and pollution.

# **Change requested:**

Point 8: Could you introduce new text to represent our request than vehicle access to the site is minimised (filtered permeability'), and could you remove the word 'preferably' from the last sentence?

| Respondent 3069 Comment 7 Respondent Cllr Anketell Jones Number: Name: Agent ID: Agent Name: Further Information available in the original comment?   Attachments | Respondent Organisation:   |  |  |
|---|--|--|--|
|   |  |  |  |
| Placemaking Options Plan Reference: South Quays & Riverside Court (SB5  | a)   |  |  |
| Comment on the Site:  |  |  |  |
| As this is the first of the EA sites to be developed it is most important to cond   | centrate on the details now.                                       |  |  |
| The time is the most of time 27 to tee to be developed to is most important to don't  | centrate on the details now.                                       |  |  |
| Is residential appropriate for this site?   |  |  |  |
| The new bridge is key to initiating development of BQS. How soon will its corfunctional to all areas within walking distance?                                     | nnectivity to the south side of Bath be fully                      |  |  |
| Change requested:   |  |  |  |
| <u> </u>  |  |  |  |
|   |  |  |  |
|   |  |  |  |
| Respondent 4815 Comment 5 Respondent Timothy Cantell Number: Name:  | <b>Respondent</b> Bear Flat Association <b>Organisation:</b> (BFA) |  |  |
| Agent ID: Agent Name:   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\square$                                   |  |  |
| Placemaking Options Plan Reference: South Quays & Riverside Court (SB5  | a)   |  |  |
|   |  |  |  |
| Comment on the Site:  |  |  |  |
| We welcome the requirement for development to respond positively to the of proposed development from Bath's encircling hills, especially Beechen Clif             |  |  |  |
| taken into account. The view from Beechen Cliff is a community asset and an   | -  |  |  |
| for visitors. We strongly support SB4, SB5A and SB5B that the design of deve  | •  |  |  |
| when seen from Beechen Cliff and from other surrounding hillsides. The principle applies to views day and night as  |  |  |  |

excessive lighting can be intrusive.

**Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 6389 Comment 9 Respondent Respondent Cycle Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | South Quays & Riverside Court (SB5a) **Comment on the Site:** 7. Agree 8. Agree This area is a highly desirable route for cycling Junction must be improved for priority of cycling over vehicles Crossing over LBR That cycling provision should be provide following desire lines That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access **Change requested:**

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: South Bank (SB5b) Number: 124 Respondent 224 Comment 9 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** South Bank (SB5b) Comment on the Site: We do not agree that the appropriate height for buildings is 4 storeys with an additional storey set back. This site is bounded by dwellings which are maximum 3 storeys - development should not exceed the shoulder height of these buildings. **Change requested:** Respondent 281 Comment 6 Respondent Alison Howell **Respondent** Natural England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | South Bank (SB5b) Comment on the Site: Similarly, we endorse the wording of SB5B at paragraph 4 so that biodiversity considerations are included at the start of the design process. **Change requested:** Respondent 2484 Comment 6 Respondent James Warren **Respondent** Bath Heritage Watchdog Number: Number: Name: **Organisation:** Agent ID: **Agent Name:**

# **Comment on the Site:**

The context recognises that the existing business of car showrooms and builders merchants are valuable functions, and also recognises the site is at risk of flooding. There are not many places where such businesses could be relocated and still have a road system capable of coping with the huge delivery vehicles that service these premises alongside the normal traffic, so it must be assumed that forced relocation is likely to signal the end of both businesses and the employment they offer.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: | South Bank (SB5b)

Local residents identify water run-off from the southern slopes as being at least as much of a contribution to the flood risk as the river itself. Both businesses could survive with a risk of flooding, but rebuilding above the flood risk level can only divert water to the next most likely areas to flood downstream, the Grade 1 listed Norfolk Crescent.

The best option would be delete this location from the list of Development Sites and to leave this site to its present uses. It is a relatively small site and such a loss would not make a significant difference to the overall Placemaking Plan.

| espondent 4815 Comment 6 Respondent Timothy Cantell lumber: Name:  | <b>Respondent</b> Bear Flat Association <b>Organisation:</b> (BFA)  |
|--|---|
| gent ID: Agent Name:   |   |
| urther Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$   |
| lacemaking Options Plan Reference: South Bank (SB5b)   |   |
| omment on the Site:  |   |
| e welcome the requirement for development to respond positively to the sproposed development from Bath's encircling hills, especially Beechen Clifken into account. The view from Beechen Cliff is a community asset and an rivisitors. We strongly support SB4, SB5A and SB5B that the design of developen seen from Beechen Cliff and from other surrounding hillsides. The principles ighting can be intrusive. | ff as it is so close to the centre, should be menity, both for local and City residents and lopment must be sensitive to its prominence |
| hange requested:   |   |
|  |   |
| espondent 6389 Comment 10 Respondent<br>lumber: Number: Name:  | Respondent Cycle Bath Organisation:   |
|  |   |
| gent ID: Agent Name:   |   |
|  | sent with the comment? $\Box$   |
| _  | sent with the comment?  |
| urther Information available in the original comment?   Attachments  | sent with the comment? $\Box$   |
| urther Information available in the original comment?   Attachments  lacemaking Options Plan Reference: South Bank (SB5b)  | sent with the comment?  |
| urther Information available in the original comment?   Attachments  lacemaking Options Plan Reference: South Bank (SB5b)  omment on the Site:   |   |

Placemaking Options Plan Reference: Green Park Station West & Sydenham

Park (SB6)

Plan Order Number: 135

| Respondent 166 Comment 1 Res        | spondent   | Respondent Sainsbury's         |
|-------------------------------------|--|--------------------------------|
| Number: Number: Na                  | me:  | Organisation: Supermarkets Ltd |
|                                     | nvironment Planning Transport Ltd riginal comment?  Attachments sent | with the comment? $\Box$       |
| Placemaking Options Plan Reference: | Green Park Station West & Sydenham Pa                                | rk (SB6)                       |

#### **Comment on the Site:**

We write concerning the recently published Placemaking Plan Options Document for Bath and North East Somerset. Our client, Sainsbury's Supermarkets Ltd, is an important retailer and employer in the area and we therefore provide the following comments on the options relating to the key development sites and development management policies particularly Site SB6 (Green Park Station West and Sydenham Park) and Emerging Policy Approach CR1.

Site SB6 (Green Park Station West and Sydenham Park)

Sainsbury's has a major land-owning interest within the Green Park Station West and Sydenham Park site (Site SB6) and, as such, it is vital that Sainsbury's plays an active role in developing a viable and deliverable strategy for the site. In general terms, Sainsbury's welcomes and supports the overriding desire set out in the Options Document to deliver regeneration in the area.

Sainsbury's has an ongoing aspiration for a larger, replacement foodstore as part of a wider mixed-use scheme at the Green Park Station West and Sydenham Park site. A relocation off site is not an option Sainsbury's would wish to pursue; moving off-site would not be commercially viable. Conversely, an on-site larger, replacement store would contribute towards the convenience floorspace requirement identified in the Bath & North East Somerset Retail Study 2014 - Stage 1 Interim Report and other development requirements identified within the Core Strategy. It would align with the broad principles of Option 1 for Site SB6, albeit not the specific floorspace figures set out. Moreover, an on-site relocated and an enlarged Sainsbury's store will enable the tremendous potential to deliver a mixed-use environment on the Green Park Station West part of Site SB6 to be unlocked, as identified in the Option Document.

The policy framework contained within the emerging Placemaking Plan for Site SB6 site must demonstrate flexibility in allowing sites to come forward individually within the overall framework, as past experience has shown that it is unlikely to be possible to bring forward one comprehensive development scheme for the whole site. As the Council is aware, a hybrid application was submitted in February 2013 for a viable mixed use development on the majority of land now covered by Site SB6. That application was submitted following extensive and thorough consultation with the Council and key stakeholders. It sought a mixed use redevelopment of the site which included the erection of a new foodstore, 280 residential units, new commercial uses (uses classes A1, A2, A3, A4 & A5), new office space and related enhancements of the public realm and infrastructure works. That application was subsequently withdrawn in September 2013 owing to outstanding matters of difference with the Council and statutory consultees. A scheme along similar lines to the previous application remains Sainsbury's aspiration for delivering a viable development of Site SB6 to include a relocated and enlarged Sainsbury's store and this should be taken forward within the Placemaking Plan.

To this end, it is relevant to note that the Placemaking Plan must be consistent with the principles and policies of the National Planning Policy Framework (NPPF) (paragraph 151). The NPPF notes that Local Plans should be aspirational but realistic (paragraph 154). That it should be positively prepared, justified, effective and consistent with national policy (paragraph 182). To be effective the plan has to be deliverable i.e. it allocates sites for development that are suitable, have a realistic prospect of being delivered and are viable. An allocation for Site SB6 based on a scheme similar to the previous application referred to above will meet these objectives and ensure the plan, as it relates to Site SB6, can be considered 'sound'. Conversely, an option which continues to suggest the relocation of the Sainsbury's store off site will not be consistent with national policy; it would not be viable or realistic and so could not be considered 'sound'.

Emerging Policy Approach CR1

We note that Emerging Policy Approach CR1 sets out criteria to be met by out of centre development of main town centre uses. Such criteria need to accord with the tests for this type of development set out in the NPPF i.e. the sequential test (paragraph 24) and the impact test, as appropriate (paragraph 26). As currently worded, the criteria are at odds with the NPPF and so Policy CR1 cannot be found to be consistent with national policy.

We trust that these representations are of assistance. We look forward to assisting the Council in its preparation of the Placemaking Plan, particularly around testing the viability of any preferred options.

| spondent                            | Respondent Homebase Ltd    |
|-------------------------------------|----------------------------|
| me:                                 | Organisation:              |
| nning Consultancy Ltd               |                            |
| riginal comment?   Attachments sent | t with the comment? $\Box$ |
|                                     |                            |
|                                     | 1 (CDC)                    |
|                                     | me: nning Consultancy Ltd  |

#### **Comment on the Site:**

These comments are submitted on behalf of Homebase Ltd in relation to their existing store on Pines Way in Bath. They follow on from similar comments made by us on behalf of Homebase to the Placemaking Plan Launch Document 2013 (our representations dated the 16th September 2013 refer). Our clients comments continue to concentrate on the Plans policies for 'Site SB6', referred to as Western Riverside East (WRE) and Sydenham Park (the latter being the new name for the Homebase site and adjoining land).

Our comments largely repeat those made in relation to the Launch Document in relation to the failure to include any meaningful detail or content on the Councils specific development options for this area. The detail that is included does not expand on or add to that in the adopted policies of the Core Strategy or in the adopted Supplementary Planning Document (SPD) for Western Riverside. For the Placemaking Plan to have any meaning or purpose it must include more detail on the masterplanning of the site not only in terms of proposed users but also existing users (businesses) that will need to be relocated to accommodate the redevelopment of the site.

The Plan contains too many options for Sydenham Park and should be simplified by setting out the Councils preferred option for the redevelopment of this site. For example, the Plan suggests that Sainsburys may relocate to Sydenham Park and/or that this part of the development is likely to be pedestrian dominated with larger uses guided to the Lower Bristol Road frontage. Both imply that the Homebase would need to relocated but there is no discussion of this, neither is any consideration given as to whether the Homebase could be catered for within the Sainsbury redevelopment or whether the intention is for it to be relocated to the Lower Bristol Road frontage or elsewhere.

The Plan does not therefore take us much further forward than the adopted SPD and Core Strategy. Policy B2 (4) (h) of the latter requires consideration to be given to a comprehensive approach to this site and the ability to accommodate existing businesses - only when it is determined that they are not compatible or viable within the proposed development should consideration be given to relocating those businesses elsewhere. The lack of reference to the Homebase is a notable omission and provides little clarity or comfort to our clients concerning the proper planning of this area and does not allow it to make any commercial decisions in relation to new investment or jobs within this store.

# **Change requested:**

The allocation for Site SB6 must provide more detail and content. It should address Policy B2 (4) (h) of the Core Strategy in terms of whether existing businesses such as Homebase can be accommodated within the redevelopment proposals and if not what provision is being made for those uses either within Sydenham Park or elsewhere. As we have indicated to the

Council on numerous occasions there is in principle no planning or design reasons to prevent businesses such as Homebase being incorporated within the redevelopment of Sydenham Park through providing a new modern store that meets Homebases customer and operational requirements and is viable. At present, however, its unclear whether this option has been considered and if it has the outcome of that assessment in terms of the future of the Homebase.

The allocation should set out the parameters (criteria) that will be adopted in assessing the compliance of submitted planning applications with Policy B2 (4) (h). If this assessment shows that incorporating existing businesses such as Homebase within the redevelopment of Sydenham Park would not be compatible or viable it must then set out the parameters (criteria) for assessing alternative sites and how the proposed development would enable the relocation of those businesses.

| Respondent 224 Comment 10 Respondent Number: Name:  | Respondent Bath Preservation Trust Organisation: |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachment                                  | nts sent with the comment? $\Box$                |
| Placemaking Options Plan Reference: Green Park Station West & Syder                                       | nham Park (SB6)                                  |
| Comment on the Site:  |  |
| Green Park Station West & Sydnenham Park - SB6  |  |
| There ought to be specific 'Development and Design' principles for this lo                                | cation.  |
| 2. We do not consider 'reflecting' is appropriate – development should re presence of Green Park Station. | espect and be subservient to the architectural   |
| Change requested:   |  |
| Green Park Station West & Sydnenham Park - SB6  |  |
| There ought to be specific 'Development and Design' principles for this lo                                | cation.  |
| 2. We do not consider 'reflecting' is appropriate – development should re presence of Green Park Station. | spect and be subservient to the architectural    |
| Respondent 281 Comment 7 Respondent Alison Howell Number: Name:   | Respondent Natural England Organisation:         |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachment                                  | nts sent with the comment? $\Box$                |
| Placemaking Options Plan Reference: Green Park Station West & Syder                                       | nham Park (SB6)                                  |
| Comment on the Site:  |  |

Sydnenham Park: we welcome the intention to create a strong green identity here, emphasising the importance of enhancing the Green Infrastructure throughout. There are strong opportunities here for creating GI and ecological networks which connect right through the centre of Bath. In light of this, we welcome and endorse the wording of SB6 paragraphs 5 and 6.

#### **Change requested:**

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 2484 Comment 7 Respondent James Warren Respondent Bath Heritage Watchdog Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6) Comment on the Site: This site includes the natural pedestrian route from Oldfield Park and East Twerton into Bath and this route should be considered a thoroughfare rather than a reason for active frontage. The vast majority of pedestrians who are not shopping in Sainsburys or the Farmers Market look straight ahead because their attention is on their destination and not the surroundings. This isn't a natural cycling route: although it could be used it rarely is, so there is no established cycling desire line. Nor is it a natural public transport corridor. At present it is a very safe pedestrian environment and Midland Bridge carries

public transport, and trying to combine the two down Sydenham Park Street (which doesn't currently exist) is just the reintroduction of the BRT route under a false name, with an associated traffic hazard that doesn't currently exist. It should be borne in mind that the previous lies used to justify the BRT was that Western Riverside would not be viable without a giant bendy-bus going through it every 12 minutes, when in reality the Western Riverside is selling well and the residents have put such a small demand on public transport that First progressively reduced the service provision, and even when it reached only one minibus per hour it could not run a financially viable service. There is no reason other than stubborn

# **Change requested:**

| Respondent 2<br>Number: | 2611 Comment 11<br>Number: | Respondent<br>Name:         | <b>Respondent</b> Transition Bath <b>Organisation:</b> |  |
|-------------------------|----------------------------|-----------------------------|--|--|
| Agent ID:               | Agent Name:                |                             |  |  |
| Further Inform          | nation available in t      | he original comment? $\Box$ | Attachments sent with the comment? $\Box$              |  |

Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6)

dogma for routing public transport through this site rather than along the existing roads.

#### **Comment on the Site:**

Sydenham Park, para 6: The "mass" of any new building will result also in commensurate-sized roofscapes. These will offer opportunities for climate change mitigation, e.g. solar power, edible gardens, etc

Green Park Station West -

We strongly agree with point 4.

Point 2 needs to include making the junction with Bougham Hayes a pedestrian and cycling priority junction with safe segregated routes for each along the desire lines.

We strongly agree with points 1 and 6

## **Change requested:**

Consideration should be given to mixed use within roofscapes to mitigate climate change by, e.g., water storage, solar power and edible gardening.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Point 2: this needs to include making the junction with Bougham Hayes a pedestrian and cycling priority junction with safe segregated routes for each along the desire lines GDP Point 3: cycling should have its own segregated tracks and not shared with buses Sydenham Point 1: could you add 'and cyclist' after the word pedestrian? Sydenham Park Point 6: Pines Way should be removed from being a gyratory system Sydenham Park Point 7: Limited to disability users, and minimal operational needs, only Respondent 3069 Comment 8 Respondent Clir Anketell Jones Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6) Comment on the Site: This site must, above all, fulfil its role a the link pin between South Western areas of Bath and the city centre. Again, because of the site's importance, the Placemaking Plan must be unequivocal in its expectations. Much will depend on the decisions made by neighbouring property owners so a flexible approach will probably deliver the public realm the city wants. Whatever the built outcome for this site, pedestrians should be give generous amounts of space. **Change requested:** Respondent 4660 Comment 1 Respondent Ms Jan Brown **Respondent** Norfolk Crescent Green Number: Number: Name: **Organisation:** Residents Association Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

#### **Comment on the Site:**

Option 2 or 3 are supported and not option 1. It is assumed Sainsbury's are unlikely to proceed with relocation to Sydenham Park in the current financial climate for the grocery industry. It is noted that, subject to resolution of finishes, a planning application for a net gain of circa 10.000 m2 office development at Pinesgate will probably be approved shortly, which would provide approx 25% of the modern office space proposed in the Central Area. Further it could reasonably be anticipated that permission will be granted for student accommodation in James St West soon. In combination these 3 factors would seem to rule out Option 1. Then option 3 would be favoured over option 2 as this would provide more housing.

Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6)

Like Planning Policy, we are concerned ref piecemeal delivery, which now seems more probable given the above; hence please could consideration be given to formulating a masterplan rather than leaving developers or landowners to provide?

It would also be appreciated if you could consider what can be done to provide more precise guidance on building heights prior to final adoption of PP. Currently BWR SPD sets out a range of 5/6 storeys (assuming 2.5m residential floor to ceiling height) and BBHS also refers to storeys and not actual building heights.

Additionally Sydenham Buildings (and most other sites) will be raised above 1:100 flood levels. No doubt ref to storeys rather the heights will continue to make for difficulties in determining applications and is of particular relevance given proximity to LB's e.g. Norfolk Crescent, Norfolk Buildings, Green Park Station.

We are pleased to note the emphasis on Green Infrastructure, but concerned at ref to visual and green infrastructure links between Norfolk Crescent Green and St. James Cemetery - which seems to imply removal of green infrastructure to create a visual link; we trust this is not intended.

Regrettably the River Corridor Strategy is awaited and does not yet form part of this plan. As so much development is centered on the river corridor, this is expected to be a vital component of the plan. Your assurance is sought that consultation will take place on this strategy as soon as completed.

Finally ref Bath Flood Risk Management Project - in addition to Bath Quays, Black & Veatch recommended provision of further conveyance downstream at Sydenham Park, then BWR East, and possibly Stable Yard. Whilst this plan does not include for such, it is trusted that BANES will do more than the minimum required and these provisions will be made in due course.

| Change requested:  |   |
|--|---|
| - ·  |   |
|  |   |
| Respondent 6389 Comment 11 Respondent Number: Number: Name:  | Respondent Cycle Bath Organisation:                     |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Atta   | achments sent with the comment? $\Box$                  |
|  |   |
| Placemaking Options Plan Reference: Green Park Station West 8  | k Sydenham Park (SB6)                                   |
| Comment on the Site:   |   |
| 2 & 3 Agree  |   |
| SP – 6 Agree – great opportunity for new segregated cycle routes   |   |
| This area is a highly desirable route for cycling and used as a major  | cycling route connecting to the city, river path, N S & |
| E W, Oldfield park & Weston River Development  Junction at Brougham Hayes must be improved for priority of cyclin        | ng over vehicles  |
| That cycling provision should be provided following desire lines   | ing over vernores                                       |
| Along highly desirable routes where there is a high – over 3000 per provided   | r hr - volume of traffic segregated tracks must be      |
| That all developments have cycle parking / storage that is well desineeds covered, secure, convenient and easy to access | gned appropriate for the development ie long term       |
| SP – 1 & cycling   |   |
| , ,  |   |
| Change requested:  |   |
|  |   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 6402 Comment 1 Respondent **Respondent** Pinesgate Investment Number: Number: Name: **Organisation:** Company Agent ID: 39 Agent Name: GVA Grimley Ltd Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6) Comment on the Site: Pinesgate Investment Company are the freehold owner of land at Pinesgate, Pines Way, Bath. Presently, the Pinesgate site comprises two medium-sized modern office buildings, sandwiching an area of surface-level car parking. The site is bound by the Pines Way gyratory system in its whole circumference. Pinesgate Investment Company are keen to realise the development potential of Pinesgate; a sentiment echoed by the identification of the site for redevelopment in previous iterations of local policy and masterplanning by the Local Planning Authority (LPA). As a substantial site located at a key juncture between the central area and western riverside area, this site presents a considerable opportunity to deliver the spatial vision proposed for Bath city centre. In June 2014, a planning application (ref. 14/02619/FUL) was submitted to redevelop the Pinesgate East to provide a new, larger building with a high-quality office floorspace (B1 Use Class). This will be the first Grade A office space to be delivered within the City in decades. At the time of writing, the officer has recommended approval of the scheme, and the application is due to be determined imminently. The balance of the site is also likely to become available for development during the lifetime of the Placemaking Plan. The proposed redevelopment of Pinesgate is not a standalone development opportunity; it is at the core of the Council's strategy for this part of the city to provide regeneration and knit together the neighbouring development and regeneration opportunities at Bath Western Riverside East and Green Park. Our client is therefore keen to ensure that emerging policy places the site and its wider context in the best position to contribute to this strategy. **Change requested:** Respondent 6402 Comment 2 Respondent **Respondent** Pinesgate Investment Number: Number: Name: **Organisation:** Company Agent ID: 39 Agent Name: GVA Grimley Ltd Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6) **Comment on the Site:** Generic Design Principles

The PMP requires, under point 3, the provision of streets and spaces which are complimentary to pedestrians and cyclists. This is pertinent to the delivery of Pinesgate as the Council are seeking the closure of the gyratory through the draft Transport Strategy, which can only be achieved following demolition of the existing Pinesgate buildings.

We recognise the requirement under point 5 to enhance visual links and green infrastructure to the wider area. The proposed office scheme at Pinesgate East, includes a visual and pedestrian link from Pinesway to St James's Cemetery. This however, must be considered alongside the objective of closing the gyratory which will require land take from the Pinesgate site.

#### **Change requested:**

Whilst we are supportive of this principle, we raise objection to the requirement to comply with the 'Bath Pattern Book' in designing public realm. This document has not been through public consultation and therefore does not constitute a sound evidence base for compliance. It is not listed as part of the evidence base for the PMP and it is unreasonable to require compliance to a document which is yet to be published.

| Respondent 6402 Comment 3 Res<br>Number: Number: Na                        | spondent<br>me:                              | Respondent Pinesgate Investment Organisation: Company |
|--|--|---|
| Agent ID: 39 Agent Name: GVA Gri<br>Further Information available in the o | imley Ltd riginal comment?  Attachments sent | with the comment? $\Box$                              |
| Placemaking Options Plan Reference:  | Green Park Station West & Sydenham Pa        | rk (SB6)  |
| Comment on the Site:   |  |   |

**Building Heights** 

The generic design principles expressed for the Sydenham Park area highlight the need to undertake analysis of viewpoints to ensure an appropriate response and steer for height, massing and orientation. We recognise this as an appropriate approach to ensure good design.

The document also references The Bath Building Heights Strategy, expressing that this should be used as an evidence base for the analysis of viewpoints, as expressed above. With the area being within Zone 3 ('The Valley Floor'), it states that new development should be four storeys, with potential for a further storey set back within the roofscape.

We have accepted that the Bath Building Heights Strategy represents the most up-to- date guidance from B&NES on the appropriate height of development in the city, and should therefore be considered a material consideration for appraising the acceptability of the height of new development. The emerging development proposals at Pinesgate East sit well within the parameters set by the Bath Building Heights Strategy. As such the emerging development proposals at Pinesgate accord with the parameters set out within these generic design principles.

#### **Change requested:**

#### **RECOMMENDATION:**

The PMP notes that the heights guidance is a recommendation only and is subject to modifiers. It should also recognise circumstances where additional height is required for development viability purposes and where increased storey height can be acceptable if there is no identified harm to the Outstanding Universal Values of the World Heritage City.

| Respondent 6402 Comment 4 Res<br>Number: Number: Na   | •                                      | Respondent Pinesgate Investment Organisation: Company |
|---|--|---|
| Agent ID: 39 Agent Name: GVA Gri  | imley Ltd                              |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |   |
|   |  |   |
| Placemaking Options Plan Reference:   | Green Park Station West & Sydenham Par | k (SB6)   |

#### **Comment on the Site:**

Proposed Prescriptive Breakdown of Development Quantums

The Pinesgate site falls under policy SB6, an area identified as 'Green Park Station West and Sydenham Station West'. This covers a number of sites, including the Pinesgate site and gyratory in totality, as well as Green Park Station and the Sainsbury and Homebase land interests. As such, it covers a large area, with a diverse range of ownerships, as well as being subject to physical, planning and environmental constraints.

The emerging approach of the PMP is to apply both general principles that would apply across the wider area as well as site and area specific principles. This would sit alongside the adopted and endorsed masterplans for Bath Western Riverside and the River Corridors.

In general, our client seeks a degree of flexibility about the precise mix and quantum of uses across the area, rather than designating prescriptive quantum for individual plots. Option 1 for Sydenham Park also fails to recognise the pending planning application for an 18,200 sqm office scheme at Pinesgate East by only allowing 4500 sqm of office space. This option is therefore not deliverable.

As we have previously related through our submissions to the PMP launch document, we consider that there is also potential for Pinesgate to facilitate the optimal regeneration of the North and South Quays sites, for example, by accommodating replacement car parking for the city centre. This option should not be ruled out in the PMP.

Providing a prescriptive quantum of floorspace may unnecessarily stymie or constrain such opportunities from coming forward. Furthermore, with the allocation covering such a broad area, it is unclear how the proposed quantum of floorspace would be divided among the various land interests at this location. As such, we do not feel that this presents the best approach to optimise synergies with the development of the central area, or to deliver a coordinated approach in this location.

#### **Change requested:**

#### **RECOMMENDATION:**

Future iterations of the overall development approach at Green Park Station West and Sydenham Park should retain a flexible approach to the overall type and quantum of development and uses, particularly for accommodating uses to unlock the North and South Quays site within the City Centre.

| Respondent 64<br>Number: | 402 <b>Comment</b> 5 <b>Number:</b> | Respondent<br>Name:          | Respondent<br>Organisation:   | Pinesgate Investment<br>Company |
|--------------------------|-------------------------------------|------------------------------|-------------------------------|---------------------------------|
| Agent ID: 39             | Agent Name: GV                      | 'A Grimley Ltd               |                               |                                 |
| Further Informa          | ation available in t                | the original comment? $\Box$ | Attachments sent with the com | ment? $\square$                 |
| Placemaking O            | ntions Plan Refere                  | nce: Green Park Station      | West & Sydenham Park (SR6)    |                                 |

#### **Comment on the Site:**

Proposed Quantum of Retail Floorspace

We note that the development options presented for the Sydenham Park section of the site has been presented with three alternate development options. Each of these include a significant element of retail uses, including food / convenience retail and non-convenience retail (A1 Use Class) and food and drink uses (A3 Use Class). This ranges between a total of 6,500 square metres (sq.m) for the lowest options and 40,500 square metres (sq.m) on the highest option. This excludes provision of retail within the Green Park Station section of the site, which is identified as having a much lower capacity for retail, food and drink uses (ranging between (1000sq.m and 3,500sq.m).

We are concerned about the express expectations by the Council for the Sydenham Park, which may place an unattainable expectation upon future development proposals at Pinesgate. We acknowledge there is some potential to accommodate 'bulky goods' retail and similar uses with a larger floorplate at the adjacent sites at Homebase and Pines Way Industrial Estate sites; however, there is no extant critical mass for smaller scale retail uses, given the out-of-centre location of the site away from existing retail centres and primary frontages.

The divided nature of landownership as well as the constraints of infrastructure requirements presents a real risk of suboptimal planning outcomes. Provision of smaller retail units will be difficult to achieve through the piecemeal development of the area, without obliging Pinesgate Investment Company or other developers to including a potentially unviable use at their own risk.

#### **Change requested:**

#### **RECOMMENDATION:**

We would strongly advise the LPA to reconsider the quantum of retail development proposed for the Sydenham Park element of allocation SB6. We would not support any approach that placed a prescriptive requirement for the delivery of retail floorspace, particularly of a large scale, and encourage the LPA to ensure that draft policy has a flexible and measured approach to any future delivery.

| Respondent 6402 Comment 6 Res<br>Number: Number: Namber: | •  | Respondent Pinesgate Investment Organisation: Company |
|--|--|---|
| Agent ID: 39 Agent Name: GVA Gri<br>Further Information available in the or  | imley Ltd  riginal comment?   Attachments sent | with the comment? $\Box$                              |
| Placemaking Options Plan Reference:  | Green Park Station West & Sydenham Pa          | rk (SB6)  |

#### Comment on the Site:

Active Frontages and Uses

We note that the generic design principles identified for area SB6 express a desire for new development to provide both Active Frontages and Active Uses at a ground floor level, particularly along Sydenham Park Street.

We are supportive of measures to ensure that the public realm remains lively and engaging, there is a distinction that should be made between Active Frontages and Active Uses. The former can be achieved through sensitive design of ground floor facades, ensuring inter-visibility and activity at a ground floor level, and avoiding blank facades. It is therefore entirely possible that this could be achieved through design alone, without prescribing uses.

Active Uses typically imply a narrow scope of uses, focussed primarily on retail, food and drink uses. For the same reasons as expressed above, we would have deep reservations about any obligation to provide smaller scale retail uses in this location, as occupiers for such uses are likely to be difficult to secure at Pinesgate.

#### **Change requested:**

#### **RECOMMENDATION:**

Future iterations of the development and design policy for Sydenham Park should distinguish between Active Frontages and Active Uses. Active Uses should be limited to the pedestrian stretches of the proposed 'Sydenham Park Street', with no requisite to deliver these upon the Pinesgate site.

| Respondent 6402 Comment 7 Res<br>Number: Number: Na | •                                      | Respondent Pinesgate Investment Organisation: Company |
|---|--|---|
| <b>Agent ID:</b> 39 <b>Agent Name:</b> GVA Gri      | mley Ltd                               |   |
| Further Information available in the o              | riginal comment?   Attachments sent    | with the comment? $\square$                           |
| Placemaking Options Plan Reference:                 | Green Park Station West & Sydenham Par | k (SB6)   |

#### **Comment on the Site:**

Conclusion

In conclusion, while our client remains broadly supportive of the Placemaking Plan, the detail and options expressed within this consultation have given cause for concern. In particular, we have a concern that the emerging policy places an onerously prescriptive breakdown of development that has too great an emphasis upon retail uses, and could potentially exclude alternative uses that complement the overall area masterplan and other regeneration objectives in the City Centre. We have also provided feedback upon some of the design criteria to ensure that the approach to new

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order development in this location remains viable and robust. Change requested: Respondent 6451 Comment 2 Respondent Respondent The British Land Number: Number: Name: Organisation: Company Agent ID: 235 Agent Name: Quod Further Information available in the original comment? ☐ Attachments sent with the comment? ✓ Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6)

#### Comment on the Site:

The Options document provides an opportunity to comment on a number of different development scenarios relative to specific sites that are of interest to British Land. Notably this includes the site which has been referred to as Sydenham Park that includes land within British Land's ownership, as we will come on to confirm. The options given are high level and in some cases very ambitious with significant challenges. We appreciate that in formulating the next stage, which will be the Draft Plan, B&NES will want to work closely with key stakeholders, like British Land, to ensure that draft policies remain deliverable and therefore "sound". We would therefore welcome the opportunity to discuss the comments below further in the coming months.

# a)Land Ownership

British Land own a number of retail assets within Bath including the Homebase unit on Pines Way, to the east of the Sainsbury's store at Green Park, and a 50% stake in the Southgate scheme which is within Bath city centre. These two assets complement one another in terms of the retail offer and it is important that the relationship is maintained and not prejudiced in the context of any policy aspiration at Sydenham Park, or indeed any other edge of out of centre location. Any proposed retail uses outside of the city centre must complement the in town offer.

Quod I Ingeni Building 17 Broadwick Street London W1F 0AXI 020 3597 1000 I www.quod.com

Quod Limited. Registered in England at above address No. 7170188.

Equally the policy evolution must respect existing land use values and land ownerships, both freehold and leasehold. The Homebase unit and associated car park are owned freehold by British Land with an unexpired leasehold term held by Homebase.

British Land also own Weston Lock Retail Park which is currently the subject of an application for a new M&S Simply Food store, which will be complementary to M&S' existing general merchandise store in the city centre.

#### b)General Commentary

The Core Strategy sets the strategic context for the allocation of sites within the Central Area and Enterprise Area within which the Homebase unit is located (Place Making Plan reference SB6B). We appreciate that in combination the site allocations need to 'add-up', in conjunction with projects built or committed since 2011, to deliver the 'needs' identified within the Core Strategy in relation to office, retail and leisure space, along with a contribution to the achievement of 7,000 dwellings for the city.

To achieve this three spatial strategies governing the allocation of uses to sites within Central Area and elsewhere in the Enterprise Area are presented. However, it is important to highlight, and we note the acknowledgement, that this is not a statutory consultation phase. This means that participation will inevitably continue during the year as part of an iterative

process of policy development with various parties including significant landowners like British Land.

Of the three headline options presented, the Sydenham Park site, as a whole, plays a significant part in the delivery of a wide range of strategic land use needs in Bath, with retailing being a major focus in Option 1. This includes the relocation of Sainsbury's. As we will come on to discuss, we remain very sceptical over the deliverability of this option and whilst we support a greater critical mass of non-food retailing on the Sydenham Park site, attempting to relocate Sainsbury's adds a level of complexity that will undermine any such policy aspiration.

Options 2 and 3 are therefore believed to be more realistic and deliverable, but the level of non-food floorspace in both options will not deliver a critical mass of attraction that is required if Sydenham Park site is to be a retail-led scheme, in an accessible location, on the edge of the city centre. The site offers a significant opportunity to provide additional retailing which is complementary to the city centre including South Gate. Residential is also a compatible land use which can benefit from the site's river frontage.

c)The Central Area and River Corridor: Green Park Station West & Sydenham Park

This area comprises:

**Green Park Station West** 

Green Park Station, the units facing James Street West, Sainsbury's.

#### Sydenham Park

- ■Bath Riverside East: Homebase its car park and overflow Sainsbury car park.
- ■Pinesway: Pinesgate offices and the associated road gyratory.
- ■Pinesway Industrial Estate.

British Land own a portion of the site referred to as Sydenham Park, namely the Homebase and its car park.

We agree that the site is complex, not lease due to multiple land ownerships and lease expiries, which does suggest that delivery could be undertaken in a phased or piecemeal manner. Whilst British Land support, in principle, a comprehensive approach, this must not result in a policy framework that stagnates the site. We have already seen that Sainsbury's failed attempt to relocate to the west which only seeks to underline the scale of the challenge, particularly in the context of Option 1, which in this respect is unworkable, in our view.

A comprehensive approach also points towards Compulsory Purchase Order powers to be utilised as it is highly unlikely that wholesale redevelopment of the site on the scale envisaged in any of the three 'do something' scenarios could be delivered without this.

The principle of masterplanning is also endorsed, but the scale and cost of the task should not be underestimated. To this end, British Land believe that the Green Park West and Syndenham Park sites should be considered separately, with only Sainsbury's overflow parking needing to be re-provided as part of any policy aspiration on the Syndenham Park land. It is unrealistic to promote Sainsbury's relocation.

## i)Vision

The vision needs to respect the need to retain the accessibility of the site by private car given the need to maintain vehicular access to Sainsbury's. This conflicts with the idea of having a significant linear public space - Sydenham Park Street - that provides a focus for development in the area, and provides an enticing tree- lined route that connects the adjoining residential communities to the city centre. Whilst British Land support the principle of this green space, it must not compromise the viability of certain key land uses.

ii)Generic Design Principles

Any pedestrian/cycle route through the site needs to respect the existing car dependant land uses and vehicular access to Sainsbury's must be preserved. The idea of a pedestrian dominant environment may not achieve this.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order Any retail-led scheme must be complementary to the city centre. The promotion of ground floor active frontages envisaged to the central public realm suggest small retail units, which in turn could compete with the city centre. Building heights in Sydenham Park should not be limited by policy and should be assessed on merit having regard to the scale and massing of surrounding buildings. The suggested 4-storeys may well limit the potential of the site given the floorspace figures envisaged. This also seems too low for certain parts of the site which are bound by higher density development. We agree that larger format uses should benefit from road frontage and access from Lower Bristol Road. It is also essential that these uses, particularly retail, should be supported by good levels of car parking. We fully support the enhancement and use of the river frontage, particularly for residential. Removal of the gyratory is fully supported, but good road access through the site must be retained. iii)Options We have the following high level comments on the options presented and we do not support the 'do nothing' scenario. Option 1 ■Residential supported with particular emphasis along river frontage; ■Relocation of Sainsbury's not viable or deliverable; ■Support increased critical mass of non-food floorspace in a form which complements the city centre offer; ■Leisure or additional retail/residential uses should be considered over offices, given the site's edge of centre location and alternative site for offices elsewhere within the Enterprise Area; and ■Support increased provision of complementary A3 uses particularly to support any leisure uses. Options 2 & 3 ■Support exclusion of relocated Sainsbury's; ■Residential supported with particular emphasis along river frontage; ■Support increased critical mass of non-food floorspace in a form which complements the city centre offer; ■ Leisure or additional retail/residential uses should be considered over offices, given the site's edge of centre location and alternative site for offices elsewhere within the Enterprise Area; and ■Support increased provision of complementary A3 uses particularly to support any leisure uses. D)Conclusions British Land supports the principle of Sydenham Park being a more intensively developed site for a mix of land uses including retail, leisure, complementary A3 uses and residential. Any policy aspirations for the Sydenham Park site must however be realistic and capable of delivery over the plan period. **Change requested:** Respondent 6465 Comment 3 Respondent Mr Nicholas Chambers Respondent Number: Number: Name: Organisation:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Agent ID:

Placemaking Options Plan Reference: Green Park Station West & Sydenham Park (SB6)

#### **Comment on the Site:**

If Sainsbury's does not vacate option 2 is best for SB6a and option 3 for SB6b, but hopefully Sainsbury's will be willing to relocate as stated last year.

Why has the Kingsmead House/Plymouth House/Roswell Court area not been included? It was included in the council 'Urban design led review of: Bath City Centre Sites' in 2009 so don't understand why it is not in this. Although Kingsmead House is being turned into a hotel, the whole area is in need of redevelopment. It could still provide social housing, but something more suitable to its surroundings and make better use of the space. As Avon Street and Sawclose car parks are being removed it would make sense to build an underground car park like Southgate on this site to replace the lost spaces to cater the Odeon, Theatre Royal, Premier Inn and new Apex Hotel as Park & Ride won't solve this problem.

#### **Change requested:**

To include Kingsmead House/Plymouth House/Roswell Court area in the plan with an underground car park to make up lost spaces.

Placemaking Options Plan Reference: Bath Riverside: Core Area (SB19)

|  | Number: 142                                      |
|--|--|
| Respondent 224 Comment 11 Respondent Number: Number: Name: Agent ID: Agent Name:   | Respondent Bath Preservation Trust Organisation: |
|  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\square$                      |
| Placemaking Options Plan Reference: Bath Riverside: Core Area (SB19)   |  |
| Comment on the Site:   |  |
| Development in accordance with SPD.  |  |
| Change requested:  |  |
|  |  |
| Respondent 279 Comment 6 Respondent Rohan Torkildsen Number: Name:   | Respondent English Heritage Organisation:        |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                         |
| Placemaking Options Plan Reference: Bath Riverside: Core Area (SB19)   |  |
| Comment on the Site:   |  |
| EH suggests a critical review of the Bath Western Riverside SPD to establish wheth from the first phase of construction and a refreshed SPD could be beneficial to the River Corridor. |  |
| Change requested:  |  |
|  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6389 Comment 12 Respondent Number: Name:  | Respondent Cycle Bath Organisation:              |
| Number: Name:  | -  |
|  | Organisation:                                    |

# **Comment on the Site:**

This area is a highly desirable route for cycling with opportunities for multiple improvements for cycling

That cycling provision should be provided following desire lines

Placemaking Options Plan Reference: Bath Riverside: Core Area (SB19)

Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided

Junction must be improved for priority of cycling over vehicles

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

Plan Order

| Schedule of Comments on the Placemaking I | Plan Options Document in Plan Order |
|---|-------------------------------------|
| Change requested:                         |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |
|   |                                     |

Plan Order Placemaking Options Plan Reference: Bath Riverside: North Bank (SB13) Number: 147 Respondent 224 Comment 12 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Bath Riverside: North Bank (SB13) Comment on the Site: We agree with option 1. This site is not suitable for student housing. **Change requested:** Respondent 2611 Comment 13 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Bath Riverside: North Bank (SB13) **Comment on the Site:** If the river path is not to have any lighting then there needs to be segregated cycle route to the north of the river from Locksbrook Road to Monmouth Place for safe night time cycling **Change requested:** Respondent 2663 Comment 6 Respondent Ms Jacky Wilkinson Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

#### **Comment on the Site:**

Local Plan policy GDS.1/B1 does not say residential led development. It states that the BWR will be a comprehensive mixed use development, with significant provision for B1 uses and small scale local needs, shops and local offices.

Placemaking Options Plan Reference: Bath Riverside: North Bank (SB13)

It also states that existing businesses wishing to remain in current locations can do so if they are compatible with the SPD. They can either remain in their current location or be relocated within or adjacent to the development area.

The loss of small affordable premises in active use would be contrary to this broad aim and would be yet another set back for the cultural/creative industries in the City. There is no mention in this emerging Placemaking policy of any intention to

retain the active economic or cultural uses or to relocate them nearby.

The Bath Western Riverside SPD indentifies a series of distinct character areas and recognises in 2.7.4 that the North Bank is a conservation area and that it is a character area as a whole.

Assumptions about the demolition of unlisted buildings in the conservation area appear to have been made without the correct conservation area assessments being made. This is contrary to the National Planning Policy Framework, which in paragraphs 128 and 129, requires that the significance of an asset which may be affected by a proposal should be assessed.

If decisions are taken without a full assessment of the significance of the buildings in the area, the requirements of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 have not been satisfied. This Act requires the Council in exercising its powers to have special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

No assumptions therefore should be made about the demolition of unlisted buildings (for example the Victoria Pub and the Albion Cabinet Works and various historic walls) without a full assessment of their significance. Similarly no assumptions, on a blanket basis, can be made about building heights without full information about the setting of the conservation area and other heritage assets, such as listed buildings and the Park.

An example of inconsistency: why does the BWR SPD require 2-4 floors around the immediate setting of the listed buildings on the Lower Bristol Road but suggests 3-5 floors over the whole of the North Bank including in the immediate setting of listed buildings of a similar height?

In summary,

- 1. Without the full evidence base in the form of a detailed conservation area assessment, the proposals shown for this site are unsound.
- 2. The Council should demonstrate how it is actually delivering a comprehensive mixed use scheme on Bath Western Riverside.
- 3. Existing small scale users should not be removed from the North Bank without a full assessment of their contribution to the mixed economy and cultural life of Bath and their satisfactory relocation close by in accordance with the Local Plan policy quoted in the Placemaking plan.

#### **Change requested:**

**Change requested:** 

This policy and its text should be completely revised in accordance with a full conservation area appraisal. The full requirements of the Local Plan policy should be reflected in its wording.

|   | pondent Cllr Anketell Jones<br>me:  | Respondent Organisation: |  |  |
|---|---|--------------------------|--|--|
| Agent ID: Agent Name:   |   |                          |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |   |                          |  |  |
| Placemaking Options Plan Reference:   | Bath Riverside: North Bank (SB13)   |                          |  |  |
| Comment on the Site:  |   |                          |  |  |
|   | ably be developed competitively for high of ards the river. Proximity to the bank and I | G                        |  |  |

| Schedule of Comments on the Placemaking Plan   | Options Document in Plan Order                   |
|--|--|
| Respondent 6389 Comment 15 Respondent Number: Number: Name:  | Respondent Cycle Bath Organisation:              |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attac  | hments sent with the comment? $\square$          |
| Placemaking Options Plan Reference: Bath Riverside: North Bank (   | SB13)  |
| Comment on the Site:   | J  |
| This area is a highly desirable route for cycling with opportunities for   | multiple improvements for cycling                |
| That cycling provision should be provided following desire lines   |  |
| Along highly desirable routes where there is a high – over 3000 per h<br>provided  | r - volume of traffic segregated tracks must be  |
| Junction must be improved for priority of cycling over vehicles  |  |
| That all developments have cycle parking / storage that is well design   | ned appropriate for the development ie long term |
| needs covered, secure, convenient and easy to access   |  |
| There needs to be safe segregated cycle route on the North side of the   | ne river   |
| Change requested:  |  |
| change requested.  |  |
|  |  |
|  |  |
| Respondent 6477 Comment 1 Respondent Mr Anthony Burston  | n Respondent                                     |
| Number: Name:  | Organisation:                                    |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   | hments sent with the comment? $\Box$             |
| Tartier information available in the original comment.   | milents sent with the comment.                   |
| Plana di Carina Plana Parina di Pari | 5042)  |
| Placemaking Options Plan Reference: Bath Riverside: North Bank (   | SB13)  |
| Comment on the Site:   |  |
| Access to this site via South Road /Southlands Road would not be acc   | reptable for safety reasons.                     |
| South Road is restricted to one lane by parked vehicles for long streto  | ,  |
| that restrict visibility. Driving along here has become hazardous and f  | urther increase in traffic                       |
| would make it dangerous.   |  |
| Southlands Drive is steep and restricted by parked vehicles. Access in   | snow or ice is extremely difficult               |
| at present and increased traffic would be dangerous.<br>The alternative SR14 option avoids all these difficulties and offers the   | ontion of improving visibility at the North      |
| The alternative 5K14 option avoids all these difficulties and offers the<br>Road/Haywood Road crossroads   | s option of improving visibility at the North    |
|  |  |
| Change requirement   |  |
| Change requested:  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: The Bath Press (SB7) Number: 152 Respondent 224 Comment 13 Respondent **Respondent** Bath Preservation Trust Number: Number: Organisation: Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: The Bath Press (SB7) Comment on the Site: We do not consider bulky goods retail at all suitable for this site. We question the allocation of sites for bulky goods retail as trends move towards internet shopping. **Change requested:** Respondent 279 Comment 7 Respondent Rohan Torkildsen Respondent English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: The Bath Press (SB7) Comment on the Site: Perhaps there might be a stronger policy commitment to retaining the building's historic significance than the apparent optional consideration? **Change requested:** Respondent 2663 Comment 7 Respondent Ms Jacky Wilkinson Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: The Bath Press (SB7) Comment on the Site: Paragraph 2 should be amended to require the retention of the Bath Press facade and parts of the building. The policy should states that its demolition will be resisted.

# Change requested:

As it stands the wording is too weak.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 3069 Comment 10 Respondent Cllr Anketell Jones Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: The Bath Press (SB7) **Comment on the Site:** 1.1042 The Bath Press facade was not integral to the proposed buildings for the site. The effect was to make it look useless. The space behind it would have been dark and draughty. A future plan would look more attractive if the facade appeared to belong to the building. 1.1047 This is the first statement to say a development should aspire to be carbon neutral. This should apply to all developments referred to in the Placemaking Plan. **Change requested:**

| Respondent 6389<br>Number: |                                     | spondent<br>ame:            | <b>Respondent</b> Cycle Bath <b>Organisation:</b> |
|----------------------------|-------------------------------------|-----------------------------|---|
|                            | gent Name:<br>on available in the c | original comment?   Attachm | ents sent with the comment? $\Box$                |

#### **Comment on the Site:**

- 8. Agree add cycling
- 9. Agree Plus crossing it at Dorset close & Windsor bridge6 This junction needs major improvements for any sane cyclist to go near

That cycling provision should be provided following desire lines

Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided

Junction must be improved for priority of cycling over vehicles

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Roseberry Place (SB8) Number: 160

| Respondent 224 Comment 14 Respondent Number: Number: Name:                       | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b>         |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Roseberry Place (SB8)                        |  |
| Comment on the Site:   |  |
| Ecology & GI should dominate the nodal character of the site.                    |  |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 281 Comment 8 Respondent Alison Howell Number: Name:                  | Respondent Natural England Organisation:                               |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Roseberry Place (SB8)                        |  |
| Comment on the Site:   |  |
| Roseberry Place SB8: we welcome the identification of the ecological node and th | ne requirements set out in paragraph 5.                                |
| Change requested:  |  |
| 6  |  |
|  |  |
| Respondent 828 Comment 3 Respondent Number: Name:                                | Respondent Deeley Freed Estates Organisation: Limited and DFE Projects |
| Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner        |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Roseberry Place (SB8)                        |  |

# **Comment on the Site:**

Site SB8 – Roseberry Place

In paragraph 1.108, second bullet point, line 2, the reference should be to "including potentially the relocation of businesses....." Without this additional word the policy could be unintentionally restrictive.

In paragraph 1.108, third bullet point, the reference to potential cycle bridges over Lower Bristol Road and Windsor Bridge Road should be deleted as engineering studies indicate that they would not be feasible having regard to level differences, gradient requirements and land ownership considerations. The focus therefore needs to be on other forms of safe, convenient connections for cyclists.

Plan Order

| Schedule of Comme   | ents on the Placemaking Plan Options      | Document in Plan Order                         |  |
|---|---|--|--|
| In the table linked to paragraph 1.109, small-scale local needs retail should be included in all options, in line with the development principles. Such needs are typically provided for in convenience shops of 1,000 sq m or less net floorspace.   |   |  |  |
| In the emerging development and desig   | n principles (PPOD page 44):              |  |  |
| Principle No 4 - the reference to the pot context of paragraph 1.108.   | cential provision of bridges should be d  | deleted for the reasons set out above in the   |  |
| Change requested:   |   |  |  |
| Amend paragraphs 1.108, and Principle and inhibits reasonable flexibility.  | No 4 as suggested above, recognising      | that the specific bridge option is unjustified |  |
| Paragraph 1.109 (table) should be amer  | nded as a matter of consistency within    | the document and reasonableness.               |  |
| <b>B</b>  |   |  |  |
| Respondent 2611 Comment 14 Res<br>Number: Number: Namber  | pondent<br>me:                            | Respondent Transition Bath Organisation:       |  |
| Agent ID: Agent Name:   |   |  |  |
| Further Information available in the or   | riginal comment?   Attachments s          | ent with the comment? $\Box$                   |  |
| Placemaking Options Plan Reference:   | Roseberry Place (SB8)                     |  |  |
| Comment on the Site:  |   |  |  |
|   | reate a new cycling and pedestrian bric   | dges over Windsor Bridge Road and Lower        |  |
| Change requested:   |   |  |  |
|   |   |  |  |
|   |   |  |  |
| Respondent 3069 Comment 11 Res<br>Number: Number: Nam   | pondent Cllr Anketell Jones<br>me:        | Respondent Organisation:                       |  |
| Agent ID: Agent Name:   |   |  |  |
| Further Information available in the or   | riginal comment? $\square$ Attachments s  | ent with the comment? $\square$                |  |
| Placemaking Options Plan Reference:   | Roseberry Place (SB8)                     |  |  |
| Commant on the Site:  |   |  |  |
| Comment on the Site:  This is an untidy part of the city that apprenticular control of the city | pears to have outlived its role. It would | be easy to improve its appearance with         |  |
|   |   | o it should be watched closely to ensure       |  |
| above average development values are  | delivered.                                |  |  |
| Change requested:   |   |  |  |

| Schedule of Comments on the  | ne Placemaking Plan Options Document in Plan Order |  |  |
|--|--|--|--|
| Respondent 6389 Comment 14 Respondent Number: Number: Name:  | Respondent Cycle Bath Organisation:                |  |  |
| Agent ID: Agent Name:  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |  |
| Placemaking Options Plan Reference: Roseber  | ry Place (SB8)                                     |  |  |
| Comment on the Site:   |  |  |  |
| 4. Agree – A cycle bridge over the roads would b   | e great  |  |  |
| That cycling provision should be provided followi  | ng desire lines                                    |  |  |
| Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided  |  |  |  |
| Junction must be improved for priority of cycling over vehicles  |  |  |  |
| That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access |  |  |  |
| Change requested:  |  |  |  |

Placemaking Options Plan Reference: Locksbrook Road and Brassmill Lane

(SB11)

Plan Order Number: 175

| Respondent 224 Comment 15 Respondent Number: Name:   | Respondent Bath Preservation Trust Organisation: |  |
|--|--|--|
| Agent ID: Agent Name:  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |
| Placemaking Options Plan Reference: Locksbrook Road and Brassmi  | II Lane (SB11)                                   |  |
| Comment on the Site:   |  |  |
| Locksbrook Road & Brass Mill Lane SB11   |  |  |
| The site and policy should include the island.   |  |  |
| Change requested:  |  |  |
|  |  |  |
|  |  |  |
| Description 2014 of the second |  |  |
| Respondent 2611 Comment 15 Respondent Number: Name:  | Respondent Transition Bath Organisation:         |  |
| Tunic.   | Organisation.                                    |  |
| Agent ID: Agent Name:  |  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? —                   |  |
|  |  |  |
| Placemaking Options Plan Reference: Locksbrook Road and Brassmi  | II Lane (SB11)                                   |  |
|  |  |  |
| Comment on the Site:  Locksbrook Road Agree – 'accessed by a comprehensive sustainable cy  | cling and padastrian natwork'                    |  |
| LOCKSDIOOK ROAD Agree — accessed by a comprehensive sustainable cy   | cling and pedestrian network                     |  |
| Change requested:  |  |  |
|  |  |  |
|  |  |  |
| Respondent 2611 Comment 16 Respondent  | Daniero danta Transcitica Dath                   |  |
| Number: Number: Name:  | Respondent Transition Bath Organisation:         |  |
| Agent ID: Agent Name:  |  |  |
|  |  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? —                   |  |
|  |  |  |
|  |  |  |
| Placemaking Options Plan Reference: Locksbrook Road and Brassmi  |  |  |
| <u> </u>   |  |  |
| Comment on the Site:   |  |  |
| <u> </u>   |  |  |
| Comment on the Site: SB11 p47 1.21 Strongly agree with pedestrian and cycling connections  |  |  |
| Comment on the Site: SB11 p47  | II Lane (SB11)                                   |  |

|  | Schedule of Co             | mments on the Placem       | aking Plan Options Document in Plan Order              |
|--|----------------------------|----------------------------|--|
| Respondent<br>Number:                      | 2611 Comment 17 Number:    | Respondent<br>Name:        | <b>Respondent</b> Transition Bath <b>Organisation:</b> |
| Agent ID:                                  | Agent Name:                |                            |  |
| Further Info                               | rmation available in th    | ne original comment?       | Attachments sent with the comment?                     |
| Placemaking                                | Options Plan Referer       | ice: Locksbrook Road a     | and Brassmill Lane (SB11)                              |
| Comment or                                 | ı the Site:                |                            |  |
| Pg 48 1<br>Needs to be s                   | segregated pedestrian      | and cycling routes, that   | follow the desire lines and with safe crossing points  |
| Pg 48 3 Point                              | 8: we strongly agree       |                            |  |
| Change requ                                | ested:                     |                            |  |
| - 6 – commit                               | to, rather than saying     | 'wherever practicable'     |  |
|  |                            |                            |  |
| Respondent<br>Number:                      | 2611 Comment 18<br>Number: | Respondent<br>Name:        | Respondent Transition Bath Organisation:               |
| Agent ID:                                  | Agent Name:                |                            |  |
| Further Info                               | rmation available in th    | ne original comment?       | Attachments sent with the comment?                     |
| Placemaking                                | ; Options Plan Referer     | ce: Locksbrook Road a      | and Brassmill Lane (SB11)                              |
| C  | a Ale a Cita               |                            |  |
| Comment or<br>1.11 Retentio<br>Greenbank G | n of RUH disused allot     | ment site, for staff and f | therapeutic use, possibly open to local residents via  |
| Change requ                                | ested:                     |                            |  |
|  | Local Green Space          |                            |  |
|  |                            |                            |  |
| Respondent<br>Number:                      | 6389 Comment 15<br>Number: | Respondent<br>Name:        | Respondent Cycle Bath Organisation:                    |
| Agent ID:                                  | Agent Name:                |                            |  |
| Further Info                               | rmation available in tl    | ne original comment?       | Attachments sent with the comment?                     |
| Placemaking                                | Options Plan Referer       | ice: Locksbrook Road a     | and Brassmill Lane (SB11)                              |
| Comment or                                 | ı the Site:                |                            |  |
| 1. Agree – fo                              | r cycling                  |                            |  |
| 6. Agree – fo                              |                            | I before any new develo    | nnment   |
| This area is a                             | highly desirable route     | •                          | unities for multiple improvements including a bridge   |
| That cycling p                             | provision should be pro    | ovided following desire I  | lines  |

| Along highly desirable routes where there is a hig<br>provided & heavy good vehicles   | gh – over 3000 per hr - volume o                           | of traffic segregated tracks must be |
|--|--|--------------------------------------|
| Junction must be improved for priority of cycling  | g over vehicles  |                                      |
| That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access |  |                                      |
| Change requested:  |  |                                      |
|  |  |                                      |
| Respondent 6457 Comment 1 Respondent Number: Number: Name:   | Richard Savage, Julia Norton,<br>Rosemary Fear and Frances | Respondent Organisation:             |
| Agent ID: 205 Agent Name: Rocke Associates   | ttd.   |                                      |

Placemaking Options Plan Reference: Locksbrook Road and Brassmill Lane (SB11)

#### **Comment on the Site:**

With reference to the above matter, I am writing to make some brief submissions on behalf of Richard Savage, Julia Norton, Rosemary Fear and Frances Davey who are the joint owners of premises at 151 Locksbrook Road. The premises, which are identified on the enclosed plan, are currently let on a short term lease.

Further Information available in the original comment? 

Attachments sent with the comment?

The premises of 151 Locksbrook Road are at the junction of Locksbrook Road with Station Road. Station Road connects the Upper Bristol Road, and District Centre of Chelsea Road to the north, with the residential and employment communities at Locksbrook Road. The route continues southwards via a pedestrian/cycle bridge over the River Avon to the Lower Bristol Road. It is therefore an important cross¬city route, in particular for pedestrians and cyclists. It provides an important connection for residents and those working in the local businesses to the local facilities in Chelsea Road. With the imminent opening of the Lidl store on the south side of the river in the former Herman Miller factory, it is likely to become an even more important pedestrian route.

My clients' premises are therefore prominently located occupying a key node in the local highway network. However, the premises are coming to the end of their useful life for commercial purposes, and in need of redevelopment.

The site is not within the core employment area as defined in the adopted Local Plan. Their exclusion is considered to be correct since, in terms of scale and quality, they do not contribute significantly to the employment base of the city. Furthermore, in view of the plan strategy to achieve a managed reduction in industrial floorspace, it is premises of this nature that are the most appropriate to redevelop for other purposes, and in particular housing in view of the pressures on providing suitable housing land within the city.

Based on the plan on page 46 of the Placemaking Plan Options Consultation the site is included in an area designated as SB11c. It is assumed that this is the area to which the 'Emerging Development Design Principles: SB11' for the Locksbrook Road and Brassmill Lane area are to apply. In terms of emerging land use options it is stated in paragraph 1.122 as follows:

The current and future role of this area is set out in Policy B3 of the Core Strategy. There are no options to explore in the Placemaking Plan. However, the Placemaking Plan will formalise the area based Policy of the Core Strategy as a site specific policy with a detailed boundary. This site is already allocated as a 'core employment site' in the B&NES Local Plan (2007). This saved policy will be replaced by the Placemaking Plan.

There is currently a lack of clarity in the Options Consultation concerning the intentions for the area identified as SB11c; in particular whether it is intended to define the 'core employment area' to which Core Strategy Policy B3 applies, or a wider area to which the development design principles in emerging policy SB11 will relate. The area to which SB11c relates is

not consistent with the 'core employment site' identified in the adopted Local Plan, but extends to include a wider area.

My clients object to any extension of the 'core employment area' to include 151 Locksbrook Road. Inclusion of my clients' site is inconsistent with the strategic intention of Core Strategy Policy B3 to protect an area that functions as Bath's 'primary location for industrial enterprise'. Moreover, the policy presumes in favour of retaining land in the 'B' classes where it remains a 'viable' use. My clients' premises are of marginal viability for commercial purposes, and to allow them to be redeveloped for an alternative purpose would be consistent with the planned contraction in the demand for industrial floorsapce without prejudice to the strategic ambitions of Policy B3.

The immediate context of 151 Locksbrook Road are the residential properties on Station Road to the west and north, and on Locksbrook Road to the south-west and west. Redevelopment of the site for residential purposes would assist with the ambition in the emerging Placemaking Plan to redefine the image and identify of the area. The location of the site at a key intersection of routes gives it a particular role in defining the image and identity, the character of which is business uses intermixed with residential.

The current image of the site is poor, and it is in need of redevelopment to enhance its visual appearance. There is an opportunity to increase building heights without adversely affecting the amenities of neighbouring properties, and which is another key aspiration of the emerging Placemaking Plan. An increase in building height at this key intersection would have positive urban design benefits.

The premises of 151 Locksbrook Road therefore make little contribution to the strategic employment aspirations for the Locksbrook Road / Brassmill Lane area, and currently do not contribute positively to its image and identity at a key intersection of routes. The immediate context of the site is both residential and industrial, and the only realistic redevelopment potential is for residential purposes. The site is previously- developed land, and redevelopment for residential purposes will contribute towards meeting the significant quantum of housing that the Council is seeking to deliver from small, unallocated sites with the boundary of the city of Bath.

Having regard to the above considerations, the following clarification must be included in the draft Plan:

- •Clear definition of the area to which the protection afforded by Policy B3 will relate, and which should be based on the 'core employment site' allocated in the adopted Local Plan.
- Exclusion of 151 Locksbrook Road from the area to which Core Strategy Policy B3 will relate.
- •Confirmation in the 'Emerging Development and Design Principles: SB11' that redevelopment of existing sites in commercial use for other purposes will be considered favourably where they do not contribute to the strategic employment objectives, and particularly where their redevelopment will contribute to the wider objectives to redefine the image and identify of the area.

I would be grateful if you would keep me informed on progress with the draft Plan.

| Change requested: |  |
|-------------------|--|
|                   |  |
|                   |  |
|                   |  |

Placemaking Options Plan Reference: Twerton Park (SB15)

Number: 179 Respondent 224 **Comment** 16 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Twerton Park (SB15) Comment on the Site: Development should be fine grained and respect the existing street pattern and plot layout. **Change requested:** Respondent 6389 Comment 16 Respondent Respondent Cycle Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Twerton Park (SB15) **Comment on the Site:** Add & cycling routes

That cycling provision should be provided following desire lines

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

# Change requested:

Plan Order

Placemaking Options Plan Reference: Former Transport Depot, Brougham Hayes (SB14)

Plan Order Number: 182

| Respondent 102 Comment 13 Respondent Robin Kerr Number: Name:  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations        |  |  |
|--|--|--|--|
| Agent ID: Agent Name:  | · ·  |  |  |
| Further Information available in the original comment?   Attachments sent with the comment?  |  |  |  |
| Placemaking Options Plan Reference: Former Transport Depot, Brough   | nam Hayes (SB14)   |  |  |
| Comment on the Site:   |  |  |  |
| Student Housing block application made, and yet not favoured by this do  | cument   |  |  |
| The Student Housing sections are unimpressive. They take no account of described which show that the demand for additional private-sector beds provision, thus already contravening the headline policy "to provide the off-campus provision playing a supplementary role". This needs further of FOBRA. | s would greatly exceed the likely on-campus majority of new accommodation on campus with |  |  |
| Change requested:  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Respondent 224 Comment 17 Respondent Number: Name:   | Respondent Bath Preservation Trust Organisation:   |  |  |
| Agent ID: Agent Name:  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachme   | ents sent with the comment? $\Box$   |  |  |
| Placemaking Options Plan Reference: Former Transport Depot, Brougham Hayes (SB14)  |  |  |  |
| Comment on the Site:   |  |  |  |
| This site should be specifically allocated for car-free starter homes without car parking.   |  |  |  |
| Change requested:  |  |  |  |

Placemaking Options Plan Reference: Hartwells Garage, Newbridge (SB18b)

Plan Order Number: 186

|   | spondent Robin Kerr<br>ame:                  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|---|--|---|--|--|
| Agent ID: Agent Name:   |  | -   |  |  |
| Further Information available in the original comment?   Attachments sent with the comment?             |  |   |  |  |
| Placemaking Options Plan Reference: Hartwells Garage, Newbridge (SB18b)                                 |  |   |  |  |
| Comment on the Site:  |  |   |  |  |
| Student Housing block application made, and yet not favoured by this document.                          |  |   |  |  |
| Change requested:   |  |   |  |  |
| Respondent 224 Comment 18 Res<br>Number: Number: Na   | spondent<br>nme:                             | Respondent Bath Preservation Trust Organisation:                                  |  |  |
| Agent ID: Agent Name:   |  |   |  |  |
| Further Information available in the o  | original comment? $\square$ Attachments sent | with the comment? $\Box$  |  |  |
| Placemaking Options Plan Reference: Hartwells Garage, Newbridge (SB18b)                                 |  |   |  |  |
| Comment on the Site:  |  |   |  |  |
| We agree with option 1. This site is not  | suitable for student housing.                |   |  |  |
| Change requested:   |  |   |  |  |
| change requested.   |  |   |  |  |
|   |  |   |  |  |
| Respondent 6389 Comment 17 Res<br>Number: Number: Na  | spondent<br>nme:                             | Respondent Cycle Bath Organisation:   |  |  |
| Agent ID: Agent Name:   |  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |   |  |  |
| Placemaking Options Plan Reference:   | Hartwells Garage, Newbridge (SB18b)          |   |  |  |
| Comment on the Site:  |  |   |  |  |

The old rail line should be made into a cycle route before a new development

That cycling provision should be provided following desire lines

Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

| Change requested:  |   |  |  |
|--|---|--|--|
|  |   |  |  |
|  |   |  |  |
| Respondent 6458 Comment 1 Respondent   | Respondent London Road  |  |  |
| Number: Name:  | Organisation: Nottingham Ltd  |  |  |
| Agent ID: 237 Agent Name: Walsingham Planning  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachm  | ments sent with the comment? 🔽  |  |  |
| Placemaking Options Plan Reference: Hartwells Garage, Newbridge  | (SB18b)   |  |  |
| Comment on the Site:   |   |  |  |
| I am writing on behalf of London Road Nottingham Ltd, the owner of the above site, to make representations on the proposed SB18 allocation in the draft Placemaking Plan Options consultation. Certain corrections and clarifications need to be made.                                       |   |  |  |
| Paragraph 1.126 needs to be corrected. It states that the site is occupion<br>The western part of the site is occupied by Hanson concrete batching parts as the student accommodation can be removed as this application has been were student accommodation.                                | plant. Reference to the planning application for                                    |  |  |
| In the Design Principles section, reference to the Officer Report should Instead, reference should be made to the design parameters agreed by maximum building heights for both upper and lower parts of the site. Tredevelopment proposals. A copy of the Section 17 Certificate is include | the Section 17 approval in 2010, namely This should form the starting point for any |  |  |
| It should be emphasised that a new use needs to be found for the site<br>John in due course. Other options for redevelopment could include a c<br>assessment).   | •   |  |  |
| Change requested:  |   |  |  |
| <u> </u>   |   |  |  |
|  |   |  |  |
| Respondent 6462 Comment 1 Respondent Mrs Sarah Shaw Number: Number: Name:  | Respondent Organisation:  |  |  |
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |  |  |
| Placemaking Options Plan Reference: Hartwells Garage, Newbridge  | (SB18b)   |  |  |
| Comment on the Site:   |   |  |  |
| Agree that this area at Hartwells should be residential or residential led. I also agree that student housing is less preferred here.  |   |  |  |
| Change requested:  |   |  |  |
| Request that this is amended to be lower density residential.  |   |  |  |
|  |   |  |  |

# Number: 188

Placemaking Options Plan Reference: MoD Foxhill (SB27)

| Respondent 300 Comment 6 Res<br>Number: Number: Namber  | spondent<br>me:    | Respondent Curo Group Organisation: |  |  |  |
|---|--------------------|-------------------------------------|--|--|--|
| Agent ID: 171 Agent Name: Barton Willmore   |                    |                                     |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                    |                                     |  |  |  |
|   |                    |                                     |  |  |  |
| Placemaking Options Plan Reference:   | MoD Foxhill (SB27) |                                     |  |  |  |

#### **Comment on the Site:**

The former MOD Foxhill site is subject to a current planning application (14/04354/EOUT) for its redevelopment for a mixed use development of up to 700 dwellings, up to 1,00sqm B1 employment, up to 3,500sqm D1 use, up to 500sqm retail, open space and all associated infrastructure.

Whilst the current planning application relates only to the former MOD Foxhill site (now referred to as Mulberry Park), Curo has an aspiration to regenerate the existing Foxhill estate and this has been endorsed through the whole area being shortlisted by the government for designation as a Housing Zone.

The policy relating to Foxhill should therefore not focus solely on the redevelopment of the former MOD Foxhill site, but also be recognise and be supportive of the social, economic and environmental benefits that could be delivered through the regeneration of the existing Foxhill housing estate.

#### **Change requested:**

A policy should be included within the Placemaking Plan which is supportive of the principle of the regeneration of the existing Foxhill estate and recognise the benefits that this could deliver.

Curo would be happy to discuss the nature of the policy sought in greater detail with the Council to inform revisions to the policy.

Plan Order

Plan Order Placemaking Options Plan Reference: MoD Warminster Road (SB25) Number: 188 Respondent 154 Comment 2 Respondent Mrs Jane Hennell **Respondent** The Canal & River Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: MoD Warminster Road (SB25) Comment on the Site: MOD Warminster In an increasingly fast-paced and crowded world, our historic canals and rivers provide a local haven for people and nature. The Canal & River Trust (the Trust) is the charity entrusted with the care of 2,000 miles of waterways in England and Wales. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding. The Trust has a range of charitable objects including: To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; To protect and conserve objects and buildings of heritage interest; To further the conservation, protection and improvement of the natural environment of inland waterways; and To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. Within the Bath & North Somerset district The Canal & River Trust act as Navigation Authority for parts of the River Avon, although in some sections we also own adjoining land which is used as a towpath. We also own and maintain the Kennet & Avon Canal. The Canal & River Trust has commented on the Concept Statement and subsequent planning application for this site which adjoins the Kennet & Avon Waterway. We have always made it clear that a second bridge will not be supported by us in this location but that consideration should be given to improving the adjoining towpath as important Green Infrastructure and to help mitigate against the increased usage and resultant degradation caused by this proposal. **Change requested:** Respondent 2954 Comment 1 Respondent Ms Kirsten Elliott Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

# Comment on the Site:

I feel that the concept statements should be now part of the core strategy, so that developers have to adhere to them. It is particularly important to preserve the field around the site as it stands, with no encroachment of any kind - not even

Placemaking Options Plan Reference: MoD Warminster Road (SB25)

gardens - from the development on the brownfield site. This is perhaps one of the most important views in and of Bath. In the summer, at weekends, visitors are literally queueing up here to take photographs. It also marks a clear distinciton between the city and its rural setting. It is important to wildlife. Deer, badger, even otters at the canal fringe use it. It does not and should not have park trees. Woodland trees such as hawthorn provide cover for a multitude of birds. It really needs special protection and should, perhaps be handed over to Avon Wildlife trust to manage it. The footpaths do not need to be turned into gravel paths or cycle tracks - it is beautiful as it is and much loved and used by the local community for dog walking, picnics, and just enjoying the view.

### **Change requested:**

I would like to see the protection of this site strengthened.

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.14

Plan Order Number: 197

Respondent 224 Comment 2 Respondent Respondent Bath Preservation Trust Number: Name: Organisation:

Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.14

Comment on the Site:

Change requested:

A Policy for the Central Area should be included after paragraph 1.14.

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.143

Plan Order Number: 200

| Respondent 102 Comment 1<br>Number: Number:   | .5 Respondent Robin Kerr<br>Name:      | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|---|--|---|--|--|
| Agent ID: Agent Name:   |  |   |  |  |
| Further Information available in  | n the original comment? $\Box$ Attachr | ments sent with the comment? $\square$  |  |  |
|   |  |   |  |  |
| Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.143 |  |   |  |  |
| Comment on the Site:  |  |   |  |  |
| GIA should be defined as Gross Internal Area.   |  |   |  |  |
| Change requested:   |  |   |  |  |
|   |  |   |  |  |

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.144

Plan Order Number: 201

|   | espondent Robin Kerr<br>lame:              | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|---|--|---|--|--|
| Agent ID: Agent Name:   |  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |   |  |  |
| Placemaking Options Plan Reference  | : The University of Bath at Claverton Down | n (SB26) / Paragraph 1.144  |  |  |
| Comment on the Site:  |  |   |  |  |
| The campus Masterplan makes provision for up to 2,400 additional bedrooms. Only 700 have been built since 2009 (The Quads in 2014) and there are no known plans to build any more (see FoBRA paper). The argument as to whether the ultimate number should be 2,000 or 2,400 is therefore somewhat academic. FoBRA's Comments on B&NES Information Paper 'Student Numbers and Accommodation Requirements 2011-2029' dated 25 Sept 2014 (copy attached) provides more accurate figures and forecasts, and is endorsed by the University of Bath. It should therefore be adopted in place of the Council's 'Student Numbers and Accommodation Requirements' Information Paper on the B&NES website. |  |   |  |  |
| Change requested:   |  |   |  |  |

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.145

Plan Order Number: 202

Respondent 102 Comment 17 Respondent Robin Kerr
Number: Name: Organisation: Residents' Associations

Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.145

Comment on the Site:

The 'combined effect' figures need to be explained. An increased floorspace of over 28,000 sqm relative to that approved in current policy is considered sufficiently significant to need to be accommodated in new policy, subject to the 'Environmental Capacity'.

Change requested:

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.148

Plan Order Number: 205

| Respondent 102<br>Number:   | Comment 18 Number: | Respondent Robin Kerr<br>Name:      | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |
|---|--------------------|-------------------------------------|---|--|
| Agent ID: Ag  | gent Name:         |                                     |   |  |
| Further Information   | on available in t  | he original comment? $\Box$ Attachr | nents sent with the comment? $\square$  |  |
|   |                    |                                     |   |  |
| Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.148 |                    |                                     |   |  |
| Comment on the Site:  |                    |                                     |   |  |
| Agreed.   |                    |                                     |   |  |
| Change requested:   |                    |                                     |   |  |

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.149

Plan Order Number: 206

Respondent 102 Comment 19 Respondent Robin Kerr
Number: Name: Organisation: Residents' Associations
Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) / Paragraph 1.149

Comment on the Site:

Where is the 'green heart criterion' defined?

Change requested:

Placemaking Options Plan Reference: The University of Bath at Claverton Down

(SB26)

Plan Order Number: 209

| Respondent 2<br>Number: | Comment Number:    | 1 <b>Respondent</b> Mr Chris Beez Name: | ley Respondent Beech Avenue Organisation: Residents' Association, |
|-------------------------|--------------------|---|---|
| Agent ID:               | Agent Name:        |   |   |
| Further Inform          | nation available i | n the original comment? $\Box$          | Attachments sent with the comment? $\square$                      |
|                         |                    |   |   |

**Comment on the Site:** 

I strongly agree with the following wording of paras.1.140 & 1.142 (page 54) relating to future development at the University of Bath:

"The context for these [development capacity] options is primarily defined by...the impacts of development on nearby residential areas" (para.1.140)

and

"Residential areas of the city...adjoin the campus, particularly to the south, and this relationship needs to be respected in considering the Universitys future development" (para.1.142).

### **Change requested:**

Reflecting the wording of paras.1.140 & 1.142, at Emerging Policy Approach SB26 para. 1.f (page 56), replace

Placemaking Options Plan Reference: |The University of Bath at Claverton Down (SB26)

"High quality design and landscaping that responds positively and sensitively to the Cotswolds AONB designation and ensures that development on the campus has much-improved visual and landscape relationship with neighbouring land, particularly Bushey Norwood"

with

"High quality design and landscaping that responds positively and sensitively to the Cotswolds AONB designation and ensures that development on the campus has much-improved visual, landscape and amenity relationship with neighbouring land, particularly adjoining residential areas and Bushey Norwood".

Respondent 2 Comment 2 Respondent Mr Chris Beezley Respondent Beech Avenue

Number: Number: Organisation: Residents;' Association

Agent ID: Agent Name:

Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26)

#### Comment on the Site:

Emerging Policy Approach SB26 (Page 56, The University of Bath) makes provision for up to 2,400 additional campus student bedrooms at Claverton Down in the period 2011 to 2026. To date only 700 (The Quads) have materialised, leaving a possible balance of UP TO 1,700 between now and 2026. The University of Bath has no plans to build this number.

BARA is a member of FoBRA and FoBRA's report dated 25th September 2014 "Comments on B&NES Local Plan Information Paper 'Student Numbers and Accommodation Requirements 2011-2029' (Part of the Strategic Housing Market Assessment, dated August 2014)" explains why it is highly unlikely that 1,700 new campus bedrooms will materialise, and describes credible future student number scenarios (endorsed by the University of Bath) that are very likely to result in a demand for up to 3,000 private sector student bedspaces in Bath above and beyond those likely to be provided on campus, in HMOs or in the six Private Sector Accommodation Blocks already granted planning permission in the city.

### **Change requested:**

While the University of Bath presses on with its ambitious academic buildings plans year-on-year, progress with campus residential accommodation is far less enthusiastic.

The Placemaking Plan should acknowledge that it is highly unlikely that provision of campus student bedrooms will keep pace with the likely increase in student numbers and that by 2026 there is likely to be a shortfall of up to 3,000 student bedspaces. B&NES' stated policy is to maintain the number of HMOs at current levels (about 2,800). This suggests that this demand is likely to be met in the form of further Private Sector Student Accommodation Blocks beyond those currently in the pipeline, provision for which is not included in the Placemaking Plan.

This oversight should be corrected and student accommodation demand managed via a formal Student Housing Policy as consistently called for by FoBRA.

| Respondent 102 Comment 6 Respondent Robin Kerr Number: Name:   | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|--|---|
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sent   | t with the comment? $\Box$  |
| Placemaking Options Plan Reference: The University of Bath at Claverton Down   | n (SB26)  |
| Comment on the Site:   |   |
| Change requested:  |   |
| FoBRA would expect the accompanying Evidence Base to recognise (and cite) the Management Plan as being a material consideration in deciding future planning a                  |   |
|  |   |
| Respondent 102 Comment 20 Respondent Robin Kerr Number: Name:  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sent   | t with the comment? $\square$   |
| Placemaking Options Plan Reference: The University of Bath at Claverton Dow  | n (SB26)  |
| Comment on the Site:   |   |
| It seems odd to include 'either/or' in the floorspace options. Paras $1.140 \& 1.147$ considering the potential impact of future development on nearby residential are campus. | ·   |
| Change requested:  |   |
| Para.1f should therefore be amended to read "much improved visual, landscap neighbouring land, particularly adjoining residential areas and Bushey Norwood"                    | pe and amenity relationship with  |
|  |   |
| Respondent 279 Comment 8 Respondent Rohan Torkildsen Number: Name:   | Respondent English Heritage Organisation:   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment?   | t with the comment? $\Box$  |

| Placemaking Options Plan Reference: The University of Bath at Clavert   | con Down (SB26)                                  |
|---|--|
| Comment on the Site:  |  |
| The Policy should make reference to number of affected heritage assets adjacent scheduled monument. It should be highlighted that any develop context.  |  |
| Might the proposed masterplan be an SPD?  |  |
| Change requested:   |  |
|   |  |
| Respondent 281 Comment 9 Respondent Alison Howell Number: Name:   | Respondent Natural England Organisation:         |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment? $\square$            |
|   |  |
| Placemaking Options Plan Reference: The University of Bath at Clavert   | on Down (SB26)                                   |
| Comment on the Site:  |  |
| University of Bath at Claverton Down SB26: we welcome the requirement sensitively to the AONB and to improve the visual and landscape relation Norwood.   |  |
| In relation to this, the University site is very close to the Bat SAC and Bus<br>of many species, including those protected by the SAC designation. It is land therefore we suggest that development should also be required to m | known that bats use routes around the university |
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 304 Comment 18 Respondent Number: Name:  | Respondent University of Bath Organisation:      |
| Agent ID: 44 Agent Name: Define Design and Planning Ltd   |  |
| Further Information available in the original comment?   Attachme   | ents sent with the comment? $\Box$               |
| Placemaking Options Plan Reference: The University of Bath at Clavert   | con Down (SB26)                                  |
| Comment on the Site:  |  |

#### Comment on the Site:

Introduction

The University of Bath (the University) would welcome the inclusion of a policy in the Place Making Plan (PMP) that recognises the importance of the University to the city, and reflects the support enshrined in Core Strategy (CS) Policies B1 & B5 and extant Local Plan (LP) Policy GDS.1/B11 for the continued development of the Campus.

Development is required to enable the sustainable growth of the University and enhancement of its campus in accordance with its Masterplan. The University would, therefore, like to establish a positive working relationship with Bath & North East Somerset Council (the Council) to prepare a policy for the PMP that reflects the opportunities and

constraints at the campus, and enshrines key development principles established by the existing planning policy context and Masterplan. The aim of the policy should be to provide greater certainty in the consideration of future planning applications for proposed developments within the Masterplan that will provide accommodation for the University's research, academic and operational activities, additional bed spaces or critical supporting infrastructure, and enable their timely determination. However, the University has some specific concerns with the options set out in the PMP in relation to proposed Policy SB26, and therefore, objects to the policy in its currently proposed form.

Moreover, the PMP currently only considers focussing University related development on the Campus itself. However, given the Campus' sensitive environmental context and that its capacity to accommodate further development is ultimately finite, it is the University's view that the PMP should also consider alternative options for the provision of the required development, and particularly the provision of additional student bed spaces, elsewhere in and around the City. That is not to say that there would be no further student bed space developments on campus, but it would allow the University to prioritise the provision of further academic and research developments on Campus that are critical the continued success of the University, and must for operational reasons be co-located with the existing services and facilities. The University would, therefore, like to explore the offcampus development options further with the Council in the context of the preparation of the PMP.

Before setting out the University's concerns with the PMP in more detail, it is first necessary to provide some context in respect of the Higher Education (HE) sector, the University's strategy and the Masterplan.

#### The University

The University has been located in Bath since 1965 and has grown from being a small institution with around 5,000 students to a world class university with over 16,000 students and around 3,000 staff (the largest employer in Bath after the RUH). Today the University plays a significant role in the city and wider area in terms of its academic offering and contribution to economic development and social well-being.

The University ranks in the top ten in all league tables of UK universities published by our national newspapers (and recently ranked first for student satisfaction in the National Student Survey for the second year running). It has a reputation for academic excellence in both research and teaching and has a track record of working in partnership with business, the public services, and the voluntary sector. It specialises in the STEM subjects: science, technology, engineering and mathematics, which are a particular focus for the West of England Local Economic Partnership (LEP), and consequently supports the UK's knowledge-based economy. The University is also recognised as a sector leader in technology transfer. Consequently, the University attracts the most able staff, researchers and students from the global Higher Education recruitment market, who interact with the business community in a mutually sustaining manner, encouraging innovation and enterprise. The University currently holds a research portfolio of grants and contracts worth £122 million.

The University's growing success in securing research projects both in the UK and international markets, generates significant opportunities for investment and employment assisting the area's economic development, notably through the creation and growth of knowledge-based, high value-added companies.

Moreover, the University brings many wider economic benefits to the area. Not only is it a major employer in itself with around 3,000 staff, it is estimated that each full-time student spends over £4,000 per annum, amounting to some £48 million for approximately 12,000 students (assuming not all students are full time). The University of Bath has estimated its current positive economic impact on the City of Bath to be approximately £150 million per annum.

The University also provides access for the local community to world-class sports, social and recreational facilities on the campus, and interacts further with the community through outreach activities, including mentoring schemes with local schools, and students' fundraising and volunteering activities.

#### The Future

The Government's policy on Higher Education (HE) provision has rapidly evolved, not only in terms of funding, but also in respect of widening access and participation, and driving competition, student choice and quality standards to put students and the value of their experience at the heart of the system. The Government also recognises the growing

association between universities and businesses in terms of education and research, and the importance of that relationship in developing a skilled workforce, job creation, business innovation and growth, and new company formation.

Government policy and the popularity of the University with prospective students has, therefore, driven the continued growth of the University beyond anticipated levels in recent years. The average annual growth in student numbers over the past ten years has been around 4% per annum.

However, it is not expected that the University could maintain these historic growth rates in the period to 2026 with its existing business model. Indeed, the campus itself has a finite capacity in terms of the number of students it can accommodate at any time. Future growth could increasingly come in the

form of collaborative provision, where only a proportion of the delivery would be on campus, or distance learning provision and provision delivered wholly off campus in new University venues.

Accurately predicting future growth and development needs over such a long period of time is very difficult, particularly in light of the changing policy and economic context within which Higher Education is provided in the UK. The different political parties have very different visions for future funding and the result of the general election later this year could have a significant impact on the Higher Education sector. Indeed, many of the determining factors are outside of the direct control of the University. The University would therefore, like to enter into a more detailed dialogue with the Council to discuss this matter.

Nevertheless, the case for further development on and off the Campus is clear. In response to the Government's HE agenda, the University needs to continue to strive for teaching and research excellence in an increasingly competitive market, whilst also ensuring its long term financial sustainability if it is to retain its current status as a top 10 University, and continue to perform its critical social and economic development role within the city and wider area. To this end, it will have to continue to meet the expectations of its students and staff, and ultimately of the wider education and business communities. Central to that is the effective management and development of the University's estate, through continued investment in refurbishing some of the ageing buildings on the Campus, and in the creation of new facilities both on and off Campus to ensure that the teaching and research environment provided is of the highest quality as befitting of a leading University and to meet future needs arising from its continued growth. The historic growth in student numbers resulted in a 50% reduction in the area available per student from 1990. The recent developments that have taken place on the Campus have started to redress this situation, but acute space pressures still exist and further decant space is required to allow the on-going programme of refurbishment of the older building stock to continue.

Consequently the University has prepared a Masterplan that demonstrates how further Campus development can be achieved to provide additional academic, related floorspace and student bedrooms to accommodate the anticipated growth of the University in the period to 2026, whilst enhancing the environment for students, staff and visitors. However, as set out above it is the University's view that off-campus development options must now also be identified and carefully considered.

The Council has a critical role to play in supporting the University to realise these aims and aspirations for the benefit of the City and wider area; most notably, in terms of the University's estate, through the provision of a positive planning policy context that allows the expedient determination of future planning applications for key investments planned and highlighted in the University's Masterplan, and to realise potential off Campus development opportunities to meet identified needs.

#### **Policy Position**

The requirement for the University to maximise the development potential of its land holdings in order to meet the needs arising from its continued development is acknowledged in the extant Local Plan that was adopted in October 2007. Policy GDS.1/B11 establishes key development principles for the campus, and recognises the need to address the sensitive environmental context without unduly hindering the further development of the University's estate. Indeed, the Public Inquiry into the Local Plan resulted in the removal of parts of the campus from the Green Belt to allow further development.

Policy GDS.1/B11 identifies the campus as a "General Development Site" and requires the preparation of a Masterplan to

guide the anticipated development in the plan period to 2011. The policy requires that the Masterplan provides for the comprehensive development of its estate to provide 43,250m2 of university related development and 40,000m2 of student residential accommodation, whilst protecting environmentally sensitive features and areas, ensuring high quality design and the implementation of an integrated transport solution. These matters have been fully addressed in the Masterplan prepared by the University.

The University also welcomed and supported the recognition in the Core Strategy, notably Strategic Objective 3, Policy B1: Bath Spatial Strategy (part 7), and Policy B5: Strategic Policy for Bath's Universities, that the spatial strategy should seek to enable the provision of additional teaching and research space and student bed spaces to facilitate the growth of the University, and in doing so encourage economic development. Notably at paragraph 2.36 the Core Strategy states: "The Council

seeks to enable the continued success of The University of Bath and Bath Spa University and the contribution they make to the city's identify and profile"; and paragraph 2.38: "The Council also understand that each institution needs to invest in its academic estate in order to continue to provide high standards."

Policy B5 itself refers to the provision of additional teaching and research space (45,000m2) and student bed spaces (2,000) in accordance with Local Plan Policy GDS.1/11 to facilitate the growth of the University. The supporting text to the policy (para 2.38) recognises the work undertaken by the University in preparing and consulting on the Masterplan for the campus, and its value in providing a framework for future development.

In its Core Planning Principles the National Planning Policy Framework (NPPF) emphasises the need to identify and meet the development needs of an area, and respond positively to opportunities for growth. It states (para 18) that the Government is committed to securing economic growth in order to create jobs and prosperity, and that planning should operate to encourage and not act as an impediment to sustainable growth (para 19).

There is, therefore, clear and unequivocal extant policy support for the further development of the University Campus and recognition of the value of the University's Masterplan.

#### The Campus Masterplan

The development of the Campus has been guided since 1965 by a series of Masterplans. The original Masterplan was prepared by architects, Robert Matthew Johnson Marshall (RMJM) who designed the Campus as a single cluster of buildings set in a downland landscape. Subsequently, RMJM produced a revised masterplan in 1975. In the 1980s, Alison and Peter Smithson were appointed architects and a number of new buildings were added, although no new formal masterplan was produced. In 1995, a new masterplan was produced by architects, Evans & Shalev and, in 2001, a further masterplan was produced by architects, Feilden Clegg Bradley. The 2001 Masterplan was endorsed by the Council and helped to facilitate the development of the Sports Training Village and 800 bed spaces.

However, the growth in student numbers and success of the University's research activities had resulted in substantial space pressures, that were only exacerbated by the poor conditions of some of the University's original buildings which were at the end of their design life. Consequently, in 2007, and in the context of the emerging Local Plan, the University requested that the Centre for Advanced Studies in Architecture (CASA) work with the Department of Estates to prepare a new Masterplan with the assistance of a team of consultants.

# The 2009 Masterplan

The resultant 2009 Masterplan seeks to facilitate the development of the Campus to provide additional academic and related floorspace and student bedrooms to accommodate the anticipated significant growth of the University in the period to 2026. The Masterplan also seeks to address the poor condition of some of the original buildings on the campus that are nearing the end of their design life through a programme of refurbishment, which is facilitated by the provision of decant space.

The Masterplan responds to the provisions and requirements of the Council's Local Plan Policy GDS.1/B11, and now referred to in Core Strategy Policy B5. It is underpinned by a robust evidence base that investigated the development potential of various sites within the Campus (including ecology, cultural heritage, transport and planning assessments) and was the subject of extensive stakeholder and public consultation undertaken in 3 phases through 2007 and 2008.

The preparation of the University's Masterplan highlighted that the principal challenge is one of accommodating the scale of development required, whilst not adversely affecting the inherent qualities of the existing Campus or inappropriately impacting upon the surrounding area. Evidence presented to the extant Local Plan Inquiry included an analysis of the development capacity of the Campus, highlighting appropriate locations for future development. The Inspector largely agreed with its conclusions, but also identified additional areas where he thought there was capacity for further built development (for example the "undeveloped land between the Chemistry Buildings and Quarry Road" and around the western car park (para 9.25) and the "series of spaces stretching southwards from the remaining undeveloped areas of land to the south of Eastwood, through the car parking and the bus arrivals area to the raised planted bank opposite the Sports Institute and further land to the south of that building" (para 9.26)). The Inspector also identified areas that he thought should be protected and these are specifically referred to in Local Plan Policy GDS.1/B11. The Masterplan directly responded to these conclusions. Consequently it sought to focus development into areas of lesser environmental quality, so that new development could realise improvements in the amenity of the campus environment.

The emerging Masterplan received widespread support, but the loss of sport and recreation space, and the impact of transport and parking were highlighted as key areas of concern in the consultation process. Consequently, amendments were made to the Masterplan to reduce the amount of additional parking and minimise the loss of recreation space, notably along eastern boundary of the Campus.

A detailed Masterplan report was submitted to the Council in 2009. It provided a comprehensive view of the history of the development of the Campus, the drivers for change, the underpinning evidence base, and the outcomes of the consultation undertaken. It also set out in detail the concept and framework for the future development of the Campus and outlined specific development proposals.

The evidence base was appended to the Report and included the detailed consultation report, ecology survey reports, archaeological assessment, transport assessment, and an analysis of the Masterplan's compliance with national and local planning policy. The policy assessment concluded that the Masterplan proposals accord with the key policies of the Development Plan and relevant national planning policy, and could therefore, be endorsed by both the University and the Council as an appropriate framework for future development of the University.

# 2012 Masterplan Summary Update

No formal response to the submission of the 2009 Masterplan was given by the Council, and by 2011 the University were preparing to embark on a major capital investment programme to enhance and expand the campus. It was agreed in a meeting between the University and key officers at the Council that a Masterplan Summary Update would be prepared to accompany the major planning applications, and that would then be considered by the Development Control Committee when the applications were being determined. Consequently, a Summary Update Masterplan Report was prepared in 2012.

After submission of the Masterplan in 2009, the University had continued to engage with key stakeholders in the area and as a consequence some relatively minor amendments to the development framework within the 2012 Masterplan Summary Update were made to address of the concerns raised (notably, the deletion of the proposals to locate car parking on the existing tennis courts adjacent to Convocation Avenue). It also took account of Campus developments that had taken place since 2009 (including the demolition and replacement of 4 West, improvement of the Student Centre and Arrivals Area, and the development of the East Building). There were also a number of contextual changes, notably in terms of Government policy and student funding, that had occurred in the intervening period and the Summary Update sought to reflect those changes by providing a greater degree of flexibility in respect of the specific nature and timing of development proposals, and extending the timeframe for the Masterplan to reflect the Council's emerging Core Strategy.

However, the Summary Update was not intended to replace the 2009 Masterplan Report as it is fundamentally based on the evidence and proposals presented therein. Its intent was to summarise the Masterplan proposals in the form of a Development Framework with associated Landscape & Sports, Access & Parking and Circulation figures. The Development Framework established the key parameters for the future development of the Campus, whilst being less prescriptive in respect of their specific nature in order to provide the flexibility required over the longer Masterplan timeframe. It did that by defining development zones within which it would be appropriate for development to occur; the precise location and form of specific buildings to be determined through the detailed design process

once the specific accommodation requirements were known and site specific assessments had been undertaken.

The 2012 Masterplan Summary Update then accompanied a series of planning applications submitted in 2012 that were subsequently approved by the Council. They included the redevelopment and refurbishment of 1 West, and the development of the Chancellors' Building, the Centre for the Arts and the Quads providing 708 student bed spaces on the part of the East Car Park. The Committee/Delegated Reports relating to those applications set out the drivers to the Masterplan, the

agreed approach to its preparation, and subsequently endorsed its content.

The application for the Chancellors' Building (12/02626/FUL) was submitted in June 2012. In the report to the Planning Committee, the Council's Case Officer stated that the consideration of the application represented "the first opportunity to introduce Members to the University's revised and updated masterplan, which has been produced by the University to guide its development through the period to 2026 (which ties in with the Council's draft Core Strategy)". The Case Officer went on to state that whilst the new Masterplan was not intended to gain any formal status within the planning process, "it constitutes an essential supporting document which will be used repeatedly in the future to provide a context for individual development projects as they move through the planning application process".

The Case Officer reported that the Masterplan was a direct response to the Local Plan requirement, but had also taken account of the Council's draft Core Strategy. It was stated that it had been agreed between Council Officers and the University that the new Masterplan would be produced on a flexible "loose-leaf" basis to allow the University to bring forward revisions and in order to ensure that the Masterplan continued to properly reflect the University's evolving development programme. It was further stated that Council's Officers endorsed the approach adopted by the University as the most satisfactory means of maintaining a degree of strategic awareness in respect of the University's development programme, also allowing review and comment by all stakeholders on a regular basis.

The Case Officer stated that the Masterplan met the requirements of Local Plan Policy GDS.1/B11, and were considered to be in accordance with national planning policies as set out in the National Planning Policy Framework (NPPF) adopted by the Government in March 2012. That conclusion was repeated in the consideration of subsequent applications. For example, the delegated report for The Quads stated:

"The Master Plan itself broadly meets the Local Plan's requirements in that it demonstrates that development proposals over the period to 2026 will be focused around the already heavily-developed core of the campus, whilst important open areas (particularly to the south) will be safeguarded in order to maintain the existing green and attractive setting to the large academic and residential buildings that characterise the campus.

I am generally satisfied that the strategic elements in the updated Master Plan meet the requirements of Local Plan Policy GDS.1 (B11). However, the Master Plan has been enhanced by using a S.106 Agreement that is now in place to secure practical commitments and information from the University that the Master Plan does not itself address.

When fleshed out in this manner, it is evident that the new updated Master Plan broadly complies with established and emerging Council policies, and has been constructed so as to provide a clear (and yet flexible) context for the assessment of individual development proposals. Whilst formal approval of the updated Master Plan is not being sought, I am of the view that an informal Plan, regularly reviewed and updated, is a much more effective means of supporting each individual proposal that emerges over time."

The Chancellors' Building planning application was granted by the Council on 21 December 2012 subject to a number of planning conditions. In the section of the planning permission giving reasons for granting permission, the Council set out that the proposed development was "supported by an updated Master Plan as required by Policy GDS.1/B11 of the Bath and North East Somerset Local Plan". The minute of the meeting records the Masterplan being presented to Members, and the support it subsequently received.

In conjunction with the planning permission, on the 21st December 2012, the University entered into a Section 106 Agreement with the Council. Reference was made within that to the Masterplan, and in Schedule 3 which contained covenants by the Council, it was acknowledged (at para. 8) that the contributions to public transport, footway and cycleway provision and crossings, and other planning obligations, including the production of a new Travel Plan and Landscape Management and Ecological Management Plan, were given by the University in connection with the

development of the Campus in accordance with the Masterplan.

The Case Officer subsequently prepared a note for the Council's planning file which specifically recorded that the Section 106 Agreement was intended to address strategic transport and landscape/ecology management issues associated with the Masterplan which was required by the Local Plan. The file note went on to say that the Council's Planning Committee authorised the grant of the permission on that basis, and welcomed the Masterplan as an important aid to the decision making process in establishing a context for the planning application and subsequent proposals. In addition, it was recorded that it had been agreed with the University that the intention was for the current planning applications, and any subsequent applications which accorded with the development framework set out in the Masterplan, to benefit individually and cumulatively from the provisions within the Section 106 Agreement. In doing so it confirmed that no further Section 106 Agreement or similar provisions would be needed in respect of traffic and transportation or ecology and landscape issues.

### 2014 Masterplan Summary Update

It was clearly understood then that the 2012 Masterplan Summary Update was never intended to be a static document, but instead a living document that evolves to reflect the on-going development of the campus. A further update was, therefore, prepared in 2014 to accompany the planning applications for 10 West and 4 East South that were subsequently approved. The 2014 Masterplan Summary Update Report presented the up-dated Development Framework within the Masterplan to take account of those developments that had recently been completed on the Campus, were currently under construction, or were in the detailed planning stage. It also summarised the proposals in the Strategic Landscape and Ecological Management Plan that has been prepared following the commitment made in the Chancellors' Building Section 106 Agreement.

Strategic Landscape and Ecological Management Plan (LEMP)

The LEMP was prepared following a scoping exercise with the Council and Natural England that recognised that the Campus sits within a significant and rich landscape. Extensive ecology and landscape surveys were undertaken to up-date the site information, and on the basis of that the LEMP categorised the existing and proposed landscape assets, set out a methodology for their establishment and maintenance, and proposed a long-term vision for their management. The preparation of the LEMP, therefore, demonstrates the University's commitment to being a sensitive and diligent custodian of its landscape environment.

#### Masterplan Status

The preparation of a Masterplan is a requirement of the Council's extant Local Plan policy, and the University prepared it on the basis of a robust evidence base and extensive and on-going stakeholder consultation. It was subsequently informally endorsed as part of the development management process that resulted in the approval of planning applications for significant academic and student bed space developments on the campus. It is clear from the Chancellors' Building planning application Committee Report, the planning permission which was subsequently granted, the related Section 106 Agreement, and the file note produced by the Case Officer on behalf of the Council, that the Masterplan was treated as a material consideration by the Council, and was afforded very considerable weight. This is an entirely legitimate and proportionate approach for the Council to have taken and properly reflects the time and effort and procedure that was put in place by the University in connection with the production and adoption of the Masterplan.

Therefore, whilst it may not have gone through a formal adoption process by the Council, in the circumstances as outlined above, and in the absence of any reason being given for the Masterplan having become unsatisfactory, it would be unreasonable of the Council not to continue to give very significant weight to the Masterplan in the construction of planning policies for the Campus and the determination of future planning applications.

**Emerging Policy Approach SB26** 

#### **General Comments**

Whilst the draft policy reflects some elements of the extant Local Plan Policy GDS1/B11 and Core Strategy Policy B5, which establish key development principles for the campus, those policies recognise the need to address the sensitive

environmental context without unduly hindering the further development of the University's estate. That is not at all apparent in the Emerging Policy Approach SB26. Indeed, there is little, if any, recognition of the importance of the University and its activities to the economic and social well-being of the city and wider area, either within the policy or the supporting text.

In some respects, this reflects the issues that have arisen in the implementation of the Masterplan during the determination of recent applications. It must be remedied to ensure that those benefits, that are also key elements of sustainable development as recognised by the NPPF, are taken into account along with the environmental matters that the University have responsibly sought to address in the day to day management of the Campus and its long term development.

With that in mind, the principal premise of the policy should be to facilitate the sustainable growth of the University and enhancement of its Campus in accordance with its Masterplan to enable its continued success. As stated above, the University would, therefore, wish to work with the Council to prepare a policy that reflects the opportunities and constraints at the campus, and enshrines key development principles established by the existing policy context and Masterplan. The aim of the policy should be to seek to provide greater certainty in the consideration of future planning applications in relation to proposed developments within the Masterplan that will provide additional student bed spaces, accommodate the University's research, academic and operational activities or provide critical supporting infrastructure.

Notwithstanding that it is also necessary for the PMP to address potential off Campus development options, notably for the provision of additional student bed spaces. That too should be recognised in Policy SB26, and elsewhere in the PMP.

| Change requested:  |                                    |                                      |
|--|------------------------------------|--------------------------------------|
|  |                                    |                                      |
| Respondent 2919 Comment 1 Resp<br>Number: Number: Nam  |                                    | Respondent Organisation:             |
| Agent ID: Agent Name:  Further Information available in the original in the or | ginal comment?   Attachmen         | its sent with the comment? $\square$ |
| Placemaking Options Plan Reference:  | The University of Bath at Claverto | n Down (SB26)                        |

#### **Comment on the Site:**

The Claverton Down campus provides a valuable green infrastructure asset for the city. I support the suggestion in the PMP that it will be important to assess the environmental capacity of the whole campus to accept the proposed increases in academic space and residential accommodation. It would be unacceptable for the campus to become a congested mix of buildings taking up a large proportion of the available land area. Some of this congestion is becoming apparent in the current build programme. There is also the related issue of the capacity of the local transport system, especially public transport and the local road network, to cope with any further increases in student and staff travel demands. Transport considerations appear to be largely omitted from the PMP text. If there is to be a formally adopted Masterplan for the campus, the environmental and transport capacity issues should be paramount.

### **Change requested:**

I support the principle that any further growth in student numbers should be matched with additional on-campus accommodation, bearing in mind that at present it is mostly first year students that are accommodated on campus. Any knock-on effects for their accommodation needs in second and subsequent years must also be taken into account in the policy development. The environmental and transport capacity issues need to be made priority considerations in the policy wording.

|  |   |   | ng Plan Options Document in Plan Order  |
|--|---|---|---|
| Respondent 309<br>Number:  | 95 <b>Comment</b> 11 <b>Number:</b>   | Respondent Dr NJT Long Name:  | Respondent Bath and North East Organisation: Somerset Branch of the   |
| Agent ID:  | Agent Name:   |   |   |
| Further Informat   | tion available in   | the original comment? $\Box$  | Attachments sent with the comment?  |
| Placemaking Opt  | tions Plan Refere   | nce: The University of Bat  | n at Claverton Down (SB26)  |
| Comment on the   | e Site:   |   |   |
| Paragraphs 1.135   | to 1.151 and 2.1  | 63 re the University of Bath  | and 1.152 to 1.159 re. Bath Spa University  |
| educational facilit<br>do have significan<br>esidential accom<br>not to mention th | ties to minimise to<br>toncerns abou<br>amodation and as<br>ne landscape issu | ravel and free up potential the likely expansion plans sociated facilities. This may es. We support the concept | academic advances and providing accommodation close to family housing and damage to the Green Belt. However we of both Universities in terms of academic buildings, have a significant detrimental effect on the local Green Belt of restricting the boundary of such developments, being asing option as proposed in the plan. |
| Change requeste  | ed:   |   |   |
|  |   |   |   |
|  |   |   |   |
| Respondent 309<br>Number:  | 95 <b>Comment</b> 12 <b>Number:</b>   | Respondent Dr N J T Long<br>Name:   | Respondent Bath and North East Organisation: Somerset Branch of the   |
| Agent ID:  | Agent Name:   |   |   |
| Further Informat   | tion available in   | the original comment? $\Box$  | Attachments sent with the comment? $\square$  |
| Placemaking Opt  | tions Plan Refere   | nce: The University of Bat  | n at Claverton Down (SB26)  |
| Comment on the   | e Site:   |   |   |
| Paragraphs 1.135   | to 1.151 and 2.1  | 63 re the University of Bath  | and 1.152 to 1.159 re. Bath Spa University  |
| educational facilit<br>do have significan<br>esidential accom<br>not to mention th | ties to minimise to<br>toncerns aboumodation and as<br>ne landscape issu      | ravel and free up potential the likely expansion plans sociated facilities. This may es. We support the concept | academic advances and providing accommodation close to family housing and damage to the Green Belt. However we of both Universities in terms of academic buildings, have a significant detrimental effect on the local Green Belt of restricting the boundary of such developments, being asing option as proposed in the plan. |
| Change requeste  | ed:   |   |   |
|  |   |   |   |
| Respondent 466<br>Number:  | 60 <b>Comment</b> 2<br><b>Number:</b>   | Respondent Ms Jan Brow<br>Name:   | n Respondent Organisation:  |
| Agent ID:  | Agent Name:   |   |   |
| Further Informat   | tion available in   | the original comment? $\Box$  | Attachments sent with the comment? $\Box$   |
| Placemaking Opt  | tions Plan Refere   | nce: The University of Bat  | n at Claverton Down (SB26)  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Comment on the Site: Agree with proposed wording **Change requested:** Respondent 6389 Comment 18 Respondent **Respondent** Cycle Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) **Comment on the Site:** This area is a highly desirable area for cycling with opportunities for multiple improvements for cycling including low gradient route from the city centre That cycling provision should be provided following desire lines Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided Junction must be improved for priority of cycling over vehicles That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access **Change requested: Respondent** 6467 **Comment** 1 **Respondent** Mr Simon Barnes Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26) Comment on the Site: My comments relate to the University of Bath. Masterplan

The current iteration of the Masterplan was never formally adopted by the Council. The only time it was ever reported to the Council was on 26th September 2012 when it was reported to the Development Control Committee in conjunction with a planning application for a new academic building. However, the officer report stated that The new Master Plan is not part of the current Planning application and it is not intended that it should gain any formal status within the Planning process. The Options Document appears to acknowledge this and I welcome the suggestion that each iteration of the Masterplan should be examined by the Development Control Committee because it is only if it is subject to proper

scrutiny by the LPA and the public that it can then carry any real weight in the planning system.

Bath and North East Somerset Council

It should be noted, however, that if the Masterplan is adopted by the Council as a framework for future development on the campus then it must be subject to Strategic Environmental Assessment because it would be a plan or programme which sets the framework for development consent and would be required by administrative provisions, namely the BANES Core Strategy. It is submitted that it would not satisfy the SEA Directive simply for the Placemaking Plan to be subject to SEA; the Masterplan and each iteration of it would also need to be specifically subject to SEA.

#### **Ecology and Green Infrastructure**

I welcome the acknowledgement in the Options Document that the campus is situated in an environmentally sensitive area with numerous designations. One of the most important of these is the Bath and Bradford on Avon Bats SAC which is situated approximately 700m away from the campus. The Masterplan (and the Placemaking Plan) are both plans and therefore in order to comply with the Habitats Directive the LPA must be certain, on the basis of the best scientific evidence, that the plan(s) will not have a significant effect on the SAC. It is recommended that up to date data is gathered and there is close liaison with Natural England.

Green space on the campus is becoming increasingly scarce and whilst I support the continued success of the University, this must not be at the expense of the precious little green space which is left. In particular, the University wants to build a car park on the undeveloped area on the northern boundary of the campus, adjacent to the golf course. Application 14/02715/FUL was eventually withdrawn, but I would draw your attention to the objection from the Inspector of Ancient Monuments of English Heritage who made it clear that the campus is situated within an area of great archaeological significance, being within the setting of the Bathampton Camp SAM. Most of the archaeological interest was destroyed when the University was originally built and this is the last surviving area. The Inspector made it clear that it should not be developed at all and it is disappointing that the University has recently made a second application to build a car park on it. The Placemaking Plan should preserve it for future generations. To this end, the proposals in the Options Document to provide any additional parking (and I would question if any is justified) by way of decked car parking in the western area of the campus is very much welcomed.

#### Car Parking and Transport

The University has expanded very rapidly and has far exceeded the capacity identified in policy GDS1/B11 and this puts pressure on transport infrastructure. However, this should not be used as a reason to then compound the problem by allowing the University to increase the amount of unsustainable transport that would not be a sustainable approach. Any proposals for further car parking should be looked at very closely and with great scepticism. The emphasis should be on sustainable options such as more buses, cycling and walking and the Council should be slow to grant permission for more car parking which inevitably encourages more car use. It is understood that the University has obligations under a recent s106 agreement to put in place sustainable transport and those obligations should be closely monitored and enforced.

| ognising<br>order to |
|----------------------|
|                      |
|                      |
| sidents'             |
|                      |
|                      |
|                      |
|                      |

#### Comment on the Site:

We would like the emerging policy approach on the future development of the University Campus at Claverton Down to incorporate policies to address the following concerns we have from the perspective of residents on the hill.

Public Trasport should be of a high quality reliable fleet of Buses that are both quiet and do not cause undue pollution, there should be sufficient transport provided at peak times so that bus capacity is also available for residents as well as students. (At present there are peak times when the buses are so full that the buses do not stop at the hill's bus stops, there are also occasions where buses break down both on the hill and in the City. The current bus fleet is noisy and causes disturbance to residents) The policy statement on the plan is not strong enough at present.

The university should actively seek residential accommodation within walking distance of the hill when opportunities for development arise, for example there are good walking and cycling routes to Combe Down. This would take pressure off public transport and reduce car journeys. (This may be a more relevant comment on housing policy for the plan)

Please note I was not able to find the guidance note mentioned.

| Trease note I was not able to find the ge | marice note mentioned.                     |                            |
|---|--|----------------------------|
| Change requested:                         |  |                            |
|   |  |                            |
|   |  |                            |
| Respondent 6546 Comment 1 Res             | pondent Mr Ralph Nunn                      | Respondent                 |
| Number: Number: Na                        | me:  | Organisation:              |
| Agent ID: Agent Name:                     |  |                            |
| Further Information available in the or   | riginal comment? $\square$ Attachments sen | t with the comment? $\Box$ |
|   | ·  |                            |
| Placemaking Options Plan Reference:       | The University of Bath at Claverton Dow    | /n (SB26)                  |

#### **Comment on the Site:**

I agree with the following wording of paras. 1.140 and 1.142 relating to future development at the University of Bath: The context for these (development capacity) options is primarily defined by ... the impacts of development on nearby residential areas (para.1.140) and Residential areas of the City ... adjoin the campus, particularly to the south, and this relationship needs to be respected in considering the University's future development (para. 1.142).

#### **Change requested:**

Reflecting the wording of paras. 1.140 and 1.142 at Emerging Policy Approach SB26 para. 1.f(page 56).

#### Replace:

"High quality design and landscaping that responds positively and sensitively to Cotswold AONB designation and ensures that development on the campus has much improved visual and landscape relationship with neighbouring land, particularly Bushey Norwood".

#### With

"High quality design and landscaping that responds positively and sensitively to the Cotswold AONB designation and ensures that development on the campus has much improved visual, landscape and amenity relationship with neighbouring land, particularly adjoining residential areas and Bushey Norwood.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Respondent 6569 Comment 1 Respondent Mr Roger & Mrs Stella Wain- Number: Name: Heapy Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |
| Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26)   |
| Comment on the Site:  |
| The university do not say how many car parking spaces they are trying to obtain by decking the West Car Park. Any majo ncrease in car parking spaces on this site will impact on the residents of North Road. The entrance to this site is along Quarry Road from North Road. There will be major traffic congestion problems on North Road. Also the additional 2400 students accommodation currently being planned adjacent to the West Car Park will see students using the bus stop on Bathwick Hill (crossing North Road and cutting down North Lane)rather than the main Bus Terminal on campus. Even more chaos for North Road with extra cars and students. |
| Change requested:   |
| That the current proposal for a new building to accommodate 2000 students adjacent to the West Car Park be moved elsewhere away from North Road. That the numbers of cars parking on the decking of the West Car Park be strictly controlled and that North Road does not have to bear the brunt of the increase in traffic.  |
| Respondent 6571 Comment 1 Respondent Mr George Walker Number: Name: Respondent Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: The University of Bath at Claverton Down (SB26)   |
| Comment on the Site:  |
| With reference to 1.143 Academic Space - proposed building of 10 West. As residents we are concerned that the already neavy traffic on North Road will be exacerbated by construction traffic in the first instance and increased usage of the North Road West entrance thereafter.   |
| Change requested:   |

As local residents we object to any local development to the West of the University that relies on increased traffic along Quarry Road via North Road.

Placemaking Options Plan Reference: Bath Spa University at Newton Park

(SB31)

Plan Order Number: 219

| Respondent 281<br>Number:                   | _   | spondent Alison Howell                                    | Respondent<br>Organisation:   | Natural England                                   |
|---|---|---|---|---|
| Agent ID: Ag                                | ent Name:   |   |   |   |
| Further Information                         | n available in the c  | original comment?   Atta                                  | chments sent with the com   | ment? $\square$                                   |
| Placemaking Option                          | ns Plan Reference:  | Bath Spa University at New                                | rton Park (SB31)  |   |
| Comment on the S                            | ite:  |   |   |   |
| here as this will be a 2010, the University | a constraint which f<br>y's own consultants<br>ed Lesser Horsesho | uture development needs to<br>(Nicholas Pearson Associate | akes reference to the signification respond to from the very be s) identified bat roosts in 16 ulation of Great Crested New | eginning of the process. In university buildings. |
|   |   |   |   |   |
| Respondent 322<br>Number:                   |   | spondent<br>ame:  | Respondent<br>Organisation:   | Bath Spa University                               |
| Agent ID: 47 Ag                             | ent Name: CSJ Plan  | nning Consultants Limited                                 | 3   |   |
| Further Information                         | n available in the c  | original comment? 🗹 Atta                                  | chments sent with the com   | ment?   |
| Placemaking Ontic                           | ins Dlan Reference:   | Rath Sna University at New                                | vton Park (SR21)  |   |

#### **Comment on the Site:**

- 1. INTRODUCTION
- 1.1. CSJ Planning Consultants have been commissioned to provide consultation responses to the Placemaking Plan Options Report on behalf of Bath Spa University.
- 1.2. It is understood that representatives of Bath Spa University have met with Bath and North East Somerset policy officers recently to discuss the likely requirements of Bath Spa University over the plan period in terms of student numbers and the translation of this into accommodation requirements up to 2021.
- 1.3. Bath Spa University and its representatives welcome the ongoing discussions with Bath and North East Somerset and the constructive working relationship. This has helped to deliver the Strategic Framework document produced in 2010 which identified academic and accommodation deficiencies and requirements as well as aspirations for the future. It went on to provide the Newton Park Campus Master Plan for the period 2010-2030 which set out three phases of development. Phase 1 comprised the redevelopment of part of the campus to achieve new academic space. This development was opened in July 2014. Phase 2 provided for the construction of a further 561 bed spaces to the south of the campus and this was completed in September 2014.
- 1.4. At February 2015, Bath Spa University maintained or leased 1,558 units of managed accommodation, both on and off campus. These comprised:
- Newton Park Campus, (871 units)
- Waterside Court, Lower Bristol Road (316 units)

- Charlton Court, Lower Bristol Road (295 units)
- Bankside, Lansdown (43 units)
- 33 Homestay units
- 1.5. In the 2014/2015 academic intake, Bath Spa University has 6632 full-time equivalent students. This includes 1300 postgraduates. The University is currently in the process of purchasing the recently completed student accommodation at Green Park (which will provide a further 461 managed bed spaces from September 2016) and negotiating a nominations agreement for Twerton Mills which will provide 277 beds from September 2015.
- 1.6. These representations are split into three topic areas that relate to certain policies and explanatory memorandum within the Placemaking Plan. They comprise the following:
- A forecast of student numbers based upon a detailed analysis of Bath Spa University's business plan of future full time and part time students at the university.
- Representation on the proposed Major Existing Development Site around the Newton Park Campus and how this can be taken forward.
- Potential for further student accommodation within Bath central area in light of Policy B5 of the Core Strategy.

#### 2. FUTURE STUDENT NUMBERS AT BSU

The current forecast for student numbers are based on full time equivalent students and contained in the table below. This includes forecasts for the Bath Spa Global joint venture.

The numbers produced in the table show the total required if all first year students applied and are eligible for BSU controlled accommodation. The University will not allow first year students to be allocated BSU accommodation if their home address is within a 30 mile radius of the Campus.

In 2014/15 the University allocated 1558 beds, 30 of which were acquired through private landlords. Therefore 633 students either did not require BSU controlled accommodation or were not eligible. This number will vary year on year.

If the number of students not eligible remains constant the table does identify with the acquisition of Green Park House and the agreement with Twerton Mills the University will still require as a minimum an additional 270 bed spaces by September 2020.

- 3. MAJOR EXISTING DEVELOPMENT SITE (MEDS)
- 3.1. With reference to the emerging policy approach SB31, which deals with future development at the Newton Park Campus, we would make the following observations and representations at this stage.
- 3.2. As set out in the previous sections, it is predicted that Bath Spa University full-time students will increase by approximately over 3000 over the next five years. These additional numbers will be made up of both international students, and home students. In order to accommodate these numbers, there will be a requirement for further managed bed spaces either on-campus or off-campus, preferably within the city of Bath. The table above shows that an additional 270 will be required but this could increase up to approximately 900 bed spaces if the total of those not currently eligible decrease.
- 3.3. As currently anticipated in the Master Plan the implementation of Phase 3 of the Newton Park Master Plan would only increase the number of bed spaces by approximately 150 (excluding the recently completed Phase 2 bed spaces).
- 3.4. In addition, the implementation of Phase 3 will create a situation where bed spaces are lost for at least one academic year, whilst redevelopment or partial redevelopment takes place.

- 3.5. There is therefore likely to be limited potential to provide further bed spaces at the Newton Park Campus within the plan period. In addition, with the increase in student numbers there may be a requirement to provide further upgrade or introduction of specific academic facilities at the campus, which would again put pressure on land within the existing MEDS.
- 3.6. In order to adhere to current National Planning Policy as set out in the National Planning Policy Framework (NPPF) paragraph 89, we would propose that the MEDS boundary is deleted from any future plan.
- 3.7. We would suggest that with the backdrop of the Newton Park Campus Master Plan, any future development proposals can be agreed through application of the

principles set out in paragraph 89 of the NPPF through the development management process. The particular exception to an appropriate development in

the Green Belt is defined in paragraph 89 as follows:

"limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether a redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the green belt and the purpose of including land within it than the existing development".

3.8. This principle, coupled with the proposals set out in the Newton Park Master Plan would provide adequate guidance in bringing forward any future redevelopment schemes on the campus.

### **Change requested:**

- 3.9. We would therefore suggest that the emerging policy approach SB31 first paragraph, reflect the above by stating "development at the Newton Park Campus
- should be made within the provisions of paragraph 89 (final bullet) of the NPPF and principles set out in the University's Newton Park Campus Master Plan to 2030.
- 3.10. We would then go on to suggest that development beyond this area will require very special circumstances to be demonstrated.
- 3.11. We would suggest deletion of the second paragraph after this sentence. The reason being is that the strategic framework for the University provided as part of

the Master Plan exercise in 2010, provides aspirations and potential projects to be brought forward at a number of sites across Bath and North East Somerset. Many

of the sites operated by Bath Spa University cater for specific Departments and Faculties within the University. Bath Spa University would not want to find itself in

the position where a fully justified academic facility linked to an existing Department at the Newton Park Campus was directed towards an alternative University site within Bath & North East Somerset, which operated a completely different Department. For example, it would make no operational sense to provide further facilities for the performing arts and acting at the Sion Hill Art School.

3.12. The third paragraph of the emerging policy approach SB31, is in our view, reasonable. However, in order to reflect paragraph 131 of the NPPF, we would

suggest that the word "maintaining" after "respect of" is deleted and the word "sustaining" is substituted.

- 3.13. Taking the above into account, we would suggest that this approach is reflected under the section entitled Previously Developed Sites in the Green Belt at page 214 of the Placemaking Plan.
- 3.14. Although not directly relevant to the Newton Park Campus site, given that any new development at the campus would only be visible from other parts of the Green Belt, we think it worth noting our views on emerging policy approach GB1.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                             |                       |  |                         |  |
|---|-----------------------|--|-------------------------|--|
| Respondent 6389<br>Number:  | Comment 20<br>Number: | Respondent<br>Name:                                |                         | Respondent Cycle Bath Organisation:  |
| Agent ID: Ag  | gent Name:            |  |                         |  |
| Further Information   | on available in t     | he original comment?                               | ☐ Attachments sent      | with the comment? $\Box$   |
| Placemaking Option  | ons Plan Refere       | nce: Bath Spa Universit                            | ty at Newton Park (SB32 | 1)   |
| Comment on the S  | Site:                 |  |                         |  |
|   |                       | for cycling with opportu<br>sing including Twerton |                         | rovements for cycling including the route                                      |
| That cycling provisi  | on should be pr       | ovided following desire                            | lines                   |  |
| Along highly desira<br>provided   | ble routes wher       | e there is a high – over                           | 3000 per hr - volume of | traffic segregated tracks must be  |
| lunction must be in   | nproved for pric      | ority of cycling over vehi                         | cles                    |  |
| ·   |                       | parking / storage that is and easy to access       | well designed appropria | ate for the development ie long term   |
| Change requested  | <b>:</b>              |  |                         |  |
|   |                       | for cycling with opportusing including Twerton     |                         | rovements for cycling including the route                                      |
| Respondent 6555<br>Number:  | Comment 1 Number:     | Respondent Mr David                                | Robertson               | Respondent Organisation:   |
| Agent ID: Ag  | gent Name:            |  |                         |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                       |  |                         |  |
| Placemaking Option  | ons Plan Refere       | nce: Bath Spa Universit                            | ty at Newton Park (SB3: | 1)   |
| Comment on the S  | Site:                 |  |                         |  |
| 1,000 students has  | been introduce        |  | ay. The extent of phase | f the proposal to accommodate a further es 1 and 2 has already transformed the |

I am firmly opposed to the removal of productive, arable land in the greenbelt for the purposes of housing students from abroad. I cannot believe that a valid case can be made of 'very special circumstances' which will satisfy the requirements of NPPF paragraph 89.

# **Change requested:**

I think that the document is worded too sympathetically towards the further erosion of the greenbelt . Please remove the final sentence beginning 'any rearrangement of uses...'.

Placemaking Options Plan Reference: Royal United Hospital (SB28)

Plan Order
Number: 225

| Respondent 224 Comment 19 Res<br>Number: Number: Na   | pondent<br>me:                              | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b>      |  |  |
|---|---|---|--|--|
| Agent ID: Agent Name:   |   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |   |   |  |  |
| Placemaking Options Plan Reference:   | Royal United Hospital (SB28)                |   |  |  |
| Comment on the Site:  |   |   |  |  |
| Sites identified in the SHLAA for having housing.   | housing potential should be specifically do | eveloped for affordable key-worker                                  |  |  |
| Change requested:   |   |   |  |  |
|   |   |   |  |  |
| Respondent 261 Comment 1 Res<br>Number: Number: Na  | pondent<br>me:                              | Respondent Royal United Hospitals Organisation: Bath NHS Foundation |  |  |
| Agent ID: 225 Agent Name: JLL   |   |   |  |  |
| Further Information available in the o  | riginal comment? $\square$ Attachments sent | t with the comment? 🗹   |  |  |
| Placemaking Options Plan Reference:   | Royal United Hospital (SB28)                |   |  |  |

# **Comment on the Site:**

Issues of Car Parking

- 5.4The issue of car parking is a key operational issue for the Trust, as identified within Section 4. The need to improve car parking for all who use and work in the hospital is one of the key core principles that guide future estate investment including making the site easier to read through natural signposting.
- 5.5The Trust recognises the need to rationalise the number of car parks around the site and increase the overall number of parkng spaces for visitors and patients. The anxiety attached to seeking a car parking space and the poor provision has been specifically highlighted by users for many years, causing pressure on surrounding streets.
- 5.6As part of the overall parking strategy for the site the Trust is considering all options including the future potential transfer of services from the Royal National Hospital for Rheumatic Diseases (The Min) -approximately 200 staff and the loss of 100 spaces from adjoining land leased from St John's Hospital which expires in October 2015.
- 5.7The preferred option for the Trust is to rationalise parking across the site and provide a new visitor car park on the former Dermatology, Pathology and Mortuary sites these buildings are now vacant with the facilities services being reprovided within the hospital site. Located immediately adjacent the main entrance (Gate 1) this provides the opportunity to improve the natural 'sign posting' for visitors, preventing the need to circulate around the campus and thereby enhancing the overall patient experience to the hospital.
- 5.8A planning application for the new visitor car park will be submitted this spring following public consultation. The proposals will be supported by a site wide car parking strategy, transport assessment and updated travel plan. The Trust and their advisors are currently engaged in formal pre-applications with the Council in respect of this proposal and are working with the Highway Officers to agree the scope of supporting information and methodologies. Once the visitor car park is approved this will then 'enable' future phases of development to come forward.
- 5.9Given the forthcoming planning application for the visitor car park and site wide car parking strategy we would therefore challenge the requirement under emerging policy SB38 (1) for further site specific policy criteria or guidance in relation to parking which in our view is unnecessary.

Council Endorsement of the Estate Strategy

5.11In agreement with Policy Officers, the Trust would be keen to explore opportunities for the Estate Strategy to be formally endorsed by the Council in supporting the strategic context, the masterplan phases and enable a more streamlined process to be undertaken in the determination of future planning applications. This would support the Government's view that the planning system should work proactively to support economic growth and not be burdened by "unnecessary bureaucracy that can hinder sustainable growth" by streamlining information requirements for planning application submissions.

5.12As identified above, the Estate Strategy is a strategic plan that underpins the health infrastructure needs of the community and priorities for investment. As an evidence base document this should therefore influence the formulation of site specific Policy SB28.

5.13In developing the visitor car park proposals the Trust will be undertaking public consultation with the local community and therefore this could provide an opportunity for formal Council endorsement of the RUH North Redevelopment proposals, subject to this process being undertaken in a timely manner.

#### Alternative Uses

5.14The RUH North Redevelopment Proposals and Masterplan identify the specific areas of future estate renewal in the short term (i.e. the next five years). The Placemaking plan takes a longer term view to future development. Future opportunities within the 52 acre campus may come forward for alterative uses and therefore the Plan should retain flexibility for this, in accordance with the NPPF paragraph 14 (i.e. sufficient flexibility to adapt to rapid change).

- 5.15Regard should also be had to the Government's Estate Strategy (2014), as outlined in section 3 which requires public sector organisations to create an efficient, fit-for-purpose and sustainable estate. As such the Trust will need to continually review and update their Estate Strategy and fund future health infrastructure investment.
- 5.16The Trust would therefore support the continuing reference to the potential for alternative uses for non-health related uses should future development opportunities arise within the campus.
- 5.17On the 1st February 2015 the Trust formally acquired the RNHRD and will manage all the services provided by this specialist hospital forthwith. Whilst there are no definite plans yet for the sale of the building, the Trust is planning to build new facilities at the RUH within the next 3years to enable the transfer of services to bespoke environments that will be designed with users for this patient population. It is suggested that the Placemaking Plan recognises and supports the potential range of alternative uses for this site appropriate to its city centre location within the life of the Plan.

  5.18Subject to the outcome of ongoing discussions and the necessary approvals further surplus land may come forward as a result of the acquisition providing potential redevelopment opportunities.

### **Change requested:**

Context and Masterplan Phasing

5.3To facilitate the phased masterplan process and assist in streamlining future planning applications we would propose that additional text is included setting out the strategic context, issues to be addressed and the proposed key phases - as set out in section 4 i.e.

Proposed Additional Text

"The Trust has carried out a comprehensive review of its estate and developed a strategic plan (known as the Estate Strategy) for investment and renewal to improve the quality and standard of accommodation and services for patients and staff alike.

The Trust's priorities are to provide fit for purpose accommodation, demolishing unsuitable and outdated buildings, improving the sustainability of the Estate, co-locating functions to cluster complimentary uses and delivering a parking strategy that will improve on-site parking, 'way finding', reducing off-site parking impacts and encouraging the use of sustainable modes of travel.

Central to delivering the Trust's long term vision and objectives is an overarching car park strategy for the campus that improves the current parking arrangements across the site (numbers, rationalisation of car parks and sign posting) and supports the masterplan vision.

The Estate Strategy (2014) specifically sets out the proposed RUH North Redevelopment programme over the next five years supported by a phased masterplan. These phases are as follows:-

Phase 1: a) Proposed new replacement pharmacy with aseptic services

b) Provision of new visitor and patient car park located immediately adjacent to the front entrance (Gate 1)

Phase 2: A new Integrated Therapies Centre including hydro pool and gym

Phase 3 A new Cancer Treatment Centre - a new state of the art facility set within an enhancedgreenspace for the campus'.

Paragraph 1.129 - 'One of the main issues in respect of the operation is the need to rationalise the number of visitor car parks around the site and increase the overall number of parking spaces for visitors and patients. The Trust is therefore

preparing a site wide car parking strategy to address the existing arrangements and support the RUH North Redevelopment Proposals and estate renewal.

Delete reference to further site specific policy guidance for on-site car parking (paragraph 1.129).

| Respondent 2484 Comment 8 Respondent James Warren Number: Number: Name: Agent ID: Agent Name:   | Respondent Bath Heritage Watchdog Organisation:  |
|---|--|
|   | s sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Royal United Hospital (SB28)  |  |
| Comment on the Site:  |  |
| Government policy is to centralise some treatments into specialist facilities, the last couple of decades. There are already reports of there being insuffic when a Park and Ride is not an option, and surplus land would be best used reclaimed for treatment use should another hospital department be placed RUH has acquired the Royal National Hospital for Rheumatic Diseases (AKA commit to using The Min building for more than three years, so there are hi facilities. | tient parking for staff working unsociable hours to correct that shortfall. It can then be there. According to the news recently, the The Min) and the RUH website doesn't |
| Once land is surrendered and developed, the situation is irretrievable and the being transferred to Swindon or Bristol to their new super-hospitals if there location needing the land that had previously been surrendered. The safest the Placemaking Plan so that there is no encouragement to the Trust to surrendered.   | are future plans which make the Combe Park approach would be to remove this site from  |
| Change requested:   |  |
|   |  |
| Respondent 6389 Comment 21 Respondent Number: Number: Name:   | Respondent Cycle Bath Organisation:  |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachment  | s sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Royal United Hospital (SB28)  |  |
| Comment on the Site:  |  |

This area is a highly desirable area for cycling with opportunities for multiple improvements for cycling including the route from the city centre, P&R, and all residential areas within 5 miles

That cycling provision should be provided following desire lines

Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided

Junction must be improved for priority of cycling over vehicles

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |
|---|--|
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

Placemaking Options Plan Reference: Local Green Space in Bath / Paragraph

1.160

Plan Order Number: 226

| Respondent 224 Comment 20 Res<br>Number: Number: Namber |   | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |  |
|---|---|--|--|
| Agent ID: Agent Name:                                   |   |  |  |
| Further Information available in the or                 | riginal comment?   Attachments sent         | with the comment? $\square$                                    |  |
|   |   |  |  |
| Placemaking Options Plan Reference:                     | Local Green Space in Bath / Paragraph 1.1   | th / Paragraph 1.160   |  |
| Comment on the Site:                                    |   |  |  |
| The criteria for identification require cla             | rification. Green spaces should, for examp  | le, include cemeteries, school and                             |  |
| community playing fields, allotments, N                 | ational Trust and RPHG land, unstable hills | ides and most of the City Farm.                                |  |
| Change requested:                                       |   |  |  |

Placemaking Options Plan Reference: Local Green Space in Bath / Paragraph

1.161

Plan Order Number: 227

| Respondent 102<br>Number:                   | Comment 21 Number:                    | Respondent Robin Kerr<br>Name:            | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations  |
|---|---------------------------------------|---|--|
| Agent ID: Ag                                | gent Name:                            |   |  |
| Further Information                         | on available in t                     | ne original comment? $\square$ Attachment | ts sent with the comment? $\Box$   |
|   |                                       |   |  |
| Placemaking Option                          | ons Plan Referer                      | Local Green Space in Bath / Paragr        | aph 1.161  |
| Comment on the S                            | Site:                                 |   |  |
| It is implied in this                       | paragraph that E                      | ath's existing Green Open Spaces, previ   | ously safeguarded in the Local Plan (Appendix  |
| understands that "o<br>15 titled "Local Gre | designation" will<br>een Space Design |   | nation in the Placemaking Plan. FoBRA as or open space [see B&NES email dated 7 Jan existing Green Open Spaces are automatically |
| Change requested                            | :                                     |   |  |

# Plan Order Placemaking Options Plan Reference: Keynsham General Comments Number: 236 Respondent 262 Comment 1 Respondent lan Lings Respondent Woodland Trust Number: Number: Organisation: Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Keynsham General Comments Comment on the Site: The Woodland Trust objected to your previous policy proposals with regards to land adjoining south west Keynsham because site allocations should reflect the rural identity of local surroundings, whilst also seeking the enhancement of Green Infrastructure, and Abbots Wood is a valuable and well used local community green asset. Therefore, we do not support development proposals being put in place for Green Belt to the south west of Keynsham .Key development opportunities, such as the re-development at the riverside offices and fire station, as well as four local green spaces, should continue to be focussed where possible within a town centre, where they can contribute a lot to local character and distinctiveness, whilst also achieving a sustainable pattern of development. **Change requested:** Respondent 279 Comment 9 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Keynsham General Comments Comment on the Site: This section provides a series of positive initiatives that will help to advance the quality of the townscape and public realm, enhancing the character and appearance of Keynsham's conservation area. **Change requested:** Respondent 3107 Comment 5 Respondent Mr Anthony Orley Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

# Comment on the Site:

The Placemaking Plan emerging policy approach ST7 in relation to developments and transport policy is noted. When applying this to Keynsham the rapid and substantial planned development of various residential and industrial sites

Placemaking Options Plan Reference: Keynsham General Comments

around Keynsham should never have been approved if the ST7 policy had been correctly applied. The Keynsham Transport Plan Consultation which closed on 12 November 2014 came along far too late to influence anything. When the Banes Core Plan Consultation took place I submitted in December 2013 a detailed report on transport access grounds why the KE3A developments on the south and north of the restricted A4 road should never be allowed. This was ignored and it will be interesting to see what the arising consequences will be when the KE3A developments come to fruition. The late 2014 Keynsham Transport Plan Consultation document which trailed behind all the Banes development planning proposals and approvals finally realised that Keynsham transport infrastructure is going to face some severe tests. In central Keynsham it is expected peak period traffic levels will put heavy pressure on every road and junction in central Keynsham. The A4 Hicks Gate major roundabout will require major improvements to cope with peak period traffic. Junctions and mini roundabouts on the peripheral of the town centre area will require attention. Little was said about the Keynsham East A4 through to Saltford which is the most restricted stretch of the A4 between Brislington and Bath and which the Banes Highways department acknowledged in an earlier report is not capable of being improved. All that the Placemaking Plan can now do is tinker with the consequences of developments being approved one by one in isolation with scant regard for the accumalitive impacts on the fragile road infrastructure of the Keynsham area. The Banes Highways Department has run computerised transport models for the Keynsham area road infrastructure against volumes of assumed traffic. To come out with reasonable assesments a 10% reduction in expected traffic volumes had to be applied. This was done on the premise that more people would be walking, cycling or using public transport. Providing facilities to encourage people to use these alternative forms of travel is a good policy but getting people to do it is somewhat different. Except for their own employees Banes Council has no jurisdiction of any kind to enforce this attempt at social engineering.

#### **Change requested:**

Under estimating volumes of traffic by 10% in computerised traffic modelling for future traffic growth is a dangerous high risk policy which could have disastrous consequences for Keynsham. Further traffic models should be run without the 10% reduction. There maybe still time to avoid irreversable damage and possible grid locks on the Keynsham roads. In the meantime all that the Placemaking Plan can do is watch and wait and carry out as much damage limitation as possible where ever possible within the Placemaking Plan ST7 emerging policy approach.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Somerdale (SK2) Number: 246 Respondent 239 Comment 1 Respondent **Respondent** Keynsham Civic Society Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Somerdale (SK2) Comment on the Site: Concerned that the development is not in accordance with the original proposals [13/01780/EOUT]. 3. Has the Design Guide been approved by the Local Planning Authority? 10. There are issues with respect enhancing the environment. Developer appears to have gone back on supporting for enhancement of the environment. 12. >No provision for a second access. >Proposed traffic lights will cause severe congestion on Station Road, Bristol Road and the High Street. >Alternatively, a roundabout would provide the potential for a bus stop to service the station and reduce the potential for congestion. **Change requested:** Respondent 255 Comment 1 Respondent Respondent Taylor Wimpey Bristol Number: Number: Name: **Organisation:**

# Comment on the Site:

Agent ID: 255 Agent Name: Barton Willmore

Placemaking Options Plan Reference: Somerdale (SK2)

Planning permission has been granted for the comprehensive redevelopment of the former Cadbury factory at Somerdale, Keynsham (Application Reference: 13/01780/EOUT). Whilst there is currently an application under consideration (submitted by MF Freeman and Taylor Wimpey, Application Reference: 14/05811/EFUL) which proposes a slight variation to the planning permission for part of the site, policy SK2 in the Placemaking Plan should reflect the requirements of the existing planning permission and not impose new requirements above and beyond those required through the extant planning permission for the site.

As such, draft policy SK2 should be amended to reflect what the extant planning permission allows for, specifically:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

- -2. that the permission is for up to 11,150sqm of B1 employment space, ot at least 11,000sqnnd not only B1 office; and
- -6. that the permission allows for up to 1,000sqm for a new medical facility (use class D1).

Furthermore, should planning permission be granted for the current application (14/05811/EFUL) prior to the Submission of the Placemaking Plan, the policy should be further amended to reflect the change in uses permitted through this application.

| Change requested:  |
|--|
| Proposed amendments to the draft Policy SK2:   |
| EMERGING POLICY APPROACH SK2 EMERGING DEVELOPMENT AND DESIGN PRINCIPLES  |
| 1. Around 700 dwellings 9. Flood protection measures, including provision of SUDS and an area of wetland habitat.  |
| 2. At least 11,000sqm of B1 office use.  |
| Replace with   |
| Up to 11,150 sqm of B1 employment use 10. Provision of landscaping (including retention of avenue of trees along Somerdale Road), wildlife areas, open space and cycle/footways. |
| 3. Submission of a Design Guide, to be approved by the Local Planning Authority.11. Provision of a multifunctional riverside path.   |
| 4. Retention of Block A and alterations to Blocks B and C. 12. Highway works at Somerdale Road/Station Road.   |
| 5. New Primary School. 13. Remediation of land contamination.  |
| 6. New GP surgery (D1 use)   |
| Replace with:  |
| Up to 1000sqm medical facility (D1 use)  |
| 7. New social and sports club (Fry Club) and sports pitches.   |
| 8. New small scale local needs retail (up to 500sqm of A1, A3, A4 and A5).   |
|  |
| Respondent279Comment10RespondentRohan TorkildsenRespondentEnglish HeritageNumber:Number:Name:Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Somerdale (SK2)  |
|  |

# Comment on the Site: It is surprising this section makes no reference to the important Roman archaeology and how development is expected to respond? **Change requested:** Respondent 6368 Comment 1 Respondent Miss Iris Lerpiniere Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Somerdale (SK2) **Comment on the Site:** 1. Somerdale needs to have at least three protected sites a. The old railway line b.Fry's park currently used as car park c.Sports fields **Change requested:** Respondent 6369 Comment 1 Respondent Mrs Diane Feltham Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Somerdale (SK2) Comment on the Site: Currently there is a patch of ground in area 9 used as overflow car parking for the railway station. I believe this and the old railway line should be areas protected for wildlife. **Change requested:** Respondent 6422 Comment 1 Respondent **Respondent** Freeman Retirement Number: Number: Name: **Organisation:** Living Agent ID: 172 Agent Name: Tetlow King Planning

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: | Somerdale (SK2)

# Comment on the Site:

This representation is made on behalf of our clients Freeman Retirement Living in response to the Placemaking Plan Options Document; the particular focus of this representation is on the Policy Approach SK2 for Somerdale in Keynsham.

Somerdale has been recognised as a place of considerable sustainable growth in Keynsham, the Council is looking to acknowledge this importance by formally allocating the site in the Placemaking Plan (Par 1.175). This representation seeks to highlight the importance and need for high quality care accommodation in the locality and look for its inclusion in Policy SK2.

As is mentioned in paragraph 1.174 of the Policy Document there is an active planning permission on the site (13/01780/EOUT). Our clients have submitted a revised application (14/05811/EFUL) which is currently under consideration. The revision concerns a smaller part of the larger application site, relating to two buildings identified as building B and C in the approved application and another part of the site where a care home had previously been approved (in outline form). Buildings B and C have full planning permission for use as "employment use (B1) leisure (D2 uses) and retail (A3, A4 and A5 uses) including use of existing basements for car parking and associated surface level parking". The area of B1 space and other uses in Building B and C was approved as up to 11,500 square metres. The new application retains the B1 space and relocates (and enlarges) the approved care home, from a different part of the larger outline approved site, into Building B while also replacing the previous approved care home with 30 dwellings.

An enlarged care development is justified in responding to an ageing population. We have proven the need through a Needs Assessment, which was submitted as part of application 14/05811/EFUL. Core Strategy policy has also identified the significant need for care across Bath & North East Somerset, this is evidenced in paragraph 2.8, 2.9 and 2.12 of the Placemaking Plan:

- "2.8 Bath & North East Somerset is facing a significant and increasing demand for housing and care to meet the needs of its ageing population. The number of people of retirement age is predicted to increase by nearly 6,000 (18.3%) by 2021. The most significant rate of growth in the local authority area's population will be in the number of people aged 85 and above: this is anticipated to have risen 23.9% by 2021.
- 2.9 The most significant rate of growth in the local authority area's population will be in the number of people aged 85 and above: this is anticipated to have risen 23.9% by 2021. 2
- 2.12 Data from the 2011 Census highlights that the majority of older people in the Bath and North East Somerset area own their own homes and many of these people will want a choice of housing options when their care or mobility needs increase. The current supply of 150 Extra Care units is found in the affordable housing sector, and while this is making a valuable contribution to meeting current demand, the Council wishes to support the development of mixed tenure Extra Care in both Bath city and the wider district. Delivering a range or tenure options for Extra Care will address this lack of choice."

Policy CP10 of the adopted Core Strategy 2011- 2029 has recognised this pressing need and acknowledges the role the Placemaking Plan will have in addressing this need:

"Housing developments will also need to contribute to the provision of homes that are suitable for the needs of older people, disabled people and those with other special needs (including supported housing projects), in a way that integrates all households into the community.

The specific accommodation needs of older people will be addressed through the Placemaking Plan, including considering the allocation of appropriate sites".

Our clients would like "Approach SK2" to consider the wording of this policy so that it is in conformity with the Core Strategy, it should mention the overriding need to supply high quality care accommodation and care development. As such care development should be included in the list of types of development that the site will accommodate as part of this mixed used development reflecting the existing outline planning permission, planning policy and national policy.

| Change request |
|----------------|
|----------------|

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Ashton Way Car Park (SK3) Number: 253 Respondent 239 Comment 2 Respondent **Respondent** Keynsham Civic Society Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Ashton Way Car Park (SK3) Comment on the Site: •1. Relocating the Leisure Centre to Ashton Way will significantly reduce parking unless the existing Leisure Centre location is used for parking. •2. >A double decker car park on Ashton Way will be very unsightly, and unacceptable unless underground. >We would not support using the green area in front of the scout hut for additional parking, but not object to the use of the land currently occupied by Milland House. > provision needs to be made for parking coaches ferrying school children to the swimming pool and for deliveries. •3. Strongly support the provision of a CHP plant as part of a district heating network. •4. Any development should avoid breeching the old walls. •5. Use of local stone should not be limited to just the bottom 3 courses as was done in the new Health Centre. •6 to 9, 11 &14. Support these proposals. •10 & 12. In order to avoid 'harming the amenity of the Mayfields', it would make more sense to locate the new leisure centre at the north end of the Ashton Way car park, with a crossing giving access to the either end of the High Street. •13. The public conveniences currently in Ashton Way should be retained. Facilities in the new leisure centre will not suffice, particularly if run as a franchise. **Change requested:** Respondent 837 **Comment** 5 **Respondent** Mr David Redgewell **Respondent** South West Transport Number: Number: Name: Organisation: Network, Railfuture Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Ashton Way Car Park (SK3) Comment on the Site: Ashton Way - The development needs to include a bus and taxi interchange within the design of remodelling the car park. **Change requested:** to support public transport facilities within the scheme. **Respondent** 3107 **Comment** 1 **Respondent** Mr Anthony Orley Respondent

Number:

**Agent Name:** 

Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Agent ID:

Organisation:

Placemaking Options Plan Reference: Ashton Way Car Park (SK3)

#### **Comment on the Site:**

1. I suggest there should be major concern about this proposal and the reasons put forward by Banes Council. From reading various parts of the Placemaking Plan document a pattern has emerged why this is being proposed by Banes:

A.Banes need a building in a prefered strategic position in Ashton Way to house a Combined Heat and Power Plant (CHP)to provide a district heating network system for Keynsham Town centre.

- B.Banes own the freehold of the Keynsham Riverside Suite which currently includes the Keynsham Leisure Center facility. Banes want to pull down the Riverside Suite building and redevelop the site with a mixed use development.
- C. Two of the three main occupants in the Riverside Suite have vacated or are in the process of vacating the building i.e.Council Staff moved to the new Civic Centre and the Fire Brigade and Rescue Service who are moving to a new development at Durley Hill. This leaves the Leisure Centre as the only remaining main occupant in the Riverside Suite complex. This has become inconvenient to Banes who want to pull down and redevelop the Riverside Suite site. Banes have proposed a new Leisure Centre be built on the Ashton Way car park. This has another attraction for Banes because the new Leisure Centre could house the new Combined Heat and Power Plant where they prefer it in Ashton Way.
- 2. All this sounds very enterprising and credible. The question arises does this proposal stand up to scrutiny when all the wider implications are taken into account. The answer to that is an emphatic NO for the following reasons.
- A. Is the current Leisure Centre facility in the Riverside Suite still fit for purpose. The answer is YES i.e. there is no indication given to prove otherwise.
- B. Does Central Keynsham want or deserve to be inflicted with yet another large building on what is currently a large open space car park at Ashton Way. The answer is NO.
- C.Does Central Keynsham want an ugly multi storey car park on Ashton WAy to compensate for loss of parking spaces. The answer is NO.
- D. Does Central Keynsham want to go through another phase of development in a srategic position with all its widespread disruption. The answer is NO.
- E.Does Central Keynsham want or afford to lose the majority if not all parking spaces on the existing Ashton Way car park while a new Leisure Centre and multi storey car park are built. The answer is NO.
- F. For reasons already given can the detrimental impact of such a major project on the long term loss of trade to shops and businesses in Central Keynsham be justified. The answer is NO.
- G. Can the existing Riverside Suite building be modernised, improved and upgraded for mixed use. The answer is YES. Although Banes have indicated this is considered to be non cost effective they have put it forward as a viable optional alternative in the Placemaking Plan item SK4.
- 3. By taking the wider impact implications into account there does not seem to be much to justify the proposal to build a new Leisure Centre and multi storey car park in Ashton Way. It is assumed the reason why Banes want a Combined Heating and Power Plant (CHP) installed in an Aston Way Leisure Centre is because the Leisure Centre will be a prime user of the CHP output to heat the swimming pool etc as well as being the prefered distribution hub for the local heating network system. If so this is a high price for Keynsham to pay if the welcome wide open space of Ashton Way car park is replaced by a large bulk Leisure Centre building and an ugly multi storey car park.

#### **Change requested:**

It is understood Banes are in the process of conducting a feasibility study for the new Combined Heating and Power Plant (CHP)and its accompanying district network heating system. It is suggested another option should be considered which does not require a new Leisure Centre in Ashton Way. The main contender is to install the CHP in a modernised and

upgraded Riverside Suite. As already stated the modernisation and upgrading of the existing Riverside Suite to accomodate mixed use is a Banes optional alternative identified in the Banes Placemaking Plan item SK4. The medium for conducting the heat from the CHP to the district heating system is underground hot water pipes. If the existing district heating system water pipes for the new Civic Centre have the capacity it may be possible to connect a Riverside Suite CHP into that existing system and extend the boosted system to provide district heating up into the High Street district. The alternative is a separate system from the Riverside Suite CHP to provide heating to the High Street district. The route and distance for the hot water system will be longer but this can be compensated by a more powerful CHP.It is suggested these alternatives should be considered and costed.

| Respondent 6368 Comment 3 Respondent Miss Iris Lerpiniere Number: Number: Name:                          | Respondent Organisation:   |
|--|----------------------------|
| Agent ID: Agent Name:  |                            |
| Further Information available in the original comment? $\Box$ Attachments sent                           | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Ashton Way Car Park (SK3)  |                            |
| Comment on the Site:   |                            |
| 3.I do not feel that a large building on the Ashton Way car park can be a visual asse                    | et                         |
| Change requested:  |                            |
| Respondent 6369 Comment 2 Respondent Mrs Diane Feltham   | Respondent                 |
| Number: Number: Name:  | Organisation:              |
| Agent ID: Agent Name:  |                            |
| Further Information available in the original comment? $\Box$ Attachments sent                           | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Ashton Way Car Park (SK3)  |                            |
| Comment on the Site: I am concerned that building the leisure centre on Ashton Way will significantly re | duce parking availability. |
| Change requested:  |                            |
|  |                            |
|  |                            |
| Respondent 6388 Comment 1 Respondent Terry & Siri Edwards Number: Name:                                  | Respondent Organisation:   |
| Agent ID: Agent Name:  |                            |
| Further Information available in the original comment? $\Box$ Attachments sent                           | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Ashton Way Car Park (SK3)  |                            |
| Comment on the Site:   |                            |
| A.<br>1. SK3 Ashton Way Car Park Footprint too Small:-   |                            |

- 1.1 From 4876\_Keynsham\_LC\_Pre\_App\_Report\_120702\_P2.pdf, it can be seen that the Council is (implicitly) proposing to scale down the scope and size of the existing Leisure Centre. This has not been clearly declared on the face of placemaking plan\_options.pdf Our response to this is that such scaling down is untoward and not desired by us or we think Keynsham folk generally; and would in any case, miss a real financial opportunity.
- 1.2 An option to deal with this (other than substantially downgrading the Leisure Centre) is to acquire the adjoining Scouting land, together with Kwik Fit and the abutting property. This would allow a single ground level leisure facility of equal if not greater facility than the existing, while offices and community rooms can be provided above, perhaps to two storeys. This would up-rate the financial viability of this approach significantly. Such financial improvement would help to a) ameliorate both the land acquisition costs, and b) the squeeze of the financial weight of the BBE. Sufficient space would remain for a two level care park using an excavated lower level and thus lowering the upper profile in keeping with the commitment to preserve Mayfields amenity.
- 1.3 Such acquisition (1.2) would have the considerable advantage of permitting significant resolution of the mini roundabout muddle ref TESCO, Ashton Way, Charlton Road.
- 1.4 In 1.2 a commercial agreement would be required with Scouting, producing significant strategic funding for the movement, while offering at the same time a suitable alternative location. This could be the land owned at present by BANES at the rear of St John's Church, presently being used as Station Road car park and some kind of industrial purpose (for which we cannot see a decision as to change of use). Relocation of Scouting (duly recompensed) would enable St John's to join its Community Hall with the new Scouting building, a synergy surely valuable to both (assuming there is not a denominational problem). In this regard Scouting would benefit from: a) strategic funding; b) a new building; c) direct communication with the Memorial Park and its facilities; d) synergy with St John's hall; e) existing immediate parking and pick-up; d) enhanced security; f) continuing proximity to all Keynsham facilities.
- 1.5 Development of Milland House (PP-03507461) would enhance Ashton Way Car park which ever way it turns out. However, Milland House could be acquired if its development does not price it up. However, Milland House is by no means a determiner of the question itself in regard to the footprint for the replacement Leisure centre being too small. Whether Milland House is acquired or not is without impact on the small footprint effect.

#### 1.6 In Conclusion

If the suggested acquistion as per 1.2, 1.3, 1.4 are infeasible in regard to the opinion of Scouting as to its interests in this, then the question of building a replacement Leisure Centre on Ashton Way car park (SK3) in accordance with the suggestions given in: 4876\_Keynsham\_LC\_Pre\_App\_Report\_120702\_P2.pdf should be abandoned as it is clear that such a build would de facto be a decision by default not to replace the present Leisure Centre. Such depletion would be contrary to BANES own Health and Fitness Strategy . joint\_health\_wellbeing\_strategy.pdf and its joint\_health\_wellbeing\_strategy\_appendix\_1.pdf.

If the footprint cannot be increase as per 1.2, 1.3, 1.4 then the following B option should be thoroughly investigated as a viable alternative (2ff).

B.

- 2. SK3 Cannot Acquire Additional Land to Make Sufficient Footprint for Replacement Leisure Centre: In this scenario the whole question of the development of the Golden Temple and the Big Brown Elephant (BBE) should be re-assessed in the following way:-
- 2.1 A detailed financial analysis is required to measure the annual current account (direct) costs to running the Freehold liabilities resolved to the freeholder (which is as we understand it BANES), together with the indirect costs. In this regard the strategic 'balance sheet' effect should also be identified. This would provide the essential financial framework governing any formulation of the future development of the BBE.
- 2.2 These costs are likely to be severe and not yet fully factored into the placemaking plan\_options.pdf, although it seems to be the underlying motive for the reduction of the Leisure Centre scope and its relocation to SK3 in keeping with saving, inter alia, current account costs of heating the BBE. It is with in mind that a (new) development brief for the BBE be formulated. Present direction of travel for the BBE entailing the relocation and downscaling of the existing Leisure Centre seems driven by the likely severity of these costs devolving to BANES. There is a sense of a tail wagging the

elephant.

- 2.3 With this in mind and 1.6 the whole question of how the Golden temple and its BBE be developed should be put to a Pre application Design study (similar to that of 4876\_Keynsham\_LC\_Pre\_App\_Report\_120702\_P2.pdf), but given open terms of reference which do not target a particular outcome.
- 2.4 In this regard, the problem should therefore be addressed in terms of finding a development concept for the BBE which includes replacing the existing Leisure Centre within its environs, and in terms of overall integration with the Golden Temple.
- 2.5 Such an integrated approach is likely to prove beneficial in terms of marketing BBE for overall long term development. A marketing mix of high grade retirement flats, hotel, shops, community facilities, and commercial offices would in fact be assisted by the formation of the replacement Leisure Centre in its midst.
- 2.6 In regard to the formation of an imaginative development brief, then C following suggests that an innovative means of pedestrian communication be devised between lower Bath Hill East car park and the BBE development overall would add positively to the mix.

C.

- 3. Observation on the Intractable Nature of Traffic Flow and Pedestrian Safety
- 3.1 It is widely understood that there is a fundamental and intractable problem in regard to traffic management and pedestrian movement which has arisen step by step from the substantial and otherwise beneficial development of Keynsham village into a town with excellent facilities which reach well beyond the capacity of its roads and pathways to support. This developmental overreach is subject only to amelioration rather than solution.
- 3.2 In regard to A 1.3, significant traffic management improvement would be garnered by the acquisition of Kwik Fit and abutting property. At the same time it would be necessary to place a full 24/7 restriction on the use of Mayfields for parking to prevent Leisure Centre users avoiding the new car parking charges applicable to the (new) Aston Way car park.
- 3.3 An innovative approach to establishing pedestrian communication between a developed BBE including a replacement Leisure Centre and the Lower Bath Hill car park, together with additional storeys, perhaps trebling its capacity. The raising of its height could enable coherence with a communicating innovation. This would reduce through traffic, if users were discounted parking fees and have an easy means of walking (up) to the (new) BBE and Golden temple. Such a design question could be put out to competition.
- 3.4 Keynsham's considerable growth from village to highly attractive township has left it strangled by its village level roads and pathways. Of particular concern are the risks (& potential BANES liabilities) arising from the problem of the increase in 'pedestrian marooning'. This traffic and pedestrian safety problem is certainly intractable to conventional solutions.
- 3.5 The township has put in place its Golden Temple and concomitant Big Brown Elephant, together with a large scale increase in housing and concomitant through traffic, together with an increasingly large and diverse range of attractive shops. All such are producing ever more problematic congestion by vehicular traffic and pedestrian confusion. In this context highly innovative solutions must needs be sought, but with the constraint that knocking down the village would be a way of helping it survive its own success.

### **Change requested:**

D

- 4. Recommendations:
- 4.1 That SK3 acquire additional land from Scouting and at the same time enable its relocation at BANES Station Road car park at rear of St John's Church. That a single level replacement Leisure Centre on the enlarged footprint be built, with additional commercial/community rooms above, while improving double mini roundabout through Kwik Fit and abutting acquisition and increasing financial viability of this option.

4.2 That failing 4.1 a full financial appraisal be provided of the direct and indirect management costs of the BBE liability to BANES as the freeholder, and in this framework formulate a comprehensive development brief for the BBE which includes replacement of the Leisure Centre within its environs.

4.3 That innovative ways of ameliorating traffic flows through Keynsham be formulated in terms of achieving strategic reduction of through traffic.

| Respondent 6438 Comment 1 Respondent Patsy Jenkins Number: Name:  | Respondent Organisation:   |
|---|--|
| Agent ID: Agent Name:   | o gamaatom   |
| Further Information available in the original comment?  | chments sent with the comment? $\Box$  |
|   |  |
| Placemaking Options Plan Reference: Ashton Way Car Park (SK3)   |  |
| Comment on the Site:  |  |
| Proposed site for new leisure centre.   |  |
| I think it would be a big mistake to site a new leisure centre on the premium, we have a high elderly population and we cannot afford to car park with footpath access through to the High Street and is always any more trade. Why not site the new leisure centre at the Riversid new Somerdale development on the old Cadbury site where ample Can anyone tell me why the pavement next to the new Market Walso wide? It has narrowed the road, so taking away the valuable left length of queuing traffic longer at peak times? There is very little us road itself is busy and a zebra crossing is desperately needed there. | to lose any town centre parking spaces. It is a well used ays busy. The High Street shops cannot afford to lose e complex where the old swimming pool is, or in the parking could be provided.  k development at the top of Bath Hill has been made hand turn lane at the roundabout which makes the se of the pavement on that side of the road but the |
| Please do not steal any valuable parking spaces in Ashton Way for a   | Leisure Centre!  |
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 6495 Comment 1 Respondent Mr Terry Dove  | Respondent 1st Keynsham Scout  |
| Number: Name:   | Organisation: Group  |

### **Comment on the Site:**

Agent ID:

I write to express the following comments on behalf of the Trustees for 1st Keynsham Scout Group in respect of the proposed development encompassing Ashton Way car park marked SK3.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Whilst no firm plans have been published we would note that part of the emerging development plan "alternative options" includes a comment about the inclusion of adjacent land which could be included within an enlarged site allocation. We are assuming that this comment refers to Scout Grounds adjacent to the car park as we can see no other areas which could be so described. The development of Aston Way car park includes mention of a leisure centre and a double storey car park. Without sight of firm proposals we are unable to make specific comments but we would like to

**Agent Name:** 

Placemaking Options Plan Reference: Ashton Way Car Park (SK3)

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order register the following concerns. If the council is referring to the use of our ground as part of the development we can see no benefits should it be inferred that we re-locate to make way for this development. In fact we would argue that the facilities in which we have invested heavily over a number of years could be lost for future generations. 1st Keynsham Scout Group is one of the largest in the UK providing adventure for around 300 young people each week. Our Headquarters and its central location are used for a number of community events and if redeveloped, this oasis would be lost for future generations. A quote taken from the development plan: Land and buildings in community use are a valuable local resource. Displacing them by redevelopment or change of use makes it far more difficult to return them to community use. This could mean that future requirements for community use may lead to pressure to develop facilities on green field land in less accessible locations. This would be contrary to Government policy which places importance on facilities being in safe and accessible locations for the community they The trustees of 1st Keynsham Scout Group concur with this view and we will engage fully with the local authority if our assumptions are correct. **Change requested:** Respondent 6568 Comment 1 Respondent Mrs Linda Wadey Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Ashton Way Car Park (SK3) **Comment on the Site:** I am a Keynsham resident and I am opposed to the building of a leisure centre on the Ashton Way car park. I use this car park regularly to shop in Keynsham centre and support local traders. I would park in one of the Bath Hill car parks but these are always full in the weekdays with cars for those who work in Keynsham. I think visually that a large leisure centre building would be dreadful and an eyesore for the residents of Mayfields and would block in the Scout and Guide huts limited open space and grass areas as there is so little distance between the current car park wall and peoples' homes. The current open air car park fits with the limited space and does not intrude on the residences surrounding. A leisure centre would be not in keeping with the surrounds and a blight on the area. Please could an alternative site be sought and can we retain our open air car park, no more multi-storey ones. **Change requested:** Perhaps we could seek to house the new leisure centre on the Fry's Ground which is being redeveloped?

Number:

Agent ID:

Respondent 6576 Comment 2 Respondent Mr Sam Willitts

Placemaking Options Plan Reference: Ashton Way Car Park (SK3)

Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

**Agent Name:** 

**Respondent** Keynsham Community

**Organisation:** Energy

# **Comment on the Site:**

KCE supports BATHNES commitment to adistrict heating priority area to include plans for a new leisure centre at Ashton Way car park. We would want to see the council working with KCE to develop a community based co-ownership model for the district heating.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4) / Paragraph 1.190

Plan Order Number: 264

Respondent 102 Comment 5 Respondent Robin Kerr
Number: Name: Organisation: Residents' Associations

Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4) / Paragraph 1.190

#### Comment on the Site:

It is accepted that the list of sources at para 1.19 is not exhaustive, but the evidence base should surely include an agreed Student Numbers and Accommodation Requirements paper; and an emerging Student Housing Strategy.

What about the World Heritage Site Management Plan? The WHS is referred to only in relation to its 'Setting'.

The Air Quality Action Plan should also be referenced, with a link.

Lastly, the Cotswolds AONB (CAONB) Management Plan should be referenced. The Placemaking Plan Options Document acknowledges (at para.1.141) that the University of Bath campus lies partly within the CAONB. Emerging Policy Approach SB26 (page 56) calls for future development at the University to 'respond positively and sensitively to the CAONB designation'. As well as helping protect part of the city and its setting at Claverton Down from inappropriate development, the CAONB designation extends well within the city boundary in other locations, notably into Widcombe - where it penetrates to within half a mile of the city centre. The Placemaking Plan acknowledges (at para.2.221) that AONBs enjoy 'the highest status of protection in relation to landscape along with National Parks', but nowhere in the document can be found any reference as to how such protection will be achieved.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Riverside Offices and Fire Station (SK4) Number: 267 Respondent 239 Comment 3 Respondent **Respondent** Keynsham Civic Society Number: Number: Organisation: Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4) Comment on the Site: Strongly support these proposals. The alternatives are unacceptable. It is also vital that the proposed new Emergency Services HQ replacing the existing Fire Station, adheres to these policies. •9. Access to any new (subterranean) car parking must be via Temple Street and not the Park. •11. Provision of additional parking should not detract from the Park. **Change requested:** Respondent 279 Comment 11 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

# Comment on the Site:

This appears a welcome and appropriate policy response to help ensure a high quality responsive sustainable development.

Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4)

### **Change requested:**

Respondent 837 Comment 6 Respondent Mr David Redgewell Respondent South West Transport Number: Name: Organisation: Network, Railfuture

Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA

Further Information available in the original comment? ☐ Attachments sent with the comment? ✓

Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4)

#### Comment on the Site:

Riverside Keynsham - Needs to include bus interchange facilities within the site, improved walking and cycling and a public square.

#### **Change requested:**

to support public transport facilities within the scheme.

| Respondent 3107 Comment 2 Respondent Mr Anthony Orley Number: Name:   | Respondent<br>Organisation:   |
|---|---|
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment?   Attachments s  | sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4   | 4)  |
| Comment on the Site:  |   |
| For the reasons presented in detail in my comments and proposals for the Pla park(Comment Reference Number 21752)I do not agree with the Banes proporedevelop the site.   | ,   |
| Change requested:   |   |
| (Comment Reference Number 21752)I submit that the SK4 alternative option consider i.e. allocate the SK4 Riverside Suite for comprehensive refurbishmen Riverside Suite complex. Moving the Leisure Centre to the Ashton Way car part of the new Combined Heat and Power Plant in the Riverside Suite complex and district heating system are also included in my Ashton Way SK3 comments (Comments) | t and retain the Leisure Centre in the rk is unacceptable. Proposals for installation d distribution of heat to the Town Centre |
|   |   |
| Respondent 6576 Comment 3 Respondent Mr Sam Willitts Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment? ☐ Attachments s   | Respondent Keynsham Community Organisation: Energy sent with the comment?   |
| Placemaking Options Plan Reference: Riverside Offices and Fire Station (SK4   | 4)  |
| Comment on the Site:  |   |
| KCE welcomes the Councils commitment to linking Riverside to district heating   | g.  |
| Change requested:   |   |

Placemaking Options Plan Reference: Pixash Lane Waste Site (SK8) / Paragraph

1.194

Plan Order Number: 271

| Respondent 102 Comme<br>Number: Number | nt 22 Respondent Robin Kerr<br>r: Name:  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|--|--|---|
| Agent ID: Agent Nam                    | e:                                       |   |
| Further Information availab            | ole in the original comment? $\Box$ Atta | achments sent with the comment? $\square$   |
|  |  |   |
| Placemaking Options Plan F             | Reference: Pixash Lane Waste Site (SK    | (8) / Paragraph 1.194   |
| Comment on the Site:                   |  |   |
| Bath citizens will be dismaye          | d to learn that their convenient recycli | ing centre at Midland Road is going largely to move to                            |
| Pixash Lane.                           |  |   |
| Change requested:                      |  |   |

| Placemaking Options Plan Reference: Pixash Lane W   | aste Site (SK8) Plan Order Number: 275               |
|---|--|
| Respondent 239 Comment 4 Respondent Number: Number: Name:   | Respondent Keynsham Civic Society Organisation:      |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attac   | hments sent with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Pixash Lane Waste Site (SK8)  |  |
| Comment on the Site:  |  |
| <ul> <li>We understand that the Depot adjacent to the existing waste site is<br/>Midland Road Depot and that it is not proposed to relocate the wast</li> </ul>     |  |
| <ul> <li>Increased traffic from the A4 will require improvement to the access<br/>should be prohibited, at least for HGV vehicles travelling west on the</li> </ul> | _  |
| •Upgrading Worlds End Lane for access to the proposed developmen  | t land also has implications for access from the A4. |
| Change requested:   |  |
| <u> </u>  |  |
|   |  |
| Respondent 2611 Comment 19 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:             |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attac   | hments sent with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Pixash Lane Waste Site (SK8)  |  |
| Comment on the Site:  |  |
| Para 1. Ancillary uses should include repair, re-use, and upcycling. No but could provide training and employment opportunities.                                    | t only would this conform to the waste hierarchy,    |
| Change requested:   |  |
| List repair, re-use, and upcycling as potential ancillary uses.   |  |
|   |  |
| Respondent 3107 Comment 4 Respondent Mr Anthony Orley Number: Number: Name:   | Respondent<br>Organisation:                          |
| Agent ID: Agent Name:   |  |
|   |  |
| Further Information available in the original comment?   Attac  | hments sent with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Pixash Lane Waste Site (SK8)  |  |

# **Comment on the Site:**

The Placemaking Plan proposal SK8 to extend the current waste recycling amenity centre at Pixash Lane Keynsham to accomodate some of the facilities and equipment from the current Midlands Road depot in Bath is noted. This confirms

Plan Order

part of the prediction made in my December 2013 Core Plan Consultation response that more heavy transport will be based on the Pixash Lane site putting more pressure on the Pixash Lane junction with the congested A4 road. It is also noted World Ends Lane will also be upgraded to enable HGV access to the Core Strategy KE3A extension to the Ashmead Industrial Estate. This is not unexpected with even more heavy vehicle pressure on the Pixash Lane junction with the A4.

### **Change requested:**

If it is intended to ease some of the pressure on the Pixash Lane/A4 junction by diverting some of the heavy vehicles down through the existing Ashmead Industrial Estate road towards the A4 Broadmead roundabout junction it should be noted this current industrial estate road is inadequate. The concrete slab construction of this road is in a poor state and some of the slabs have broken up and collapsed. Current systematic patching of ths road is inadequate and useless. Serious refurbishment of this road will be necessary if it is to be capable of taking more heavy vehicles.

| Respondent 6368 Comment 4 Respondent Miss Iris Lerpiniere Number: Name:  | Respondent Organisation:   |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Atta   | chments sent with the comment? $\square$   |
|  |  |
| Placemaking Options Plan Reference: Pixash Lane Waste Site (SK   | 3)   |
| Comment on the Site:   |  |
| 4.I am most concerned that the Pixash changeover will increase traf  | fic badly a rush hours   |
| Change requested:  |  |
| Change requested.  |  |
|  |  |
|  |  |
| Respondent 6390 Comment 1 Respondent Alan Draper Number: Name:   | Respondent Organisation:   |
| Agent ID: Agent Name:  | Organisation.  |
|  | -h   |
| Further Information available in the original comment? <a> Atta</a>  | comments sent with the comment? —  |
| Placemaking Options Plan Reference: Pixash Lane Waste Site (SK   | 3)   |
| r lacellaking options i fan Kererenee.   | 7)   |
| Comment on the Site:   |  |
| Introduction   |  |
| I have written this as my submission to the current Bath and North Consultation with particular regard to the Pixash Lane Waste Site .   | East Somerset (BANES) Placemaking Plan Options   |
| I write as a concerned owner of one of the houses that front onto the proposed development. This is to raise awareness of the consultations sharing this with the local media, raise awareness of issues as a resuccommunities throughout BANES.                                     | on and my concerns with my neighbours and, by  |
| I only became aware of the consultation myself when a postcard from after my local 'drop-in' information event on the 8th Dec. (I also real Keynsham residents to participate in the consultation but again it was family commitments has prevented me from drafting and sharing the | d a generic article in the 'Keynshamvoice' inviting asn't until after the event). Unfortunately work and |
| ,, and sharing the   | is document earner in the consultation process.  |

We moved to our current home on the A4 Bath Road, from Oldland Common, in the beginning of 2012. We moved because of the: many facilities available in walking distance; the quality of local school, rural position of the house (despite it being situated on one the busiest roads in the region); and the local transport links to Bristol, Bath and beyond. The house and area have certainly exceeded our high expectations and we couldn't ask for more friendly and supportive neighbours.

Searches on the property at the time did not identify that the BANES strategy, to relocate the Bath's central waste management facilities from the Midland Road Depot to the Pixash Lane Waste Site, had already been established. I assume this was due to the immaturity of the project and lack of detail in the public domain at the time. No reference to an expanded Pixash Lane Waste site is made in the 2011 Joint Waste Core Strategy or the BANES Core Strategy (adopted in July 2014 after several years of development). The former identifies a 4.5 hectares north of the Broadmead Lane sewage works for 'residual waste treatment'. The latter does not make direct reference to the Pixash Lane Waste site but does allocate around 6 hectares of greenbelt north of the A4 and adjacent to the current facility as a 'strategic site' for future employment in "use classes B1 (b) and (c), B2 and any employment use not falling within the National Planning Policy Framework (NPPF) definition of a main town centre use". It is difficult to imagine that the proposed new waste site falls into this planning classification.

With the strategy set it appears now that the programmes and projects to deliver it are already being executed. The land to the south of the Pixash lane recycling facility (a redundant former MoD warehouse) has already been acquired and planning consent was granted in July 2013 for the demolition of the Midland Road Depot for redevelopment of the site into a residential area.

With the adoption of the Core Strategy, the council have now issued the Placemaking Plan to complete the Local Plan in accordance with the government policy set out in the NPPF. The council expects that the Placemaking Plan will help to deliver better places by "facilitating the delivery of high quality, sustainable and well located development and by setting out detailed development and design principles for identified and allocated development sites". Stakeholder engagement with the Placemaking Plan, at this stage, is expected to ease the passage of the planning permission when it is sought in the coming years.

It is noted that the Placemaking Plan does not address all elements of the Core Strategy which allocated significant amounts of new development within and surrounding Keynsham. With relation to these sites the Placemaking Plan informs that "issues have therefore already been addressed through the Core Strategy. The urban extension sites for example, which provide strategic levels of new homes and new employment space are allocated for development in the Core Strategy (and subject to a Masterplanning process outside of the Placemaking Plan)". This suggests that the engagement regarding these sites is now over and the only influence the community can have on the final outcome will be through the individual planning applications as they are submitted.

The inclusion of the Council proposal "to relocate some of the waste operations and transfer station from the Midland Road depot in Bath to Pixash Lane" in the Placemaking Plan" should imply that engagement is not over, otherwise the Placemaking Plan is little more than a box-ticking activity.

Exactly what facilities would be transferred has not been defined but it is a reasonable working assumption that all of the Midland Road facilities will be relocated to Pixash Lane. It is not clear what acreage will be required to accommodate the new Pixash Lane waste facility but a simple comparison of the area occupied by the current Midland Road Depot would overspill the current boundary and extend substantially into the designated 'employment area'.

### So What?

Well obviously my preferred solution is that the waste operations and transfer station is not relocated to Pixash Lane (and there is no commercial demand to develop the 'employment area' in the greenbelt area north of the A4) and so our lives can continue as they are today. I fear however that the process has gone past the point of no return. By engaging with the Placemaking Plan, my optimism hopes I can influence the development of the new waste site and employment area to minimise the impact on my family, neighbours and community. (I'm trying hard to hold my cynicism in abeyance.) My overarching argument is that my family, neighbours and community should be better off if the proposed development goes ahead and at the very least no worse off. The expression 'No worse off' is terribly subjective and it is always difficult to demonstrate compliance against it, so I have broken it down into a number of factors which, if managed correctly, should enable my family, my neighbours, and the new waste site/new employment area to satisfactorily co-exist.

Volume of traffic

The A4 is one of the busiest roads in the region. It is already difficult to pull out of our properties onto the highway. Patience is a virtue and a skill practiced by Bath Road residents. In 13/14, approximately 75,000 tonnes of domestic waste was collected from households in BANES. Assuming that each rubbish truck had a capacity of 10 tonnes would mean that a minimum additional 7,500 trucks would rumble past our driveways each year taking their loads to the transfer station behind our homes and a further 7,500 to take the waste onto its final destination. This is grossly underestimated as it assumes that each truck is filled to capacity (recycling trucks carry much less) and makes no provision for vehicles bringing trade waste to the facility. It is fair to say that a good number of the refuse and recycling trucks already journey past my house each day, so only the 'delta' needs to be taken into consideration. At the moment I cannot find any documents on the BANES website that makes an assessment as to what the 'delta' should be. The 'delta' also needs to take into account the anticipated increase in waste movements from the larger population of BANES residents, as a result of the core strategy.

Pedestrians crossing Pixash Lane already have to be extremely cautious when crossing the road. Drivers concentrate more on pulling out into the A4 traffic than the movement of pedestrians. This has been made worse recently by the opening of the Police Centre in Ashmead Road. The relocated waste transfer station and the future employment area will make crossing Pixash Lanes significantly more hazardous. Many school children cross Pixash Lane and the A4 Bath Road as they head to or return from local schools.

During the day Pixash Lane and Ashmead road are used for parking by workers in the nearby industrial unit, making it difficult enough for vehicles to pass at existing volumes of traffic. It is presumed that waste will be removed from the site in articulated bulk waste vehicles of the type pictured below; these will have difficult manoeuvring into and out of World End Lane without significant redesign of the junction and introducing parking restrictions on Pixash Lane and Ashmead Road. The issues will be compounded if the same entrance/exit is used by householders bringing their waste to the new facility. There can be significant queues to use the current amenity centre at peak times at both Midland Road and Pixash Lane. The congestion could delay the passage of emergency vehicles.

I see no mention in the Placemaking Plan for traffic management impact of the new Waste facility or the employment area to be undertaken. It could be implied in the reference to the "masterplan required for Core Strategy Policy KE3a" however it would be beneficial to all, if the emerging development and design principles for Pixash Lane includes an explicit statement such as the impact of traffic using the site is to be assessed and the site subsequently designed with a view to minimising disruption and risk to local residents.

To be 'no worse off' with regard to volume of traffic, the new facilities should not:

- be any more difficult to leave (and enter) properties that front on to the A4 Bath Road;
- •take any longer to reach my property from the Broadmead Lane roundabout or from the centre of the Saltford than it does today; and
- •be any more hazardous for pedestrians to cross Pixash Lane or the A4 Bath Road.

I am content to keep a record of the time taken to pull out of my property so that a baseline can be established for the 'AS-IS' position to assist the traffic impact assessment and subsequent design activity.

### Noise

The existing volume of vehicles on the A4 Bath Road create significant traffic noise, particularly when large trucks rumble by and when the traffic is running at 40mph. The properties however shield the noise from the back gardens of the properties. There is the occasional disturbance from: the civic amenity centre (as they swap out skips); trains (both on the main line and at Avon Valley Railway); aircraft overhead on their way to the airport; and from the local farm. All in all it is very peaceful and with the host of songbirds that visit the garden throughout the year, very rural. You can sit out in the garden and chat without having to raise your voice. You can also sleep with the windows open without fear of being disturbed.

To be no worse off the new facilities should not:

•create any more noise disturbance than is present today including:

ovehicle noise whilst entering or leaving the site;

othe emptying and filling of vehicles;

oidling stationary vehicles; and

onoise of employees operating the facility;

- •prevent residents from enjoying the outdoors in their back gardens; and
- •force residents to close their windows to escape from noise disturbance.

The Placemaking Plan already includes a design principle with regard to noise, "Minimise visual and acoustic nuisance from the site to the residential properties to the south utilising suitable screening including the use of a landscape buffer" This principle is supported and I would propose that the new facility and any access road to it are built to the north of Worlds End Lane, then the existing mature trees and hedgerows and the orchard behind our properties act as part of this landscape buffer. The design principle can be modified to support this by adding "making maximum use of existing trees and hedgerows.

I am content to undertake a regular noise survey in my back garden to provide the 'AS-IS' position to support the design process.

#### Smell

Rarely do we currently experience foul odours from the current Pixash Lane Civic Amenity Centre. This is due to the limited size of the current facility, the regular replacement of full skips and the distance from the residential properties. A bigger site will have more waste material stored there. The waste material would remain there longer until it is processed and transferred to its final destination. More decomposing waste material will result in more smell. The smell will be associated with fine waste particles suspended in the air. I pass the South Glos waste transfer station in Mangotsfield regularly (on the cycle path on my commute to work) and the smell there is quite hideous despite its 'odour management plan'. The prevailing wind for the region is south westerly so typically any odour from the facility will be blown away from the A4 Bath Road houses (though straight towards Avon Valley Country Farm). However the Bristol wind rose shown below demonstrates that the winds come from the northerly direction over 30% of the time, meaning that for a good proportion of the year the foul stench will be wafted towards our houses.

The Placemaking Plan design principles requires that an "Odour Management Plan to be submitted with a planning application". It is considered that this should be strengthened to include an explicit statement such as "the facility and its operations are to be designed to prevent/minimise foul odours escaping into the local environment to minimise impact on local residents."

To be no worse off the new facilities should not:

- •create any more foul odours than are present today from:
- waste material held on the site;
- vehicles delivering or collecting waste;
- processes undertaken at the facility; and
- smoking shelters located close to property boundaries.

#### Environment

We are fortunate thanks to our rural location to have an abundance of wildlife that visits our gardens. Rabbits, Hedgehogs, Frogs, Newts, Owls, Woodpeckers and Jays are all regularly visitors as well as the exhaustive array of songbirds. They live in the orchard behind our properties and the hedges bordering World End Lane. Bats are also frequently seen in the evening twilight conducting their aerobatic routine over the gardens catching insects. Wild flowers grow in the orchard, pollinated by a healthy population of Bees which help pollinate the plants in our gardens. This is all at risk if the infrastructure for the Pixash waste site extends beyond its current footprint and removes grassland, hedgerows and trees for the local eco-system. The volume of waste material being transferred will also encourage rats, pigeons and sea-gulls to the area. These will impact the balance of the local eco-system driving other wildlife away.

Beneath the top soil in my back garden is heavy clay. For a good proportion of the year it saturates, with the excess running off through the Orchard draining toward the tributaries that feed the River Avon. The orchard and the ditch (once a natural watercourse) running alongside Worlds End Lane are important components of this draining process. The proposed new development will impact on how water drains from the A4 Bath Road properties, if not considered properly in the design phase. Poor draining will make the back gardens unusable and unproductive.

The design of the waste facility has not been shared. It is assumed it will be similar to that at Mangotsfield, where the refuse trucks empty their loads onto the floors before it is transferred into bulk waste truck. This movement of waste will create significant dust which will be blown in the direction of the wind. This will reduce air quality for the local residents and will film anything that is in its path (vegetation, property, laundry etc). I'm hoping that no hazardous waste will be kept at the facility.

The Sustainability Appraisal Report supporting the Core Strategy makes no reference to the Pixash Lane Waste Facility though in support of the employment area KE3:

- Major positive effects in the short, medium and long term are identified with regards to 8 of the SA objectives. (Build a strong and competitive economy and enable local businesses to prosper).
- •Uncertain effects in the short, medium and long terms are identified with regards to the following SA objectives:
- Objective 12 Protect and enhance local distinctiveness; and
- Objective 15 Reduce land, water, air, light, noise pollution.
- •Policies KE3 and KE3B require survey and assessment of environmental and heritage assets to inform site masterplanning so it is unlikely that there will be significant negative effects however the uncertainty is due to the fact that the masterplanning process is being relied upon to avoid potential negative effects and therefore at this stage it is not certain that all potential negative effects can or will be mitigated through the masterplanning process.
- •No major negative effects have been identified.

The sustainability report in direct support for the Placemaking Plan for the Pixash Lane waste site state for the same objectives.

Therefore to address the concerns raised above and in the sustainability appraisal reports, the Placemaking Plan design principles require an explicit statement such as "the facility is to be subject to a full environmental impact assessment, including the effect on local residents. All resultant issues raised in the EIA are to be satisfactorily addressed before planning permission is granted. In addition, the Placemaking Plan design principles requires an explicit statement such as "the design process should maximise the retention existing natural features, trees, hedgerows, and wildlife habitats) Environmentally to be no worse off the new facilities should not:

- •change the diversity of wildlife visitors to our properties;
- •impact the growth of fruits, vegetables and flowers in our gardens;
- discourage residents from wanting to spend time outside their houses;
- prevent adequate drainage of soils from neighbouring properties;
- prevent dust from waste processing from leaving the facility; and
- allow rodents to colonise and escape into neighbouring properties

I am content to undertake a wildlife and environment survey in my back garden to provide the 'AS-IS' position to support the design process.

**Rural Tranquillity** 

The three photos overleaf show a rural panoramic view from the bedroom window on the first floor of my property, looking towards the new Pixash Lane Waste Facility to the left and the new employment area to the right.

The same view is shown below from the pergola on the ground floor.

And finally to show the difference between winter and summer the view from the kitchen patio doors looking towards the old MOD building on Pixash Lane.

This back garden, its rural positioning and its view featured prominently in our decision to buy the property and make it our new family home. Obviously building anything where there is currently nothing is going to change the view from the gardens of the A4 Bath Road, but the designs should be sympathetic to local residents and at sufficient distance so as not to encroach on our privacy and rural tranquillity. The new facility should also be designed so that it is not harshly flood lit at night to minimise light pollution onto our properties.

To be no worse off with regard to rural tranquillity, the new facilities should not:

- obscure the views of open countryside from the back gardens of the A4 Bath Road properties;
- •have a visual impact greater than that of the former MOD warehouse to the north of World End Lane;
- •remove trees and hedgerows that provide a natural shield between industrial facilities and the houses; and
- •be harshly floodlit creating excessive light pollution.

#### Well Being

There is enough stress and anxiety in this world already. The family home is the last bastion of solitude, providing a place to recharge, regroup and re-engage. It also provides stability and a safe environment for my children to grow and prepare to tackle the outside world. It is understandable that I would have a hostile reaction when the stability of my family home comes under attack. My well-being is already being impacted as a result of the proposed new waste facility and employment area as a result of:

#### House Values

According to Zoopla, the value of my house has already decreased by some £20,000 since the start of the Placemaking Plan consultation. I accept this may not be fully down to building new waste transfer facility but the trend data shows that my property has dropped significantly more than other residences in BS31 catchment. I will not be able to sell my house on the open market until the new facility and employments area are operational. This is because I would have to declare that I am moving as a direct result of the new developments. I am also at a loss regarding investment decisions regarding the property. I had intentions of extending over the garage and utilising the loft space. At the moment I cannot progress these intentions as I do not know what impact of the new waste facility and employment area will have the house value and whether I would get a return on my investment. On a smaller scale the fence at the bottom of my garden need replacing but I am holding off on doing so until the way forward is clear.

The local residents should not be in a worse financial position as a result of the new facilities being built in Pixash Lane and the council should consider compensation for 'Injurious Affection' and 'Disturbance' based on property values before Placemaking Plan consultation was launched. This compensation should also include the fees for legal advice to ensure that residents' claims are fairly represented.

#### Livelihood

My family's livelihood is not directly impacted by the Pixash Lane Waste Site or the new employment area. There are others though where it will. As their properties will need to be compulsorily purchased. It is in everyone's interest for these negotiations not to be protracted and for the council not to be too hard-lined in reaching a settlement with the owners. Other compulsory purchase schemes have shown that latitude can be give in compensation 'heads-of-claim' to achieve a sensible position with claimants. This is to ensure their livelihoods are not adversely affected, as the heads-of-claim, are not limited to the pure market-value for the property.

#### Stress and Anxiety

Stress and anxiety of local residents will be at a high level until the new facility and employment area is built and in operation. Most of this anxiety will be driven by the lack of information as to how the development will affect individuals, families and businesses. As required by the government, BANES have been quite transparent in the publication of the Core Strategy and Placemaking Plan documentation on the internet. However, it has to be sought out and you need to have some knowledge to fathom out how it all fits together. This causes a knowledge vacuum which will be filled by rumour and speculation resulting in unnecessary stress and anxiety.

I would be very surprised if initial drafts of plans of the new waste facility and employment area haven't already been drawn up. This would fill the knowledge vacuum so should have been shared with local residents as part of this consultation exercise. There will also be concern regarding the disruption to residents during the physical construction of the facilities (noise, dusts, material deliveries etc) and plans for managing these aspects should be shared as soon as they are drawn up. It also causes me some anxiety, as a BANES taxpayer, how the new waste centre and employment area is to be funded. I expect in these austere times that there is no new money to be allocated to the project. Is the business

case for this development a standalone document or is it linked to a business case for the wider core strategy? Specifically, I would be interested to know what other options were considered for relocating the waste centre from Midland Road and how Pixash Lane offers the best value for money to the council (especially when the larger footprint will limit the benefits from the wider employment area).

To be no worse off with regard to Well-Being the new facilities should not:

- cause financial loss to local residents as a result of their homes being de-valued;
- cause loss of livelihood
- •increase stress and anxiety including during the construction phase
- •alienate local residents through lack of open communication and not sharing early drafts of plans and the new facilities should be able to demonstrate value for money and tangible benefits over and above any other options that were considered to relocate the services from the Midland Road Depot.

The Placemaking Plan design principles would benefit from requires an explicit statement such as "as key stakeholders, local residents are to consulted and informed throughout the design and construction phases of the project" to facilitate ongoing communication.

The Placemaking Plan should also identify the Senior Responsible Owner and publish the benefits management and realisation plans for each of the projects identified in it.

Communication between the Council, the developers and the local residents need to be significantly improved if the construction of the new waste facility and employment area is to progress smoothly. If my neighbours are content for me to do so, I would be content to volunteer and represent the interests of the A4 Bath Road residents.

Now what?

This paper raises a number of issues with the proposed new Waste Site in Pixash lane (and the adjacent employment areas. I have tried hard not to take the NIMBY (Not In My Back Yard) approach and tried to identify factors (summarised in Annex A) that, if properly taken into account, would allow successful co-existence and demonstrate that local residents to be at least 'no worse off. The Placemaking plan would benefit from the amendments suggested (summarised in Annex B) to accommodate the factors identified. Personally I'm not looking for a compromise (which suggests that everyone loses out on something) but a collaboration (which implies that all parties benefit from the agreed way forward). The consultation period will end and the comments will be collated and acted upon. If (when) the Placemaking Plan gets adopted, then individual planning applications can be submitted.

I don't expect all of the issues raised in this paper to feature in the adopted Placemaking Plan. This should however provide early notification of my concerns which are shared by my neighbours. If the council and developers were sensible they would engage with A4 Bath Road residents now to ensure that they had our 'buy-in' before plans are finalised and applications submitted. In the meantime I will liaise with my neighbours and the local community, taking advantage of the BANES Neighbourhood Planning Protocol, to ensure we provide a loud, united voice to minimise the disruption and impact on our lives of the proposed new Pixash Lane Waste Site and employment area.

| Change requested:  |  |
|--|--|
| Respondent 6576 Comment 4 Respondent Mr Sam Willitts Number: Name:                   | Respondent Keynsham Community Organisation: Energy |
| Agent ID: Agent Name:  Further Information available in the original comment?   Atta | chments sent with the comment? $\Box$              |
| Placemaking Options Plan Reference: Pixash Lane Waste Site (SK                       | 8)   |

# **Comment on the Site:**

KCE would like to see the Council working with us to develop community-owned solar PV at this site. We welcome the Councils commitment to renewable energy, in particular solar PV at this site.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Keynsham - Proposed Green Space (GR5) Number: 278 Respondent 6550 Comment 1 Respondent Mr John Pritchard Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Keynsham - Proposed Green Space (GR5) **Comment on the Site:** As a resident of Milward Road for many years since the houses were built, I have greatly appreciated the open space between Milward Road and St Johns Court. The trees enhance the environment and the footpath which runs across is regularly used by residents of Milward Road and St Ladoc Road as a convenient access to the High Street. It is also used by children and dog owners. I feel that this area should always remain a pleasant open space. **Change requested:**

Placemaking Options Plan Reference: Keynsham - Proposed Green Space (GR18)

Plan Order Number: 283

| Respondent 3107 Comment 3 Res<br>Number: Number: Na  | spondent Mr Anthony Orley<br>ame: | Respondent Organisation: |  |  |  |
|--|-----------------------------------|--------------------------|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                   |                          |  |  |  |
| Placemaking Options Plan Reference: Keynsham - Proposed Green Space (GR18)   |                                   |                          |  |  |  |

#### **Comment on the Site:**

The recognition by Banes Council that some of the land on the Core Plan KE3A site east of Breachers Gate GR18 is worthy of green space status is welcome. As recognised by Banes Council in their visual survey of the Core Plan KE3A site on the south side of the A4 road the land in the area of Breachers Gate is a Medieval 15th century landscape in the form of narrow hedged fields laid out in the form of Medieval lynchets. All of the land in the Core Plan KE3A area on the south side of the A4 road is pasture land with an abundance of wild flora which provides a blaze of colour in the spring time and golden long grasses in the summer. It is all free from the use of chemical fertilisers and pesticides. The uncontaminated fields and hedgerows supports a wide variety of wildlife both big and small. It is particularly a haven for birds, butterflies, bumble bees and bats. In the Core Plan Consultation I believe I presented a strong ecological and visual case to Banes for keeping all of the KE3A land on the south side of the A4 road in the green belt. This case failed but I am now pleased to see that Keynsham Parish Council has persuaded Banes Council to consider some respite to some of this land.

### **Change requested:**

The Placemaking Plan GR18 green space status is of immense importance for what wild life and flora will remain after the Core Plan development of KE3A takes place. This will have to be carefully managed by Banes during the critical development period. It is also of immense importance to the people who live in East Keynsham. Not only for those who already reside here but also for those people who will inhabit the 200-250 dwellings when they are built. The next stage of consultation and planning for the KE3A land on the south side of the A4 road is awaited with interest. It is sincerely hoped Banes Council will turn the Placemaking Plan proposal GR18 into a reality by securing vital and adequate area(s) of green space in the KE3A masterplan.

| Respondent 6346 Comment 1 Res<br>Number: Number: Namber   | spondent<br>me:                       | Respondent Mactaggart and Mickel Organisation: |  |  |  |
|---|---------------------------------------|--|--|--|--|
| Agent ID: 205 Agent Name: Rocke Associates  Further Information available in the original comment?   Attachments sent with the comment? |                                       |  |  |  |  |
| Placemaking Options Plan Reference:   | Keynsham - Proposed Green Space (GR18 | 8)   |  |  |  |

### **Comment on the Site:**

Local Green Space in Keynsham: Land East of Breaches Gate

The identification of the above site as having the potential as a LGS (paras. 1.202-1.204) is misleading, and could potentially raise false expectations, since it is a strategic allocation in the Core Strategy. It is not considered to comply with the criteria set out in the NPPF (para. 77) since it is both an extensive tract of land and there is no evidence that the green area is demonstrably special to the local community and holds any particular local significance. The allocation of land in the Core Strategy met with comparatively little objection, which suggests that its value to the local community is limited.

Any provisions for open space that are delivered as part of the future development of the site are likely to be offered for adoption and therefore will not require the protection of a LGS designation. Moreover, it would be wrong to pre-empt whether any future open space provision would justify the designation. The NPPF position is quite clear that the LGS designation will not be appropriate for most green areas or open space.

Any reference to LGS designation on land east of Breaches Gate should therefore be removed from the

|                  | Schedule of Comments on the Placemaking Plan Options Document in Plan Order |   |  |  |  |
|------------------|---|---|--|--|--|
| Plan.            |   |   |  |  |  |
| Change requested | l:  |   |  |  |  |
|                  |   |   |  |  |  |
|                  |   |   |  |  |  |
|                  |   | ľ |  |  |  |

# Plan Order Placemaking Options Plan Reference: Policy HG4 Number: 299 Respondent 1556 Comment 4 Respondent Respondent Strategic Land Number: Number: **Organisation:** Partnerships Name: Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy HG4 Comment on the Site: This policy effectively prohibits development if it is outside the development boundary and is not allocated. We object to the inflexibility of this policy, which is wrong and particularly so in the circumstances of using out of date evidence and if development boundaries are going to be so tightly drawn. With tight boundaries and this policy operating together the plan will have a very short life because it will be overtaken by the new housing requirements which are currently being identified by the West of England SHMA. This will need to conclude what the appropriate geographical boundary is and whether this extends beyond the West of England to include parts of Mendip and Wiltshire. The RSS Proposed Changes July 2008 version (see Appendix A) recognised the full extent of the West of England Housing Market Area which having been through examination identified Mendip and West Wiltshire as being part of it. It is essential that the housing market area and functional economic area are properly considered, and the cross boundary relationships clearly understood. For example Mendip is also preparing their Part 2 Development Plan and this also needs to be taken into account in this plan. It is likely that the area operates as a single entity and that it is entirely right, and requires proper planning to set out a single comprehensive strategy to address the requirements that exist. As discussed above this new evidence will render the BANES Core Strategy out of date and if the Placemaking Plan contains no flexibility, it will also be out of date before it is adopted and have to be reviewed to accommodate the additional growth requirements. **Change requested:** Respondent 4803 Comment 3 Respondent Respondent Waddeton Park Limited Number: Number: Name: Organisation: Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? Attachments sent with the comment?

#### Comment on the Site:

Policy HG.4

This policy effectively prohibits development if it is outside the development boundary and is not allocated. We object to the inflexibility of this policy, which is wrong and particularly so in the circumstances of using out of date evidence and if development boundaries are going to be so tightly drawn. With tight boundaries and this policy operating together the plan will have a very short life because it will be overtaken by the new housing requirements which are currently being identified by the West of England SHMA. This will need to conclude what the appropriate geographical boundary is and

Placemaking Options Plan Reference: Policy HG4

whether this extends beyond the West of England to include parts of Mendip and Wiltshire. The RSS Proposed Changes July 2008 version (see Appendix A) recognised the full extent of the West of England Housing Market Area which having been through examination identified Mendip and West Wiltshire as being part of it. It is essential that the housing market area and functional economic area are properly considered, and the cross boundary relationships clearly understood. For example Mendip is also preparing their Part 2 Development Plan and this also needs to be taken into account in this plan. It is likely that the area operates as a single entity and that it is entirely right, and requires proper planning to set out a single comprehensive strategy to address the requirements that exist. As discussed above this new evidence will render the BANES Core Strategy out of date and if the Placemaking Plan contains no flexibility, it will also be out of date before it is adopted and have to be reviewed to accommodate the additional growth requirements.

| Change requested:                       |  |                                   |
|---|--|-----------------------------------|
|   |  |                                   |
|   |  |                                   |
|   |  |                                   |
|   |  |                                   |
| Respondent 6410 Comment 2 Res           | pondent Ms Gaynor Parkinson              | Respondent Linden Homes Strategic |
|   | me:                                      | Organisation: L and               |
| Agent ID: Agent Name:                   |  |                                   |
| Further Information available in the or | riginal comment? $\square$ Attachments s | ent with the comment? $\Box$      |
|   |  |                                   |
| Placemaking Options Plan Reference:     | Policy HG4                               |                                   |
|   |  |                                   |

#### Comment on the Site:

Linden Homes has acquired an interest in the site known as Land at Old Bath Road, North Radstock (the site).

The 155 acre site is located on the north side of Radstock adjoining the residential area of Tyning. The site comprises agricultural land on either side of Bath Old Road and Trinity Primary School is located to the south.

The site is identified within the 2013 SHLAA under references 16a and 16c. The BANES Local Plan 2007 Proposals Map identifies the site as lying outside of the settlement boundary. No designations apply to the site apart from the Forest of Avon (Policy NE.5) designation, which is a saved Local Plan policy.

We note the main aim of the Placemaking Plan is to help to deliver high quality, sustainable and well located development for the period up to 2029.

The Placemaking Plan is intended to complement the strategic planning framework provided in the Councils Core Strategy which was formally adopted by BANES in July 2014 and will deliver the detailed housing and employment requirements established in the Core Strategy and its strategic objectives.

By allocating the site at Old Bath Road for high quality housing, this contributes to meeting the strategic objectives set out in the Core Strategy, particularly with respect to meeting housing needs and delivering well connected places accessible by sustainable means of transport.

We believe that development of Land at Old Bath Road, North Radstock could deliver a high quality residential extension to the settlement of Radstock that would be sustainably located and deliver much needed new homes.

Page 78 of the Options Document sets out an overview of development sites in the Somer Valley, which covers the urban areas of Midsomer Norton, Westfield and Radstock together with a rural hinterland containing the principle villages of Peasedown St John and Paulton.

Paragraph 1.208 of the Options Document states that the local population identifies itself as separate small communities, mainly based on the former mining settlements. However, residents also recognize that new opportunities and projects need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole.

Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Midsomer Norton town centre will continue to be the principle centre for the Somer Valley, with Radstock town centre providing a smaller scale but important focal point for neighbouring communities. Para 1.209 of the Options Plan states Midsomer Norton, Westfield and Radstock are very closely connected, both physically and economically; although the settlements are independent and distinct, it can be difficult for those not familiar with the area to establish precisely where the boundaries between the three lie. Amongst a series of requirements in Policy SV1 is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.

However paragraph 1.212 of the Options Document states that the majority of these dwellings have either been built since the start of the Plan period, or are existing commitments and paragraph 1.213 states thaadditional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement. This approach is reinforced through proposed detailed Policy HG.4 in the Options Document that continues to rely on the development boundaries identified in the 2007 BANES Local Plan. Whilst there is a recognition that these boundaries will need review as part of the development of the Placemaking Plan, paragraph 1.213 is clear that this would only be in relation to sites which lie outside existing development boundaries but now have planning permission. Furthermore this paragraph asserts that Additional greenfield sites in Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan.

We consider that this approach is restrictive and inflexible. Such an approach would result in an unsound Placemaking Plan which would not be in conformity with the Core Strategy as it would not be capable of delivering the required minimum level of dwellings for the Somer Valley Area identified in Core Strategy Policy SV1 within the Plan period. Furthermore it is very unlikely that any shortfall in this location could be met elsewhere in the District outside of the Somer Valley due to Green Belt constraints. We therefore consider that the need for a more flexible approach in the Placemaking Plan.

We object to Policy HG.4 on the basis that there is a need for housing to be located outside settlement boundaries at Radstock and that this should be the subject of positive and proactive planning for sustainable development.

Many of the sites identified in Radstock and the wider district are located on previously developed land and may have high associated remediation costs involved. This may result in both delays to the delivery of these sites and in some cases their unviability in current market conditions. In addition this may further impact on other plan considerations such as the provision of affordable housing.

We suggest that BANES needs to allocate a number of relatively unconstrained greenfield sites such as the land at Old Bath Road, North Radstock, that are otherwise sustainably located, in order to give themselves the necessary flexibility to achieve both an ongoing five year land supply and the overall Core Strategy Housing Target.

At Para. 1.281 of the Options document it states that the consultation will provide the opportunity to highlight to the Council any other potential development sites that are not currently included.

Linden Homes proposes that the Council consider Land at Old Bath Road, North Radstock for allocation as part of the Place Making site selection process that is extended in scope to include greenfield land at Radstock and as part of a settlement boundary review. There is intrinsic merit of development in this location and the quality of development that Linden would bring to the site.

Footnote 11 (to paragraph 47) of the NPPF requires that, to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that the development of the site is viable. The Old Bath Road site meets these requirements as follows:

"Available now" Linden controls the land through an agreement with a single landowner to bring the site forward for development. The site is therefore available now.

"Offer a suitable location for development" Radstock is a sustainable town which includes key community facilities the site is suitable to create a sustainable urban extension to the town of Radstock.

"A realistic prospect that housing will be delivered on the site within 5 years" Linden is committed to bringing forward the site for development and to deliver a first phase of housing completions within five years

"Development of the site is viable" there are no viability constraints to the delivery of the site.

We should point out that this is not an all or nothing approach. The site is approximately 155 acres so our site could provide 100 - 500 houses and anything in between. So it should not be assumed that the site can only be built out in its entirety.

Linden Homes has an interest in the site and will be looking to engage with the local community and key stakeholders including the Council to initially prepare a development framework masterplan document. The development framework document would provide details of emerging proposals which will emerge as the project progresses and key stakeholders such as the local community are consulted. The document would give confidence to the Council that the site is a deliverable and desirable development that would have a positive impact on the existing settlement.

#### Lindens commitment:

We will seek to directly engage with the local planning authority as is progresses the Bath and North East Somerset Placemaking Plan.

We will submit evidence and representations at the appropriate time.

We will take the opportunity to explain our approach to stakeholders and to the local community where possible.

We will continue to undertake our preparatory work and to develop our master planning to demonstrate a deliverable and desirable high quality residential scheme.

Linden and its consultancy team will seek a meeting with the Councs Development Management and Policy officers to discuss the principles and details of an emerging scheme.

We therefore respectfully request that the site should be allocated for residential development in the Draft Placemaking Plan on the basis that the subject site is suitable for new housing development, and is viable and therefore deliverable.

Linden Homes will also be submitting representations to the Joint Strategic Planning Strategy: Call for Sites as part of the review process, and the Councils HELAA.

| change requesteur  |                                    |                             |
|--|------------------------------------|-----------------------------|
|  |                                    |                             |
|  |                                    |                             |
|  |                                    |                             |
|  |                                    |                             |
| Respondent 6414 Comment 21 Res   | nandant                            | Respondent Radstock Land LP |
|  |                                    | •                           |
| Number: Number: Na   | me:                                | Organisation:               |
| Agent ID: 162 Agent Name: Degesie  |                                    |                             |
| <b>Agent ID: </b> 162 <b>Agent Name:</b> Pegasus   |                                    |                             |
| From the authorized the south of the south o |                                    | with the comment? $\square$ |
| Further Information available in the or  | iginal comment?   Attachments sent | with the comment? —         |
|  |                                    |                             |
|  |                                    |                             |
| Placemaking Options Plan Reference:  | Policy HG4                         |                             |
|  | ,                                  |                             |

#### **Comment on the Site:**

Change requested

Emerging Policy Approach HG.4

Saved Policy HG.4 of the Local Plan seeks to restrict development in named settlements to within a defined housing development boundary or within a locally allocated development site.

Emerging Policy Approach HG.4 seeks to continue this restrictive stance to development in Midsomer Norton, Peasedown St John and Paulton.

This restrictive and binary approach to development at these settlements is not consistent with national planning policy.

The NPPF clearly requires a balancing exercise or cost-benefit analysis be applied to planning decisions i.e. unless any adverse impacts associated with a development would significantly or demonstrably outweigh the benefits, it should be allowed.

As currently proposed, Emerging Policy HG.4 does not allow for this cost-benefit exercise to be applied.

Furthermore, the NPPF requires that Local Plans plan positively for development and identify land where development would be inappropriate, for instance because of its environmental or historical significance. The NPP provides adequate restriction to development in the open countryside, where it is justified.

The proposed blanket restriction of development on land outside of a settlement boundary, does not meet the tests of the NPPF. Settlement boundaries are not based on environmental or other constraints – they simply represent the extent of the existing/planned urban area.

In order to be consistent with the NPPF, emerging Policy HG.4 must be re-worded to provide flexibility. This could be achieved by changing the wording of the emerging policy as follows:

"Residential development in Midsomer Norton, Radstock, Westfield, Peasedown St John and Paulton will be permitted provided:

a) the proposal lies within the defined housing development boundary; or

b)it forms an element of an allocated site; or

c)it meets an identified housing need and would deliver significant benefits which would not be outweighed by any adverse impacts associated with the development.

Any residential development should be appropriate to the scale of the settlement in terms of the availability of facilities and employment opportunities and accessibility to public transport and other sustainable transport modes (including cycling and walking)."

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

| Respondent 6415 | Comment 20 | Respondent | Respondent    | Strongvox Homes |
|-----------------|------------|------------|---------------|-----------------|
| Number:         | Number:    | Name:      | Organisation: |                 |

Agent ID: 162 Agent Name: Pegasus

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

| Placemaking Options Plan Reference: | Policy HG4 |
|-------------------------------------|------------|
|                                     |            |

#### Comment on the Site:

Saved Policy HG.4 of the Local Plan seeks to restrict development in named settlements to within a defined housing development boundary or within a locally allocated development site.

Emerging Policy Approach HG.4 seeks to continue this restrictive stance to development in Midsomer Norton, Peasedown St John and Paulton.

This restrictive and binary approach to development at these settlements is not consistent with national planning policy.

The NPPF clearly requires a balancing exercise or cost-benefit analysis be applied to planning decisions i.e. unless any adverse impacts associated with a development would significantly or demonstrably outweigh the benefits, it should be allowed.

As currently proposed, Emerging Policy HG.4 does not allow for this cost-benefit exercise to be applied.

Furthermore, the NPPF requires that Local Plans plan positively for development and identify land where development would be inappropriate, for instance because of its environmental or historical significance. The NPP provides adequate restriction to development in the open countryside, where it is justified.

The proposed blanket restriction of development on land outside of a settlement boundary, does not meet the tests of the NPPF. Settlement boundaries are not based on environmental or other constraints – they simply represent the extent of the existing/planned urban area.

In order to be consistent with the NPPF, emerging Policy HG.4 must be re-worded to provide flexibility. This could be achieved by changing the wording of the emerging policy as follows:

"Residential development in Midsomer Norton, Radstock, Westfield, Peasedown St John and Paulton will be permitted provided:

a) the proposal lies within the defined housing development boundary; or

b)it forms an element of an allocated site; or

c)it meets an identified housing need and would deliver significant benefits which would not be outweighed by any adverse impacts associated with the development.

Any residential development should be appropriate to the scale of the settlement in terms of the availability of facilities and employment opportunities and accessibility to public transport and other sustainable transport modes (including cycling and walking)."

| _ | ١. |   |   |   |   |   |   |   |   |   | - 1 |   |   |   |   |
|---|----|---|---|---|---|---|---|---|---|---|-----|---|---|---|---|
|   | n  | 2 | n | Œ | e | r | Δ | n |   | Δ | CI  |   | Δ | a | • |
| • |    | a |   | s | _ |   | C | u | u | c | Э,  | Ŀ | _ | u | • |

| Respondent 6434 Comment 2 Res<br>Number: Number: Nam  | spondent<br>nme:     | Respondent<br>Organisation: | David Webb<br>Management Ltd. |  |  |
|---|----------------------|-----------------------------|-------------------------------|--|--|
| Agent ID: 229 Agent Name: Phoenix   | x Land Solutions Ltd |                             |                               |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                      |                             |                               |  |  |
|   |                      |                             |                               |  |  |
| Placemaking Options Plan Reference:   | Policy HG4           |                             |                               |  |  |

#### Comment on the Site:

change policy HG4 to include an additional point so that it reads as follows:

POLICY APPROACH HG.4

Residential development in Midsomer Norton, Radstock, Westfield, Peasedown St John and Paulton will be permitted provided:

a) the proposal lies within the defined housing development boundary; or

b)the proposal is for the development of a previously developed site on the edge of the existing Housing Development

Boundary; or

c)it forms an element of mixed use allocated site, and

d)it is appropriate to the scale of the settlement in terms of the availability of facilities and employment opportunities and accessibility to public transport and other sustainable transport modes (including cycling and walking).

This would comply with local and national policy as it carries through the Government's emphasis of prioritising brownfield and actively encourages redevelopment of brownfield land before greenfield sites on the edge of the HDB. Various current appeals and recent grants of planning permission on greenfield sites in this location demonstrate that increased emphasis is required on redevelopment of brownfield land.

### **Change requested:**

It is understood that the Placemaking Plan will focus on sites that need to be allocated to meet the requirements of the Core Strategy. It is envisaged that these are mainly brownfield sites some of which are within or adjacent to the town centres of the towns of Midsomer Norton and Radstock.

The Site is previously developed land at Tyning Hill on the edge of the existing HDB close to Radstock Town Centre. It is situated on the edge of rural landscape but does not display the physical characteristics of the agricultural landscape on the adjacent hillside or the same degree of openness. Moreover foundations and footings of previous dwellings together with associated hardstanding access are visible on the site and have not blended into the landscape.

A planning application is prepared for redevelopment of upto 55 dwellings to include an element of live work with associated remediation works, highway improvements, community cafe, biodiversity and landscape enhancement and 30% affordable housing which is designed to facilitate a quality scheme on the urban edge.

Development will form an extension of the existing HDB at Tyning Hill, and can be seen in the context of a settlement which extends up the valley hillsides. Given it is adjacent to the Radstock settlement and a 10 minute walk from Radstock Town Centre it would form a natural extension to the Town offering the opportunity to improve the settlement edge, while including new key landscape elements, which will enhance the site. It will also enable improved connectivity between the new school to the north and the existing residential development at Lower Whiteland's. It will link up existing recreational walks that enable users to enjoy Radstock mining heritage and will re-connect Lower Whitelands development and residents with the wider community that was lost since the disintegration of the adjacent Mining dwellings.

Extending the existing adjacent HDB tightly round the Site and/or widening policy HG4 would help facilitate a brownfield site in a sustainable location with various public benefits as including enhanced biodiversity, 30% affordable housing and community cafe to be brought forward in a positive way fostering the delivery of sustainable mixed use development.

| Respondent 6456 Comment 1 Respondent Biggin famil Number: Number: Name:   | y Respondent Organisation: |  |  |  |  |
|---|----------------------------|--|--|--|--|
| Agent ID: 205 Agent Name: Rocke Associates Ltd  Further Information available in the original comment? ☐ Attachments sent with the comment? ✓ |                            |  |  |  |  |
| Placemaking Options Plan Reference: Policy HG4  |                            |  |  |  |  |

#### Comment on the Site:

I refer to the above matter, and am writing to make some brief submissions on behalf of the Biggin family.

Policy HG.4

The presumption in favour of residential development in Midsomer Norton is supported. However, there needs to be a clear commitment to reviewing the development boundaries to allow for sustainable development opportunities, in particular those that are within walking distance of the town centre and offer the propensity for accessibility on foot. The requirement for residential development to form an element of a mixed use scheme is unrealistic and onerous bearing in mind the scale of site that is likely to be identified in the Placemaking Plan. Whilst some larger and/or town

centre sites might offer the potential for mixed uses, not least through a vertical distribution, there are others on which housing will be the only appropriate use, and sufficient critical mass of other, non-residential uses will not be achievable. In order to deliver the housing required following years of under-provision in the district, and in order to meet the NPPF objective to boost housing delivery significantly, the requirement for mixed use schemes on every site should be removed. Those sites that provide the opportunity for mixed use development should be identified through the individual site allocations.

Sustainable Housing Site

My clients are the owners of 46 Radstock Road, a sizeable Victorian residential property that has a frontage onto the Radstock Road. To the rear the dwelling has an extensive curtilage, and beyond that is a paddock that extends to the River Somer in the valley bottom. The site is identified on the enclosed plan.

The site represents an ideal opportunity for housing development in close proximity to Midsomer Norton Town Centre. There is sufficient space to the west of the existing dwelling to create a new access road through to the land at the rear, retaining the existing dwelling on the road frontage. Adequate visibility can be created by setting back the boundary.

The land falls towards the River Somer, and the site could be developed for residential purposes with minimum environmental impact. The site is within easy walking distance of Midsomer Norton town centre and local employment in the vicinity of Radstock Road and the town centre.

Development of the site would provide the opportunity for a riverside path that could connect to the proposed Town Park on land to the west and south (Policy SSV3).

The site should therefore be included in the development limits and allocated for residential development in the Submission Draft Placemaking Plan.

My clients would be pleased to discuss this opportunity further, and to work with the Council towards an appropriate development framework for the site.

| Change requested:  |                                  |
|--|----------------------------------|
| Respondent 6533 Comment 1 Respondent Mr Roger Mansell Number: Name:                        | Respondent<br>Organisation:      |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachment | ts sent with the comment? $\Box$ |
| Placemaking Options Plan Reference: Policy HG4   |                                  |

# **Comment on the Site:**

Haydon is not linked physically to Radstock ,being separated by a green buffer zone. Any proposed change of boundary would go against the CURRENT PLACEMAKING PLAN and any proposed development would also go against the edict that Rural Villages should maintain their own identity as stated by Bath & North East Somerset Council in its Local Plan. There is no infrastructure for any development in Haydon.

There are no facilities in Haydon.

I understand that local Doctors waiting lists are full as is St Nicholas school in Radstock.

#### **Change requested:**

I am requesting that the Placemaking Plan is adhered to and not amended to include boundary changes.

# Placemaking Options Plan Reference: Somer Valley General Comments

Plan Order Number: 300

| Respondent 219 Comment 1 I<br>Number: Number:  | Respondent<br>Name: | <b>Respondent</b> Edward Ware Homes Ltd <b>Organisation:</b> |
|--|---------------------|--|
| Agent ID: 175 Agent Name: Ian Jewson Planning Ltd  Further Information available in the original comment? ☐ Attachments sent with the comment? ✓ |                     |  |
| Placemaking Options Plan Reference: Somer Valley General Comments  |                     |  |

#### **Comment on the Site:**

Emerging Policy Approach HG.4 seeks to restrict residential development in Midsomer Norton, Radstock, Westfield, Peasedown St John and Paulton to within housing development boundaries ('HDBs) unless:

- •it forms an element of mixed use allocated site, and
- •it is appropriate to the scale of the settlement in terms of the availability of facilities and employment opportunities and accessibility to public transport and other sustainable transport modes (including cycling and walking).

The justification for this approach is set out in the supporting text which states:

- "1.211 Core Strategy Policy SV1 sets out the strategy for the Somer Valley as a whole. Amongst a series of requirements is the need to enable the delivery of around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John.
- 1.212 The majority of these dwellings have either been built since the start of the Plan period, or are existing commitments (having gained planning permission but not yet built).
- 1.213 Additional greenfield sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement. Additional greenfield sites were suggested during the launch consultation and these are listed in the consultation report, but are not taken forward as part of this options consultation. Furthermore, some greenfield sites suggested through the launch consultation have since been granted planning permission. As such they are also not included within this consultation document. However, the Housing Development Boundaries will need to be reviewed to take them into account (see the Housing Development Boundary Review section).
- 1.214 The Placemaking Plan will therefore focus on the sites that do need to be allocated to meet the requirements of the Core Strategy. These are mainly brownfield sites that are within or adjacent to the town centres of the towns of Midsomer Norton and Radstock and within Westfield. "

Paragraph 1.212 suggests that existing commitments are sufficient to address the Somer Valley housing requirement of around 2,470 dwellings. However, a review of the recently published Strategic Housing Land Availability Assessment (SHLAA) Housing Trajectory 2011 to 2029 (December 2014) indicates that this is not the case.

It is acknowledged that the trajectory suggests that 2,640 dwellings will be delivered in the Somer Valley during the plan period (2011 to 2029), 170 dwellings in excess of the housing requirement. This comprises the following:

**Dwellings** 

Completions between 1st April 2011 and 31st March 2014 498
Predicted Supply between 1st April 2014 and 31st March 2029 2,142
Total 2,640

However, a review of the sites that make up the predicted supply indicates that only 1,146 of the 2,142 dwellings have planning permission. While the number of dwellings that have been allocated in the Placemaking Plan is not fixed for each

site, it is clear that not enough sites are being proposed to meet the minimum target of 2,470 dwellings set by Policy SV1 of the Core Strategy. The emerging policy approach is therefore currently unsound as it has not been 'positively prepared' or 'justified', two of four tests of soundness set out at paragraph 182 of the NPPF.

### **Change requested:**

In order to remedy the above issue and ensure that the Placemaking Plan is sound it is necessary to allocate additional greenfield sites adjacent to the HDBs of the settlements listed in Policy SV1. Our client proposes the allocation of the sites listed in the table below. All of the sites have been subject to planning applications, with some currently subject to appeals. The applications were accompanied by a range of supporting documents which confirm that the sites are sustainable locations for development and that there are no technical issues that would preclude development. Copies of the relevant Site Location Plans and Illustrative Site Layouts are included for reference.

SiteCapacityApplication

ReferenceDrawings

Land at Abbotts Farm Close, Paulton47 dwellings13/03547/OUTSite Location Plan and Illustrative Site Layout (Appendix 1)

Land at Boxbury Hill, Midsomer Norton124 dwellings13/04880/OUTSite Location Plan and Illustrative Site Layout (Appendix 2)

Land at Northmead Road, Midsomer Norton44 dwellings14/00672/OUTSite Location Plan and Illustrative Site Layout (Appendix 3)

Land at Thicket Mead Farm, Midsomer Norton72 dwellings14/00685/OUTSite Location Plan and Illustrative Site Layout (Appendix 4)

| Respondent 279 Comment 12 Respondent Rohan Torkildsen Number: Name:                         | Respondent English Heritage Organisation: |  |  |
|---|---|--|--|
| Agent ID: Agent Name:   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments se                | nt with the comment? $\Box$               |  |  |
| Placemaking Options Plan Reference: Somer Valley General Comments                           |   |  |  |
| Comment on the Site:  |   |  |  |
| At present the evidence gathered and applied to inform these allocations is not             | clear and does not appear to form part of |  |  |
| the Plan's evidence base. As a consequence it has proved difficult to appreciate            |   |  |  |
| implications (both positive and negative) of the proposed allocations for the his           |   |  |  |
| that has been applied to their conservation.  |   |  |  |
| Change requested:   |   |  |  |
|   |   |  |  |
| Respondent 821 Comment 2 Respondent Deborah Porter  | Respondent Cam Valley Wildlife            |  |  |
| Number: Name:   | Organisation: Group                       |  |  |
| Agent ID: Agent Name:   | •   |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |   |  |  |
| Placemaking Options Plan Reference: Somer Valley General Comments                           |   |  |  |

### **Comment on the Site:**

The Somer Valley Development sites overview mentions the occurrence of brownfield sites but makes absolutely no mention of the need to steer development to low value brownfield sites and avoid high value ones in accordance with the NPPF. It make no reference to integrating the needs of wildlife and biodiversity, enhancing the resource or achieving gains for nature. It is solely concerned with where to place built development.

The Radstock Strategy is concerned mainly with socio-economic and aesthetic matters, makes no mention of the natural environment in any other context, and makes no mention of biodiversity. There is a commitment to enhancing the "quality of green infrastructure" in the context of bringing under-used and vacant sites into use, but bringing these sites into use will result in a substantial and highly significant loss to the biodiversity of the area and a significant loss in a B&NES and regional context. Enhancing these sites will not recoup the lost assets, including in the long term. The loss is not acknowledged or factored in to any strategy.

The Council's duty under the NERC Act and the requirements set out in the NPPF do not appear to be addressed in the Strategy for the Somer Valley area or the Town of Radstock. Given the recent impact of decisions on the natural environment and biodiversity of the Somer Valley area, we are somewhat concerned.

### Individual site policies

We take the view that protective polices should remain in site -specific policies where there is a known important wildlife or biodiversity matter to be addressed, as we did in our representations regarding the B&NES Local Plan. In the case of a particular development in Radstock, the specific policy had contained clauses that directed that natural environment policies were adhered to, but this was removed so as not to duplicate and to provide a concise plan. In this significant case, B&NES acted against the express wish of the Inspectorate in her report on the Local Plan, that there be full mitigation for the nature conservation losses and that value should be retained. Where she advocated no development that threatened the value of the biodiversity resource unless full mitigation could be assured, the decision made went against this. There is no indication that, if this happens to site-specific policies in the Options document, that the natural environment policies presented will protect them..

Individual site policies do take the needs of protected species into account (ie bats), but this relies on the efficacy of mitigation measures and the willingness of future residents not to negate the effect of these measures (as happens through dumping of rubbish; chopping down trees and vegetation to increase light to gardens and windows; installing security lighting or night-time garden lighting; allowing light spill from windows; toileting dogs in sensitive areas; keeping cats that kill the birds and reptiles). What it does not do is look at the importance of the resource and take an approach that values it, enhances it, and does not put it at risk.

| Change requested:   |  |  |  |
|---|--|--|--|
| Respondent 1556 Comment 6 Respondent Number: Number: Name:  | Respondent Strategic Land Organisation: Partnerships |  |  |
| Agent ID: 128 Agent Name: Peter Brett Associates  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |  |  |
| Placemaking Options Plan Reference: Somer Valley General Comments                                       |  |  |  |

### **Comment on the Site:**

Midsomer Norton

There are numerous paragraphs which recognise that Midsomer Norton is the principle town (1.217) and that there is an opportunity to create depth by encouraging new and enhanced walking links to residential areas (1.222) and that it plays the role of a market town serving a wider area (1.225). In addition paragraph 1.208 in relation to the Somer Valley recognises theneed to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole. Paragraph 1.210 recognises the need for more self-reliance and the complementary role of Midsomer

Norton, Westfield and Radstock and that Midsomer Norton will continue to be the principle centre for the Somer Valley. This would indicate that there is a positive opportunity to reinforce the important role Midsomer Norton plays within the Somer Valley and compliment further what has already got permission and to improve links into the town centre. The Placemaking Plan provides the opportunity to positively plan for the future of the town, recognise the role it plays and its attractiveness to the market and first time buyers and ability to deliver much needed houses for local people at more affordable prices than Bath.

The opportunity should be taken to comprehensively allocate and identify additional land to the south of Midsomer Norton, along Silver Street and linking in with the existing commitment to the west of Fosseway. See map at Appendix B. There are a number of opportunities to improve accessibility and connectivity along Silver Street creating a footway from the south into the town centre. There are also a number of parcels of land which could help facilitate this and which would be well suited to high quality, sustainable low carbon development, perhaps incorporating a small number of larger high quality houses together with a retirement village or care facilities of some sort. The land along Silver Street also provides opportunities to provide a number of other community facilities such as allotments and a community garden of remembrance, as well as the opportunity to improve accessibility and connectivity into the town centre with the provision of a cycle and footway, and improve bus circulation and permeability as well as safety by moving the 30mph limit south to the BANES/MENDIP boundary. There are other benefits which could also be achieved including the improvement in broadband speeds, provision of additional parking for the rugby club and the opportunity to link into the railway line and improve the use of this recreational resource. Representations about this have been submitted to the early Neighbourhood plan consultation, and it is important that the opportunity is taken to link the Placemaking Plan with the emerging neighbourhood development plan which is currently being prepared.

The current approach in the Plan concentrates on a small number of brown-field sites and continues to allocate previously developed sites which have been identified for many years and which have not come forward for numerous reasons. Continuing to rely on these sources of supply provides no certainty, flexibility or choice if they do not come forward to 2029 and seems perverse to loose employment land where the council thinks there is a problem with jobs homes balance. These sites are notoriously difficult to redevelop and brown-field sites within the urban area should be protected at least in part for employment uses which mean the potential for growth onto greenfield sites should be recognised. The current strategy is too restrictive, does not represent positive planning and is a missed opportunity to plan for long term growth which is inevitably going to be required. In addition it is likely to fail to deliver the required number of affordable homes to meet the local need. The only way to guarantee the delivery of much needed affordable housing is by identifying suitable, sustainable and unconstrained greenfield sites which can be developed quickly to ensure a robust five year supply of appropriate sites which will deliver the housing required by the Core Strategy. As set out above planning for the currently identified level of housing is likely to be an underestimate of housing need, because it does not take into account the wider housing need across the West of England which is currently being established in the overarching SHMA, which will also properly take into account all relevant market signals.

### Cross boundary issues

The plan is wholly silent on the relationship areas have across their administrative boundaries. BANES is not an island and Midsomer Norton provides services to more than just the residents of BANES. The villages within north Mendip are clearly well related to the town and there is an important functional relationship which exists. The section on Midsomer Valley should recognise the links with Mendip District Council and there should be a requirement to work with Mendip District Council in connection with their Site Allocations Part 2 Plan. It would be quite wrong for the Placemaking Plan to progress further without acknowledging the relationship and the possibility of further development to the south of the town.

We are aware that other land is being promoted to support the growth of Midsomer Norton, just beyond the boundary and it would be quite wrong to ignore this. It is essential that proper cross boundary working takes place to recognise the functional relationships which exist and the links between Midsomer Norton and the villages within Mendip.

### **Change requested:**

The plan should be made more flexible and include additional sites at Midsomer Norton to ensure it is able to respond to the evidence from the emerging West of England SHMA. The specific site at Silver Street as shown on the Attached Plan (Appendix B) should be identified as set out above.

It is essential that the emerging plans work together to address the local needs. Dealing with the growth of Midsomer Norton without taking account of the issues within Mendip is wholly inappropriate. Proper cross boundary working should take place which deals with this area as a contiguous entity because the operation of this place is not constrained to its administrative boundaries.

| Respondent 1566 Comment 3 Respondent   | Respondent Strategic Land  |
|--|--|
| Number: Name:  | Organisation: Partnerships   |
| Agent ID: 128 Agent Name: Peter Brett Associates   |  |
| Further Information available in the original comment? $\Box$ Attachment   | ments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Somer Valley General Comme   | ents   |
| Comment on the Site:   |  |
| The Policies for Midsomer Norton and the Somer Valley are consistent which basically seeks to restrict any more greenfield development of his sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Permeet the Core Strategy requirement. This means there is no flexibility meet identified local needs and also to respond to the inevitable change coming from the West of England SHMA. The current policy approach outside settlements, which is intensified by the reliance on brownfield deliver housing. There is a clear need to retain and deliver more employment sites are protected. | nousing. Paragraph 1.213 says additional green field asedown St John do not need to be allocated to within the plan to accommodate development to ges that are going to result from the new evidence contributes to considerable pressure on areas sites and the choice of using employment sites to |
| Change requested:  |  |
| The plan should be made more flexible and include more sites at Midso evidence from the emerging West of England SHMA  | omer Norton to ensure it is able to respond to the   |
| Respondent 4786 Comment 1 Respondent Councillor Barry Macro Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment? ☐ Attachment  | rae Respondent BANES Organisation: ments sent with the comment?  |

### **Comment on the Site:**

The latest iteration of the Core Strategy (as it applies to Midsomer Norton) is now very broadly acceptable and supported. The public display (at the MSN Town Hall, 28/11/14) does represent the priorities upon which our community have been consulted (over a VERY long period!) and now adds some welcome additional 'flesh' and localised contributions - especially from the Neighbourhood & Placemaking Working Group that was established by the Town Council. The congruity of the Corporate plan and the Local elements are helpfully very strong, with almost 100% LOCAL support for the strategic policy proposals and clear reinforcement of the three most essential/vital aspirations of our residents (as evidenced during personal canvassing and from spontaneous comments received from our residents).

The hard work and very welcome efforts of the Town Council and it's supporting community volunteers has already gone a long, long way in adding details to the "ideas"

The major concern - now - is the need to actually "DO" something about the listed aspirations.

We (all) seem to have been 'talking' for such a long time. We now - urgently - need to "get on with it"!

Three particular elements of that plan are of particular urgency....

Placemaking Options Plan Reference: Somer Valley General Comments

1: The comprehensive revitalisation of our present Town Centre. In particular it is important to see direct coordinated action (on the ground) for South Road - especially having regard to underpinning major improvements to the fabric and viability of the properties lying between that site and the High Street. VITAL to the success of this policy (and forward

aspirations) is the need to strongly maintain formal opposition to ANY speculative retail proposals on "out of town" sites. 2: There is an urgent need to quantify & evaluate the SCALE & DETAIL of daily out-commuting employment, in order to properly seek major investment - actively to be supported by Banes & MSNTC - in creating both the infrastructure and resources to bring NEW employment back into MSN. An emphasis upon reducing that <debilitating, two-hours/day> commuting ...and it's additionally negative environmental impacts... is essential, as is a forward-looking focus upon sustainable employment/training (incl Apprenticeships) for our local youth.

3: it is incredibly important to rigorously maintain & defend the Core Strategy's very clear & objectively determined policy of strict 'constraint' upon purely speculative and unwelcome commuter-style Lego-land housing estates upon our current green-field sites. ALL/ANY future housing investment within MSN - indeed within the entire Somer Valley - really MUST focus upon provision of RELEVANT housing units/types/styles to meet the clear needs of (primarily) our existing LOCAL residents. (With a 'possible' exception where such new housing specifically brings with it, the guaranteed direct provision of new/additional local employment.)

I believe that the present CS/plan is already - now - legally compliant and every effort must be made to ensure that the Development Control function (of Banes) must now strenuously defend, promote, prioritise and seek to implement THESE supported policies. Crass & greedy speculation - especially by regional/national developers - has no place, nor makes any positive contribution to this community and MUST be forcibly resisted, so as to allow this area to develop IN THE MANNER THAT IS NOW SOUGHT & PREFFERED BY ITS RESIDENTS.

Further delay...or just further "talking".... Is unacceptable. We all agree with where we want to get to......let's get on with it!

| Change requested:   |                           |  |  |
|---|---------------------------|--|--|
|   |                           |  |  |
|   |                           |  |  |
| Respondent 4803 Comment 2 Res<br>Number: Number: Na   | spondent<br>ime:          | Respondent Waddeton Park Limited Organisation: |  |
| Agent ID: 128 Agent Name: Peter B   | rett Associates           |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |                           |  |  |
| Placemaking Options Plan Reference:   | Somer Valley General Comm | ents   |  |

### **Comment on the Site:**

2.1.1 The Policies for Midsomer Norton and the Somer Valley are consistent with the Core Strategy and previous local plan, which basically seeks to restrict any more greenfield development of housing. Paragraph 1.213 says 'additional green field sites adjoining Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John do not need to be allocated to meet the Core Strategy requirement'. This means there is no flexibility within the plan to accommodate development to meet identified local needs and also to respond to the inevitable changes that are going to result from the new evidence coming from the West of England SHMA. The current policy approach contributes to considerable pressure on areas outside settlements, which is intensified by the reliance on brownfield sites and the choice of using employment sites to deliver housing. There is a clear need to retain and deliver more employment within the Somer Valley and it is essential that existing employment sites are protected.

### Midsomer Norton

There are numerous paragraphs which recognise that Midsomer Norton is the 'principle town' (1.217) and that there is 'an opportunity to create depth by encouraging new and enhanced walking links to residential areas' (1.222) and that it 'plays the role of a market town serving a wider area' (1.225). In addition paragraph 1.208 in relation to the Somer Valley recognises the 'need to bring about change and enable these separate communities to come together to benefit the Somer Valley as a whole'. Paragraph 1.210 recognises the need for more self-reliance and the 'complementary role of Midsomer Norton, Westfield and Radstock and that Midsomer Norton will continue to be the principle centre for the Somer Valley'. This would indicate that there is a positive opportunity to reinforce the important role Midsomer Norton plays within the Somer Valley and compliment further what has already got permission and to improve links into the town

centre. The Placemaking Plan provides the opportunity to positively plan for the future of the town, recognise the role it plays and its attractiveness to the market and first time buyers and ability to deliver much needed houses for local people at more affordable prices than Bath.

- 2.4.2 The opportunity should be taken to comprehensively allocate and identify additional land to the south of Midsomer Norton, and work with Mendip Borough Council to provide a comprehensive strategy for the long term future growth of the town. Representations about this have been submitted to the early Neighbourhood plan consultation, and it is important that the opportunity is taken to link the Placemaking Plan with the emerging neighbourhood development plan which is currently being prepared.
- 2.4.3 The current approach in the Plan concentrates on a small number of brown-field sites and continues to allocate previously developed sites which have been identified for many years and which have not come forward for numerous reasons. Continuing to rely on these sources of supply provides no certainty, flexibility or choice if they do not come forward to 2029 and seems perverse to loose employment land where the council thinks there is a problem with jobs homes balance. These sites are notoriously difficult to redevelop and brown-field sites within the urban area should be protected at least in part for employment uses which mean the potential for growth onto greenfield sites should be recognised. The current strategy is too restrictive, does not represent positive planning and is a missed opportunity to plan for long term growth which is inevitably going to be required. In addition it is likely to fail to deliver the required number of affordable homes to meet the local need. The only way to guarantee the delivery of much needed affordable housing is by identifying suitable, sustainable and unconstrained greenfield sites which can be developed quickly to ensure a robust five year supply of appropriate sites which will deliver the housing required by the Core Strategy. As set out above planning for the currently identified level of housing is likely to be an underestimate of housing need, because it does not take into account the wider housing need across the West of England which is currently being established in the overarching SHMA, which will also properly take into account all relevant market signals.
- 2.5 Cross boundary issues
- 2.5.1 The plan is wholly silent on the relationship areas have across their administrative boundaries. BANES is not an island and Midsomer Norton provides services to more than just the residents of BANES. The villages within north Mendip are clearly well related to the town and there is an important functional relationship which exists. The section on Midsomer Valley should recognise the links with Mendip District Council and there should be a requirement to work with Mendip District Council in connection with their Site Allocations Part 2 Plan. It would be quite wrong for the Placemaking Plan to progress further without acknowledging the relationship and the possibility of further development to the south of the town.
- 2.5.2 We are promoting land at White Post south of the town as shown on the brochure attached at appendix B. This is just beyond the BANES boundary and it would be quite wrong to ignore this. It is essential that proper cross boundary

|   | s work together to address the local needs. Dealing with the |
|---|--|
| s not constrained to its administrative boundaries.           |  |
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
| Respondent 4803 Comment 7 Respondent Number: Name:            | Respondent Waddeton Park Limited                             |
| Number: Name:   | Organisation:  |
| Agent ID: 128 Agent Name: Peter Brett Associates              |  |
| Further Information available in the original comment? $\Box$ | Attachments sent with the comment? 🗹                         |
| Placemaking Options Plan Reference: Somer Valley Genera       | al Comments  |
|   |  |

### Comment on the Site:

- 4.1 Residential Development
- 4.1.1 Paragraph 2.4 (p174) recognises that the plan should provide housing to 'meet community's needs'. However, the NPPF actually says at paragraph 47 that LPAs should use evidence base to ensure plan meets the full objectively assessed needs .... over the plan period'. This is important because it is about meeting the future community's needs and not being defined by the present community's resistance to development. More particularly it is not clear how housing is being provided to meet these needs because there does not seem to have been any local housing needs surveys which clearly demonstrate the local need which exists. These up to date needs studies are fundamental to placemaking in general. An up to date robust evidence base is essential for a good and sound plan. Before proposals and opportunities for each area are examined, it is necessary to understanding how each place works, its role and essentially what its needs are. Housing needs are the main driver of change and growth, and it is clearly set out within national planning policy that the needs of the population should be met. Is it the intention to undertake local housing needs surveys to inform the next stage of the plan?
- 4.2 Housing and Facilities for the Elderly, housing for people with other Supported Housing or Care Needs
- 4.2.1 In paragraph 2.8 the figures used only go to 2021 as it says 'The number of people of retirement age is predicted to increase by nearly 6,000 (18.3%) by 2021'. This is important but is only part of the story. The data in the table supporting this section is out of date, uses the interim population data and only goes to 2021. Given that the Placemaking Plan goes to 2029, it is essential that the information used is as up to date as possible and properly attempts to predict what the change is likely to be at the end of the plan period. The latest full set of Population Projections are the 2012 based sets which have been available since June 2014 and go beyond the end of the plan period. Consequently, these figures should be used to inform the policies, options and strategy within the Placemaking Plan. It should be noted that the new 2012 based household projections are due next month and also that the West of England are embarking on a proper strategic planning review which will include a comprehensive assessment of the whole area and its needs through the SHMA. This up to date and emerging evidence must be assessed and used to inform this Plan.
- 4.2.2 Using the most up to date 2012 based population projections to update the information on the growth in elderly demonstrates that there is going to be a far greater increase in the number of people at retirement age than set out currently in the plan. This is demonstrated by the figures below:

Age20112029% increase 65-7415,92821,59235 75-8410,98117,93563.3 85+4,90810,819120.4

- 4.2.3 It is essential that the Placemaking Plan uses the most up to date information to provide a true picture of what is likely to happen by the end of the plan period. This may change the strategy and in this instance may mean than more provision for elderly care should be made.
- 4.3 Policy H1
- 4.3.1 While this policy makes some positive provision for new extra care accommodation, it includes reference to including storage for bikes, at a level which is entirely inappropriate. Obviously some bike provision in terms of storage and parking may be appropriate to encourage visitors to use this form of transport, however, the reality of residents being able to cycle on a regular basis and owning a bicycle is highly unlikely.
- 4.3.2 It is entirely appropriate to identify specific sites for this use and as such the opportunity should be taken to comprehensively assess the opportunities to the south of the town and identify suitable sites.
- 4.5 Meeting Local Community and recreational needs
- 4.5.1 Para 2.263 (p248) says that the Council should 'plan positively to meet the needs for social, recreational, cultural facilities and services'. We entirely agree with this sentiment and it is important that additional community facilities are provided to meet the needs of the growing and aging population. Para 2.273 says that 'new facilities will be supported

provided they are in easily accessible locations and the land'. This sentence is left unfinished, and it is unclear what it is going on to say.

- 4.5.2 In general we support these statements and encourage the plan to go further to identify suitable locations for these types of uses, specifically within Midsomer Norton. The area to the south of the town is well related to existing development, adjacent to housing, employment and sports facilities with easy access into the town centre. There is an opportunity to develop here and include community facilities and improve access up Silver Street.
- 4.6 Policy LCR2 New or replacement community facilities
- 4.6.1 This policy says new development should be 'within or well related to the settlement'. This acknowledges that many locations on the edge of existing settlement offer the opportunity to provide new facilities which are needed by the community. Given that there are only very limited sites available within the settlement due to the fact that the development boundaries are so tightly drawn, it will be necessary to allow new community facilities on sites well related to the settlement.
- 4.7 Policy LCR3 Building for Schools
- 4.7.1 We note that the Midsomer Norton Neighbourhood Plan identified "education" as a key component of the Neighbourhood Plan, and understand that there is a projected shortfall in primary school capacity. The Core Strategy identifies the provision of 2470 new homes in the Somer Valley and while most have been committed there are still a considerable number to be built which will lead to a generation of a considerable number of children and requirement for new school places. While this policy includes specific provision for the expansion of Welton Primary school at Midsomer Norton, it is our belief that there is a need for more school places in this market town, especially in the south.
- 4.7.2 Planning for the growth of the town in a comprehensive and holistic way allows for proper provision to be made for the long term. Given the way the administrative boundaries are drawn, so closely round Midsomer Norton, it is necessary for BANES and Midsomer Norton Town Council to actively engage and work with Mendip and Somerset Councils to identify the most appropriate location for a new school and ensure that this is adequately established to cater for local children. The brochure attached at Appendix B sets out the opportunity for a school to be incorporated as part of this site.

| Change requested:   |                               |                             |  |  |
|---|-------------------------------|-----------------------------|--|--|
|   |                               |                             |  |  |
|   |                               |                             |  |  |
|   |                               |                             |  |  |
| Respondent 6414 Comment 1 Res   | pondent                       | Respondent Radstock Land LP |  |  |
|   | me:                           | Organisation:               |  |  |
| Agent ID: 162 Agent Name: Pegasus   |                               |                             |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                               |                             |  |  |
|   |                               |                             |  |  |
|   |                               |                             |  |  |
| Placemaking Options Plan Reference:   | Somer Valley General Comments |                             |  |  |

### **Comment on the Site:**

I write on behalf of my client Radstock Land LP to make representations to the Placemaking Plan Options Document published November 2014.

My clients have interests in land to the north of Fosseway Gardens, Westfield, Radstock. A site plan depicting the extent of my client interests is attached at Appendix 1 to this letter.

Pegasus Planning was heavily involved in the Examination of the Core Strategy and my comments below are made in this context.

Strategy for the Somer Valley

Page 78 of the Placemaking Plan Options Document states that additional greenfield sites adjoining Somer Valley settlements do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement.

This comment does not reflect the conclusions of the Core Strategy Inspector who was very clear in stating that the 13,000 housing requirement set by the Core Strategy should not be applied as a cap on development. Where it would represent sustainable development, proposals must not be prevented from coming forward simply on the basis that it would exceed the Core Strategy targets.

As acknowledged by the Core Strategy Inspector, the housing target set out by the Core Strategy might be too low and certainly does not represent a generous response to market signals.

Furthermore, we note that B&NES, along with the other three West of England authorities is in the process of preparing a Joint Strategic Planning Strategy (JSPS) which will identify the number of new homes and jobs to be planned for in the West of England between 2016 and 2036.

In order to inform the JSPS a new West of England SHMA is being produced. As acknowledged by the Council during the Examination of the B&NES Core Strategy, B&NES will have to respond to any request from adjoining authorities to accommodate housing need that could not be otherwise met in the Bristol sub-region.

Opportunities for sustainable development in the Somer Valley should not therefore be discounted simply on the basis of the Core Strategy housing targets (which must be applied as minimum targets).

My clients land to the north of Fosseway Gardens, Westfield, Radstock, represents a sustainable location for future development. It is:

- Adjacent to the existing built up area of Radstock;
- an inherently sustainable location within easy walking distance of the three district centres and their full range of community facilities;
- Capable of delivering a range of market and affordable housing; and
- Available for development immediately.

It is therefore a site which should be considered for development.

Placemaking Options Plan Reference: Somer Valley General Comments

| Respondent 64:<br>Number: | 15 <b>Comment</b> 1 <b>Number:</b> | Respondent<br>Name:   | Respondent Strongvox Homes Organisation:         |
|---------------------------|------------------------------------|-----------------------|--|
| Agent ID: 162             | <b>Agent Name</b> : Pe             | gasus                 |  |
| Further Informa           | tion available in                  | the original comment? | $\Box$ Attachments sent with the comment? $\Box$ |

# Comment on the Site:

Change requested:

I write on behalf of my client Strongvox Homes to make representations to the Placemaking Plan Options Document published November 2014.

My clients have interests in land to east of Church Road, Peasedown St John. A site plan depicting the extent of my client

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| interests is attached at Appendix 1 to this letter.  |
| Pegasus Planning was heavily involved in the Examination of the Core Strategy and my comments below are made in this context.  |
| Strategy for the Somer Valley  |
| Page 78 of the Placemaking Plan Options Document states that additional greenfield sites adjoining Somer Valley settlements do not need to be allocated in the Placemaking Plan in order to meet the Core Strategy housing requirement.  |
| This comment does not reflect the conclusions of the Core Strategy Inspector who was very clear in stating that the 13,000 housing requirement set by the Core Strategy should not be applied as a cap on development. Where it would represent sustainable development, proposals must not be prevented from coming forward simply on the basis that it would exceed the Core Strategy targets.   |
| As acknowledged by the Core Strategy Inspector, the housing target set out by the Core Strategy might be too low and certainly does not represent a generous response to market signals.   |
| Furthermore, we note that B&NES, along with the other three West of England authorities is in the process of preparing a Joint Strategic Planning Strategy (JSPS) which will identify the number of new homes and jobs to be planned for in the West of England between 2016 and 2036. In order to inform the JSPS a new West of England SHMA is being produced. As acknowledged by the Council during the Examination of the B&NES Core Strategy, B&NES will have to respond to any request from adjoining authorities to accommodate housing need that could not be otherwise met in the Bristol sub-region. |
| Opportunities for sustainable development in the Somer Valley should not therefore be discounted simply on the basis of the Core Strategy housing targets (which must be applied as minimum targets).  |
| My clients land to the east of Church Road, Peasedown St John, represents a sustainable location for future development. It is:  |
| -Adjacent to and well related to the existing built up area of Peasedown St John;  |
| -Outside the Green Belt;   |
| -Environmentally unconstrained;  |
| -Capable of delivering a range of market and affordable housing; and   |
| -Available for development immediately.  |
| It is therefore a site which should be considered for development.   |
| Change requested:  |
|  |
| Perpendent 6562 Comment 2 Perpendent Mas Decement Tiles  |
| Respondent 6563 Comment 2 Respondent Mrs Rosemary Tiley Respondent   |

Placemaking Options Plan Reference: Somer Valley General Comments

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

**Agent Name:** 

Name:

Number:

Agent ID:

Organisation:

### **Comment on the Site:**

I am very disappointed that the place making plan seems to ignore several of the policies designated in NPPF. Notably: Recognising the intrinsic character and beauty of the countryside, conservation of heritage assets, fullest possible use of public transport and, most importantly, support sustainable rural tourism - provision and expansion of tourist/visitor facilities.

Despite the initial statement of the importance of Radstock's railways 1.268 - there is no attempt to maintain/reinstate/enhance the few remaining vestiges of what was once the beating heart of Radstock - beyond a weak comment about retaining some/one of the Marcroft buildings.

I am really disappointed that an opportunity to reinstate a railway (if only similar to that in Midsomer Norton) has not be taken. It would attract visitors (probably more than MsN as it is on a main road) and that in itself would generate knock-on effects such as visitor/tourist services - creating employment in its wake. And should the line eventually be connected to Frome imagine the benefits to local industries as well as residents.

### **Change requested:**

I would like to see an area set aside to accommodate access to the railway line, should it become usable again and careful placement of the cycle path to ensure that it does not stop re-development of the line. We are not all fit cyclists and whilst I have no wish to curtail plans for their enjoyment - the rest of us should also be considered - especially in an aging population.

Placemaking Options Plan Reference: South Road Car Park (SSV2)

Number: 314 Respondent 279 Comment 13 Respondent Rohan Torkildsen Respondent English Heritage Number: Number: Name: Organisation: **Agent Name:** Agent ID: Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: South Road Car Park (SSV2) **Comment on the Site:** The site is immediately adjacent on 3 sides to the Midsomer Norton & Welton Conservation Area – a heritage asset at risk. There are also 2 x II LBs nearby. The policy fails to indicate how development would respond to these assets and protect and enhance local distinctiveness by design/ scaling/ massing etc. The above essential clarifications are required. English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters.

**Change requested:** 

Plan Order

Placemaking Options Plan Reference: Central High Street Core, including the

Plan Order Number: 320

**Organisation:** 

Palladium and Brewery Sites (SSV1)

Respondent 279 Comment 14 Respondent Rohan Torkildsen Respondent English Heritage

Agent ID: Agent Name:

Number:

Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: Central High Street Core, including the Palladium and Brewery Sites (SSV1)

### **Comment on the Site:**

Number:

The site is immediately adjacent to the Midsomer Norton & Welton Conservation Area – a heritage asset at risk and there are also 2 x II LBs nearby. How does/will the proposal respond?

What is the degree of local significance (non-designated heritage assets?) of this site? How has the historic and architectural significance informed the proposal?

How compatible are 'larger retail units' with the historic context?

English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Welton Bag Factory (SSV4)

| Plan Orde | er  |
|-----------|-----|
| Number:   | 327 |

| Respondent 279<br>Number:  | Comment 15 Number: | Respondent Rohan Torkildsen Name:  | Respondent English Heritage Organisation: |
|----------------------------|--------------------|--|---|
| Agent ID: Ag               | ent Name:          |  |   |
| Further Informatio         | n available in th  | ne original comment?   Attachments sen   | it with the comment? $\Box$               |
| Placemaking Option         | ons Plan Referen   | ce: Welton Bag Factory (SSV4)  |   |
| Comment on the S           | ite:               |  |   |
| How would such a v         | very large develo  | pment positively respond to the adjacent co  | nservation area?                          |
|                            |                    | neeting with officers to appreciate the ration<br>nment has informed proposals and any key d |   |
| Change requested:          | !                  |  |   |
|                            |                    |  |   |
| Decreased and C427         | • • •              |  |   |
| Respondent 6437<br>Number: | Comment 1 Number:  | Respondent<br>Name:  | Respondent MNRE Organisation:             |
| Agent ID: 231 Ag           |                    |  |   |
|                            |                    | ne original comment? 🗹 Attachments sen   | it with the comment? $\square$            |
| Placemaking Option         | ons Plan Referen   | ce: Welton Bag Factory (SSV4)  |   |

### Comment on the Site:

This submission is made on behalf of MNRE in respect of their land interest at Station Road, Midsomer Norton (Site SSV 4/MSN 9 Former Welton Bag Factory, Somer Valley). It summarises their initial responses to the options/alternatives and supporting text presented within the Placemaking Plan (Options Stage B&NES Council 2015) on the former 'Welton Bag Factory' to accord with the required timeframe for submissions.

In doing so it confirms the planning principles and assumptions which are underpin this site's consideration within the wider B&NES Evidence Base (SHLAA/JSA) and how these principles have been central to the refinement of emerging development proposals for the site. In doing so it also comments on the emerging principles and development aspirations for the wider town centre area (Midsomer Norton/Somer Valley).

MNRE representatives have worked closely with B&NES Council representatives (Economic Development/Planning Policy/Major Projects) over the last five years to ensure that all future opportunities on the site are fully considered.

The site was formally identified in the adopted B&NES Local Plan as a mixed- use site (GDS.1/NR14 See Appendix 3)). Preapplication discussions with a prospective developer of the site commenced in mid 2012.

Formal representations were made at the launch stage of the Placemaking Plan document (Terrace Hill Midsomer, September 2013).

MNRE are freehold owners of the whole of the site identified in Appendix 1 /Section 2. The adjoining Stones Cross Public House and Social Club in separate ownerships (See Appendix 1). Dialogues over the comprehensive redevelopment of the entirety of the local area are ongoing (See Section 3/Scope of Evidence). Discussions have concluded on the need to potentially extend the defined site boundary and this has resulted in the recommendation to change the site to that shown in Appendix 5.

### 2.0 SITE DESCRIPTION

The representation site ('the site') has a total area of approximately 5.7 hectares. It is located within the central built up area of Midsomer Norton adjacent to existing residential areas (See Site Location).

It comprises of an irregularly shaped vacant area of brownfield land extending within the Town Centre Shopping Area of Midsomer Norton (See Appendix 2/Inset No.19A). The site currently lies outside the defined Housing Development Boundary of Midsomer Norton (HG4/HG6).

Housing and community buildings bound the area on all sides (See Appendix 1 Landownership Plan). Existing public transport services to adjacent centres including Bath and Radstock extend along North/Radstock Road and Station Road/High Street.

A public footpath extends along the northern boundary of the site (Thicket Mead to Radstock Cycleway) with footpath links extending from this to the south.

The Midsomer Norton & Welton Conservation Area extends along the eastern boundary of the site to include the former Brewery Building but there are no listed buildings within or adajacent to the allocated site.

There are a number of semi-mature and mature trees within the north west corner of the site and a culverted section of We I low Brook extends beneath part of the site.

The Welton Bibby & Baron Paper manufacturing operation relocated from the site in 2010. All purpose-built industrial buildings on the site are now vacant having passed their design life. Buildings range from 2 to 3 storeys in height. With the application of a caveat over the former Brewery Building (See Section 5) it is envisaged that all buildings and structures across the site would be demolished prior to redevelopment.

The site is situated within walking distance from a range of local facilities including shops, schools, a major supermarket and a range of community facilities within the town (incl. Midsomer Norton Social Club, West Clewes Recreation Ground). Potential connection would be achievable to surrounding services and facilities by existing linkages.

The accessibility of the site to local facilities and services within Midsomer Norton is dealt with within a PERS audit of the local footpath/footway network. Councils own assessment of its suitability is self evident from the Midsomer Norton and Westfield Site Assessments (See Appendix 4 Appendix 1d Somer Valley BANES Strategic Land Assessment 2013)

There are existing public transport bus routes running along the frontage of the appeal site (Appendix 23 - Bus Services 19/20/Station Road/North Road). In Midsomer Norton there is no railway station, the closest station is at Frome, which is approximately 16 km from the site.

In conclusion the site relates well to existing settlement pattern of Midsomer Norton and is a highly sustainable location that offers key opportunities to achieving redevelopment objectives.

### 3.0 SCOPE OF EVIDENCE

This representation has arisen from the publication of the Placemaking Plan by B&NES Council covering the administrative area of Somer Valley. The section on 'Welton Bag Factory' states

1.241 The Welton Bibby & Baron (Welton Bag) factory located on the north eastern edge of the town centre provides a substantial redevelopment opportunity. The site is positioned on the steep north facing valley side, sloping down from the ridge at North Road to the Wellow Brook base. There is a drop of approximately 10m from the valley ridge down to Wellow Brook, and similar level change on the south facing slope on the other side of the brook against the former railway line.

1.242 The factory buildings and ancillary uses occupy the majority of the

- 5.7ha site. The core complex straddles the valley base, culverting the Wellow Brook, and fronting out to Station Road. The position of the factory interrupts the valley setting and creates a significant barrier to a potential west-east strategic green infrastructure route following the Wellow Brook.
- 1.243 There are no buildings at the ridge where the site fronts to North Road and consequently the site remains fairly hidden from this prominent position and the top of the High Street. Aside from a collection of historic buildings (which should be retained) within the adjoining Conservation Area dating to the site's former brewery use, the majority of the buildings on site are of limited built quality. The 1850s brewery buildings survive largely untouched and with most of their external architectural features intact. These present a considerable asset to incorporate into future development of the site.
- 1.244 The priority will be to deliver an appropriate mix of employment floorspace and housing, and to improve connections through to the High Street. The Stone's Cross roundabout is the key point of arrival to the High Street but fails to capitalise on the range of attractive Victorian buildings there to announce the beginning of the High Street successfully. The steep, single sided pavement route along Station Road combined with heavy traffic creates an unattractive pedestrian environment and difficulties integrating the site.
- 1.245 It is not considered that the site is sequentially preferable to the South Road car park site in delivering new retail floorspace, due to it being an 'edge of centre' location. The issue of suitable pedestrian links between the High Street and this site also make it difficult for retail uses to function as an integral part of the town centre. However, as with the South Road site, the B&NES retail study currently being undertaken by GVA will also be assessing the Welton Bag site to examine its credentials in delivering a new supermarket.
- 1.246 An important focus is the frontage to North Road, where an area of hard standing is divided from the valley top by a high wall. This area presents the only real opportunity to establish a more direct and attractive connection between the site and the High Street via the Stone's Cross gateway.
- 1.247 Incorporation of a high quality green infrastructure link along the Wellow Brook through the site will also be a key priority, linking with the attractive Welton Green community space.

This submission is made on the basis that there are no other known references made to the site within the Placemaking Plan. Given that the site is referred to by different name in the Strategic Land Availability Assessment 2013 we would suggest standardising on the naming. In view of the proposed site extension we would suggest 'Former Welton Manufacturing Site/Stones Cross Roundabout'.

### 4.0 FUTURE PROPOSED USES

The site has an extended history in terms of its planning promotion as a major mixed use development site. However existing material relating to the Strategic Land Availability Assessment 2013 of Site MSN 9 Appendix 1 di Report of Findings is historic and requires updating as part of this current Placemaking Plan review. The assumptions made in terms of site capacities, vehicle accessing and general highways lack proper supporting work.

At this juncture MNRE wish to continue to preserve the option to facilitate a phased redevelopment of the site over the coming decade. This would include

- C3 residential development (70%) comprised of approx. 300 units;
- Employment development (30%) incl. A1 retail development of a national multiple.
- Community/Assembly/Leisure Buildings incl. D Class Uses.
- associated private and public carparking for town centre;
- associated public realm and landscaping.

Dialogue commenced with B&NES representatives when the local planning authority began their Local Plan Review in 2004. The availability of the site was first reported in writing as part of the call for sites.

Given the site credentials in planning terms discussions focused upon a mix of potential uses. Employment uses are envisaged within the A & B Landuse categories.

A number of national multiples have shown interest in taking part of the site for a joint food retail store combined with other A & B Class Uses.

### 5.0 FORMER WELTON BAG FACTORY SSV4

Given that the draft Placemaking Plan seeks to allocate and facilitate the delivery of housing, employment and other uses on this brownfield site (SSV 4) to meet the development needs identified in the adopted core strategy, its general approach is welcomed.

Council views on the 'reasonable alternatives' or 'options' for this site are also broadly accepted. However given that expressed options could form the basis of development management policies (the Draft Plan) used in the determination of planning applications for the site, suggested amendments and clarifications are sought over specific assumptions underlying the commentary on the site. MNRE reserve the opportunity to comment on subsequent iterations of the Site Assessment.

As mentioned the site currently lies outside the defined Housing Development Boundary of Midsomer Norton (HG4/HG6). Given the five stated functions of the Placemaking Plan this context should be formally amended to reflect its residential potential.

In regard to the revised site definition and extension of the proposed area to include Stones Cross the total area would be approximately 6 hectares. The justification for this recommendation relates to the Council's commentary over required linkage of the area to the High Street and the establishment of an improved gateway to Town Centre (see below).

### 6.0 MIDSOMER NORTON/SOMER VALLEY

MNRE acknowledge the published initial findings of the Stage 1 B&NES Retail Study in respect of Midsomer Norton and Radstock. They acknowledge the comments over predicted retail expenditure, the health check of the centres and estimates of retail need. We are also aware of the outstanding assessment work being undertaken on Stage 2 of this study. In these circumstances MNRE reserve the opportunity to comment on subsequent iterations of the town centre assessment.

At this stage MNRE acknowledge that Midsomer Norton town centre currently serves the daily shopping needs of Norton-Radstock residents and those villages in the southern part of Bath & North East Somerset and northern Mendip District. While the town has a good range of convenience shopping facilities, both within the town centre and out-of-centre at Thicket Mead (which lies within the Parish of Paulton) B&NES Retail Strategy 2014 confirms that the town is losing market share (Page 54) to adjoining centres including Bath. The town centre also continues to provide for a range of day to day comparison goods shopping and residents tend to travel to Bath to meet their other shopping needs.

MNRE note that despite providing a range of shops there is still scope for improving the town centre. There are few medium or large units available that would be suitable for national multiples. Proposals should help to enhance the centre by making better use of public spaces and improving linkages between different parts of the retail frontage.

The availability of a good range of convenience and comparison shops will make an important contribution to people's quality of life in Midsomer Norton. Shopping provision is primarily focused in the town centre of Midsomer Norton although some out of centre sites exist.

Existing B&NES Council background documentation stress the importance of maintaining and enhancing the vitality and viability of the centre in conjunction with that at Radstock, to meet the various shopping needs of residents and visitors in the most sustainable way.

In this regard MNRE highlight the important contribution that a vibrant public realm makes to the success of the centre.

The assessment of how retail development requirements should be met is being considered within Stage 2 of the B&NES

# Stage 1 of this document was released in November 2014 and does not preclude retail development on site SSV4. Formal release of Stage 2 is anticipated in March 2015. It is assumed that the deposit version of the Placemaking Plan will take account of its findings following consultation and an opportunity to comment will be permitted at that time. Change requested:

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

Retail Strategy 2015.

Placemaking Options Plan Reference: Welton Bag Factory (SSV4) / Paragraph

1.241

Plan Order Number: 328

|   | spondent<br>me:                              | Respondent MNRE Organisation:              |  |  |  |
|---|--|--|--|--|--|
| Agent ID: 231 Agent Name:   |  |  |  |  |  |
| Further Information available in the original comment? $lacktriangle$ Attachments sent with the comment? $\Box$ |  |  |  |  |  |
|   |  |  |  |  |  |
| Placemaking Options Plan Reference:   | Welton Bag Factory (SSV4) / Paragraph 1      | .241                                       |  |  |  |
| Comment on the Site:  |  |  |  |  |  |
| It is unclear how this description of the   | topography of the site assists in terms of p | purposes of the Placemaking Plan           |  |  |  |
|   | not present a key constraint to site redevel | . , ,                                      |  |  |  |
| residential areas, which extend within t  | he immediate vicinity of the site. The site  | is also fully screened from large areas of |  |  |  |

Midsomer Norton (See Existing Para 1.243 below).

**Change requested:** 

Placemaking Options Plan Reference: Welton Bag Factory (SSV4) / Paragraph

1.242

Plan Order Number: 329

| Number: 643       | / Comment 3 Number: | Respondent<br>Name:    | Respondent<br>Organisation    |       |
|-------------------|---------------------|------------------------|-------------------------------|-------|
| Agent ID: 231 A   | gent Name:          |                        |                               |       |
| Further Informati | on available in tl  | he original comment? 🗹 | Attachments sent with the com | ment? |
|                   |                     |                        |                               |       |

Placemaking Options Plan Reference: Welton Bag Factory (SSV4) / Paragraph 1.242

### **Comment on the Site:**

An existing shared public footpath with bridleway and cycleway rights (ST Route T9/NR Greenway/Public Footpath CL24/21) already extends along the northern boundary of the site. Subject to detaile engineering and environmental planning review the owners of the site would be happy to assist in ensuring that any options future development seek to investigate additional opportunities for non-vehicular east-west connections in the vicinity of Wellow Brook.

An existing shared public footpath with bridleway and cycleway rights (ST Route T9/NR Greenway/Public Footpath CL24/21) already extends along the northern boundary of the site. Subject to detaile engineering and environmental planning review the owners of the site would be happy to assist in ensuring that any options future development seek to investigate additional opportunities for non- vehicular east-west connections in the vicinity of Wellow Brook.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: Welton Bag Factory (SSV4) / Paragraph

1.243

Plan Order Number: 330

| Number:         | 3/ Comment 4<br>Number: | Respondent<br>Name:     | Respondent MNRE Organisation:             |  |
|-----------------|-------------------------|-------------------------|---|--|
| Agent ID: 231   | Agent Name:             |                         |   |  |
| Further Informa | tion available in t     | the original comment? 🗹 | Attachments sent with the comment? $\Box$ |  |
|                 |                         |                         |   |  |

Placemaking Options Plan Reference: | Welton Bag Factory (SSV4) / Paragraph 1.243

### Comment on the Site:

The future treatment of the public realm in the vicinity of Stones Cross Roundabout and the site's connection through to the High Street will be a key 'design influencing factor' in taking forward detailed proposals for site redevelopment. In this regard it will be imperative that design and access statement and corresponding supporting design material explain the design principles and concepts that have been applied to the proposed development. Given the potential scale of residential development (300 units) and the proximities within the town centre direct pedestrian connection will be vital.

Best practice dictates that any urban design exercise take into account the other existing buildings (SCPH/MN Social Club) in the immediate vicinity of the Stones Cross Roundabout. This point is repeatedly made in the commentary text referring to this site within the Placemaking Plan. For this reason alone a recommendation is made that the area be extended to encompass these two additional buildings (See Sections Vi above).

The future treatment of the public realm in the vicinity of Stones Cross Roundabout and the site's connection through to the High Street will be a key 'design influencing factor' in taking forward detailed proposals for site redevelopment. In this regard it will be imperative that design and access statement and corresponding supporting design material explain the design principles and concepts that have been applied to the proposed development. Given the potential scale of residential development (300 units) and the proximities within the town centre direct pedestrian connection will be vital.

Best practice dictates that any urban design exercise take into account the other existing buildings (SCPH/MN Social Club) in the immediate vicinity of the Stones Cross Roundabout. This point is repeatedly made in the commentary text referring to this site within the Placemaking Plan. For this reason alone a recommendation is made that the area be extended to encompass these two additional buildings (See Sections Vi above).

The Midsomer Norton & Welton Conservation Area extends along the eastern boundary of the site to include the former Brewery Building. There are no listed buildings within or adjacent to the identified site or the extended site proposal. The former Brewery Building is in a poor state of repair having been subject to significant internal alteration. The comparative narrowness of Station Road at this point will be a key design influencing factor.

Subject to detailed engineering investigations the owners of the site would be happy to assist in ensuring that any options for future development seek to investigate opportunities to preserve and enhance the former Brewery Building (or its existing frontage). In this regard the expressed desirability of putting this building to a viable use/s is acknowledged. This would be assessed against overall scheme viability and delivery. Existing exploratory text should be amended to reflect this position.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Welton Bag Factory (SSV4) / Paragraph

1.244

Plan Order Number: 331

| Respondent 6437 C<br>Number: | Comment 5 Respondent Number: Name:   | Respondent MNRE Organisation:            |
|------------------------------|--|--|
| Agent ID: 231 Agen           | nt Name:   |  |
| Further Information          | available in the original comment? <a> Attachments sen</a>   | t with the comment? $\Box$               |
| Placemaking Options          | s Plan Reference: Welton Bag Factory (SSV4) / Paragraph 2  | 1.244                                    |
| Comment on the Site          | e:   |  |
| As per previous comm         | ment. Future treatment of the public realm in the vicinity of  | North Road and the site's connection     |
| proposals. The existing      | t') through to the High Street will be a key 'design influencir<br>ng Victorian buildings referred to in this commentary are situ<br>ock Road. MNRE seek written confirmation that these addit | uated outside the site on the north side |

within an amended allocation area.

**Change requested:** 

Placemaking Options Plan Reference: Welton Bag Factory (SSV4) / Paragraph

1.245

Plan Order Number: 332

| Respondent 6<br>Number: | Number:            | 6 Respondent Name:        | Respondent MNRE Organisation:             |
|-------------------------|--------------------|---------------------------|---|
| Agent ID: 231           | Agent Name:        |                           |   |
| Further Inform          | nation available i | n the original comment? 🗹 | Attachments sent with the comment? $\Box$ |
|                         |                    |                           |   |

Placemaking Options Plan Reference: | Welton Bag Factory (SSV4) / Paragraph 1.245

### Comment on the Site:

As per previous comment. The connection of the site to the High Street will be a key 'design influencing factor' in taking forward detailed proposals for site redevelopment. It would be inappropriate to predetermine the outcome of this detailed design review at this stage.

Similarly it is clear that commentary text relating to the outcome of detailed assessment work, including the B&NES Retail Study (and other ongoing review work), is inappropriate at this stage.

The precise 'function' of this site in retailing terms has yet to be determined. There are likely to be a number of reasonable and realistic alternatives and options emanating from a detailed review exercise. In these circumstances related text in Para 1.245 is premature, contrary to the purposes of the Placemaking Plan at this stage and should be omitted from the draft document.

Retail uses are envisaged as part of a mix of uses on this site based on guidance supplied within the NPPF and NPPG. Previous written representations were lodged in response to the Placemaking Plan Launch Document 2013 on this potential use. The precise scale and nature of such retail uses has yet to be proven. This is not however the purpose of the Placemaking document at this stage. It would be wholly inappropriate at this stage to reach premature conclusions over potentially viable alternatives for protectionist reasons.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: Midsomer Norton Town Park (SSV3) Number: 335 Respondent 281 Comment 11 Respondent Alison Howell Respondent Natural England Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ **Placemaking Options Plan Reference:** Midsomer Norton Town Park (SSV3) Comment on the Site: Midsomer Norton paragraph 1.257: in the context of the Town park, we welcome the recognition of the fact that this area is known to be significant for commuting and foraging bats. To be absolutely clear, Natural England regards the Five Arches path as supporting, functional habitat for the bat SAC and therefore it is essential that it is protected in the same way as the SAC itself. Maintaining the path as a dark corridor is essential. **Change requested:** Respondent 837 **Comment** 7 **Respondent** Mr David Redgewell **Respondent** South West Transport Number: Number: Organisation: Network, Railfuture Name: Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA Further Information available in the original comment? 

Attachments sent with the comment? **Placemaking Options Plan Reference:** Midsomer Norton Town Park (SSV3) **Comment on the Site:** 

Protect the former Somerset and Dorset railway as a linear walkway and potentially reuse as a railway for the Somerset and Dorset Railway Heritage Trust

### **Change requested:**

to protect the former railway line from redevelopment.

Plan Order

**Placemaking Options Plan Reference:** Former Sewage Works, Welton Hollow (SSV10)

Plan Order Number: 348

Respondent 279 Comment 16 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Former Sewage Works, Welton Hollow (SSV10) Comment on the Site: How compatible is a redevelopment with the rural/open conservation area nearby? English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters. **Change requested:** Respondent 281 Comment 12 Respondent Alison Howell Respondent Natural England Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Former Sewage Works, Welton Hollow (SSV10) Comment on the Site: SSV10: we suggest that allocation of this site needs to respect its situation adjacent to the Norton Radstock Greenway and to protect and enhance this important linear route for ecology.

**Change requested:** 

| Placemaking Options Plan Reference: Charlton Timber Yard (SSV14)  | Plan Order<br>Number: 384         |
|---|-----------------------------------|
| Respondent 279 Comment 17 Respondent Rohan Torkildsen Respondent English Follower: Number: Name: Organisation:  | leritage                          |
| Agent ID: Agent Name:   |                                   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |                                   |
| Placemaking Options Plan Reference: Charlton Timber Yard (SSV14)  |                                   |
| Comment on the Site:  |                                   |
| Support Option 5 and the 'heritage led regeneration scheme to enhance CA'   |                                   |
| English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocation understand how the historic environment has informed proposals and any key design parameters.  | ns and                            |
| Change requested:   |                                   |
|   |                                   |
|   |                                   |
| Respondent 281 Comment 13 Respondent Alison Howell Respondent Natural I Number: Name: Organisation:   | England                           |
| Agent ID: Agent Name:   |                                   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |                                   |
| Placemaking Options Plan Reference: Charlton Timber Yard (SSV14)  |                                   |
| Comment on the Site:  |                                   |
| SSV14: again, this site is adjacent to a route which is thought to be used by bats to commute between the Bradford on Avon SAC and the Mells Valley SAC. We therefore welcome the inclusion of the requirement bats at paragraph 6. In relation to alternative options, we draw the Council's attention to the fact that lig will have a bearing on paragraph 5 and whether the Wellow Brook ecological corridor should form a more functional Green Infrastructure route, incorporating a riverside walkway. | s in relation to<br>hting impacts |
| Change requested:   | ·                                 |
| enunge requesteur   |                                   |
|   |                                   |
| Respondent 837 Comment 4 Respondent Mr David Redgewell Respondent South W Number: Name: Organisation: Network   | •                                 |
| Agent ID: 56 Agent Name: South West Transport Network   |                                   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\checkmark$   |                                   |
|   |                                   |

Radstock Town Centre needs to retain rail access to Frome and provide public transport interchange and cycleway

**Comment on the Site:** 

Plan Order

| Change requested:  |   |  |  |  |
|--|---|--|--|--|
| Need to provide transport corridor   |   |  |  |  |
|  |   |  |  |  |
|  |   |  |  |  |
| Respondent 4532 Comment 3 Respondent Number: Number: Name:   | Respondent The Silverwood                             |  |  |  |
| Tallici  | Organisation: Partnership                             |  |  |  |
| <b>Agent ID:</b> 36 <b>Agent Name:</b> D2 Planning   |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attack   | hments sent with the comment? $\Box$                  |  |  |  |
| Placemaking Options Plan Reference: Charlton Timber Yard (SSV14  | .)  |  |  |  |
| Comment on the Site:   |   |  |  |  |
| This site was until recently occupied by Charltons World of Wood, a f  | ormer timber yard with ancillary retail use. It is    |  |  |  |
| currently being used by Wessex Water as a compound for works being   | -   |  |  |  |
| adjacent to Radstock Town Centre and was formally used as employr imbalance that exists in the Somer Valley between employment and       |   |  |  |  |
| employment or other appropriate Town Centre uses. The need for U   |   |  |  |  |
| been identified by the Town Council.   | se class B2 (maastral) employment sites has also      |  |  |  |
| Change requested:  |   |  |  |  |
| To allocate the site as an employment site to meet the need identifie  | d by the Town Council for such units. The residential |  |  |  |
| numbers of the allocation should be replaced with an allocation at La  | •   |  |  |  |
| Radstock.  |   |  |  |  |
|  |   |  |  |  |
| Respondent 6530 Comment 2 Respondent Mr Royston Knight   | Respondent  |  |  |  |
| Number: Name:  | Organisation:   |  |  |  |
| Agent ID: Agent Name:  |   |  |  |  |
| Further Information available in the original comment?   | hments sent with the comment?                         |  |  |  |
| runtier information available in the original comment. — Actual  | and the serie with the comment.                       |  |  |  |
| Placemaking Options Plan Reference: Charlton Timber Yard (SSV14  | 1   |  |  |  |
| Charlon Timber Fara (55V14   | .)  |  |  |  |
| Comment on the Site:   |   |  |  |  |
| It is essential to keep this low level building as part of our cultural her  | ritage and an important Heritage White Lias Building. |  |  |  |
| It also contains the ORIGINAL FIRE STATION [facing the Listed Printing   | g building]   |  |  |  |
| Once the development is complete it may well be an ideal Office / Display centre [complete with car park space]. Is it not               |   |  |  |  |
| possible to relocate an enlarged Doctors Surgery, with adequate car parking facilities. [That would be a novelty for                     |   |  |  |  |
| Radstock residents!] The last thing I would want to see there is more AFFORDARIE HOUSE   | NC  |  |  |  |
| The last thing I would want to see there is more AFFORDABLE HOUSII I suspect it would be unsuitable/too small to develop/create a Reside |   |  |  |  |
| Town.  |   |  |  |  |
|  |   |  |  |  |
| Change requested:  |   |  |  |  |
|  |   |  |  |  |
|  |   |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Ryman Engineering Services (SSV16) Number: 395 Respondent 6530 Comment 1 Respondent Mr Royston Knight Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Ryman Engineering Services (SSV16) **Comment on the Site:** I feel it is important to keep as much as possioble of the building structure in tact, i.e. retaining the White Lias as much as possible. There is so much threatened demolition of our cultural heritage, we must keep as much as possible. I would think the limitation of available building that smaller 'Artisan-type' facilities should be considered. [eg. wrought iron workshop, candle maker, picture frame maker. small time glass blower]. To this end could you not ADVERTISE the potential, inviting prospective occupants to express the sort of needs required so that they, with the Council work together to see any development/alteration come to fruition. It is essential that this little enclave be kept for Industrial purposes, albeit on light! **Change requested:**

Placemaking Options Plan Reference: Radstock County Infants (SSV17)

| Respondent279Comment18RespondentRohan TorkildsenRespondentEnglish HeritageNumber:Number:Name:Organisation:   |
|--|
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Radstock County Infants (SSV17)  |
| Comment on the Site:   |
| Policy should ensure development is consistent with the scale and form of the prevailing context.  |
| English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters.  |
| Change requested:  |
|  |
|  |
| Respondent 6530 Comment 3 Respondent Mr Royston Knight Respondent  |
| Number: Name: Organisation:  |
| - Junior - J |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Agent ID: Agent Name:  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Radstock County Infants (SSV17)  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Radstock County Infants (SSV17)  Comment on the Site:  This site has been the subject of at least one Planning Application already and has come unstuck for one reason or  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Radstock County Infants (SSV17)  Comment on the Site:  This site has been the subject of at least one Planning Application already and has come unstuck for one reason or another. Possibly over development [or greed].   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Radstock County Infants (SSV17)  Comment on the Site:  This site has been the subject of at least one Planning Application already and has come unstuck for one reason or another. Possibly over development [or greed].  Whatever goes here, again it is essential that it complements White Lias Stone of the area. ALSO, the road is completely  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Radstock County Infants (SSV17)  Comment on the Site:  This site has been the subject of at least one Planning Application already and has come unstuck for one reason or another. Possibly over development [or greed].  Whatever goes here, again it is essential that it complements White Lias Stone of the area. ALSO, the road is completely congested with traffic so it is paramount that there should be NO OVER-DEVELOPMENT. Whatever is allowed, all  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Radstock County Infants (SSV17)  Comment on the Site:  This site has been the subject of at least one Planning Application already and has come unstuck for one reason or another. Possibly over development [or greed].  Whatever goes here, again it is essential that it complements White Lias Stone of the area. ALSO, the road is completely congested with traffic so it is paramount that there should be NO OVER-DEVELOPMENT. Whatever is allowed, all sufficient PARKING should be self-contained, i.e. nothing to spill over onto Bath Old Road.   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Radstock County Infants (SSV17)  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Radstock County Infants (SSV17)  Comment on the Site:  This site has been the subject of at least one Planning Application already and has come unstuck for one reason or another. Possibly over development [or greed].  Whatever goes here, again it is essential that it complements White Lias Stone of the area. ALSO, the road is completely congested with traffic so it is paramount that there should be NO OVER-DEVELOPMENT. Whatever is allowed, all sufficient PARKING should be self-contained, i.e. nothing to spill over onto Bath Old Road.  Why not let a local builder be given the opportunity to develop the site with one or two architect designed properties   |

Plan Order

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Coomb End (SSV6) Number: 404 Respondent 279 Comment 19 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Coomb End (SSV6) Comment on the Site: It appears that evidence is required to demonstrate the relative impact on the character and appearance of the conservation area. If the principle is to be agreed, a series of key design principles to safeguard heritage significance will be required. English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters. **Change requested:** Respondent 1327 Comment 1 Respondent Eleanor Jackson (Cllr) Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Coomb End (SSV6) **Comment on the Site:** Further to our discussion last week about the Combend site, please took at planning application 13/00658/FUL and in particular the decision notice, with the reasons for refusal. I think much of this would also apply to your proposal, plus the objections raised to the application to develop 37 Combend. I think it is significant that although the developer did receive permission, it was in a modified form, and no work has begun. I suspect there is no finance forthcoming for such a dodgy site. **Change requested:** Respondent 4452 Comment 1 Respondent R M Sellwood **Respondent** The Property Number: Number: Name: **Organisation:** Development Company

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Placemaking Options Plan Reference: Coomb End (SSV6)

Agent ID:

### **Comment on the Site:**

These representations are submitted on behalf of The Property Development Company Ltd which has land interests at Coomb End, Smallcombe Road at Radstock.

Whilst it is accepted that the recently adopted Core Strategy seeks to limit new, greenfield development in the Somer Valley, the plan does expect 2,470 dwellings to be completed in the area between 2011 and 2029. In accordance with this approach, the Placemaking Plan proposes a number of residential allocations to achieve this provision. However, it is noted that a significant proportion of these sites are previously developed with high development costs in an area of relatively low values. In addition, several are in multiple land ownerships. In this context, it is questionable whether the identified sites will deliver the 2,470 dwellings sought by the Core Strategy in the period to 2029. Given that the NPPF gives priority to boosting the supply of housing, the Placemaking Plan should have a contingency position if these previously developed sites fail to come forward. This contingency should be set out in the new policy which will replace Policy HG.4 and entails identifying reserve sites that would be brought forward if the delivery of the identified sites fails. It is suggested that the replacement for Policy HG.4 states

"Residential development in Midsomer Norton, Radstock, Westfield, Peasedown St John and Paulton will be permitted provided

- (a) the proposal lies within the defined housing development boundary; or
- (b)it forms an element of a mixed use allocated site, and

(c)it is appropriate to the scale of the settlement in terms of the availability of facilities and employment opportunities and accessible to public transport and other sustainable transport modes (including cycling and walking).

The Core Strategy Policy SV1 seeks to achieve the completion of 2,470 homes to be built between 2011 and 2029. Whilst priority will be given to previously developed sites and allocations, a number of reserve sites are identified which can be brought forward for development if monitoring demonstrates that the 2,470 homes would not otherwise be completed". The Property Development Company proposes that land at Coombe End, (Smallcombe Road, Clandown), Radstock is identified as a reserve housing site. This site is outside the Green Belt and formed SHLAA site RAD17. This 1.4 hectare site was assessed as having the capacity for approximately 40 dwellings at a density of 30dph. I attach plan IMA-13-060 which outlines a developable area of 1.3 hectares. As you will note, the site has existing residential development on three sides, it is within walking and cycling distance of the facilities in Radstock and adjoins the A367 Bath to Radstock road which is served by busses. It is therefore both a sustainable and deliverable site.

| Change requested:                                    |                          |   |
|--|--------------------------|---|
| Respondent 4532 Comment 2 Res<br>Number: Number: Nam | pondent<br>me:           | Respondent The Silverwood Organisation: Partnership |
| Agent ID: 36 Agent Name: D2 Plant                    | 9                        |   |
| Further Information available in the or              | riginal comment? $\ lue$ | Attachments sent with the comment?                  |
| Placemaking Options Plan Reference:                  | Coomb End (SSV6)         |   |

### **Comment on the Site:**

The site was allocated under the previous Local Plan for a mixed use development, including around 30 dwellings. The site is also within the Conservation Area. Whilst part of the site has been developed for 5 houses, the remainder of the site remains undeveloped. It is considered that there may now be a highway objection to the development of the site for further residential development. The road is narrow, barely wide enough for two cars to pass in some sections, and lacking in pavements in places. It can be difficult to use the junction with the A367 at its southern end because of the acute angle, restricted visibility and the volume and speed of traffic on the main road. It is also likely that the site is in a number of different ownerships.

### **Change requested:**

To remove the allocation because of lack of delivery since the Local Plan was adopted, as well as possible highway issues related to providing a larger development at the site. To replace the allocation with Land North of Kilmersdon Road,

Manor Farm, Haydon

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Former St Nicholas Infant School (SSV20) Number: 422 Respondent 279 **Comment** 20 **Respondent** Rohan Torkildsen Respondent English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Former St Nicholas Infant School (SSV20) Comment on the Site: The site falls within the conservation area and is close to a number of listed buildings. Perhaps do the lack of explicit evidence, it is unclear how an understanding of the historic environment has informed the proposals and how development would complement the affected heritage assets. English Heritage would welcome a meeting with officers to appreciate the rationale behind these allocations and understand how the historic environment has informed proposals and any key design parameters. **Change requested:** Respondent 281 Comment 14 Respondent Alison Howell Respondent Natural England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Former St Nicholas Infant School (SSV20) **Comment on the Site:**

SSV20: we endorse the emerging policy approach but suggest that paragraph 3 should read: "Appropriate mitigation to be included for bats which takes account of the significance of bat populations in this area."

### **Change requested:**

Respondent 4532 Comment 4 Respondent **Respondent** The Silverwood Number: Number: Name: **Organisation:** Partnership Agent ID: 36 Agent Name: D2 Planning

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Former St Nicholas Infant School (SSV20)

### Comment on the Site:

This site is the former St Nicholas Infant School, which lies to the south of Radstock town centre and is adjacent to the public car park. The site consists of 19th Century buildings and is located within the Conservation Area. The site has been subject to previous planning applications for redevelopment which involved the demolition of the buildings on the site.

These have been refused by the Local Planning Authority.

The Local Planning Authority considers that the 19th Century buildings are capable of conversion to residential. However, it is known that the redevelopment of the site using the existing buildings would render any development unviable. There are also bats roosting within the building and redevelopment would need to provide appropriate ecological mitigation. In view of the above, the site is not deliverable and will not be developed.

### **Change requested:**

To remove the allocation because of issues in regards to viability of converting the existing 19th Century buildings. To replace the allocation with Land North of Kilmersdon Road, Manor Farm, Haydon.

| Respondent 6449 Comment 1 Respondent Rev'd Susan Greatorex Number: Name:   | Respondent St Nicholas Church Organisation: Radstock |  |  |  |  |
|--|--|--|--|--|--|
| Agent ID: Agent Name:  |  |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                             |  |  |  |  |
| Placemaking Options Plan Reference: Former St Nicholas Infant School (SSV20)   |  |  |  |  |  |
| Comment on the Site:   |  |  |  |  |  |
| St Nicolas church PCC is encouraged by the Placemaking Plan consultation and the development in and around the centre of Radstock.   | recognition of the potential for                     |  |  |  |  |
| Further to on-site discussions with council officers we welcome the opportunity to In town planning terms we wish to highlight the availability for redevelopment of the Charak Council Counci |  |  |  |  |  |
| the Church Centre and associated café.<br>We foresee potential for replacement buildings to create a small sheltered housin  | g scheme and a new church centre on                  |  |  |  |  |
| the site. This would build upon the growing need for the existing facilities, and wir contribute to enhancement of the town centre.  | _  |  |  |  |  |
| We encourage the council to see this land as a valuable ingredient in the continue centre.   | d improvement of Radstock town                       |  |  |  |  |
| Change requested:  |  |  |  |  |  |
|  |  |  |  |  |  |
| Respondent 6570 Comment 1 Respondent Earl James Waldegrave   | Respondent   |  |  |  |  |
| · · · · · · · · · · · · · · · · · · ·  | Organisation:  |  |  |  |  |
| Agent ID: 47 Agent Name: CSJ Planning Consultants Ltd  |  |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |  |  |  |

### **Comment on the Site:**

The Radstock School Development Company Ltd is the freeholder of the site. However, it was only finally reverted back to my client in 2011 following a legal dispute with the Church of England.

**Placemaking Options Plan Reference:** Former St Nicholas Infant School (SSV20)

Circa 1858 and predating the 1870 Education Act, the Waldegrave family became benefactors to the development of St Nicholas Church of England School. The school on completion was presented to Radstock Town as an education facility for the town on the understanding that should at any time in the future the education use of the land and buildings cease; it would revert back to the Waldegrave Estate.

The school closed at the end of the summer term of 2005 and at this time, it should have reverted back to the ownership of the Waldegrave Estate. However, the Church of England contested this, despite the fact that my client had advised that the building and land would be claimed back under the Reverter of Sites Act 1987.

The aforementioned legal dispute took place in 2005 when the Church of England contested my client's claim under the Reverter of Sites Act, and was only finally resolved in my client's favour in September 2011.

During the custodianship of the Church of England and legal dispute, the former school building unfortunately suffered significant damage as a result of vandalism and theft of materials, which ultimately exposed the building to disrepair.

A Structural Inspection Report undertaken concluded that the state of the building was so poor that any remedial works would be extremely expensive, difficult to design and engineer and would have no guarantee of presenting a building that could be useful. Despite presenting this information during the planning application process to develop the site, the Council rejected the report and still insist that the building can be converted, despite producing no evidence to counter the Structural Engineer's Report. This resulted in application 14/03356/OUT being refused, which will be the subject of a forthcoming appeal.

It is essential that the Council produces evidence to substantiate its assertion that the building is not structurally dangerous, and that a viable scheme involving the reuse and conversion of the building is possible.

### **Change requested:**

My client supports the principle of using the site for residential purposes. In the absence however, of any evidence to refute the Structural Report and substantiate its position that the existing building should be converted and reused, the  $\hat{a}\in$  conservation and reuse $\hat{a}\in$  of the former school building proposed in the draft policy cannot be taken forward. It is therefore respectfully requested that this aspect of the policy is removed.

It should also be noted that the draft allocation outline of the site includes part of the former school (the Headmasters residence) that was actually developed in 2012 (LPA ref 12/02587/FUL) and is now in use as a single dwellinghouse.

Placemaking Options Plan Reference: Radstock College (SSV18)

| Respondent 4532 Comment 5 Respondent Number: Number: Name:   | Respondent The Silverwood Organisation: Partnership |
|--|---|
| Agent ID: 36 Agent Name: D2 Planning   |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |
| Placemaking Options Plan Reference: Radstock College (SSV18)   |   |
| Comment on the Site:   |   |
| Objections are lodged to the allocation of Radstock College for up to 50 dwellings. The site is located adjacent to but outside the Housing Development Boundary on the edge of the settlement, the same situation as the un-allocated site at Manor Farm, Haydon.   |   |
| The site comprises playing fields adjacent to existing College buildings to the east, open fields and flood plain (a Site of Nature Conservation Interest or SNCI) associated with Waterside, a tributary of Wellow Brook to the south, existing houses on the Ding to the west, and Wells Road to the north. In addition, the site lies adjacent to the Radstock Conservation Area. The site is also designated as a playing field in the Local Plan, which is protected by Saved Policy SR1.A of the Local Plan. |   |
| The development of the site would be in direct conflict with Saved Policy SR1.A. No suitable replacement recreational land has been presented as part of the Placemaking Plan and the Council have not identified any local green space in the Somer Valley in the Placemaking Plan which could provide an alternative facility to recompense the loss. An application is also likely to receive an objection from Sports England due to the loss of the playing fields.   |   |
| Furthermore, the site is no longer available for residential development. The landowner is no longer seeking to develop the site for residential purposes.   |   |
| Change requested:  |   |
| Delete Site SSV18 as a residential allocation and for the site to remain in its current use (Playing field). The allocation should be replaced with Land North of Kilmersdon Road, Manor Farm, Haydon, Radstock.   |   |
| Respondent 6517 Comment 1 Respondent Mr Ronald Hopk Number: Name:  | kins Respondent Westfield Resident Organisation:    |

### **Comment on the Site:**

Agent ID:

I was able view and discuss the Place Making plan during it's presentation at Norton Radstock College.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

I am appalled that the the plan advocates housing / commercial developments on the former factory site at Cobblers Way and on the Norton Radstock College.

I understand that planning permission has already be sought for 91 dwellings on the former factory site at Cobblers Way and on that basis (applying the same ratio of BANES Placemaking plan development size v planning application request) the college site will attract applications for >152 dwellings..

When this is coupled to other opportunist local developments and in-fill building already permitted and completed or in process or construction, (because of the lack of a core policy by BANES until a few months ago) this has led to an absolutely unacceptable load on local infrastructure, medical and dental provision, schools, and incredible road

**Agent Name:** 

Placemaking Options Plan Reference: Radstock College (SSV18)

Plan Order

Number: 434

congestion.

The area is already obviously over developed and should not be further sacrificed to satisfy the government's requirement on BANES for house building allocation.

#### **Change requested:**

Eliminate all possibility of further excessive developments in Westfield and ensure all current planning applications (eg. Cobblers Way) do not exceed the Placemaking plan proposals.

| Respondent 6563 Comment 1 Res<br>Number: Number: Namber:   | pondent Mrs Rosemary Tiley<br>me: | Respondent Organisation: |
|--|-----------------------------------|--------------------------|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                   |                          |
| Placemaking Options Plan Reference: Radstock College (SSV18)   |                                   |                          |

#### Comment on the Site:

I am concerned that 1.327 maintains that the trees along the western and eastern boundaries should be retained, whilst access to the site would need to be improved to accommodate the additional traffic housing (or even business units) would engender. These two policies/design principles are mutually exclusive, as the road cannot be widened without felling trees! I am also slightly concerned that playing fields are to be sacrificed - where would 'alternative provision' be found? The plan seems very fond of saying that alternative parking/recreational land will be found in Radstock - but no firm suggestions are forthcoming and no obvious alternative sites left without housing proposed.

#### **Change requested:**

I would like the trees to be legally protected and to come under the cloak of 'conservation'. (I do not understand why the college site as a whole is not included in the conservation area? Do councils only include private properties in such applications?) I would draw your attention to NPPF 118/5 regarding the loss of aged or veteran trees.

Placemaking Options Plan Reference: St Peter's Factory / Cobblers Way (SSV11)

Plan Order Number: 442

| Respondent 821<br>Number:   |                     | espondent Deborah Porter<br>lame:         | Respondent Cam Valley Wildlife Organisation: Group |  |
|---|---------------------|---|--|--|
| Agent ID: Agent Name:   |                     |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                     |   |  |  |
| Placemaking Options Plan Reference: St Peter's Factory / Cobblers Way (SSV11)                           |                     |   |  |  |
| riacemaking Optio   | iis riaii kelerence | st reter's ractory / Cobbiers Way (SSVII) | 1  |  |

#### Comment on the Site:

**Change requested:** 

The St Peter's site policy for Westfield refers to its importance for invertebrates and reptiles, but seeks to remove the habitat that supports them and instead replace it with alternative habitat, including wetland habitat for invertebrates. The main invertebrate value of the site is connected with warm dry habitats with bare soil, not with wet habitats or with meadow habitat. The intention appears to be to lose rare and notable species that are part of significant invertebrate communities and metapopulations and replace with habitats that are likely to attract mainly (or solely) common species found elsewhere. These invertebrate communities and metapopulations are being exterminated from the area through (mainly brownfield) developments permitted through development control decisions. With no effective strategy to protect them, further biodiversity losses in the area and the District, and perhaps the Region, will result. This flies in the face of the aims set out in the NPPF.

| Respondent 6404 Comment 1        | •                             | <b>Respondent</b> Oval Homes        |
|----------------------------------|-------------------------------|-------------------------------------|
| Number: Number:                  | Name:                         | Organisation:                       |
| Agent ID: 195 Agent Name: Ale    | der King Planning Consultants |                                     |
|                                  | the evicinal comment?         | tachments cant with the comment?    |
| Further Information available in | the original comment? — At    | tachinents sent with the comment? — |

#### Comment on the Site:

We have the following comments on the emerging policy approach to SSV11:

1)The supporting text to emerging policy approach to SSV11, notes that "the site is of high ecological value having been identified as an important post-industrial site with particular value for bats, reptiles and invertebrates." The site adjoins a BAP Woodland and, while it was previously identified as an ecological site of local importance, this designation not saved.

An outline planning application (reference 14/04003/OUT) for the development of the site is presently being determined by Bath and North East Somerset Council (BANES). This confirms that the site does not contain any statutory wildlife sites and that the habitats present on the site are common and widespread. The proposed site masterplan includes opportunities to accommodate existing species on the site including bats (bat roosts, bat foraging and commuting routes), nesting birds and reptiles.

2) In relation to the policy text of emerging policy approach to SSV11, provides fr around 30 dwellings (including affordable housing in accordance with Adopted Core Strategy Policy CP9) and employment floorspace or, alternativ place the employment area with additional housing. This would raise the residential capacity of the site to around 40 dwellings.

Appendix 2 of the BANES Strategic Housing Land Availability Assessment (SHLAA) Housing Trajectory (November 2013),

which was submitted as one of the Core Documents at the BANES Core Strategy Examination (10 April 2014), indicates that the site capacity is 78 dwellings which are expected to come forward within the five year supply period, in two tranches from 2015 to 2017. The expectation is that the remainder of the site would come forward for a care home.

The outline planning application (14/04003/OUT) which is presently being determined by Bath and North East Somerset Council (BANES) provides for 91residential dwellings on the application site, without any commercial development. The amount of development to be provided by the application site is presently being negotiated with the Case Officer.

#### **Change requested:**

The supporting text to the emerging policy approach to SSV11 should be changed to reflect point 1) above. The policy text of the emerging policy approach to SSV11 should be changed to reflect the site capacity provided for by the SHLAA and the pending planning application (14/04003/OUT), which is a range from 81 to 92 dwellings (excluding any commercial development).

Plan Order Placemaking Options Plan Reference: Old Mills Industrial Estate (SSV9) Number: 452 Respondent 1399 Comment 1 Respondent Ms Jayne Evans Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Old Mills Industrial Estate (SSV9) Comment on the Site: We are very concerned about any more development here as we still have lot's of existing problems and isssues from the development already here that have never been resolved. We have tried and tried to get issues sorted but nothing ever gets done. The view at the front of our house has been completely blocked, we now look at industrial units, we were told they were going to be below eye view but they are not. The landscaping trees have grown up so we can't even see above them. The ugly transformer that we were told was temporary is still there right in front our window view. Orange lights glare into my bedroom. Alarms going off at night. LGV parking up with engines and freezer units running, this wakes us up with the vibration and noise. Constantly woken by night time delivery lorrys. Cutting and grinding from units we were promised wouldn't effect us. From behind our property we are blinded by floodlights from Paulton house. Until recently we were daily woken by the amount of noise from there aswell. They cut a lot of the landscaping trees down, I was unable to lay our hedge around our field as this would have made the light situation worse. You are blinded by these lights while using the footpath. There is a lot of rubbish that I regularly have to clear up. We have on going problems with plastic being burnt, this effects my health. This is also a beautiful area abundant with wildlife, any more developement will be detrimental to our rural area. The land is very good fertile working farmland. We have already suffered and continue to do so due to development. Please at the least protect our air, noise and light quality. This is right next to a brownfield site, why not build on that instead. It does not make sense to build on such quality farmland with springs abundant. Please don't destroy more of Old Mills, we already feel that our identity is getting lost. There have been Mesolithic and Neolithic archaeological digs with results. The place looks a mess around ind est entrance with all the advertising boards. We haven't even been able to get our place names replaced after they were stolen. It isn't right that we should end up in the middle of a roundabout in the middle of an industrial estate, our house has already been devalued because of existing problems from existing development. This has never been resolved in over 20 years. All of this development is a great worry for us, it is effecting our quality of life on a daily basis. I can't make plans for my future with all this hanging over our heads. You are planning to built on our land without even talking to us. With lack of communication or old issues not ever being resolved I don't feel very hopeful for the future. Time after time we have tried eg paulton parish, Norton town council, banes directly and councillors. We never have a voice. Change requested:

| change requested. |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |
|                   |  |  |
|                   |  |  |
|                   |  |  |

Respondent1399Comment2RespondentMs Jayne EvansRespondentNumber:Number:Name:Organisation:

Agent ID: Agent Name:

Further Information available in the original comment? <a> Attachments sent with the comment? <a> •</a>

Placemaking Options Plan Reference: Old Mills Industrial Estate (SSV9)

#### Comment on the Site:

As a resident of Old Mills, Paulton, I am responding to the consultation on the Place Making Plan and would like to object to the potential development of this area.

A survey of the coal mining industry by English Heritage demonstrated that Somerset and Avon retain the best preserved

colliery landscapes in Britain. For over 500 years coal mines were active around the Paulton area. Old Mills Pit was worked for 100 years. We have a rank of miners' cottages still in the beautiful setting they have always been in. Both steam engines from the colliery are preserved.

Old Mills is a rural hamlet in a rural area with 34 houses. We have an abundance of wildlife and attractive countryside all around.

The view from the Arnhem Memorial, Clapton and the Mendip Plateau would be ruined, if the landscape were to be developed. It would spoil the landscape of the valley and the gateway to the area and its mining heritage. Old Mills is in attractive countryside enjoyed by many at the foothills of the Mendips. Development would damage the landscape of the area.

This is working farmland with medieval strip fields and ridge and furrow evident on both sides of the valley. There have been archaeological digs with interesting finds from the Neolithic and Meseolithic digs and also Roman coins and lots of flints. The land here is very fertile and provides farmers with jobs.

We have lots of springs and flooding now happens in four places due to the development that has already taken place. We feel we are losing our identity and it will ruin our quality of life if further development in this area of SSV9 Old Mills takes place. We live here because we enjoy the countryside and we don't want to be in the middle of an industrial estate. There are more suitable and brownfield sites available. It just doesn't make sense to build here.

Planning has previously been turned down for industrial units to the south and on the other side of the road to this proposed development.

I am enclosing a petition signed by local residents supporting our obections.

| Change requested:   |   |  |  |
|---|---|--|--|
|   |   |  |  |
| Respondent 1556 Comment 5 Respondent Number: Number: Name:  | Respondent Strategic Land Organisation: Partnerships  |  |  |
| Agent ID: 128 Agent Name: Peter Brett Associates  |   |  |  |
| -   | hments sent with the comment? $\Box$  |  |  |
| Placemaking Options Plan Reference: Old Mills Industrial Estate (S  | SV9)  |  |  |
| Comment on the Site:  |   |  |  |
| Strategic Land Partnership supports the continued allocation SSV9, within Paulton Parish. Para 1.339 continues to identify the extension as a suitable location for employment and we support the identificat Norton to ensure a more mixed and balanced economy. It is also im by uses which are not necessarily confined to employment land, this are required to provide necessarily services for the expansion of the | to the employment site at Old Mills Industrial Estate ion of employment sites and uses within Midsomer portant to realise that employment can be generated included uses such as care homes and schools which |  |  |
| Change requested:   |   |  |  |
|   |   |  |  |
| Respondent 4532 Comment 6 Respondent Number: Number: Name:  | <b>Respondent</b> The Silverwood <b>Organisation:</b> Partnership   |  |  |
| Agent ID: 36 Agent Name: D2 Planning  |   |  |  |
| Further Information available in the original comment? $\Box$ Attac   | hments sent with the comment? $\Box$  |  |  |
| Placemaking Options Plan Reference: Old Mills Industrial Estate (S  | SV9)  |  |  |

#### **Comment on the Site:**

The main justification for the Councils allocation of this site is to provide long term supply of new employment land to boost jobs in the area in light of the apparent high levels of out-commuting in the Somer Valley. However, it has been highlighted under the objectors comments in relation to SSV14 that there are alternative brownfield sites, which were previously employment sites, in the Somer Valley which could be redeveloped to provide new employment land. It is considered that there should be no allocation at all, and that the Council should seek alternatives elsewhere in the Somer Valley.

#### **Change requested:**

Delete Site SSV18 as a residential allocation and for the site to remain in its current use (Playing field). The allocation should be replaced with Land North of Kilmersdon Road, Manor Farm, Haydon, Radstock.

| Respondent 4803<br>Number:  | Comment 4 Respondent<br>Number: Name:  | Respondent Waddeton Park Limited Organisation:  |  |  |
|---|--|---|--|--|
| Agent ID: 128 Agent Name: Peter Brett Associates  |  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\checkmark$ |  |   |  |  |
| Placemaking Optio   | ons Plan Reference: Old Mills Industrial Estate (S   | SSV9)   |  |  |
| Comment on the S  | ite:   |   |  |  |
| Para 1.339 continue<br>for employment and<br>more mixed and bal<br>not necessarily conf                       | es to identify the extension to the employment sid we support the identification of employment sidenced economy. It is also important to realise the fined to employment land, this included uses successives for the expansion of the town. | te North West of MSN, and within Paulton Parish. Ite at Old Mills Industrial Estate as a suitable location Ites and uses within Midsomer Norton to ensure a Ite tat employment can be generated by uses which are It has care homes and schools which are required to |  |  |
|   | Comment 1 Respondent Ms Margaret Edwa Number: Name: ent Name: on available in the original comment?   Attack   | Organisation:   |  |  |
| Placemaking Optio   | ons Plan Reference: Old Mills Industrial Estate (S   | SSV9)   |  |  |

#### **Comment on the Site:**

I am not happy with st Peters Factory, SSV18 and would like to make comments on SSV9. St Peters Factory Not good enough rds and nothing will help! Schools Nr and constant traffic congestion already not good! SSV18 Radstock college exactly the same as above and for both WHY!more houses loads in Paulton new built and still empty!! Printworks etc etc. NO jobs No good roads Lack of early buses to Bristol and Bath. WE need businesses, retail!, restaurants! Car parks! We need Radstock college as none for miles around! No more houses on Old Mills we have not the infrastructure and the chicane in the Paulton High st is causing jams, accidents because it is hard to judge what speed cars are going when coming towards you there on a main road! You have put speed limit down to 20 that should be enough although half way down hill after hospital should be 30 due to police stop and it is very difficult to drive at 20 down hill and normally sometimes when u first start of on a cold morning and your car is likely to stall! I would like a reply to this

#### **Change requested:**

WE need businesses, retail!, restaurants! car parks! We need Radstock college as none for miles around! No more houses on Old Mills we have not the infrastructure and the chicane in the Paulton High st is causing jams, accidents because it is hard to judge what speed cars are going when coming towards you there on a main road! You have put speed limit down to 20 that should be enough although half way down hill after hospital should be 30 due to police stop and it is very difficult to drive at 20 down hill and normally sometimes when u first start of on a cold morning and your car is likely to stall!

Placemaking Options Plan Reference: Rural Areas - Context / Paragraph 1.343

Number: 456 Respondent 102 Comment 23 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: Organisation: Residents' Associations Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Rural Areas - Context / Paragraph 1.343 **Comment on the Site:** There is a need to mention non-residential development requirements: eg (a) that the Bath Transport Strategy has confirmed the need for a P&R site to the east of Bath and that a site will need to be found; and (b) work to consider an alternative route to the A46-A36 through Bath. **Change requested:** 

Plan Order

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Rural General Comments Number: 469 Respondent 279 Comment 21 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Rural General Comments Comment on the Site: It is appreciated it is likely that most, if not all, of these allocations will be consistent with national planning policy for the historic environment. Nevertheless due to the lack of evidence EH would welcome the opportunity to appreciate how an understanding of the historic environment including the historic integrity of these small settlements, designated and nondesignated heritage assets and their settings, have informed these allocations and the great weight that has been applied to their conservation. **Change requested:** Respondent 1253 Comment 7 Respondent Emily Merko **Respondent** Hinton Blewett Parish Number: Number: Name: **Organisation:** Council Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Rural General Comments **Comment on the Site:** The Parish Council would like serious consideration to be given to the other four sites as detailed in the Hinton Blewett Placemaking Plan Stage 1. The Parish Council would like the opportunity to discuss the other four sites further with the Placemaking Plan Officers. **Change requested:** Respondent 3095 Comment 1 Respondent Dr N J T Long **Respondent** Bath and North East Number: Number: Name: **Organisation:** Somerset Branch of the Agent ID: **Agent Name:**

#### Comment on the Site:

**Rural Areas** 

The CPRE wishes to confirm its support for limited development in RA1 villages (about 50 dwellings plus windfall sites)

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Rural General Comments

and RA2 villages (about 10-15 dwellings plus windfall) as proposed in the Core Strategy (CS) and reiterated in the Placemaking Plan Options Consultation (PPOC). This is to avoid swamping established communities and straining local facilities. In addition, the CPRE believes that these extra dwellings should, where possible, be delivered over a number of sites within villages to maintain character and to avoid the identikit large scale housing developments often proposed by national housebuilders. The CPRE is also concerned that sites selected sites in the Placemaking Plan will be approved and developed very quickly over the next year or two giving no scope for additions to the housing stock later in the Plan period and not facilitating the slow organic growth vital for the preservation of the visual and social character of these communities.

| Change requested:   |   |
|---|---|
| Respondent 4605 Comment 1 Respondent Rebecca Sweet Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |   |
| Placemaking Options Plan Reference: Rural General Comments  |   |
| Comment on the Site:  My name is Rebecca Sweet, I currently live back with my parents in Norton Hawkfield after selling my house in Paulton.  The reason I write to you today is to raise the issue that there has been no housing development in the village for a few years now. I am 27 years old and was born and raised in the village, my family have been living in the village for over 90 years. Currently the house prices are so high in the village that unfortunately my partner and I, who both work full time, can't afford to buy. I would love to be able to start a family and bring my children up the way I was brought up and in the village as there is so much family history in the area.  I know there has been a planning application for 2 houses on Church Road, which I think is brilliant, but realistically are these houses going to be affordable or have priority to the local people? It's ridiculous that the younger generation are being forced out of the villages they grew up in. Surely something has got to happen in Norton Malreward soon that can accommodate us?  If there is any more I can do to support affordable housing in the area then please do let me know.  Change requested: | : |
| Respondent 6389 Comment 22 Respondent Respondent Cycle Bath Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Rural General Comments   |   |
| Comment on the Site: Bathampton   |   |

Opportunity for improvements for cycling along A36

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided   |
| lunction must be improved for priority of cycling over vehicles   |
| Bathford  |
| Opportunity for improvements for cycling to city centre   |
| That cycling provision should be provided following desire lines  |
| Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided   |
| lunction must be improved for priority of cycling over vehicles   |
| Change requested:   |
|   |
| Respondent 6424 Comment 3 Respondent Mrs Sally Wyatt Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Rural General Comments  |
| Comment on the Site:  Hi Julie  hope you got the map. The smaller marked area is what we thought could be the play area with access to the woods many thanks sally wyatt  Hi Julie In my hast to complete the comments form I forgot to state where the land is ie south of highbury road hallatrow.  Many thanks sally wyatt |
| Change requested:   |
| Respondent 6425 Comment 1 Respondent Mr P Jones Respondent Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
|   |
| Placemaking Options Plan Reference: Rural General Comments  |

#### **Comment on the Site:**

Please find these comments for your consideration regarding the site at Camelot, Red Hill, Camerton, Bath, BA2 ONY, stating why this site would be most advantageous to the Parish of Camerton.

At the local Placemaking and Parish meetings, locals wanted housing developments to be in keeping, spread out and not condensed or near existing Housing Development Boundaries (HDBs) to retain Camertons' feeling of open space. Camelot site scored highest at placemaking meeting for suitability for housing.

#### Principle 4:

HDBs do not need to be continuous. It may be appropriate given the nature and form of village to define two or more separate elements (Taken from Placemaking Plan - options statement) As Camertons' existing HDBs are built in and either side of the steep valley (high visibility impact) they are in or very near the areas of the existing Flood plain, the conservation areas of the SNCI Cam Brook, award winning Heritage site, the historic Camerton Batch Nature Reserve, Limestone Link National footpath, natural animal thoroughfare/ecological corridor and generally interrupt the valley views.

The Camelot site is as near, if not closer to the 2 biggest HDBs of Camerton than the 2 smaller HDBs are to them, but Camelot site has the advantage of being above the valley out of view and away from current and future conservation issues.

Camerton needs more housing if it has any chance of sustaining what little amenities it has, and hopefully progress to reinstating much sought after village life including local shop/post office/cafe or even a pub that have all been lost over the years, rather than relying on the bigger (and soon to get even larger) neighbouring Timsbury and Peasedown villages which are too far to walk from existing HDBs. Camerton Primary school would benefit from a much needed influx of local children, opposed to the already over subscribed primary schools nearby.

The site at Camelot, which can be taken from part of the garden, equates to approx 1.3 acres (0.53 hect) with 53m road frontage, or from the total site area of Camelot amounting to approx 2.37 acres (0.963 hect) with 78m road frontage in total including existing highway access. So the site at Camelot could either accommodate a range from a few houses upto the larger amount, even a community café/shop (as in nearby Wellow) and even small industrial units.

Camelot sites' frontage is straight and positioned along one of the few straight pieces of the only main road running centrally through Camerton that joins all existing Housing Development Boundaries. It has street lighting in place and is maintained (gritting, etc) and a bus stop is within a few metres of the plot boundary. The frontage makes up a moderate percentage of what is needed for the proposed Red Hill footpath. Ideally situated equidistant from the two main recreation areas of Camerton (one side School, Church, Play Park, Nature reserve and the other side Camerton Recreation hall and field, Meadgate farm shop, Camerton Garage, Travis Perkins builders merchants and local restaurant and bar).

#### The merits of the site include-

Site size can easily accommodate properties with generous plot sizes to match existing housing in Camerton Flat land opposed to usual sloping of Camerton valley (flat gardens more desirable to young families that are needed for the school) Well drained land Non-contaminated land Partially screened and low visibility impact. Not seen from valley or main road coming in Not agricultural/valuable farmland being used Not in greenbelt designated land All services eg. Electric, water, sewerage on site Light and bright plot suitable for sustainable power additions (i.e. not in valley shadows, etc) No immediate neighbours (opposite Travis Perkins builders yard) On bus route and near to main bus route On bus route for catchments area Secondary schools (also Timsbury primary) Direct access to main road with good visibility both ways Walking distance to Camerton School and Church, Nature reserve and play park.

Even closer to other amenities than existing HDBs which include Camerton Recreation hall and field, Meadgate farm shop, Camerton Garage, Travis Perkins builders' merchants and local restaurant and bar. And also Timsbury with all of its existing amenities eg. Doctors, Post office, Shops, School, Pub, Hairdressers, Cafes, etc. which are accessible via a flat walk.

As it is inevitable that Camerton will soon have to provide extra dwellings to compensate the under delivery of housing in our area, we feel The Camelot site offers the best potential in Camerton due to its unique location that has the least impact on the surrounding area.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                 |                             |  |  |
|---|-----------------------------|--|--|
| Thank you for considering the above proposal.   |                             |  |  |
| Change requested:   |                             |  |  |
|   |                             |  |  |
| Respondent 6446 Comment 1 Respondent Number: Number: Name:                                  | Respondent<br>Organisation: |  |  |
| Agent ID: 233 Agent Name: Turley Associates Limited   |                             |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |                             |  |  |
| Placemaking Options Plan Reference: Rural General Comments                                  |                             |  |  |
|   |                             |  |  |

#### **Comment on the Site:**

We write with regard to the above consultation. The comments set out below are made on behalf of our client and are structured under various headings which relate to specific sections of the Placemaking Plan Options Document, but specifically relate to Rural Areas and the Development Management Sections.

Our client has interest in the policies and strategies set out in the emerging Placemaking Plan. The representations set out below are made in the context of seeking to work with the Council to ensure that an effective and deliverable plan for the area is achieved.

The main points of our representations which are set out in this letter are:-

- The Placemaking Plan and its supporting evidence does not clearly demonstrate how the Core Strategy housing requirement for rural areas will be effectively delivered over the Plan period, and in the most sustainable manner.
- For clarity and avoidance of doubt, the Placemaking Plan should clearly identify those settlements which fall under Policy RA1 or RA2
- The housing requirement in rural areas should be proportionately allocated to Policy RA1 settlements across the district, dependent on the sustainable credentials (i.e. access to a range of facilities and services) of each settlement.
- An appropriate housing requirement for each RA1 settlement, along with any other requirements for Neighbourhood Plans to adhere to, should be clearly stated as a policy within the Placemaking Plan.
- The mechanism by which the Council considers it appropriate to identify housing sites instead of, or in addition to the Neighbourhood Plan needs to be clarified to ensure certainty in the delivery of the identified housing requirement, over the Plan period.

**Rural Areas** 

Core Strategy Policy RA1

The Core Strategy currently sets out the housing requirement in rural areas of around 1,100 dwellings, over the Plan period of 2011 -2029. The Core Strategy relies upon a number of policies to be applied to the villages within the District (namely Policy RA1 and RA2) to deliver this growth.

Policy RA1 explicitly states:-

"At the villages outside the Green Belt or excluded from the Green Belt, proposals for residential development of a scale, character and appearance appropriate to the village and its setting will be acceptable within the housing development

boundary provided the proposal is in accordance with the spatial strategy for the District set out under Policy DW1 and the village has:

a: at least 3 of the key facilities within the village: post office, school, community meeting place and convenience shop, and

b: at least a daily Monday-Saturday public transport service to main centres,

At villages outside the Green Belt which meet these criteria, development sites will also be identified in the Placemaking Plan and the housing development boundary will be reviewed accordingly to enable delivery during the Plan period of the 1,120 dwellings identified on the Key Diagram. Residential development on sites outside the Green Belt adjoining the housing development boundary at these villages will be acceptable if identified in an adopted Neighbourhood Plan.

Proposals at villages located outside the Green Belt or excluded from the Green Belt for employment development of a scale, character and appearance appropriate to the village and its setting will be acceptable within and adjoining the housing development boundary on land outside the Green Belt"

As highlighted in Policy RA1, it is for the Placemaking Plan to identify development sites to enable the delivery of 1,120 dwellings in the rural areas. This option document does not demonstrate how this will be achieved with any certainty. The Placemaking Plan and its supporting evidence needs to robustly demonstrate how the 1,120 dwellings in rural areas will be delivered with some certainty over the Plan period, and in the most sustainable manner.

Paragraph 1.345 states those villages which meet the Policy RA1 criteria will each accommodate approximately 50 dwellings over the period 2014-2029. This supporting text is seeking to further detail Core Strategy Policy RA1. This objective should be established as a policy to enforce its application.

Although Policy RA1 sets out a clear criterion, for clarity and certainty it is important for the Placemaking Plan to define which settlements are considered to be a Policy RA1 settlement. This should be detailed within the wording of a policy.

In addition, the Placemaking Plan and its evidence do not clearly justify why the quantum of development should be at the same level for each RA1 settlement. It is suggested that some villages could more suitably accommodate to each, more development than others. Therefore, it is suggested that those settlements which meet the RA1 criteria should be suitably appraised to consider whether a different level of growth could be accommodated, to ensure the most sustainable distribution of development. Factors such as access to services and facilities, connection and relationship with other settlements and land available to deliver housing should be taken into account to determine the most appropriate and deliverable, sustainable level of growth at each settlement.

Furthermore, we wish to clarify the specific period by which future allocations referenced in Paragraph 1.345 relate. It is appropriate that planning permissions from the period 2011-2013 should be excluded from meeting the specified additional requirement at each RA1 settlement, and that the additional 50 dwellings (excluding windfall sites within the Housing Development Boundary) should be for the period from 2014 (i.e. 1 January) onwards.

#### Neighbourhood Plans

Although Core Strategy Policy RA1 clearly instructs the Placemaking plan to identify sites for housing, it is apparent that the Placemaking Plan is directing all decisions regarding growth in some RA1 settlement to Neighbourhood Development Plans.

We accept and respect the role that Neighbourhood Development Plans can have in bringing forward local policies and shaping places. However, we consider that clear and concise guidance is required for those RA1 settlements where the Placemaking Plan is relying upon Neighbourhood Plans to identify sites to meet the specified housing requirement. We recommend that full and clear guidance, including a strategic vision and a specified housing requirement is detailed within the Placemaking Plan, for each of those settlements subject to Neighbourhood Plans. It is then for the Neighbourhood Plans to identify the most suitable and deliverable sites to meet this requirement.

In nearly all of the RA1 settlements, sites outside of the existing Housing Development Boundary will be required to meet the additional housing requirement. Where this is the case the Placemaking Plan should clearly direct Neighbourhood

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Plans to do this.   |
| It is not entirely clear whether the Council consider that those settlements depending on Neighbourhood Plans (such as Clutton) should be adhering to the proposed requirement set out in Paragraph 1.345 i.e. Approximately 50 dwellings within the Housing Development Boundary (in addition to windfall sites), between 2014-2029. Detailing the housing requirement for each settlement will provide clarity to those involved in the preparation of the respective Neighbourhood Plans. In addition, it would seek to ensure that all development plan documents are consistent and aiming to meet the Spatial Vision and Strategic Objectives set out in the Core Strategy, including meeting identified housing needs.   |
| We also have concerns about the reliance of the delivery of housing through Neighbourhood Plans. We consider that the Council should insert a fall-back position or mechanism to deal with situations whereby a Neighbourhood Plan does not emerge as expected or in a timely manner. This is wholly important to ensure the aspirations and requirements within the Placemaking Plan and the Core Strategy are fully met.  |
| Employment  |
| We support the further acknowledgement of the provision of additional employment in rural areas, within Paragraph<br>1.349.   |
| Change requested:   |
|   |
| Respondent 6463 Comment 3 Respondent Graham & Iris Nicholls Respondent Timsbury Horticultural   |
| Number: Name: Organisation: Society  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |
| Agent ID: Agent Name:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Rural General Comments  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Agent ID: Agent Name:  Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Rural General Comments  Comment on the Site:  What I find it difficult to understand is that at the initial meeting in the autumn of 2013 it was stated that one landowner was willing to sell his land for part building and part for the use of Timsbury villagers. TIM3 & TIM4. Mr Bertram had even produced a plan showing a housing development and new road for the school. Why wasn't this seized upon immediately  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Rural General Comments  Comment on the Site:  What I find it difficult to understand is that at the initial meeting in the autumn of 2013 it was stated that one landowner was willing to sell his land for part building and part for the use of Timsbury villagers. TIM3 & TIM4. Mr Bertram had even produced a plan showing a housing development and new road for the school. Why wasn't this seized upon immediately and the deal finalised?  Finally I suggest that the Steering Committee, Parish Council and BANES planners have a rethink and instead put this area   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Rural General Comments  Comment on the Site:  What I find it difficult to understand is that at the initial meeting in the autumn of 2013 it was stated that one landowner was willing to sell his land for part building and part for the use of Timsbury villagers. TIM3 & TIM4. Mr Bertram had even produced a plan showing a housing development and new road for the school. Why wasn't this seized upon immediately and the deal finalised?  Finally I suggest that the Steering Committee, Parish Council and BANES planners have a rethink and instead put this area forward as a Local Green Space Designation for the benefit of all the villagers.  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Rural General Comments  Comment on the Site:  What I find it difficult to understand is that at the initial meeting in the autumn of 2013 it was stated that one landowner was willing to sell his land for part building and part for the use of Timsbury villagers. TIM3 & TIM4. Mr Bertram had even produced a plan showing a housing development and new road for the school. Why wasn't this seized upon immediately and the deal finalised?  Finally I suggest that the Steering Committee, Parish Council and BANES planners have a rethink and instead put this area forward as a Local Green Space Designation for the benefit of all the villagers.  |
| Agent ID: Agent Name:  Further Information available in the original comment?  Attachments sent with the comment?    Placemaking Options Plan Reference: Rural General Comments  Comment on the Site:  What I find it difficult to understand is that at the initial meeting in the autumn of 2013 it was stated that one landowner was willing to sell his land for part building and part for the use of Timsbury villagers. TIM3 & TIM4. Mr Bertram had even produced a plan showing a housing development and new road for the school. Why wasn't this seized upon immediately and the deal finalised?  Finally I suggest that the Steering Committee, Parish Council and BANES planners have a rethink and instead put this area forward as a Local Green Space Designation for the benefit of all the villagers.  Change requested:  Respondent 6463 Comment 9 Respondent Mrs Florence M Button via Respondent Timsbury Horticultural |

Placemaking Options Plan Reference: Rural General Comments

#### **Comment on the Site:**

The site originally proposed, Tim3 & Tim4, and verbally agreed with the owner, is much more suitable for the suggested development with better access roads leading to Keynsham/Bristol and a possible access to North Road via Lippiatt Lane which would be far better than on a dangerous corner as proposed. It's unfortunate that the Parish Council didn't pursue the matter further at the time.

| Change requested:   |  |  |  |
|---|--|--|--|
|   |  |  |  |
|   |  |  |  |
| Respondent 6468 Comment 1 Respondent Mr N Barnett   | Respondent                               |  |  |
| Number: Name:   | Organisation:                            |  |  |
| Agent ID: Agent Name:   |  |  |  |
|   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |  |  |
|   |  |  |  |
| Placemaking Options Plan Reference: Rural General Comments  |  |  |  |
| Comment on the Site:  | J  |  |  |
| Farmborough is not mentioned. Is any development expected within the HDB?                               | If RA1 was to apply at some point during |  |  |
| the period, it is unclear where further development is expected within the HDB.                         |  |  |  |
| Local Green Spaces for Farmborough should be included.  |  |  |  |
|   |  |  |  |
| Change requested:   |  |  |  |
|   |  |  |  |

# Placemaking Options Plan Reference: Batheaston (SR16) Number: 476

| Respondent 6413 Comment 1 Re<br>Number: Number: N  | espondent Mr Derek Redding<br>Jame: | <b>Respondent</b> Batheaston Leisure <b>Organisation:</b> Association |  |  |
|--|-------------------------------------|---|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                     |   |  |  |
| Placemaking Options Plan Reference: Batheaston (SR16)  |                                     |   |  |  |

#### Comment on the Site:

I attended the recent public exhibitions in Bathampton and Batheaston where I had some useful discussions with your officer, Julie O'Rourke.

I am writing both as a local resident and in the capacity as Chair of the Batheaston Leisure Association (BLA), a voluntary body which holds a lease from the Batheaston Parish Council to maintain and manage the village leisure facilities alongside Coalpit Road, namely the football pitch, children's playground, outdoor multi-sports court and the Rhymes Pavilion.

The BLA's facilities neighbour on three sides the SR16 site being proposed to be earmarked for new housing development.

To avoid any doubt, Julie O'Rourke has confirmed on separate occasions that the site as it appears marked on the map is incorrectly shown as including the multi-sports court and that the actual site is restricted to the Coalpit Road garages and not incorporating any land currently leased by the BLA.

The BLA believes that housing would not be appropriate on this site for the following reasons.

- Housing would have a detrimental impact to the surrounding leisure facilities, isolating them and reducing their importance as a series of linked and complimentary sites.
- •The site is surrounded on three sides by actively used leisure facilities generating noise and disturbance which does not seem appropriate immediately adjacent to housing.
- Development for housing would cause a permanent loss of alternative development opportunity of the site, or part of, for improving leisure facilities in a village with limited facilities and few, if any, viable alternative options available.
- •The proposed site is small and will have only a marginal impact on improving housing provision whilst increasing density in what is an already overcrowded area.

The BLA would like to see the Coalpit Road garages redeveloped as they are currently in poor condition and provide little amenity to the village and are generally detrimental to the character of this part of the village.

The BLA's strategic vision for the area is to create an attractive corridor of mainly outdoor facilities adjacent to Coalpit Road thereby linking the commercial centre of the village to the various community amenities in Northend, which link in turn to the Batheaston-Bathampton cycle/footpath and the scenic St Catherine's valley. This vision also seeks to open up access to St Catherine's Brook.

A common and often aired complaint about living in Batheaston (most recently during the BPC's "Think Tank" exercise) is the poor parking provision within the village. Parking has also been raised as an issue by objectors to the plans for a new Village Hall on School Lane. The BLA would like to suggest that there is an opportunity to address this with new parking facilities on the site which could be widely used by visitors not only to the leisure facilities but also the school, village hall, for shopping etc., as well as for overflow parking for local residents. The BLA's vision is for a mixed development of

Plan Order

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| arking and expanded leisure facilities on the site.   |
| nope this is helpful and trust that the BLA's views will be taken into consideration as part of the consultation.   |
| hange requested:  |
| nunge requesteu.  |
|   |
| espondent 6423 Comment 1 Respondent Mr Rob Mimmack Respondent Umber: Name: Organisation:  |
| gent ID: Agent Name:  |
| urther Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
|   |
| lacemaking Options Plan Reference: Batheaston (SR16)  |
| omment on the Site:   |
| oposed housing site at Coalpit Road. Im Vice Chair of Batheaston Leisure Association (BLA) and a Committee Member of Batheaston Forward - The Residents' isociation for Batheaston as well as a local resident. It is first point is to record that the plan displayed is incorrect as the floodlit hard court adjoining the garages is NOT when which is owned by Batheaston Parish Council and leased to BLA. Batheaston is a large village with only the otball pitch and the hard court available as sports facilities for young people. These sites should not be considered for development for alternative uses.  In second point is that the hard court is floodlit and used in the evenings for 5-a-side football which is inevitably a bit bit bit bits. Placing new dwellings immediately adjacent to this amenity does not seem sensible as residents are bound to find the lights and the noise disturbing and is likely to result in conflict which may eventually force the hard court to close. It is so few houses are proposed for this site it would seem more sensible to include the area in a review by the Parish bouncil and B&NES leading to other proposals such as extended sports and recreational facilities and / or car parking to eat the requirements of Elmhurst Estate and the nearby School and proposed Village Hall in School Lane, Northend there there are already significant parking problems. There are "brownfield" sites in Batheaston parish which appear one suitable for housing development. You explained to me that these cannot be included in the Placemaking exercise excause they are in the Greenbelt but that they could nonetheless be brought forward for redevelopment. |
| hange requested:  |
|   |
|   |
| espondent 6470 Comment 1 Respondent Ms Catherine Bloxsom Respondent umber: Number: Organisation:  |
| gent ID: Agent Name:  |
| urther Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |
| lacemaking Options Plan Reference: Batheaston (SR16)  |

#### **Comment on the Site:**

Subject to every effort being made to encourage people to walk, bicycle, or use public transport wherever possible, I believe that the best use for this land would be to develop it sensitively as a short stay car park for the use of those using the play area, football pitch, primary school, Rhymes Pavilion, village hall, scout hut etc, all of which are nearby and none of which currently have parking provision. Together with work to upgrade the footpath to School Lane this would help to alleviate the parking problems in the village.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Change requested: Respondent 6496 Comment 1 Respondent Ms Vicky Drew **Respondent** The Labour Party Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Batheaston (SR16) Comment on the Site: I notice your plans for the garage site on Coalpit Road, Batheaston incorporates the hard standing court and popular local leisure facility. This will not be acceptable to the community or the newly formed Residents Association. **Change requested:** Exclude all building proposed on our local leisure facilities currently managed by the Batheaston Leisure Association. Respondent 6500 Comment 1 Respondent Mr Peter Fear Respondent Number: Number: Name: Organisation: **Agent Name:** Agent ID: Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Batheaston (SR16) Comment on the Site: This site was reviewed by Batheaston Parish Council towards the end of 2013. The brief given to the Council was that it needed to find an allocation for 50 houses being a RA1 Village. The exercise was conducted and the Parish Council followed this brief and wasn't fully aware of the relaxation that was later given due to the fact that Batheaston was excluded from the green belt and would probably find it difficult to meet the 50 unit requirement. The Village is now progressing with it's Neighbourhood Plan and comments have been made to the potential unsuitability of this site for housing as it is directly adjacent to the only recreational spaces available in the Village. The Neighbourhood Plan process will be reviewing this site and it is possible that a different conclusion will be reached through the Community consultation process. There is also some uncertainty as to the perimeter of the site. This has been raised with a Planning Officer. **Change requested:** Text to be included -That due regard will be given to any recommendation made for this site in the Batheaston Neighbourhood Plan.

| Schedule of Comments on the Placemaking Plan Options Doo   | ument in Plan Order  |
|--|--|
| ·  | Respondent Organisation:   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Batheaston (SR16)  |  |
| Comment on the Site:  Hi, I am concerned that the plans show the children's skateboard ramp and five as development. Is this the case?   | ide area appear to be shown for  |
| Change requested:  |  |
| Number: Name:  | Respondent KBA Ltd Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Batheaston (SR16)  |  |
| Comment on the Site:   |  |
| The description of the site makes no mention of the multi-sports facility that exist skate ramps and basketball facility that exists on the site. Therefore with the describent the boundary and size of this potential development site should be changed. The description also notes that the adjacent school is 'landlocked' but this site for potentially expanded school site spanning both sides of the brook and which would Perhaps this site should be safeguarded against residential development instead. Lane adjacent to the doctors surgery instead be considered for residential development. | ms a potential southern boundary to a ld address both 'halves' of Batheaston. Could a site further south along Coalpit |
| Change requested:  |  |
| Reduce the site boundary or mention that loss of the multi-sports facility and bask considered as part of the proposals. Change to an alternative site in Batheaston such as the above-mentioned one also  |  |
|  |  |
| · · ·  | Respondent KBA Ltd Organisation:   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\qed$ Attachments sent   | with the comment? $\Box$   |
| Placemaking Options Plan Reference: Batheaston (SR16)  |  |

#### **Comment on the Site:**

I feel that the garages site should not be developed for housing but should be protected for potential future expansion of the primary school (which of course comprises an infant and junior school) so it can also have a frontage onto the Elmhurst half of Batheaston.

I feel that the site on Coalpit Lane between the doctors surgery and the Rhymes Pavilion could be developed for a local supermarket - which would procure a pavement on that side of the road. The supermarket could be on columns at the road level addressing the street and parking/deliveries could be at a lower level at the rear in the flood zone. This could also be served by additional parking opposite the shops on London Road East (as well as private but publicly available parking at the rear of the Fat Friar).

A strip of land along the River Avon between the former Avondale Hotel and the Manor House Secret Garden (excluding the area immediately around the public toilets) should be designated as a Local Greenspace. Development of additional buildings on the raised car wash site should be resisted. This would avoid repeating the mistake of the large horizontal slabs of modern houses that are still under construction about 25m up Bannerdown Hill. Please take a look from the Toll Bridge Road at the other end of the cycleway (or indeed all along the cycleway). Large/wide buildings on a single level are out of character with the view of Batheaston from the meadows.

Most of the above area forms the immediate setting for several Listed Buildings on London Road East that are for some reason outside the Batheaston Conservation Area (perhaps because it was designated in 1979 when boundaries were often drawn too tightly - as EH advise). The Conservation Area should be extended to include this area as it is the historic core of Batheaston, its connection with the River Avon, and that relationship is desirable to be preserved and enhanced.

The vacant site adjacent to the Landrover garage on the A4 should allow conversion to food retail use as an alternative position for a larger (eg: Sainsburys Local etc.) local supermarket which could serve both Batheaston and Bathford. Unfortunately this site is in Bathford Parish although undeniably part of the community of Batheaston. Indeed all the housing development east of Morris Lane and north-west of the A4, and that is within Bathford Parish, should rightly be changed to Batheaston Parish.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |

Placemaking Options Plan Reference: Bathampton - Proposed Local Green

Space (GR17)

Plan Order Number: 483

| Respondent 6403 Comi  | ment 1 Respondent                    | Respondent Property Bath Ltd |  |  |  |
|---|--------------------------------------|------------------------------|--|--|--|
| Number: Num   | nber: Name:                          | Organisation:                |  |  |  |
| Agent ID: 220 Agent Na  | ame: Alder King Planning Consultants |                              |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\checkmark$ |                                      |                              |  |  |  |
|   |                                      |                              |  |  |  |
| Placemaking Options Pla   | n Reference: Bathampton - Proposed L | ocal Green Space (GR17)      |  |  |  |

#### Comment on the Site:

#### 1INTRODUCTION

- 1.1 This planning statement supports representations submitted to the emerging Placemaking Plan in relation to land at Miller Walk, Bathampton. The land the subject of these representations is indicated on the plan enclosed (and embedded in the Aaron Evans document) and comprises two parts. The main body of the site (West) is wholly enclosed, invisible to the public and private. The subsidiary part (East) is an open but discrete part through which runs a public footpath. In addition to the footpath there is also a right of vehicle access across this land to service the main part of the site. The statement has been prepared in conjunction with Aaron Evans Architects (context analysis); Nicholas Pearson Associates Preliminary LVIA and extended Phase 1 Habitat Survey and Greenman Environmental Management (Tree Survey). A copy of each document is enclosed.
- 1.2 In its current form the plan is unsound. The Placemaking Plan at pages 123 / 124 notes the site as GR17 and as a Local Green Space. There is no justification for the notation and the text supporting the notation is illogical and inaccurate and this has been acknowledged by Council Officers as an error. (email from Sarah James to Dale Evans dated 5 January 2015). The purpose of these representations is therefore to object to the GR17 notation on the plan at page 123 and correct and amend the text at paragraphs 1.362 and 1.363 on page 124. Finally, and flowing from the above these representations seek to ensure that any identification of Local Green Space in the vicinity of Miller Walk is both justified and accurate.

#### 2 POLICY CONTEXT

- 2.1 The site the subject of these representations has previously been the subject of planning applications and appeals and this background is relevant to considering the appropriateness of the designation of this site as Local Green Space. The most relevant planning history is the proposal and subsequent appeal decision in November 2007 (APP/F/O114/A/07/2038358). This decision then needs to be considered in the context of the Development Plan position and Other Material Considerations particularly where circumstances have changed since 2007.
- 2.2 The start point is the Development Plan that comprises the October 2007 adopted Local Plan Proposals Map and saved policies and the 2014 adopted Core Strategy. Other important material considerations include the National Planning Policy Framework (the Framework and particularly paragraph 77 and the definition of Open Space at Annex 2) and the Government's Planning Practice Guidance (PPG). The Core Strategy, the Framework and the PPG, are important changes since the 2007 appeal decision.
- 2.3 The site the subject of these representations is situated within the settlement of Bathampton and has no specific allocation or notation on the adopted Proposals Map. The site is however situated on the edge of the Conservation Area and to the North of an open space crossed by a public footpath. When the Conservation Area was designated in 1984 (in the then Wansdyke) the subject site along with land to the North and East was identified as a "fringe area", a notation that has no planning status at all, but where development would need to be considered carefully. It is however pertinent to note that the subject site was not at that time considered worthy of Conservation Area status and notwithstanding the 2007 appeal decision (and two other appeal decisions that preceded it) this has not changed. The site has not been included within any Conservation Area extension since its designation in 1984 despite the planning history and the legal

duty to review Conservation Areas from time to time (Listed Building Act 1990 S69) and previous attempts to formally identify it as important open space have also been rejected. Indeed part of the original fringe area accommodates the existing Miller Walk housing development. The site is described in detail in the supporting reports but pertinent to this planning summary is the fact that the main part of the site is enclosed by a high belt of Leylandii trees and is not visible to the public. The body of the site is also within private ownership with no current or past public access. The land to the East is also in private ownership across which there is an established right of vehicular access.

2.4 The criteria relevant to considering whether existing open spaces should be formally notified are set out in Framework paragraph 77.

#### 3 COMMENTARY

- 3.1 The main part of the land at Miller Walk is neither "open", nor of public value and cannot be seen by the public so has no visual amenity value. In this context it is not an "open space" as the Framework defines. The land to the East may be regarded as an "open space" but it is discreet and makes no significant contribution to the character of the village or the setting of the Conservation Area.
- 3.2 While local communities should be able to identify sites which deserve special protection it is clear that such notation should be used sparingly and only applied to cases which are "demonstrably special" (Framework para 77 second bullet).
- 3.3 In this respect the policy context and policy and planning history referred to above is relevant. It also follows that a blanket approach to existing undeveloped spaces within settlements is wholly inappropriate and that where land parcels (albeit adjacent to each other) are readily distinguishable then each needs to be carefully considered against the relevant criteria. In each case the question must be asked: Is this land "demonstrably special"?
- 3.4 Unlike the land to the North, which is publically visible and accessible the main part of the Miller Walk land is wholly enclosed and private. In this respect it is readily distinguishable. On this basis and with no other visual amenity, historical or ecological interest the land is not "demonstrably special" and the plan should be amended accordingly. The land to the East is locally visible but clearly distinct from the land to the North and is subject to a private right of vehicular access. This land also has no historical or ecological interest and is also not "demonstrably special".

#### **Change requested:**

#### **4 SUGGESTED CHANGE**

- 4.1 Plan page 123 delete green notation from plan. NB: my client would have no objection to the open land to the North only being specifically noted as Local Green Space.
- 4.2 If land to the North is to be retained then amend 1.362 to read Local Green Space GR17, is the Land adjacent to Bathampton Lane.
- 4.3 Amend 1.363 second bullet by deleting "the Cotswolds AONB"
- 4.4 Amend all bullets so that they reflect only the Framework para 77 criteria specifically delete reference to other landscape designations, village green and planning history.

Placemaking Options Plan Reference: Bathampton - Proposed Local Green

Land needs allocating within Bathampton for MetroWest.

Space (GR16)

Plan Order Number: 485

Respondent 837 Comment 2 Respondent Mr David Redgewell Respondent South West Transport Organisation: Network, Railfuture

Agent ID: 56 Agent Name: South West Transport Network

Further Information available in the original comment? ☐ Attachments sent with the comment? ☐

Placemaking Options Plan Reference: Bathampton - Proposed Local Green Space (GR16)

Comment on the Site:

Support the retention of site as open space but need to understand how land is allocated for the railway station in Bathampton and its relationship to GR16.

Change requested:

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Compton Martin (SR17) Number: 500 Respondent 6480 Comment 2 Respondent Mr Simon Chamberlain Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Compton Martin (SR17) **Comment on the Site:** In spring of last year I submitted an application for a site in Compton Martin for consideration within the place making To date I have had no formal response to my submission. Therefore I object to the proposals for Compton Martin as I believe it does not consider all appropriate sites.

**Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: East Harptree (SR6) Number: 509 Respondent 4808 Comment 2 Respondent **Respondent** E V Currell & Sons Number: Number: Name: **Organisation:** Agent ID: 51 Agent Name: Hoddell Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR6) Comment on the Site: We note that one of the other sites put forward for consideration as part of this consultation, Site SR6, is currently subject to an, as yet, undetermined planning application (ref: 14/05836/FUL) for 8 no.dwellings. **Change requested:** Respondent 6394 Comment 1 Respondent Chris Hodges Respondent Meadow Bank Water Number: Number: Name: **Organisation:** Street Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: East Harptree (SR6) Comment on the Site: I make the following comments 1. Although the site SR6 is in itself not subject to flooding, any development would put increased pressure on an inadequate surface water drainage system in Water Street. 2. The provision of footpath access to Middle Street would be totally inappropriate It would discharge on to busy road which is too narrow for wheelchair or pushchair use. East Harptree has historic infrastructure, none of the roads meet current standards in carriageway widths or pavements. Increased development would greatly increase the risk of accidents, particularly to children and the elderly. 3. The reasons for designating Parkers Mead GR1 status could be equally applied to SR6. In view of its proximity to the school, public transport, local shop and other facilities it would make it appropriate for some family housing.

4. The visual impact of entering the village from the south would be improved by the development of the former

Developments of greater than five units would be detrimental to the character of the village and any future housing

agricultural site SR5. I am surprised that this was not classified as the preferred option.

**Change requested:** 

should be spread around the village to minimise its impact.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Respondent 6394 Comment 2 Respondent Mrs Christine Hodges Respondent Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: East Harptree (SR6)   |
| Comment on the Site:  |
| I would like to make the following comments.  |
| 1. The prospect of 10 houses being built on SR6 would more than double the present number of houses. Water Street is a small street which would struggle with the additional traffic, especially waste and recycling collections and deliveries.                      |
| 2. There are no pavements in Water Street therefore pedestrians and children have to walk in the road. With more traffic and pedestrians I see this as a real problem. The junction with Whitecross Road is already dangerous during school hours.                    |
| 3. The proposed pedestrian link to Middle Street would be a danger to pedestrians, particularly children and the disabled. Middle Street is the main through road of the village with a very narrow walkway which disappears altogether near the pre school and shop. |
| 4. Water Street has flooded twice in recent years and any new development would put increased pressure on the drainage system.  |
| 5. SR6 is a site with lots of important wild life enjoying it. There is an active badger set and this was never included in the initial appraisal.  |
| I hope you will take these points into consideration.   |
| Change requested:   |
| Retain the green space that runs between Culver Lane and Whitecross Road.   |
|   |
| Respondent 6418 Comment 1 Respondent James & Lizzie Blair Respondent Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: East Harptree (SR6)   |
| Comment on the Site:  |

We are not resident yet but will be moving when our building works are complete to the converted barn adjacent to Home Farm. Therefore any development proposals within the village are of interest and in this case of concern to us.

We have attended a number of the recent meetings to discuss the Placemaking Plan which is concerning many other Parishioners. You will be receiving a "Combined Response" which emphasises 11 specific points illustrating the principle concerns that should be addressed and taken into account at this consultation stage. The report has been well researched and we concur with it.

We take this opportunity to ask those who will have the responsibility to decide on the outcome of the Placemaking Plan and subsequently on any applications submitted to develop the sites, to ensure that:-

- 1. The density is commensurate with the site areas and the topography.
- 2. The layouts have order and the proposed properties relate to each other this will ensure there is a balance between density of housing and landscape
- 3. The layouts proposed should take into account the existing setting of ! neighbouring properties and ensure that they are not compromised .
- 4. It is rare for a developer to give priority to design and landscape over profit which is understandable, but the planning authority should rigorously pursue their objectives to improve the environment we live in and therefore the above needs to be considered before the density of the site can be can be determined.
- 5. It has for so long been too easy for developers to produce mediocr design and build quality. Good design consists of three principle elements colour, texture and proportion, you will agree that none of these have a cost implication but invariably when applied with consideration by both designer and developer the result is easily perceived and appreciated by all those who pass it by and much more important by those who live within .
- 6. It may be argued that the point being made is more relevant to a planning application but if the density of a site is not thoroughly considered the result will undoubtedly lead to over development with inappropriately sized properties and highly likely with total disregard for the neighbours. We must rely on the specialist departments to ensure that the environmental, social and highways issues are addressed. However the process permits everybody to comment.

Conclusion

We would therefore ask that the decision regarding the density of these sites is not an arbitrary one, but one which will take into account the submitted Individual and Combined Response as well as our's above.

Water Street has a particular character within the village of East Harptree where the property remains predominantly of a vernacular architectural style. The decision which has to be made will have a significant impact and foresight and due diligence will be required.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |
|                   |  |  |  |

| Respondent | 6432 | Comment | 1 | Respondent | Ms Claire Frost & Mr Nick | Respondent    |
|------------|------|---------|---|------------|---------------------------|---------------|
| Number:    |      | Number: |   | Name:      | Burroughes                | Organisation: |

Agent ID: 228 Agent Name: Tetlow King Planning

Further Information available in the original comment? 

Attachments sent with the comment?

| Placemaking Options Plan Reference: | East Harptree (SR6) |
|-------------------------------------|---------------------|

#### **Comment on the Site:**

I am writing on behalf of my clients, Ms Claire Frost and Mr Nick Burroughes, regarding the proposed allocation of their land between Middle Street and Water Street, East Harptree. This site is given reference SR6 within the Placemaking Plan Options document, and is indicated as being the preferred allocation at East Harptree.

As you may be aware we currently have a planning application (reference 14/05836/FUL) pending consideration on this site for the erection of eight dwellings and access. As detailed in that application and within the 'Context' section, page 132 of the Placemaking Plan Options document, this proposed development would effectively complete a scheme first proposed and partially built out in the 1960/70s.

My clients have not previously actively engaged with the Local Plan process regarding this site, but approached B&NES

Council with a pre-application proposal in 2014 with a scheme for five dwellings. The number of dwellings now proposed for this site was determined in part by the pre-application responses received from officers, which indicated that the then-proposed five dwellings would underutilise the site. A total of eight dwellings are now proposed, with a range of sizes.

Additional dwellings above this number cannot be satisfactorily accommodated within the site without adversely affecting the ecological constraints, including a subsidiary badger sett and foraging bats. The scheme density and layout also seeks to reflect the rural nature of the village; this approach accords with the emerging policy approach H2 in Section 2 of the consultation document.

We agree with each of the site-specific points noted in the 'Context' section. Site SR6 is considered the most sustainable and suitable of the three potential allocations at East Harptree, being centrally located within the village, on an unused, 'leftover' plot of currently inaccessible land. The development of this site would not impact unnecessarily on either the Conservation Area or on land outside the Housing Development Boundary.

As indicated in the Development and Design Principles section and discussed with East Harptree Parish Council prior to finalising the proposals, the application proposes building materials that reflect the local vernacular. The building heights are sympathetic to the neighbouring properties and to the relationship with Middle Street. The site layout has been drawn with specific consideration of the on-site ecological constraints, as has the decision not to include any street lighting. This, and the decision to include a replacement badger sett on-site, are considered particular benefits of the proposal.

We do not provide comment on the alternative sites proposed for allocation within the Options document, other than to note that the application scheme for site SR6 only seeks permission for eight dwellings. Whilst site SR6 is considered the most suitable plot of land for allocation, the pending application leaves 'room' for between 2-7 dwellings to be erected elsewhere in the village to provide the planned 10-15 dwellings at East Harptree.

We support the proposed allocation of site SR6 within the Options document. I would be grateful if you could retain my details on the consultation database, to be contacted at future consultation stages of this document.

| Change requested:  |                          |  |  |  |
|--|--------------------------|--|--|--|
| Respondent 6469 Comment 1 Respondent Mrs Christine Billinghurst Number: Name:                                      | Respondent Organisation: |  |  |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                          |  |  |  |
| Placemaking Options Plan Reference: East Harptree (SR6)  |                          |  |  |  |

#### **Comment on the Site:**

I have lived adjacent to this site since 1973; when we purchased Windrush we understood that there was outline planning permission for 5 bungalows on the 0.49 hectare old orchard (it is not improved grassland) behind us, now known as SR6. (1967; 55702/C)I was horrified to discover that the options stage of the Placemaking Plan proposed that 10 houses be built on the site, double that in the outline permission. There are only 16 dwellings in Water Street at present; a further 10 would increase the number of houses in the lane by 63%, which is unacceptable and would be totally out of character with the rest of the lane. All the existing dwellings in Water Street, whatever their size, are on large plots. A planning application (WC003468C)in 1996 for 5 dwellings on a 1.1 hectare site in Water Street (Home Farm) was reduced to 3 dwellings when the original application was refused on appeal. One reason given by the Planning inspector was that "the proposed development.. would be out of scale and character with he existing pattern of development in the area and be contrary to policy ATV 2(ii) of the Mendip Hills Local Plan. I am amazed that the Placemaking Plan proposes a plot size of 0.05 hectares for development on SR6 in Water Street, when less than 20 years ago a plot size of 0.2 hectares was not allowed in Water Street and the final plot size was 0.37 hectares.

My second objection to 10 houses on SR6 is that this site forms the most important part of a "green corridor" which runs between Whitecross Road and the village development boundary at Haydons Field. This whole area was originally apple orchards (This is shown clearly on Inset Map Number 14 of the Mendip Hills Local Plan, which although no longer current, shows the history of the site) The owners of the site have made a recent planning application for the site (14/05836/FUL) and commissioned an environmental impact assessment based on 5 houses on this site, NOT 10. The second ecology report from Michael Woods Associates says, in paragraph 6.1.1, that "at least 10 species of bats were recorded during the activity transect and automated bat surveys conducted between August and September 2014" In the recommendations for mitigation (paragraph 6.1.7) a dark buffer strip of at least 8 m width is proposed around the edge of the site; this is unlikely to be possible if 10 houses are built. There is also a badger set on the site, and slow worms have been found. The proposed mitigation for these protected species would also be impossible if 10 houses were built. Therefore the proposal in the plan that 10 houses be built on SR6 is contrary to the requirements of the Habitats Directive and contrary to Bath & North East Somerset's Local Plan policies NE10 and NE11. The site appears to be more important for wildlife than GR1, the proposed green space in the village.

My third objection is to the requirement for a pedestrian link with Middle Street, which is the main route for vehicles (including large agricultural vehicles) through East Harptree. It is single track in places and has an incomplete narrow pavement which is too narrow for pushchairs or wheelchairs. The preferred route for many villagers walking or running round and through the village is Water Street or Church Lane; this is a much safer route to village amenities than walking down or across Middle Street. 10 more houses on SR6 would make Water Street more dangerous for pedestrians (it is single track in part with no pavements) There is also existing connectivity between the two roads via a footpath alongside Haydon's Field.

My fourth objection is that there are already traffic and parking problems through the centre of the village; cars parked in Whitecross Road (the only "car park" in the village) turn in the junction of Water Street and this can be dangerous. Parking in Water Street itself and in the road leading to the proposed development is known to cause problems of access to houses by delivery vans, and could block access for emergency vehicles.

My fifth objection is that SR6 is uphill of Water Street and any surface water from a new development will run into the stream / culvert alongside Water Street and increase the already high flood risk to houses and property on the lane itself.

#### **Change requested:**

I would like to see SR6 designated as a green space, possibly developed as a village orchard. However I am requesting that if development of SR6 is absolutely necessary, it should be restricted to an absolute maximum of 5 dwellings, and that "green corridors" (dark buffer strips)should be created and enhanced through the site to meet the requirements of The Habitats Directive. I am also requesting that the requirement for a footpath from the site onto Middle Street be removed in the interests of pedestrian safety.

| Respondent<br>Number:  | 6474 Comment<br>Number: | 1 Respondent Dr Kevin Brown Name: | Respondent<br>Organisation: |  |  |  |
|--|-------------------------|-----------------------------------|-----------------------------|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                         |                                   |                             |  |  |  |
| Placemaking  | Options Plan Refe       | rence: East Harptree (SR6)        |                             |  |  |  |

#### **Comment on the Site:**

The proposed scale of development on Site SR6 fails to respect the grain of the built environment within the village and threatens evidence of the historic development of this area of Middle Street/Water Street. The site occupies backlands associated with the late medieval planned layout of the village, when tofts were laid out parallel with the street. Although sub-divided into smaller plots from the mid-19th cent onwards the outline of this historic pattern is still discernible on present-day OS Maps. The new development at Orchard End adjacent to SR6 - respects this pattern in its layout. The character of the proposed settlement would have a major impact upon the historic character of the settlement contrary to Core Policy DW & CP6, and Emerging Policy Approach EH1. It is also suggested that the scale of the development - 10

houses - far exceeds the previous pattern of development in the village, which is best described as small scale: eg the recent development of Orchard End (4 houses); Home Farm (3 houses), and Water Street (4 houses). The construction of 10 houses would be contrary to Emerging Policy Approach H2 & UD2. Although the prposed site has an existing access route on to Water Street, the Placemaking Plan takes little account of Highways issues created by traffic flows along Whitecross Road & High Street. Additional vehicle movements generated by 10 households will exacerbate existing parking and road safety issues especially at the junction of Whitecross Road, Middle Street and High Street. Given the nature of local and peak time traffic movements, improved public transport will not provide a sustainable solution to these issues, contrary to Emerging Policy Approach ST7.

#### **Change requested:**

Emerging Policy Approach:SR6

- 1. 'No more than 5 dwellings'
- 2. insert 'Have particular regard to site layout: restoring the street frontage; and integrating with the neighbouring development of Orchard End. Also building height...etc'
- 5. insert 'Ensure the development respects the historic boundaries and character of the village and would not be harmful...etc'
- 8. New text 'Proposals for development should be accompanied by a full traffic study of the impact of additional vehicle movements on traffic flows along Water Street, Whitecross Road, Middle Street and High Street'.

| Respondent 6478 Comment 1 Res<br>Number: Number: Na   | spondent Mr Patrick Cannon<br>me: | Respondent<br>Organisation: |  |  |
|---|-----------------------------------|-----------------------------|--|--|
| Agent ID: Agent Name:   |                                   |                             |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                   |                             |  |  |
|   |                                   |                             |  |  |
| Placemaking Options Plan Reference:   | Fast Harntree (SR6)               |                             |  |  |

#### **Comment on the Site:**

I live in Yearten House, directly adjoining the land proposed to be developed SR6. I bought the house with my wife in January 2014. Prior to this I spent 5 months living directly behind the proposed development site at SR5. At the time of purchase we were aware that there had been historic planning permission for a further 5 low-height bungalow dwellings in large plots on SR6 similar to our own.

#### Summary

It would seem sensible, given the requirement to build 10-15 homes in the village, that the Place Making Plan advise the dwellings to be split between the possible sites. This would allow the developed houses to be set in plots with enough parking so as not to cause congestion or blockage on access roads, access and turning circles etc for emergency and amenity vehicles, to take into consideration the preservation of wildlife or the extra provision for wildlife (as required in SR6 in the plan.) It would also mean the density of housing is less in each spot, which should allow neighbourliness to be observed in not overshadowing existing or new buildings and allow the possible provision of additional green spaces or community spaces such as a green patch to play on or a community orchard or similar amenity.

#### Density

There are 4 sites in the Plan. GR1 seems to be proposed as a green space for the village, so perhaps it could be improved somewhat so that villagers could use it e.g. For children to play, and to enhance wildlife.

SR5, 6 and 7 therefore could split the required 10 houses between them, giving their surrounding neighbours 3-4 new houses to accommodate, and allowing plenty of space for access, parking, drainage etc. This would seem the obvious way to accommodate new neighbours with the minimum of overloading of infrastructure.

The preferred option appears to be to put 10 houses on SR6, which would seem excessive density that is out of keeping with the other plots in the surrounding area. The original planning was for 5 bungalows, so I am surprised that this was not reflected in the plan. It would seem the obvious way to expand capacity while being in keeping with the nature of the surrounding area.

In 1996 planning permission for 5 houses on a similar plot with access off Water Street was turned down on appeal. (WC003468) The planning officer said at the time, the proposed development and new estate road from Water Street would be out of scale and character with the existing pattern of development in the area and be contrary to policy ATV 2 (ii) of the Mendip Hills Local Plan. This is a similar case. Let us develop the land sensitively and in keeping with the local landscape and the current infrastructure of roads and flood prevention.

#### Notes on The Process of Consultation

I note that developers met with the Parish Council in November which was before the residents had an opportunity to comment in the correct planning consultation process for this Place Making Plan which started on 27th November. It would seem therefore, that SR6 has been chosen as the preferred option because a developer is willing to develop it, meeting the requirement for our village's quota in one go, but without following the proper consultation process with the rest of the village. This is disappointing.

#### Traffic

The road at SR6 is a narrow cul de sac without continuous pavement. It is currently difficult to get a large vehicle such as a refuse truck or fire engine up the lane if there are any cars parked on it. This does happen fairly frequently, as not all properties in Water Street have their own off road parking and my immediate neighbours have only parking for 2 cars a piece. The plan asks for adequate parking and Parish Council also raised this as an issue. Adequate parking for 10 houses would seem to be a bare minimum of 2 spaces per dwelling, plus an additional provision for their visitors perhaps a further space per property, plus adequate width of road and turning circle for larger emergency, amenity and delivery vehicles.

If this requirement is met by following the official national standards, rather than by addressing the individual needs of this site, in a rural community where cars are essential, we will be creating problems as visitors or residents will be forced to park down the cul de sac approach road, either blocking the pavements and endangering pedestrians, or blocking access for essential vehicles. If there are fewer than 10 houses the parking requirements will be reduced and this will be more easily accommodated within the development.

#### Natural Environment

I bought this house, in this village because it is in an AONB. The views are spectacular. The birdsong, owls, badger, bats, trees and hedgerows are the essence of the British countryside. If development is made too densely these will be lost or greatly reduced. The land at SR6 forms a natural green corridor for wildlife and a hunting ground for many species. A reduced development could preserve some of this corridor to protect this wildlife and the rural atmosphere for future generations.

The land at SR5 is currently housing a large barn and concrete standing. It does not appear to stand to lose as much wildlife as SR6 through development, so once again I am baffled by why all development needs to be done on SR5 and not split between sites to ensure more green space can be left on each plot.

#### Flooding

I am aware that there has been serious flooding in recent times in Water Street. There is no mention of the increased flood risk caused by developing this natural draining site at the top of a hill so densely. Surface water would run down the road into the culvert, which is already up to road height at times of heavy rain.

#### I support

I welcome the proposal that there be vehicular access from only one side of any proposed development. This would seem the safest option for pedestrians.

I welcome the preservation of darkness at night where possible.

I welcome the intention to build homes which do not intrude upon the skyline.

I welcome the intention to use building materials that are in keeping with the character of the village.

#### **Change requested:**

SR5, 6 and 7 therefore could split the required 10 houses between them, giving their surrounding neighbours 3-4 new houses to accommodate, and allowing plenty of space for access, parking, drainage etc. This would seem the obvious way to accommodate new neighbours with the minimum of overloading of infrastructure.

# Respondent 6479 Comment 1 Respondent Mrs Laura Cannon Respondent Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: East Harptree (SR6)

#### **Comment on the Site:**

I live directly adjoining the land proposed to be developed so I have a keen interest in what happens to it. I bought the house with my husband in January 2014. At the time we were aware that there had been historic planning permission for a further 5 low-height bungalow dwellings in large plots on the site similar to our own.

I welcome some stability in knowing what will happen to this open space, so I can plan for development of my own property and garden to best take advantage of the views in this AONB.

#### The Character Of The Area, Wildlife and Density

I moved to this village from one in Hampshire, where I lived on an urbanised 1980s development of largely detached family homes on small plots with 1-2 car parking spaces each. I chose East Harptree as a better place to bring up my children because of its more rural character. Life is different in a rural village. The community is strong. I love that my children can walk to the village school and I volunteer in the community shop. In the morning I see sheep from my bathroom, cows and distant hills from my bedroom and I see the Chew Valley Lake as I come down the stairs. This spring we intend to get some chickens, to keep in our garden as so many of my neighbours do something I could not have done without disturbing my neighbours in the urbanised development I left behind in Hampshire. My children have learned to listen for the owls at dusk, sat up with a torch waiting for a glimpse of our badger and enjoyed the bats swooping close to their heads on summer evenings. I think most people who choose to live in a rural village like ours are seeking similar lifestyle choices. My concern is that the current Place Making Plan has lost sight of this.

East Harptree is required to find space for 10-15 dwellings as an RA2 village. I cannot see that the essential qualities which make East Harptree what it is will be best maintained by choosing one of the proposed 4 development sites and cramming 10 houses into it so that the requirement is met in one go. The result will be an urbanised development that offers much smaller gardens, close proximity to other neighbours, and a loss overnight of the green corridor that provides the hunting grounds and habitat for our bats, badger and owls. The new people will not enjoy the same lifestyle as my family has and it seems likely that our own abundance of wildlife will be much reduced. Our street currently has 16 dwellings. Adding a further 10 will increase the number of houses in our lane by 63 percent. Your document strives to Protect and enhance the Districts natural, built and cultural assets and provide green infrastructure. (Pg 4) I think concentrated development which is out of keeping with the rest of the dwellings in Water Street neither protects nor enhances our natural assets. A former planning permission for 5 houses on the site behind Home Farm another cul de sac off Water Street (WC003468) was turned down on appeal in 1996 the planning inspector said the proposed development and new estate road from Water Street would be out of scale and character with the existing pattern of development in the area and be contrary to policy ATV 2 (ii) of the Mendip Hills Local Plan.†This is a similar case. We do not object to development- but want the density to be more carefully considered.

#### Traffic

I welcome the proposal that there be vehicular access from only one side of any proposed development. This would retain the cul de sac nature of the current road and be safer for children playing and for pedestrians walking to school or the local volunteer-run part-time village shop or the pub. I cannot find mention in the plan that there is no pavement currently between the old pavement that ends at the edge of The Anchorage and my own garden (Yearten House). I presume that a new pavement will have to be built taking land that is currently part of my garden frontage. I feel this would be necessary to ensure the safety of pedestrians.

The road is not wide. It is a max of approx. 450 cm and has several bends. The road currently is sometimes used for parking by the visitors of myself and my neighbours and those houses at the bottom of the lane who do not have their own off street parking. There have been instances of larger vans and lorries being unable to deliver up the cul de sac due to one car being parked on the access road. There is no mention in the Plan of how it will be ensured that there is

adequate parking and access to the new development and the existing houses. We live in a village with few amenities and so many of us use online shopping with delivery. In addition, we need access for refuse trucks and of course emergency vehicles. The current refuse trucks have to back up the lane as there is no turning circle. If cars are parked on the bends in the lane, the trucks struggle to get by. I have a major concern that if the new development of 10 houses goes ahead there will not be adequate parking for the 10 new resident households and their visitors. Realistically this will be at least 20 permanent cars and several more for visitors, including visiting care professionals like midwives and district nurses. If there is not an adequate turning circle which is not able to be parked on by these residents and their visitors, there could be real problems with access for emergency vehicles and other large vans and lorries. If the provision is not adequate people will necessarily have to park down the existing access road outside my house and down the hill, which is currently too narrow to pass a car and a large van. Will they park on the as yet unbuilt pavement therefore, endangering pedestrians, or will they block the street, endangering those needing emergency vehicles and making access for refuse collection and deliveries very difficult?

We have been warned by our Parish Council that the grit lorries have threatened not to attend East Harptree if people do not consider their parking more carefully in the centre of the village. This is a new development and we have opportunities to make it possible for people to park safely. Over burdening one area with too dense a housing development will lead to parking issues which could be avoided if the developments were more spread out.

I do not see that a pedestrian access to Middle Street is necessary as there is a footpath that links the two roads just up the lane and if this footpath is to include any disabled access ramping it would be leading directly onto a very narrow lane with narrow pavements which would not accommodate a mobility vehicle or pushchair anyway.

#### Parking in The Rest of East Harptree

Water Street is accessed at one end by a very narrow and beautiful lane, which is only really accessible to small vehicles. Therefore all larger trucks/ fire trucks/ refuse lorries etc would have to access the new development from Whitecross Road. This is where the whole village parks for accessing the school, preschool, shop, hairdresser and the Church. It is usually only a one-vehicle access road in working hours Monday to Friday for this reason. Again, I suggest that the problems with access and congestion could be eased if the 10- 15 houses were spread across other parts of the village, two of which would not need to access Whitecross Road for Access.

#### Flooding

The Place Making Plan makes no mention of the flooding in Water Street. Our lane has a culvert running down the side, into which all road surface water drains, in addition to the natural drainage which is excessive in winter. In 2012 there was significant flooding, with cars being moved by the water and properties flooded. The dense nature of a development of 10 houses on what is currently a green natural drainage site must exacerbate this issue and needs to be addressed before any planning permission could be granted. In addition, I believe that the sewerage works which would serve the new development are at capacity, so we would need to check that they could be expanded to cope with 63 percent more housing in one go.

#### Timing of the Consultation

I find it disturbing that a developer met with the Parish Council to discuss development on what the Consultation Document calls the Parish Councils Preferred site (SR6) on 18th November 2014, when the stated process on this document is that we get from 27th November until 30th January 2015 to comment and consult, and that only then will a draft plan be produced after the draft plan has been prepared using all our comments and also after scrutiny by planning officers. I understand that that developer has submitted a planning application already. It does make one feel that our views are not being given due consideration in the stated process. I do hope I am mistaken.

#### Summary

I am not against development on SR6. I would welcome new neighbours to enjoy this fabulous, warm community as I do. I do ask though, that we do not lose sight of the reasons that people love to live in East Harptree in a scrabble to fulfil a planning requirement quickly and easily by putting too dense a development on one area of the village and therefore producing problems of over-dense population, traffic problems, emergency vehicle access dangers, increased flooding risk and detrimental loss of wildlife habitat.

#### **Change requested:**

The preferred option should not be to put 10 houses on one site (SR6) but to split development across SR6, SR5 and SR7 so that the impact of traffic, drainage, wildlife loss and amenities like sewerage will be minimised. The allocation of 10 - 15

houses could be split across the sites, meeting our village quota, without making one part of the village lose it's current character and being much safer for pedestrians and road users.

| Respondent 6479 Comment 2 Respondent Mrs Laura Cannon Number: Name:  | Respondent Organisation:   |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | t with the comment? $\square$  |
| Placemaking Options Plan Reference: East Harptree (SR6)  |  |
| Comment on the Site:   |  |
| I would like to add that I support a growing number of residents in suggesting the Road and Water Street which is currently an orchard should be designated as a g conservation area in this part of the village and as other parts of the placemaking wildlife, this would seem like a positive move.   | reen space. This links 2 parts of the  |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6488 Comment 1 Respondent Mrs Mary Cookson Number: Name:  | Respondent Organisation:   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachments sent  | t with the comment? $\square$  |
|  |  |
| Placemaking Options Plan Reference: East Harptree (SR6)  |  |
| Comment on the Site:   |  |
| Three possible development sites are identified for East Harptree and it is proposed 2029. I think it is unreasonable to suggest that 8 houses should be built on SR6. Ton Water Street by 50% and there would be subsequent problems with flooding Street and traffic problems on a narrow country lane with particular danger at the 1969 planning was in place for 5 additional bungalows on this site., which would and would help to preserve the important green corridor which this site maintain Lane. | his would increase the volume of houses<br>from the stream which runs down Water<br>e road junction at Whitecross Road. In<br>be in keeping with the current dwellings |
| Change requested:  |  |
| I think further consideration should be given to developing possibly 5 houses on a SR7. Each of these sites could accommodate development and , if used in addition meet the housing requirement. I do not think there is any evidence of overwhelm development on only one site. This would seem to be to seize an apparently easy other, more equitable solutions and would avert the potentially very detrimentation.   | n to SR6, would offer plenty of scope to<br>ning support in the village for<br>solution, without due consideration for   |
|  |  |
| Respondent 6490 Comment 1 Respondent Mrs Jenny Cruse Number: Number: Name:   | Respondent Organisation:   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachments sent  | t with the comment? $\Box$   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Placemaking Options Plan Reference:** East Harptree (SR6) **Comment on the Site:** I feel that the proposed development of SR6 is too dense for the area. There are only 16 houses in Water Street at present, and an increase of 10 would be totally out of character. The resulting extra traffic would cause problems in the centre of the village at peak times, where there are considerable parking problems. **Change requested:** The core strategy for 10-15 extra dwellings in East Harptree could be spread between the other two identified sites. Respondent 6491 Comment 1 Respondent Mr Bev Cruse Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR6) **Comment on the Site:** I wish to object to the over development of site SR6 with 10 houses. This old apple orchard needs sensitive development with the houses occupying large plots, as do all the existing houses. The excellent village school also has limited space. The proposed development of 10 houses would also result in traffic problems around the centre of the village, where there are already parking problems at peak times. **Change requested:** The need to accommodate an additional 10-15 houses in East Harptree should be spread over the identified sites for development, and should be in keeping with our historic village. Respondent 6498 Comment 1 Respondent Mrs Jean Elliot Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR6)

#### Comment on the Site:

I am very concerned about the density of the proposed building on Site SR6. Ten houses in an area this size will result in a crowded development with little space between the dwellings and small, if any, gardens. This suburban-type housing estate would be entirely unsuitable in a country village where the surrounding houses are well spaced and have good sized gardens which enhance the rural setting. I understand that 10-15 new houses are required in East Harptree in the coming years but I do not understand why such a large proportion of these must be concentrated on one site. In the Plan there are two other possible development sites in the village. Building a smaller number of houses on each of these three sites would allow the required new houses to be spread more evenly throughout the village. This would benefit all the sites, the people who will live in them and the village as a whole. It would also help to alleviate the inevitable traffic and parking problems that will be caused by the 20-30 extra cars using the narrow lanes in the village.

I am surprised there is no mention of wildlife protection for this site. It is a rich habitat with at least three protected species and the hedges feed and shelter a wide variety of birds from wrens to tawny owls.

| ,  | ondent Chew Valley Yoga<br>nisation:<br>the comment?  |
|--|---|
| Respondent 6506 Comment 1 Respondent Mrs Nicky Greaves Respondent: Number: Name: Organ Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent with a Placemaking Options Plan Reference:  East Harptree (SR6)   | nisation:   |
| Number: Name: Organ Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with a se | nisation:   |
| Number: Name: Organ Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with a se | nisation:   |
| Number: Name: Organ Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with a se | nisation:   |
| Further Information available in the original comment?  Attachments sent with a sent with  |   |
| Further Information available in the original comment?  Attachments sent with a sent with  |   |
| Placemaking Options Plan Reference: East Harptree (SR6)  |   |
|  |   |
| Comment on the Site:   | la a company a fair maffe at i an af  |
| Comment on the site.   | lanaa mata fair raflaction of   |
| Firstly I think the assessment of SR6 being the preferred development site within our vithe villagers wishes but a way of certain people moving a possible development away from another part of the village where they wouldn't be affected. None of the residents of V was being carried out. I am very disappointed at the lack of information we have receiv Plan.  We moved to Water Street for its idyllic village setting. It is the most rural of all the lan room for 1 vehicle to drive through comfortably at a time. Children walk down the lane catch their bus each morning to take them to the local secondary school and then pare their younger children taking them to the primary school and the pre school. The lane I with the small number of residents on the lane there is no problem. However with the will be more than a 50% increase in the number of cars using our very small lane and I be very narrow natural lane will be detrimental not only to the pedestrians but it will also character of the lane. It would also lead to congestion at the bottom of the lane which i with children attending the school and the pre school; already this area gets very conge and pick up times.  Ideally we would like SR6 to remain as a managed green space maintaining our "green of wildlife, this area contains a large badger set and is home to various species of bats, taw to name but a few. We have had 2 major flooding issues in the last few years and with the proposed this flooding would be exacerbated which is a real issue for the current reside I understand there is a need for housing, therefore I propose that 3 or 4 low height, we site and then other houses are built on the other proposed sites including the Parkers N fairer allocation of the building.  From a heritage point of view the proposal of double the number of houses on our lane character of local distinctiveness of our village. Everybody feels that the development is density of the three existing houses in the lane, Yearton House, Wind Rush and the Anotatates that houses must be of " | rom their own local green space to Vater Street knew this assessment ed regarding the Placemaking  es in East Harptree with enough to the centre of the village to his walk down a little later with has no pavement and at present current proposal on this site there elieve the increase in traffic in this detract visually from the rural is used as a turn around for cars sted for a small village at drop off corridor" within the village for the vny owls and other small mammals he density of the houses being ints of Water Street.  I designed houses are built on this flead site, GR1, which is a much does not respect the existing a far too dense as it is twice the |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| Respondent 6507 Comment 1 Respondent Mr Anthony Greaves Respondent Anchorage Projects Number: Name: Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |
| Placemaking Options Plan Reference: East Harptree (SR6)  |
| Comment on the Site:   |
| ideally would like this area, SR6, to designated a green space. However, if the some building is to go ahead I feel there hould be a maximum of 4 houses built on this site. Currently it is a natural environment, home to all kinds of wildlife; it nks up with other green spaces to form a green corridor through the middle of the village. he proposed density of the new dwellings is totally out of keeping with our lane, all the houses in the street are on big lots. This would not be possible of you try and put more than 4 houses on the site. In 1969 planning was given for 5 xtra houses, surely planning cannot have changed so much in this time. Our little lane is very rural and we definitely do not want any street lights.  Water Street is a beautiful rural lane, if 10 new houses were built here it would not only completely ruin the character of the lane but it would also be dangerous for the pedestrians who walk down the lane each day to get their bus, go to work, o to school etc.  Inally, as nobody in the village wants areas of green space near to their home to be built on, if 3 houses were built on ach of the 4 proposed sites including GR1 that would be a fair distribution of building work.  Change requested: |
| .nange requested:  |
|  |
| Respondent 6514 Comment 1 Respondent Mrs Ruth Holland Respondent Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?  Attachments sent with the comment?  |
| Placemaking Options Plan Reference: East Harptree (SR6)  |

#### Comment on the Site:

It is recognised that site SR6 is historically an old apple orchard and I believe that it should be retained as such. In the 33 years that we have lived in Malabar House, adjacent to this site there has been little agricultural intervention or grazing on the site. It is little visited, having no right of way through the field. Thus it has become a haven for wildlife. I would venture to suggest that it is an unspoilt ecological site, which should be preserved as such, in the centre of East Harptree. It links to other green spaces, through the village, from north to south and this helps to create a green corridor for wildlife. The field is almost totally surrounded by rural style mixed hedging, some parts more managed than others and this should be retained as shelter for wildlife.

The site is almost certainly of historical interest. English Heritage visited East Harptree about five years ago and dug a test pit in the garden of Malabar House, adjacent to the SR6 field boundary. Remains from the thirteenth century were found during that dig, which are held by English Heritage. There is a great likelihood of further archaeological relics being buried in SR6.

Recognising the style of housing which now adjoins SR6, there are either twentieth century bungalows or older cottages and all roof lines are low. It would be preferable to keep any development in line with this.

Our home, Malabar House, which lies adjacent to the site is a low roof seventeenth century cottage. The site SR6 slopes from west to east and is considerably raised above the garden of Malabar House. It varies from approximately 2 metres high at the Middle Street end to about 0.75 metres at the garden's nearest point to Water Street. Any development

should not dominate other local properties, but rather be in keeping with them. It is to be hoped that planning would not make the same errors as when the development known as Ashwood in East Harptree, was built. These properties, built some 25 years ago, totally dominate all surrounding homes, even when viewed from a vantage point some two miles north of the village.

It is to be preferred that if there has to be development of homes on SR6 they should be limited in number so that each would sit on a plot of a similar size to surrounding established gardens. I suggest that five bungalows only should be considered. This would be in keeping with the outline planning permission granted in 1967, to build eight bungalows on the site between Water Street and Middle street. Three were built at the time, but the rest of the site was not developed.

There is already some flooding in Water Street, during periods of heavy rain. This will be a greater problem if SR6 is developed. Flood assessment would need to be carried out.

The village infrastructure strains to cope with volume of traffic into and through the village on very narrow roads. There are few pavements and most of these are narrow and unsuitable for pushchairs and wheel chairs. The narrow nature of our village roads precludes any possibility of widening the pavements. Further housing will increase the volume of pedestrian and vehicle traffic, exacerbating the situation.

Our village school is highly regarded, However it is on a very small site, with no land for expansion. Our school children are required to walk to the village playing field, down the busy High Street, without a pavement, and across the B3114. Despite road calming measures this is still a dangerous crossing point, with poor visibility in both directions. This inadequate site provision will be further stretched by more children attending the school.

In conclusion any proposals for developing SR6, should consider all of the above outlined issues and the negative impact the delvelopment would have on the village and it's wildlife, before proceeding.

#### **Change requested:**

We do not wish to see SR6 developed. It is a valuable ecological and historical site, which should be retained as a green space in the village.

Should any development proceed, it should be in keeping with the surrounding properties and their low roof lines. The infrastructure of the village also needs careful consideration.

| Respondent 6515 Comment 1 Res<br>Number: Number: Na  | spondent Mr Christopher Holland<br>nme: | Respondent Organisation: |
|--|---|--------------------------|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |   |                          |
| Placemaking Options Plan Reference:  | East Harptree (SR6)                     |                          |

#### **Comment on the Site:**

SR6 is a greenfield site, formerly an old apple orchard, not improved grassland. It has been little used for grazing in the last 30 years, nor has there been much agricultural intervention beyond yearly grass cutting and hedge cutting. Consequently it has become a haven for wildlife. There is a long established badger sett on the site and up to 8 species of bats have been identified there. These are protected species. The rough grassland on the site and the plant rich hedgerows are ideal habitats for small mammals which in turn bring in owls to hunt. The old apple trees provide winter feeding sites for birds and during spells of cold weather bring unusual species in.

SR6 appears to be an even more rich site for wildlife and the environment than the already identified green space GR1 Parkers Mead, East Harptree.

There could be archeological remains on site SR6. 13th century relics have been found by English Heritage in our garden, Malabar House, which adjoins the site on its north side. English Heritage identified Malabar House as one of the oldest village homes. An archeological evaluation of SR6 should be carried out.

The density of the proposed housing on SR6 is of concern when the comparative density of surrounding properties is considered. Individual plot sizes in any new development should reflect that of the established properties nearby.

All those properties which surround SR6 or on the access road from Water street are lowlying bungalows or cottages. Any development should be in keeping with these local homes with regard to their height.

Site SR6 is considerably raised above the level of Middle street and Malabar house itself. The height differentiation varies from 2metres higher at the west side of SR6 sloping to about 0.75 metres above at the eastern edge of the garden belonging to Malabar. Without careful planning and consideration this house could again find itself dominated by any new building, as it is already by the 1980/1990 development known as Ashwood.

The proposed pedestrian access onto Middle street is of limited value. It is just as easy to walk via Water street to the village centre. Additionally, while there is some pavement in Middle street it does not run the whole length of the lane. This is very narrow and will not accommodate wheelchairs or pushchairs. Middle street, although narrow, is a well used main traffic route through East Harptree especially at busy times of day. Walking along Middle street can be hazardous at such times.

While I have no personal experience of flooding I understand from residents of Water Street that the culverts struggle to cope during periods of heavy rain. The road is flooded as are some driveways. Further building could fuel this problem as run-off from SR6 would go downhill to Water Street.

It is important to retain the old village nature of this rural community. The narrow roads are already struggling to cope with the volume of traffic and on street parking which the community itself generates. Any new housing will exacerbate this problem.

#### **Change requested:**

For the above reasons I question whether SR6 should be developed at all. I see no positive impact for the community as a whole, but rather a negative one for the village itself and our local wildlife. In keeping with the BANES proposal that there should be more green spaces in East Harptree I suggest that SR6 should be protected thus.

| Respondent 6524 Comment 1 Res<br>Number: Number: Na   | spondent Mr Andrew Jones<br>me: | Respondent Deloitte Organisation: |
|---|---------------------------------|-----------------------------------|
| Agent ID: Agent Name:   |                                 |                                   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                 |                                   |
| Placemaking Options Plan Reference:   | East Harptree (SR6)             |                                   |

#### Comment on the Site:

(1) Development of the site could exacerbate significant flooding events that occur regularly on Water Street. The culvert running down Water Street often breaches its banks and floods the road during peak flows. This has resulted in flooding of properties, cars parked in the street, gardens and yards. Development of SR6 will speed up the flow of all surface water into the culvert at these peak times and worsen these events.

Key flood events in the last 3 years occurred Feb 2014, Jan 2014, Dec 2013, Sep 2012, May 2012. Evidence of flood events is available from Andrew Jones (tel 01761 221907) including photos. Further evidence of flooding is documented in the Sustainability Assessment Appendix 1 covering site SR6. Any development on this site will need to address this risk and consider maintaining extra green space and soakaways to slow down the drainage of storm water into the culvert.

(2) There is a significant traffic congestion problem at the corner of Water St and Whitecross Rd and along Water St. This is caused by high levels of car parking to use the nursery, shop, hairdressers and village hall at peak times. The roads are often impassable at these times by large vehicles such as Delivery vans, Waste lorries and Emergency vehicles and the congestion is dangerous for pedestrians where there are no pavements. A recent planning application for the Barn on Water St (reference 10/05087/FUL) had a specific planning condition added (no. 6) to permanently abandon the existing

vehicular access from Water St in the interest of highway safety. Their access was relocated to Whitecross Road. Water St has 15 houses. The extra traffic and parking of vehicles to service a large number of new houses will significantly worsen this problem.

- (3) The historic landscape setting of this village is one of low density rural dwellings surrounded by green spaces. Site SR6 is subject to an existing planning permission which allowed for an extra 5 low impact houses on site SR6. 5 houses with suitable green spaces would be in keeping with the historic setting. 10 would be out of character. Site SR6 is adjacent to a site that was the subject of a significant planning application refused at appeal (reference WC 03468/B in May 1995). This decision recognised the importance of the historic Home Farm Complex and surrounding orchards and refused an application for 5 houses on the basis of their size and scale within the existing pattern of development on Water St. Ultimately a development for 3 houses was approved with the imposition of significant non developable green spaces under a s106 arrangement. There is strong evidence of the importance of the low density rural setting not just at this site but throughout the whole village and this historic character needs to be retained.
- (4) There is evidence of significant fauna using the site. An ecology report submitted for a recent planning application on the site evidences an existing badger sett and 8 species of bat.
- (5)In light of the comments at 3 above re historical character of village:
- (6) Another Green space should be added:

#### **Change requested:**

#### (1)Change to text:

- 1.380 East Harptree Site SR6:
- Context add bullet Development of the site could exacerbate significant flooding events that occur regularly on Water Street.
- Dev & Design Principles add bullet Exacerbation of existing flooding events in Water St needs to be addressed.

#### (2)Change to text:

- 1.380 EH Site SR6:
- Context add bullet: There is an existing access into the site from Water St but extra traffic would exacerbate a traffic congestion problem at the Water St/Whitecross Rd junction.
- Dev & Design Principles add bullet: Exacerbation of existing traffic congestion at Water St/Whitecross Rd junction needs to be addressed.

### (3)Change to text:

- 1.380 EH Site SR6:
- Context: The site is an undeveloped area subject to an existing planning permission for 5 low impact houses.
- Vision add bullet: A low density development for 5 houses that reflects the historic grain of the settlement could be appropriate for this site.
- Dev & Design Principles: Up to 5 dwellings in character with rural setting

#### (4)Change to text:

- 1.380 EH Site SR6:
- Context: The site was an old apple orchard and now contains a badger sett and is used by 8 species of bat.
- Dev & Design Principles: Ensure that development would not be harmful to the badger sett or bat species using the site."

#### (5)Change to text:

Para 1.379 & 1.380: The preferred option for development in EH is for development of 10-15 houses to be spread across the 3 identified sites to maintain the historic rural character of the village and its two Conservation Areas.

#### (6)Change to text:

S1.384: A new green space should be added being the working orchard bounded by Water St and Whitecross Rd. This space is bounded on 2 sides by the Historic Core Conservation Area and forms part of the historical Home Farm Complex and surrounding orchards. The importance of this area was recognised in the refused planning appeal (reference WC 03468/B in May 1995).

| Respondent 6525 Comment 1 Res<br>Number: Number: Na           | spondent Mrs Lisa Jones<br>ame:              | Respondent Organisation: |
|---|--|--------------------------|
| Agent ID: Agent Name:  Further Information available in the o | original comment? $\square$ Attachments sent | with the comment? $\Box$ |
| Placemaking Options Plan Reference:                           | East Harptree (SR6)                          |                          |

#### **Comment on the Site:**

#### 1. Traffic

There is a significant traffic congestion problem at the corner of Water St and Whitecross Rd and along Water St. This is caused by high levels of car parking to use the nursery, shop, hairdressers and village hall at peak times. The roads are often impassable at these times by large vehicles such as Delivery vans, Waste lorries and Emergency vehicles and the congestion is dangerous for pedestrians where there are no pavements. A recent planning application for the Barn on Water St (reference 10/05087/FUL) had a specific planning condition added (no. 6) to permanently abandon the existing vehicular access from Water St in the interest of highway safety. Their access was relocated to Whitecross Road. Water St has 15 houses. The extra traffic and parking of vehicles to service a large number of new houses will significantly worsen this problem.

#### 2. Flooding

Development of the site could exacerbate significant flooding events that occur regularly on Water Street. The culvert running down Water Street often breaches its banks and floods the road during peak flows. This has resulted in flooding of properties, cars parked in the street, gardens and yards. Development of SR6 will speed up the flow of all surface water into the culvert at these peak times and worsen these events.

Key flood events in the last 3 years occurred Feb 2014, Jan 2014, Dec 2013, Sep 2012, May 2012. Evidence of flood events is available from us (tel 01761 221907) including photos. Further evidence of flooding is documented in the Sustainability Assessment Appendix 1 covering site SR6. Any development on this site will need to address this risk and consider maintaining extra green space and soakaways to slow down the drainage of storm water into the culvert.

- 3. Why do all the 10-15 houses needed all have to be built on SR6, can they not be spread across all the available sites in the village?
- 4. The historic landscape setting of this village is one of low density rural dwellings surrounded by green spaces. Site SR6 is subject to an existing planning permission which allowed for an extra 5 low impact houses on site SR6. 5 houses with suitable green spaces would be in keeping with the historic setting. 10 would be out of character. Site SR6 is adjacent to a site that was the subject of a significant planning application refused at appeal (reference WC 03468/B in May 1995). This decision recognised the importance of the historic Home Farm Complex and surrounding orchards and refused an application for 5 houses on the basis of their size and scale within the existing pattern of development on Water St. Ultimately a development for 3 houses was approved with the imposition of significant non developable green spaces under a s106 arrangement. There is strong evidence of the importance of the low density rural setting not just at this site but throughout the whole village and this historic character needs to be retained.
- 5. There should be more green spaces in the village, including the working cider apple orchard along Water Street/Whitecross Road
- 6. There is evidence of significant fauna using the site. An ecology report submitted for a recent planning application on the site evidences an existing badger sett and 8 species of bat.

#### **Change requested:**

- 1. 1.380 EH Site SR6:
- Context add bullet: There is an existing access into the site from Water St but extra traffic would exacerbate a traffic congestion problem at the Water St/Whitecross Rd junction.
- Dev & Design Principles add bullet: Exacerbation of existing traffic congestion at Water St/Whitecross Rd junction needs

to be addressed.

- 2. 1.380 East Harptree Site SR6:
- Context add bullet Development of the site could exacerbate significant flooding events that occur regularly on Water Street.
- Dev & Design Principles add bullet Exacerbation of existing flooding events in Water St needs to be addressed.
- 3. Para 1.379 & 1.380: The preferred option for development in EH is for development of 10-15 houses to be spread across the 3 identified sites to maintain the historic rural character of the village and its two Conservation Areas.
- 4. 1.380 EH Site SR6:
- Context: The site is an undeveloped area subject to an existing planning permission for 5 low impact houses.
- Vision add bullet: A low density development for 5 houses that reflects the historic grain of the settlement could be appropriate for this site.
- Dev & Design Principles: Up to 5 dwellings in character with rural setting
- 5. S1.384: A new green space should be added being the working orchard bounded by Water St and Whitecross Rd. This space is bounded on 2 sides by the Historic Core Conservation Area and forms part of the historical Home Farm Complex and surrounding orchards. The importance of this area was recognised in the refused planning appeal (reference WC 03468/B in May 1995).
- 6. 1.380 EH Site SR6:
- Context: The site was an old apple orchard and now contains a badger sett and is used by 8 species of bat.
- Dev & Design Principles: Ensure that development would not be harmful to the badger sett or bat species using the site.

| Respondent 6552 Comment 1 Res<br>Number: Number: Na  | spondent Mr James Radcliffe<br>ame: | Respondent Organisation: |
|--|-------------------------------------|--------------------------|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                     |                          |
| Placemaking Options Plan Reference:  | East Harptree (SR6)                 |                          |

#### **Comment on the Site:**

#### 1. NUMBER OF PROPOSED DWELLINGS

The Emerging Policy Approach in the B&NES Placemaking Plan indicates that up to 10 new dwellings could be built on the site known as SR6. The proposal for such a large number of new houses on a site that is only 0.49 hectares is extremely surprising in light of the character of the surrounding and existing housing. Water Street currently only has 16 dwellings (each built on relatively large plots of land) and so the proposal to build 10 new dwellings in a concentrated space is a very significant change that would severely alter the character of the area. A far more acceptable form of development would be for a very limited number of houses built on bigger plots. Surely limiting the intrusion of the development on existing residents and blending the dwellings into the existing characteristics of Water Street and its surrounding area, should be the priority?

#### 2. SR5 AND SR7

Given that three separate sites within the village (SR5, SR6 and SR7) have been identified as possible areas on which additional housing could be built, it is difficult to comprehend why the Emerging Policy has gone on to allocate all new dwellings to a single site (SR6). We do not accept that SR6 is the preferable site. There are a number of disadvantages associated with SR6 and some very good reasons why housing would be more appropriate on SR5 and SR7. A more balanced and reasonable response would be to allocate a small number of dwellings to each site.

#### 3. TRAFFIC ISSUES

Water Street is a narrow lane (with no pavement) that has a number of sections that only allow for single file traffic. The proposal for 10 new houses on SR6 would result in significant increases to the volume of traffic using the lane. There are already access issues caused by the width of the road and any overflow parking on the edge of Water Street (from visitors to the new houses, for example) would not only make the access problem worse but also cause dangerous driving conditions. There are already similar issues with Whitecross Road (where the parked cars cause hazardous driving) and these problems would intensify in the event of the existing proposals for SR6 going ahead. More traffic and any associated parked vehicles, may also prevent emergency vehicles gaining access as well as putting pedestrians (who use the lane regularly) at greater risk.

#### 4. FLOODING

B&NES will no doubt be aware of the problems that Water Street has had with flooding on a number of occasions in the past. We understand that these problems have stemmed from the culver (that runs down the side of Water Street) overflowing following heavy rainfall when debris (such as rubbish or garden waste) blocks it. Even without blockages, there is arguably already a capacity issue with the culver on Water Street, given how close the water levels can run to the road during winter months. Logic would suggest that if a housing development (of whatever size) is built on SR6, there will be more run-off water entering the culver (placing even more stain on its capacity in that section) together with a proportionally greater likelihood of debris blockages (because of the increased use of Water Street generally and greater density of population). Our property is situated downstream from the entrance on Water Street for the new development and so any such problems have the potential to cause significant expense, stress and concern. In all likelihood a development on SR6 will adversely impact on the existing flood risk to Water Street making the proposals for development untenable in any form. Any flood risk report that is commissioned must take into account the increased likelihood of blockages caused from a greater density of population in the area.

#### 5. LIGHTING

There is currently no street lighting in Water Street (or the village more generally). This darkness is valued by the community and should be maintained.

#### 6. VILLAGE SCHOOL

There are already existing capacity issues with the village primary school (as highlighted in the Emerging Policy of the Placemaking Plan). The village school is highly regarded and the quality of education offered should not be compromised by putting strain on its resources. There must be a very clear and comprehensive solution to these capacity issues before any new developments are approved. It is difficult to see how a solution is going to be found in light of the Emerging Policy's acknowledgement that 'there is no scope to expand the school'.

| Change requested:  |  |                          |
|--|--|--------------------------|
|  |  |                          |
| Respondent 6558 Comment 2 Res<br>Number: Number: Na            | pondent Mr James Shirley<br>me:          | Respondent Organisation: |
| Agent ID: Agent Name:  Further Information available in the or | riginal comment? $\Box$ Attachments sent | with the comment? $\Box$ |
| Placemaking Options Plan Reference:                            | East Harptree (SR6)                      |                          |

#### **Comment on the Site:**

Having studied the policy, and in particular the section relating to SR6, I feel that a number of the statements relating to SR6, are questionable, and should be revised. In particular I question the statement 'there are no landscape issues', and the recommendation regarding the number of dwellings to be permitted. The whole character of the area could be

# affected in a detrimental way if the the suggested number of properties (ie 10) were to be allowed. **Change requested:** - reduce the number of properties to maximum 5 emphasize the need to reflect the need for local materials give great consideration to the effect on the skyline, and views across the site make specific mention of the need to consider wildlife Respondent 6559 Comment 1 Respondent Mrs Ann Shirley Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR6) Comment on the Site: I wish to object to the proposed increase in the number of dwellings to be allowed on this site to 10. The original figure was more acceptable (and closer to the original planning permission to build 5 additional bungalows on this site). There would seem to be no justification for increasing the number of dwellings on this site when the overall total required for the village as a whole can be achieved without over-developing this particular site. **Change requested:** Change the number of dwellings on this site to be maximum 5. **Respondent** 6573 **Comment** 1 **Respondent** Mr John Watson Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: East Harptree (SR6) Comment on the Site: The land between Middle Street and Water Street, if it is to be developed, should be accessible by road from both Middle and Water Streets to reduce the impact on either of these roads both of which are not suitable to take further volume of traffic. The current proposal is to allow access solely from Water Street which is a small picturesque lane and entirely unsuitable to take the volume of traffic which would result in both the construction stage and the occupation of further houses. Additionally Water Street is accessed via Whitecross Road which is constantly made into a single track lane by parking on weekdays for access to the school, play group, village store and hairdressers shop. This road is too narrow for its present use without the additional traffic which would be generated by the current SR6 proposal. With present use of the road with the necessary parking the road is too narrow and not passable for emergency vehicles for much of the working day.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

Reduced number of houses in SR6.

Make road access to SR6 from Middle Street as well as Water Street.

**Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** East Harptree (SR5) Number: 513 Respondent 270 Comment 4 Respondent **Respondent** Blue Cedar Homes Number: Number: **Organisation:** Name: Agent ID: 36 Agent Name: D2 Planning Limited Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR5) Comment on the Site: Objections are lodged to the allocation of site SR5 for residential development (up to 10 dwellings). The site lies outside the Housing Development Boundary and is adjacent to the East Harptree Conservation Area. The site lies remote from local facilities and services when compared to more centrally located sites such as that at Church Lane. It is again unclear how in assessing the suitability of sites that this site was allocated in favour of land at Church Lane. That site lies within the settlement limits and in close proximity to existing facilities. **Change requested:** It is therefore recommended that Proposal SR5 be deleted. Delete Proposal SR5 as a residential allocation and replace it with land at Church Lane. Respondent 4808 Comment 3 Respondent **Respondent** E V Currell & Sons Number: Number: Name: **Organisation:** Agent ID: 51 Agent Name: Hoddell Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: East Harptree (SR5) Comment on the Site: Another site, SR5, has a history of planning refusals, the most recent of which was a planning application for 12 no. houses (including 4 no. affordable houses) which was refused planning permission on 10 July 2014. The application was refused on the grounds that the development would result in an inappropriate suburban development of excessive density which would unacceptably harm the setting of the Conservation Area and AONB, whilst failing to reinforce local distinctiveness. **Change requested:** Respondent 6394 Comment 3 Respondent Mrs Christine Hodges Respondent

#### Comment on the Site:

Number:

Agent ID:

SR5 could be visually improved with good housing which would leave the "Green Corridor", which runs from Culver Lane

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Placemaking Options Plan Reference: | East Harptree (SR5)

**Agent Name:** 

Name:

**Organisation:** 

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| to Whitecross Road, intact.  |
| Change requested:  |
|  |
|  |
| Respondent 6474 Comment 2 Respondent Dr Kevin Brown Respondent   |
| Respondent 6474 Comment 2 Respondent Dr Kevin Brown Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| <u>-</u>   |
| Placemaking Options Plan Reference: East Harptree (SR5)  |
| Community and the Cities   |
| Comment on the Site:  Whilst it is accepted that further development of this site would offer the opportunity to improve the built environment |
| and develop brownfield land, the scale of the proposed development (10 houses) is not in-keeping with the density of                           |
| housing in the village generally. It is not accepted that the development at Barn End provides any kind of precedent or                        |
| model of sympathetic design, and building on this scale would be contrary to Core Policy DW1 & CP6; and Emerging Policy                        |
| Approaches HE1, H2 & UD2. Equally the scale of the proposed development would generate increased traffic flows along                           |
| Middle Street, which is an important access route for traffic moving across the Chew Valley towards Bath & Bristol.                            |
| Parking and safety issues already exist along this route and the proposed development would exacerbate this problem                            |
| contrary to Core Strategy and the Local Transport Plan.  |
| Change requested:  |
| 1. amend -'no more than 3 dwellings'.  |
| 2. insert - 'Have particular regard to site layout: restoring the street frontage and continuing the linear                                    |
| arrangement of houses along Middle Street. Also building heightetc'  |
| 9. new text - 'A full traffic study should be commissioned to examine highways issues associated with increased                                |
| vehicle movements along Middle Street, Whitecross Road, Church Street and High Street, created by the proposed                                 |
| development'.  |
|  |
| Respondent 6516 Comment 1 Respondent Mr Neil Homer Respondent RCOH   |
| Number: Number: Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$                                  |
|  |
| Placemaking Options Plan Reference: East Harptree (SR5)  |
|  |

#### **Comment on the Site:**

Introduction

The following representation is made on behalf of Renaissance Land Regeneration Limited, who in January 2015, acquired an interest in the land, and who propose to submit a Full Planning Application in respect of it during the course of 2015.

Background

The site is identified in the Placemaking Plan in its assessment of options for site allocations, alongside two other sites. The Plan (in para 1.380) currently proposes that another site (SR6) in the village is the only preferred option, assuming that site will deliver 10 dwellings to contribute towards the requirement of the adopted Core Strategy for housing schemes of between 10-15 dwellings being brought forward in villages like East Harptree over the plan period.

In 2014, a planning application for a scheme of 12 dwellings was refused Outline Planning Application (14/00883/OUT) for the Pinkers Farm site. This followed refusals of previous applications for schemes on the same site. In his report justifying the latest refusal, the officer noted that:

pending the Place-making Plan acquiring material weight, the provision of 1,120 homes within RA2 settlements remains of continuing importance an essential component of the Council 5 year housing land supply.... (means that) the principle of some form of residential development is considered to be acceptable ... and whilst the site is located outside the Housing Development Boundary, it would be an organic extension to the village. The development would not undermine the Core Strategy, and the Place-making Plan is not well (enough) advanced. It would therefore not be reasonable to refuse the application as being pre-mature to the Place-making Plan, and the principle of some form of residential development is considered to be acceptable. Whilst the site does not comprise previously developed land in the terms defined in the NPPF (being associated with an agricultural use) in principle a development could potentially tidy up an untidy site.

The Place Making Plan & Site Assessment Report

The Place Making Plan correctly acknowledges that, this site has been subject to a pre-application and the principle of development appears to have been accepted. It also correctly identifies the key contextual matters and proposes a viable and acceptable vision and a range of reasonable development and design principles to which a future scheme should have regard. Furthermore, the Plan and its Site Assessment Report recognise the current 'brownfield land' status of the site (though accept this does not meet the technical definition of the NPPF).

It is therefore surprising that, given the fact that the site appears acceptable and has a recent history of being promoted (albeit with arguably poor proposals) for development, that it is not selected either in preference to, or alongside, the greenfield open space of site SR6.

In practice, the capacity of both sites is less than 10 dwellings. It is understood that a planning application for 8 dwellings has been submitted for site SR6 and this may be determined shortly. If consented, that scheme alone will not meet the housing supply requirement of the village. A scheme for site SR5 can only deliver 9 dwellings if it is to adhere to the vision and principles set out in the Plan. In which case, both sites will be required to provide for local housing supply in the coming years, not one or the other.

Unlike most greenfield locations with no abnormal costs, the demolition of the current buildings on the site SR5, and addressing ground condition issues related to its previous use, are likely to result in a scheme that will be unviable below this total dwelling number. It may therefore not be possible to artificially reduce the number of dwellings on the site to seven to meet the 10-15 dwelling cap of the Core Strategy, without requiring compromises of the scheme in other respects.

The Opportunity of Pinkers Farm

We are preparing proposals for a housing scheme that will not only successfully address all of the technical challenges presented by the site in its context, but it will also deliver on meeting a very specific rural housing need, that is for homes suited todownsizers.

There is evidence at the district and local levels, as there is across much of rural England, of the housing market underproviding new homes for this distinct market segment. When housing land becomes available it is most often developed either for larger homes than are needed by this segment or for homes that do not meet its particular design needs.

Our proposals will seek to address this need in two ways. Firstly, the scheme will be designed so that all the dwellings will be smaller and suited to older households and will therefore adopt the national best practice standards set out in Emerging Policy Approach H1 of the Plan. Although not necessarily intended at the outset for those households with immediate care needs, they will all be capable of being adapted to meet emerging care needs.

Secondly, we propose to work with the Parish Council, and perhaps its neighbouring councils if desired, to identify local 'downsizers' that are interested in acquiring a dwelling in this scheme, so that they may self develop their home from our pattern book. Although not formally intended as a self-build proposition (as per the Emerging Policy Approach H5) it does

share a number of similarities and is a common house building model elsewhere in the world. Our pattern book of homes will allow elements of the exterior and interior of the homes to be configured to meet the downzisers own preferences but within the parameters of the consented planning application. This proposition will allow for older local people in the village(s) to remain in the community and to release their larger homes on to the market to meet the needs of other household types.

As we are intending to build and sell the new homes once consent is secured, we are confident this sales proposition will be successful and we would be happy in principle to negotiate reasonable and appropriate planning conditions and/or obligations to secure this outcome.

In respect of responding to the technical challenges of the site, the scheme will tidy up an important but currently unsightly site. There is now no prospect of the site returning to agricultural use and its condition will continue to impact on the character of the Conservation Area beyond and on the amenities of immediate local residents. We are confident there is a sound design solution to meet all the principles of the Plan.

In addition, development of this land would also provide effective off-street car parking with relatively few additional traffic movements on the mai north-south thoroughfare through the village and will deliver ecological enhancements.

#### **Change requested:**

For the above reasons, we believe the Place Making Plan should include the Emerging Policy Approach: SR5 as a preferred option for meeting the local housing supply needs of East Harptree. An amendment to this effect will ensure that the Plan is consistent with the Core Strategy and will enable other Core Strategy housing objectives and policies to be delivered than the present Plan provides for.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: East Harptree (SR7) Number: 517 Respondent 270 Comment 3 Respondent **Respondent** Blue Cedar Homes Number: Number: **Organisation:** Name: Agent ID: 36 Agent Name: D2 Planning Limited Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR7) Comment on the Site: Objections are lodged to the allocation of this site for up to 5 dwellings. The site is located outside the Housing Development Boundary on the edge of the settlement. In addition the western part of the site lies within the East Harptree Conservation Area and in close proximity to St Laurence Church. There are also long views towards Chew Valley Lake and into the AONB. It is unclear how this site was allocated for housing instead of land at Church Lane. That site lies within the settlement limits, outside the Conservation Area and there are no long views into the AONB. In addition the site represents a more sustainable development being in close proximity to local facilities. It is also unclear how the proposal will deal with local educational needs as the primary school needs to expand. **Change requested:** Delete Site SR7 as a residential allocation and replace with land at Church Lane. Respondent 4808 Comment 1 Respondent Respondent E V Currell & Sons Number: Number: Name: Organisation: **Agent ID:** 51 **Agent Name:** Hoddell Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** East Harptree (SR7) **Comment on the Site:** Site SR7 (East Harptree)is located immediately to the rear of the existing properties fronting High Street and to the north of the former builders yard which is currently under development in accordance with planning permission first granted in 2009 (amended 2012). The site benefits from an existing access off High Street, capable of serving additional dwellings without significant improvement, and is well located in relation to existing facilities and amenities within the village (including primary school/nursery pre-school; church; village shop and public house/restaurant). There are a number of existing services running through the site capable of serving further housing development including: mains gas; water; public foul sewer and electricity. Whilst the site falls within the AONB and, partly, within the Conservation Area, it is considered that a modest development on the southern part of the site, utilising a conservation-led approach, would not adversely affect the natural beauty and character of the AONB and, with careful design and use of traditional building buildings and

techniques, would preserve or enhance the character and appearance of the area. Development restricted to the

southern part of the site would also ensure that existing important views, both in to and out of the village, are protected

Bath and North East Somerset Council

and/or enhanced.

**Change requested:** 

|  | Schedule of Co   | omments on the Placema   | king Plan Options Doci  | iment in Plan   | Order   |
|--|--|--|---|---|---|
| Respondent 4808<br>Number:   | Comment 4 Number:  | Respondent<br>Name:  |   | Respondent  <br>Organisation:   | E V Currell & Sons  |
| Agent ID: 51 Ag  | g <b>ent Name:</b> Ho  | ddell Associates   |   |   |   |
| Further Information  | n available in t   | he original comment?   | Attachments sent v  | vith the comm   | ent? $\square$  |
| Placemaking Optic  | ons Plan Refere  | nce: East Harptree (SR7)   |   |   |   |
| Comment on the S   | ite:   |  |   |   |   |
| latest refusal is app accordance with Po adjoining the housi village. Whilst the sand should, therefogood range of local   | ealed, or a new<br>licy RA2 of the<br>ng developmen<br>supporting text<br>re, be regarded<br>facilities are cle  | what decision is taken on to<br>application is submitted)<br>Core Strategy which allow<br>t boundary) where they a<br>to the policy talks of arou<br>d as indicative only since searly capable of accommodentified on the Key Diagr  | there is scope to releants for some limited resinger of a scale, character and 10-15 dwellings that some RA2 settlements in the proportion of the proportion of the scome and the proportion of | se further land<br>dential develo<br>and appearan<br>t figure is not<br>ncluding East I   | I within the village in pment (including on sites ce appropriate to the enshrined in the policy Harptree which has a  |
| We recommend that consultation.  | at Site SR7 is all   | ocated for residential dev   | relopment when the dra  | aft Plan is prep  | ared following this   |
| Change requested   | 1  |  |   |   |   |
| Allocate the southe  | rn part of Site S  | SR7 for modest residentia  | l development (maximu   | um 5 dwellings  | ).  |
| Respondent 6474<br>Number:<br>Agent ID: Ag   | Comment 3<br>Number:   | Respondent Dr Kevin B<br>Name:   |   | Respondent<br>Organisation:   |   |
| Further Information  | n available in t   | the original comment? $\Box$   | Attachments sent v  | vith the comm   | ent? $\square$  |
| Placemaking Option   | ons Plan Refere  | nce: East Harptree (SR7)   |   |   |   |
| Comment on the S   | ite:   |  |   |   |   |
| This site - locally kn<br>boundary historical<br>across the Chew Va<br>Chew Valley. Develo<br>Conservation Area<br>drawing of the HBD<br>contrary to Local Pl<br>Additional pedestric<br>safety issues, contra | own as 'Long Cly for the built of the some the s | ose'- as a long tradition a<br>environment of the village<br>slewett and Chew Lake; and<br>site, especially at its wested<br>onal, regional and local p<br>eviously rejected by the P<br>significant upgrading of a<br>l be generated along the B<br>g Policy Approach ST7. The<br>the 'Old Post Office', that | e and its open aspect of<br>nd into the village and S<br>ern end would have a n<br>lan policies. Developme<br>lanning Inspector; build<br>an access track to a roa<br>High Street over a section  | fers views bot<br>of Laurence Ch<br>najor impact upent of 5 proper<br>ling on Grade 1<br>dway contrary<br>on that has no<br>evelopment to | h; out of the village urch from across the con the setting of the ties would require: a relagricultural land, to Local Plan policy T15. footpath, raising road take place outside SR7 |
| Change requested   | :  |  |   |   |   |

Emerging Policy Approach SR7

1. amend - No more than 2 dwellings on land between 'Long Close' and 'The Old Post Office'.

|   | Schedule of Co  | nments on the Placemakir  | ng Plan Options Document in Plan Order   |
|---|---|---|--|
| Respondent 6511<br>Number:  | Comment 1 Number:   | Respondent Chris Head<br>Name:  | Respondent Organisation:   |
| Agent ID: Age   | nt Name:  |   |  |
| Further Information   | available in th   | ne original comment? $\Box$   | Attachments sent with the comment? $\square$   |
| Placemaking Option  | s Plan Referen  | ce: East Harptree (SR7)   |  |
| Comment on the Sit  | e:  |   |  |
| Grade 1 (Excellent) la allocation policy as not he loss of the best a not be permitted unled. Extension of the Fin the Natural England states that it is vital the distinctive hill line another area." The propo | and under the 2 ot being completed most versatess significant of the conserve the conserve and conserve and conserve and sed intrusion but environment, | 2010 Agricultural Land Classiant as it is contrary to Policile agricultural land particultural landscape of the Mendip Hambance the special qualicultural landscape of the special qualicultural landscape | In Entry Level Stewardship Scheme. The site is defined as sification by Natural England. This results in this land acy RE5 which states; Development which would result in alarly Grade 1 and 2 as identified on the Policies Map will demonstrated to outweigh any loss.  Indip Hills, Statement of Environmental Opportunity SEO1 of historic field boundaries, field and settlement patterns Hills. Safeguard inward and outward views of and to the ties, tranquillity, sense of remoteness and naturalness of 8 runs counter to this objective and would lead to an the open rural character of the village, the Mendip Hills and |
| raised as an issue in t<br>HDB for East Harptre<br>Joneth?" Response 5  | nt report is stat<br>the inquiry to the<br>e be amended<br>.229 from the I  | ne 2007 plan; Page 239 Cha<br>to follow the rear boundar<br>nspector stated; "Land we   | en included in previous Local Plan Inquiries. The site was apter B7, R2 Settlements - Policy HG.5 Issue iii) "Should the ry of Amberley, Combe Lane; to include land west of st of Joneth is undeveloped land which forms part of the B." [Property referred to as 'Joneth' is to the east of SR7 on   |
| Change requested:   |   |   |  |
|   |   |   |  |

Placemaking Options Plan Reference: East Harptree - Proposed Local Green

Space (GR1)

Plan Order Number: 519

| Respondent 270  | Comment 1 Res       | pondent Res                                | spondent Blue Cedar Homes |
|---|---------------------|--|---------------------------|
| Number:   | Number: Na          | me: Org                                    | ganisation:               |
| Agent ID: 36 Ag   | gent Name: D2 Plan  | ning Limited                               |                           |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                     |  |                           |
|   |                     |  |                           |
| Placemaking Ontic   | ons Dian Reference: | Fast Harntree - Proposed Local Green Space | (GR1)                     |

#### **Comment on the Site:**

**GR1 Local Green Space** 

Objections are lodged to the designation of the land north of Ashwood, Church Lane, East Harptree as a Local Green Space. The NPPF states at paragraph 77 that: -

The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

where the green space is in reasonably close proximity to the community it serves;

where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

where the green area concerned is local in character and is not an extensive tract of land.

The NPPG paragraph 12 states: -

Different types of designation are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

The site lies within the AONB and there has been no explanation as to what additional land benefit would be given by this designation. The NPPF is clear on the protection given to the AONB in paragraphs 115 and 116 which states: -

Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

Planning permission should be refused for major development in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Consideration of such applications should include an assessment of:

the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Clearly the same test of exceptional circumstances exists and the objectors see no benefit in the additional designation.

It would appear that the justification of the designation is set out in the 4 bullet points at paragraph 1.385. These do not

amount to a justification for designating the site as a Local Green Space as follows: -

- i. Whilst the openness of the site contrasts with the surrounding housing this could equally be said of a number of similar sites in the settlement for example proposal SR6. Indeed, the appeal Inspector specifically recognised that this site was not identified as an important open space in the adopted Local Plan.
- ii. An appeal being dismissed is not a justified reason to designate a site a Local Green Space. The appeal was dismissed on the effect on the character of the AONB. As stated earlier, where such designations exist there should be additional justification to designating a site as a Local Green Space.
- lii. The site is not of ecological importance. Indeed the appeal Inspector highlighted the fact that the Council had withdrawn its concerns in respect of trees, habitat loss and ecology.
- lv. The fact that the site is presently open does not justify an additional designation especially given the AONB designation.

Indeed, it is particularly interesting to note that not all of the site is identified within the Local Green Space Designation. Part of the site nearest the primary school is excluded from the designation but all of the above comments equally apply to that part of the site. Clearly the Council concludes that part of the site does not comply with the above criteria and that can equally be applied to the remainder of the site.

In view of the above, strong objections are made to the proposed local green designation on the site on the basis that it is not justified over and above the AONB designation.

#### **Change requested:**

Comment on the Site:

Delete the Local Green Space designation for the site.

| Respondent 270 Comment Number: Number: | 2 Respondent<br>Name:           | <b>Respondent</b> Blue Cedar Homes <b>Organisation</b> : |
|--|---------------------------------|--|
| Agent ID: 36 Agent Name:               | D2 Planning Limited             |  |
| Further Information available          | in the original comment? $\Box$ | Attachments sent with the comment? $\Box$                |

Placemaking Options Plan Reference: East Harptree - Proposed Local Green Space (GR1)

Land at Ashwood, Church Lane, East Harptree

Objections are lodged to the non allocation for residential purposes of land at Ashwood, Church Lane, East Harptree. These objections should also be read in conjunction with our objections to Policy GR1 relating to the designation of part of the site on Local Green Space. The site is located within the development boundary relating to East Harptree as defined in the adopted Local Plan. In principle residential development is acceptable and would be of a scale appropriate to the size of East Harptree. The development would also assist in promoting the self sufficiency of the settlement in terms of providing more demand for local facilities. Part of the site is also identified for the primary school extension. A residential allocation on the remaining part of the site would enable the primary school to expand and the land would be made available for that to happen. The site is identified as being suitable within the SHLAA which states: -

East Harptree is identified as being within the scope of Policy RA2 of the submission Core Strategy which would normally allow residential development within the HDB but not adjoining it. Part of site (1/3) allocated for school extension. The housing potential of the remaining (2/3) of the site is about 10.

Based on the above 2/3 the site is currently considered suitable for development under existing LP policies and the submission Core Strategy.

The site is suitable for development and can be delivered immediately after planning permission is granted. The objectors have carried out all the necessary technical and environmental surveys. There are no access constraints and the site can be adequately drained. Furthermore, there are no issues of ecological importance on the site despite the Plan making comments to the contrary. Indeed development could enhance ecological interest on the site. In all there are no constraints to residential development coming forward on the site. It is sustainable, suitable and deliverable.

| Change requested | uested | rea | ange | Cł |
|------------------|--------|-----|------|----|
|------------------|--------|-----|------|----|

| Allocate the site for residential development including primary school expansion. |  |
|---|--|
| Deallocate the proposed Local Green Space Designation.                            |  |

| Respondent<br>Number: | 6511 Comment 3<br>Number: | Respondent Chris Head Name:  | Respondent Organisation:                  |
|-----------------------|---------------------------|------------------------------|---|
| Agent ID:             | Agent Name:               |                              |   |
| Further Infor         | mation available in       | the original comment? $\Box$ | Attachments sent with the comment? $\Box$ |

|--|

#### Comment on the Site:

1) Allocation of Land for Educational Purposes

Land adjoining the northern part of site GR1 has been allocated as land for the use by the school as a playing field. This is a saved local policy from the 2007 Plan and is now incorporated into the adopted Core Strategy through Policy CF.5. This long standing policy has an impact on the school as currently to use a playing filed the school needs to walk 500m down a road without pavements and then cross over a busy road. Having access to a green space adjacent to the school would have a huge impact on the health and wellbeing of the pupils.

NPPF paragraph 76 states By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

Designating this site as a LGS therefore runs counter to NPPF as it effectively sterilises the adjoining land identified in the Core Strategy with a specific need and purpose, from ever becoming available for its designated use.

#### 2) NPPF Criteria

It is not clear how GR1 meets the second test set in Paragraph 76 of the NPPF which states The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used; where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. These criteria could be met by any of the sites selected locally through the Placemaking process.

#### 3) Other designations

In the Planning Practice Guidance Note on Open space, sports and recreation facilities, public rights of way and local green space the following question is asked of Local Green Space designation;

Q: What if land is already protected by designations such as National Park, Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area?

A: Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

It is not clear what additional benefit is derived from the designation over say its existing AONB status?

#### 4) Landowners representation

The Planning Practice Guidance Note on Open space, sports and recreation facilities, public rights of way and local green space then further asks of the Local Green Space designation;

Q: Does land need to be in public ownership?

A: Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan. It is not clear from the narrative in paragraph 1.385 of the Placemaking Plan if this has been complied with.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: High Littleton - Context / Paragraph 1.388

Plan Order Number: 522

| Respondent 4810 Comment 1<br>Number: Number: | Respondent Messrs D & D Salter Name:           | Respondent Organisation:      |
|--|--|-------------------------------|
| Agent ID: 51 Agent Name: Hod                 | dell Associates                                |                               |
| Further Information available in th          | ne original comment? $\square$ Attachments sen | t with the comment? $\square$ |
|  |  |                               |

#### Comment on the Site:

Comments on para 1.388

Objection is raised to the non-allocation of sites in High Littleton.

High Littleton has been identified as a RA1 settlement within the Core Strategy within which there is a need to identify site(s) to accommodate approximately 50 dwellings.

Whilst it is noted that there may be capacity issues at High Littleton Primary School, the opportunity exists, as part of this consultation, to identify sites within or adjoining the settlement which could contribute to the provision of school places.

In this regard two sites have previously been put forward in response to previous consultations (including in response to the SHLAA Call for Sites) as possible locations for future development on land between High Littleton and Hallatrow. These are site reference HALL1 and HTN4.

It is considered that one, or both, of these sites would provide an opportunity to accommodate 50 (or more, if required) dwellings and, if allocated, would provide the following benefits:

- 1. Sites well related to the existing villages of High Littleton and Hallatrow.
- 2. Good access to Wells Road (A39)off existing site entrance.
- 3. Opportunity to provide affordable housing.
- 4. Contribution towards education provision.
- 5. Scope to provide footway along site frontage with A39 linking Hallatrow to High Littleton.
- 6. Integration of presently isolated development at Highbury Road into new community.

#### **Change requested:**

Identification of sites HALL1 and HTN4 as possible site options for High Littleton/Hallatrow.

Plan Order Placemaking Options Plan Reference: Hallatrow (SR22) Number: 531 Respondent 180 Comment 2 Respondent **Respondent** Bloor Homes South West Number: Number: Name: **Organisation:** Agent ID: 19 Agent Name: WYG Environment Planning Transport Ltd Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Hallatrow (SR22) Comment on the Site: 1. Object to preferred site allocation SR22 2. The National Planning Policy Framework (NPPF) must be taken into account in the preparation of local and neighbourhood plans (paragraph 2) and to be found to be sound a plan inter alia needs to be consistent with national planning policy (paragraph 182). 3. The NPPF requires identification deliverable sites (paragraph 47) for the delivery of housing. To be deliverable, the site should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered in the short term (footnote 11 of NPPF). 4. Dealing with each of these criteria for site SR22: a. The site is not available. It is under the same ownership as site SR21, but is not proposed for development in the short term as it forms part of the operational farm. b. In terms of suitability, the site is a part greenfield and part brownfield, located close to the core of Hallatrow village, albeit no closer than site SR21. There are genuine questions marks over whether a safe access could be achieved owing to the narrow frontage and, thus, lack of visibility splays without reliance on third party land. As such, the sites suitability now is questionable. A development in the short term is not achievable owing to its lack of availability. 7. The purpose of the Placemaking Plan is to allocate specific sites for development which will ensure the strategic housing and employment requirements set out in the Core Strategy will be delivered in the most suitable locations. In the light of the above, the allocation of SR22 will not meet that objective; the site is not deliverable in the short term. 8. Allocation of preferred site SR22 would be at odds with the NPPF, the Core Strategy and the overwhelming desire to deliver houses in the short term within Bath & North East Somerset area. Site SR21 is the only deliverable site in Hallatrow and so should be allocated within the Placemaking Plan. **Change requested:** Site SR21 is the only deliverable site in Hallatrow and so should be allocated within the Placemaking Plan. Respondent 837 Comment 9 Respondent Mr David Redgewell **Respondent** South West Transport Number: Number: Name: Organisation: Network, Railfuture Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: Hallatrow (SR22)

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Comment on the Site: Hallowtrow - We support housing on this site but we think that it could take more than 15 affordable houses. **Change requested:** more housing and improved public transport and cycling and walking facilities to meet rural needs. Respondent 4810 Comment 3 Respondent Messrs D & D Salter Respondent Number: Number: Name: **Organisation:** Agent ID: 51 Agent Name: Hoddell Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Hallatrow (SR22) Comment on the Site: It is considered that Site SR22 is not well located given the existence of traffic management measures on this part of Wells Road which would make access to the site a problem without significant improvement. Nor it is well located in relation to existing facilities and amenities available in the adjoining village of High Littleton, including High Littleton Primary School. Representations have been made by us elsewhere in this consultation (in respect of para. 1.388) seeking the allocation of land between the villages of Hallatrow and High Littleton for residential development on the grounds that the site is better located in relation to the facilities and amenities available in both villages, and already benefits from a well formed vehicular access on to the A39. The allocation of a single site capable of accommodating the needs of both villages would provide a better solution than is currently proposed. **Change requested:** Delete allocation SR22 and replace with land situated between the villages of Hallatrow and High Littleton (for details see comments in respect of para. 1.388).

| Respondent 6424 Comment 4 Res<br>Number: Number: Na            | spondent Mrs Sally Wyatt                    | Respondent Organisation: |
|--|---|--------------------------|
| Agent ID: Agent Name:  Further Information available in the or | riginal comment? $\square$ Attachments sent | with the comment? $\Box$ |
| Placemaking Options Plan Reference:                            | Hallatrow (SR22)                            |                          |

#### Comment on the Site:

The land we have submitted is a brown field site

It could take 15/20 much needed affordable houses

The proposed entrance would join the a39 in a 30mph zone

Extra land is available for a play area which is needed for Hallatrow

A permissive path would be available to gain access to the large network of public footpaths that surround local villages and woodland.

|  | <br> | <br> |  |
|--|------|------|--|
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |
|  |      |      |  |

100 yards away from the site is the bus stops going in both directions to either Bristol or bath.

The local nursery and school and variety of local shops/businesses are all in walking distance.

**Change requested:** 

Plan Order Placemaking Options Plan Reference: Hallatrow (SR21) Number: 535 Respondent 180 Comment 1 Respondent **Respondent** Bloor Homes South West Number: Number: Name: **Organisation:** Agent ID: 19 Agent Name: WYG Environment Planning Transport Ltd Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Hallatrow (SR21) Comment on the Site: 1. Support allocation of site SR21 for up to 15 dwellings. 2. The National Planning Policy Framework (NPPF) must be taken into account in the preparation of local and neighbourhood plans (paragraph 2) and to be found to be sound a plan inter alia needs to be consistent with national planning policy (paragraph 182). 3. The NPPF requires identification deliverable sites (paragraph 47) for the delivery of housing. To be deliverable, the site should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered in the short term (footnote 11 of NPPF). 4. Dealing with each criteria in turn in respect of Site SR21: a. It is available now and is under option by our client, Bloor Homes. b. It offers a suitable location for development. The Options Document notes the site occupies a location close to the core of Hallatrow village; site frontage is available to provide a safe access to accommodate up to 15 dwelling development and development of the southern half of the site could maintain the setting of this part of the village. c. A development in the short term is achievable. Our client is keen to progress an application on this site for up to 15 dwellings in the short term in furtherance of the Core Strategys objective. 5. The purpose of the Placemaking Plan is to allocate specific sites for development which will ensure the strategic housing and employment requirements set out in the Core Strategy will be delivered in the most suitable locations. In the light of the above, the allocation of SR21 will ensure houses can be delivered in Hallatrow as envisaged in the Core Strategy.

#### **Change requested:**

Site SR21 is the only deliverable site in Hallatrow and so should be the site taken forward as the site allocated for residential development for this settlement in the Placemaking Plan.

|                                      | espondent Mr David Redgewell              | Respondent South West Transport Organisation: Network, Railfuture |
|--------------------------------------|---|---|
|                                      | West Transport Network, Railfuture Severn |   |
| Further Information available in the | original comment?   Attachments sent      | with the comment?   |
| Placemaking Options Plan Reference   | : Hallatrow (SR21)                        |   |

#### **Comment on the Site:**

Hallowtrow - Support the housing development but wish to see new footways in front of the development, traffic calming and improved bus stop provision and well designed local houses.

#### Change requested:

improved walking and cycling facilities and affordable houses in a rural community and protection of railway corridor as a walking/cycling route.

| Respondent 4810 Comment 2 R<br>Number: Number:                     | Respondent Messrs D & D Salter Name:                  | Respondent Organisation: |
|--|---|--------------------------|
| Agent ID: 51 Agent Name: Hodd Further Information available in the | lell Associates e original comment?  Attachments sent | with the comment? $\Box$ |
| Placemaking Options Plan Reference                                 | ee: Hallatrow (SR21)                                  |                          |

#### **Comment on the Site:**

It is considered that Site SR21 is not well located given the existence of traffic management measures on this part of Wells Road which would make access to the site a problem without significant improvement. Nor it is well located in relation to existing facilities and amenities available in the adjoining village of High Littleton, including High Littleton Primary School.

Representations have been made by us elsewhere in this consultation (in respect of para. 1.388) seeking the allocation of land between the villages of Hallatrow and High Littleton for residential development on the grounds that the site is better located in relation to the facilities and amenities available in both villages, and already benefits from a well formed vehicular access on to the A39.

The allocation of a single site capable of accommodating the needs of both villages would provide a better solution than is currently proposed.

#### **Change requested:**

Delete allocation SR21 and replace with land situated between the villages of Hallatrow and High Littleton (for details see comments in respect of para. 1.388).

## Plan Order **Placemaking Options Plan Reference:** Hinton Blewett (SR8) Number: 540 Respondent 1253 Comment 3 Respondent Emily Merko **Respondent** Hinton Blewett Parish Number: Number: Name: **Organisation:** Council Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Hinton Blewett (SR8) Comment on the Site: Hinton Blewett Parish Council supports Sites SR8 and SR9 as potential sites for development. **Change requested:** Respondent 1253 Comment 6 Respondent Emily Merko **Respondent** Hinton Blewett Parish Number: Number: Name: **Organisation:** Council Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Hinton Blewett (SR8) **Comment on the Site:** Hinton Blewett Parish Council supports Site SR8. However, the Parish Council would like serious consideration to be given to the other four sites as detailed in the Hinton Blewett Placemaking Plan Stage 1. The Parish Council would like the opportunity to discuss the other four sites further with the Placemaking Plan Officers. **Change requested:** Respondent 6421 Comment 1 Respondent Joanna Burgess Respondent Number: Number: Name: **Organisation:**

#### **Comment on the Site:**

Agent ID:

I support the SR8 and SR9 allocations but note elsewhere in the document that the housing development boundaries may be redrawn to reflect the allocations if they are accepted. The vegetable garden to the north west of SR8 has the visual appearance of and has been used as a detached domestic garden for over 30 years and in this context is not greenfield land in the sense that the allocated site is. If houses are to be build alongside it to the south east, in visual and landscape terms in the long term the existing character of the garden means even if stays as it is, it would appear as an extension to the residential boundary of the village.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Placemaking Options Plan Reference: Hinton Blewett (SR8)

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Change requested:** Respondent 6473 Comment 3 Respondent Mrs Liz Brimmell Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Hinton Blewett (SR8) Comment on the Site: This site is directly across the road from the housing development boundary and will have limited impact on its surroundings or the Placemaking Plan stage 1 Character Assessment for Hinton Blewett as a whole. **Change requested:** Respondent 6501 Comment 2 Respondent Mr Ian & Mrs Debra Fews Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Hinton Blewett (SR8)

#### Comment on the Site:

Whilst SR8 was identified by the Parish Council in their original Place Making Plan (PMP) submission, unlike other villages, the Parish Council did not consult with the general village population in their identification and selection of potential development sites; have not provided details of which sites were under consideration nor the selection criteria for the sites that were selected ,despite requests to do so; that some members of the PC have a vested interest in some of the sites that were identified for development, and that owners of other sites were specifically targeted and canvassed to develop sites in the near future (as opposed to the period the PMP was intended to cover) to counter the then current planning application by Lady Rees-Mogg for a development on Lower Road.

A recent planning application for this very location was refused as development would cause significant and demonstrable harm to the rural character of this part of Hinton Blewett and coupled with the unsustainable location and impact upon the local road network, would result in unsustainable development that is not outweighed by any benefits associated with the provision of four new houses in this location. The development is therefore contrary to polices D2, D4, T1 of the Bath and North East Local Plan (2007) and the aims of paragraph 14 of the National Planning Policy Framework. This would apply equally to two or three homes as it would to four. The site is also outside the current Housing Development Boundary

There are no regular bus services routed via the village and the settlement is connected to the strategic highway network via narrow (in most places single track) and unlit rural lanes, that are mostly in a poor state of repair and some of which have few passing places, including Back Lane and Widcombe Hill. There are very few dedicated pedestrian facilities within the village. There are very limited services available locally and the nearest primary schools and shops are located several miles from the village. Any development would be car dependent and the potential to use alternative sustainable modes is severely limited. This site is bounded by single track lanes that form part of the national cycle network and are regularly used by walkers and farm traffic.

Consideration should be given to whether there is a need or demand for further homes within the village since family homes often remain unsold for in excess of 18 months, and in some cases years, presumably due to all of the reasons above.

Should development be deemed necessary within the village, other sites not identified by the Parish Council in their original place making plan submission that might be more appropriate within the time frame of this plan may include: the land at the corner of Hook Lane and Lower Road (currently a brownfield site known as the Old Dairy part of what was Elmgrove Farm), extension to Glanville Drive (a fairly modern development with services) and a derelict plot to the south of Middle Road Farm. The former two locations benefit from being on the widest and best maintained road in the village.

| Change requested:  |  |
|--|--|
|  |  |
|  |  |
|  |  |
| Demandent CE24 C   |  |
| Respondent 6531 Comment 1 Respondent Mr Simon Linford                                | Respondent Czero Developments                  |
| Number: Name:  | Organisation: Limited                          |
| Agent ID: Agent Name:  |  |
|  |  |
| Further Information available in the original comment? $\Box$ Attachments            | s sent with the comment? —                     |
|  |  |
| Discounding Outions Discounds (CDO)  |  |
| Placemaking Options Plan Reference: Hinton Blewett (SR8)                             |  |
|  |  |
| Comment on the Site:   |  |
| As an RA2 category village Hinton Blewett could accommodate upto 15 dwe              | ellings within the plan period, as required by |
| the Core Strategy. These dwellings cannot be accommodated within the ho              | pusing development boundary. Small scale       |
| development on a number of sites throughout the village is preferred. According      | ,  |
| identified within the Placemaking Plan in addition to SR8                            | oranigry farther sites are required to be      |
| identified within the Flacemaking Flair in addition to 510                           |  |
| Change requested:  |  |
| Please include additional site (Parish Site reference HB5) within the Placema        | aking Dlan                                     |
| riedse iliciade additional site (ransil site reference ribs) within the riacenta     | aking Flan.                                    |
|  |  |
|  |  |
| Respondent 6544 Comment 1 Respondent Mrs Susan Norton                                | Respondent National Autistic Society           |
| Number: Name:  | Organisation:                                  |
|  | - G. G   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments            | s sent with the comment?                       |
| - article in a configuration and a configuration in the configuration configuration. | 5 55.10 Little Goldment                        |
|  |  |
| Placemaking Options Plan Reference: Hinton Blewett (SR8)                             |  |
|  |  |

#### **Comment on the Site:**

The site occupies a prominent corner location on the edge of the village and is free from development. The majority of the housing is on the other side of the road, building on this side of road/village would result in the suburbanisation of this part of Hinton Blewett and therefore would have a negative impact upon the rural character of area. The loss of the hedgerows would also impact the rural character and wildlife.

Because of the narrow lane there will be a loss of privacy for the opposite properties; a loss of a rural view and access problems to neighbouring properties.

The roads accessing the site are single lanes with no dedicated pedestrian facilities, there is a high footfall (tourists) due to the lane being part of the Limestone link and being an area of outstanding beauty. Local Traffic and residents can have issues with access due to limited on street parking, the majority of parking in Upper road is on private land, the only on street parking being opposite the proposed site. There would be more obstructions with deliveries or collections. Hinton Blewett is an isolated village location with poor infrastructure, this is partly reflected in the shortage of buyers for recently built houses on the property market. Hinton Blewett has a limited bus service; twice a week; the journey taking

an hour and half to Bath, the only return journey to Hinton Blewett leaves bath 30 minutes later.

gardens. The concern is that more properties in the road will exacerbate the problems mentioned

There are very limited services locally; the nearest shops and primary schools are several miles away, and there is little local employment; meaning any development within Hinton Blewett will be car dependent and all roads leading to the village are narrow; often single track and very poorly maintained. During recent bad weather, due to a high volume of rain and numerous springs and streams, there was localised flooding and only one viable route into the village.

There are also on going issues with water supply and sewage in Hinton Blewett. We are regularly without water, often with no notice of loss of supply and the water pressure is very low which can cause issues with appliances. The sewage system in Upper road is Victorian and the local properties have problems with blocked drains and raw sewage flooding

| Respondent 6572 Comment 1 Respondent Mrs Rosemary Walker Respondent  |
|--|
| Number: Name: Organisation:  |
| - Sumsum   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| <b>6</b>   |
|  |
| Placemaking Options Plan Reference: Hinton Blewett (SR8)   |
|  |
| Comment on the Site:   |
| I support the site but think that a requirement to restrict the height of new dwellings to make them more in keeping with  |
| the nearest adjacent dwellings would also minimise the impact of loss of views for the existing dwellings south of the site.   |
|  |
| Change requested:  |
| •  |
|  |
|  |
|  |
| Respondent 6575 Comment 1 Respondent Mr Nigel & Mrs Diane Westray Respondent   |
|  |
| Number: Name: Organisation:  |
| Number: Name: Organisation:  |
| Number: Name: Organisation:  Agent ID: Agent Name:   |
| Number: Name: Organisation:  |
| Number: Name: Organisation:  Agent ID: Agent Name:   |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Number: Name: Organisation:  Agent ID: Agent Name:   |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  Comment on the Site:  |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  Comment on the Site:  We support SR8 as it is a small development adjacent to the Housing Development Boundary. We believe the retention of   |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  Comment on the Site:  We support SR8 as it is a small development adjacent to the Housing Development Boundary. We believe the retention of the existing Housing development Boundary is very important to preserve the unique character of this village and prevent                            |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  Comment on the Site:  We support SR8 as it is a small development adjacent to the Housing Development Boundary. We believe the retention of   |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  Comment on the Site:  We support SR8 as it is a small development adjacent to the Housing Development Boundary. We believe the retention of the existing Housing development Boundary is very important to preserve the unique character of this village and prevent any sprawling development. |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Hinton Blewett (SR8)  Comment on the Site:  We support SR8 as it is a small development adjacent to the Housing Development Boundary. We believe the retention of the existing Housing development Boundary is very important to preserve the unique character of this village and prevent                            |

| Placemaking Options Plan Reference: Hinton Blewett (SR9)  | Number: 544  |  |  |
|---|--|--|--|
| Respondent 1253 Comment 4 Respondent Emily Merko Number: Name:  | Respondent Hinton Blewett Parish Organisation: Council   |  |  |
| Agent ID: Agent Name:   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$   |  |  |
| Placemaking Options Plan Reference: Hinton Blewett (SR9)  |  |  |  |
| Comment on the Site:  |  |  |  |
| Hinton Blewett Parish Council supports Sites SR8 and SR9 as potential sites for dev   | velopment.   |  |  |
| Change requested:   |  |  |  |
|   |  |  |  |
|   |  |  |  |
| Respondent 6421 Comment 2 Respondent Joanna Burgess Number: Name:   | Respondent   |  |  |
| Trainer   | Organisation:  |  |  |
| Agent ID: Agent Name:   |  |  |  |
| Further Information available in the original comment? $\square$ Attachments sent   | with the comment? —  |  |  |
| Placemaking Options Plan Reference: Hinton Blewett (SR9)  |  |  |  |
| Comment on the Site:  |  |  |  |
| I support the SR8 and SR9 allocations but note elsewhere in the document that the redrawn to reflect the allocations if they are accepted. The vegetable garden to appearance of and has been used as a detached domestic garden for over 30 year land in the sense that the allocated site is. If houses are to be build alongside it to terms in the long term the existing character of the garden means even if stays as the residential boundary of the village. | o the north west of SR8 has the visual s and in this context is not greenfield the south east, in visual and landscape |  |  |
| Change requested:   |  |  |  |
|   |  |  |  |
|   |  |  |  |
| Respondent 6473 Comment 1 Respondent Mrs Liz Brimmell Number: Name:   | Respondent Organisation:   |  |  |
| Agent ID: Agent Name:   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |  |  |
| Placemaking Options Plan Reference: Hinton Blewett (SR9)  |  |  |  |

This site is immediately adjacent to the housing development boundary and will have little or no impact on its surroundings or the Placemaking Plan stage 1 Character Assessment for Hinton Blewett as a whole.

**Comment on the Site:** 

Plan Order

| Change requested:   |   |
|---|---|
|   |   |
| Respondent 6473 Comment 2 Respondent Mrs Liz Brimmell   | Respondent  |
| Number: Name:   | Organisation:                                       |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment?                         |
| Placemaking Options Plan Reference: Hinton Blewett (SR9)  |   |
| Comment on the Site:  |   |
| This site is immediately adjacent to the housing development boundary a surroundings or the Placemaking Plan stage 1 Character Assessment for F   | ·   |
| Change requested:   |   |
|   |   |
|   |   |
| Respondent 6531 Comment 2 Respondent Mr Simon Linford Number: Name:   | Respondent Czero Developments Organisation: Limited |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment? $\square$               |
| Placemaking Options Plan Reference: Hinton Blewett (SR9)  |   |
| Comment on the Site:  |   |
| As an RA2 category village Hinton Blewett could accommodate upto 15 d dwellings cannot be accommodated within the housing development bousites throughout the village is preferred. Accordingly further sites are recellan in addition to SR9 | undary. Small scale development on a number of      |
| Change requested:   |   |
| It is requested that additional site (Parish Site reference HB5) between Ho<br>included within the Placemaking Plan.  | omefields and West Close, Lower Road also be        |
|   |   |
| Respondent 6575 Comment 2 Respondent Mr Nigel & Mrs Diane W. Number: Name:  | Vestray Respondent Organisation:                    |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment? $\square$               |
| Placemaking Options Plan Reference: Hinton Blewett (SR9)  |   |
| Comment on the Site:  |   |
| We support this as it is a small site within the Housing Development Bour   | * * -   |
| We feel it is very important to retain the existing HDB to keep the unique  | character of the village.                           |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |
|---|--|
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green

Space (GR2)

Plan Order Number: 547

| Respondent 6473 Comment 6 Res<br>Number: Number: Namber: Namber  |   | Respondent Organisation:   |  |  |
|--|---|--|--|--|
| Agent ID: Agent Name:  |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$                  |   |  |  |  |
| Placemaking Options Plan Reference:  | Hinton Blewett - Proposed Local Green S   | pace (GR2)   |  |  |
| Comment on the Site:   |   |  |  |  |
| enclosure. The enclosing road network have been within the original historic se that some geophysics and future study or | vett Conservation Area Parish Appraisal a is indicative of such a site and though out ttlement. The site is regarded as having of the landscape would prove this to be that the existence of the landscape would prove this to be the store development so that the existence of the content of | rside the Conservation Area it may well archaeological significance. It is hoped the case. Registering it as a locally |  |  |
| Respondent 6501 Comment 1 Res<br>Number: Number: Na  | pondent Mr Ian & Mrs Debra Fews<br>me:  | Respondent<br>Organisation:  |  |  |
| Agent ID: Agent Name:  | iginal comment?  Attachments sent   |  |  |  |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR2)                                    |   |  |  |  |

#### Comment on the Site:

It is inconsistent in many respects to support GR4 and not GR2 for example:

GR4 comprises four fields and GR2 comprises only one more at five fields; extensive is relative and not defined and in the rural context, this does not constitute an extensive piece of land.

Both locations comprise traditional meadow land used for animal grazing supporting rich flora and fauna.

GR2 forms part of the agricultural landscape adjacent to the Mendip Hills Area of Outstanding Natural Beauty and beyond. The space is immediately adjacent to the existing settlement and Area of Outstanding Natural Beauty and as such it provides a close connection to the countryside.

GR2 also incorporates a public right of way across it and the NPPF states that Planning policies should protect and enhance public rights of way and access.

GR2 is integral to the character of the village; it is bounded by variably densely situated properties, including farms, with the AONB and the main settlement adjacent, and it is therefore in reasonably close proximity to the community it serves. Without adequate protection it is not difficult to imagine incremental development around the perimeter of GR2 through adjacency to the Housing Development Boundary e.g. SR8, thus causing significant and demonstrable harm to the rural character of this part of Hinton Blewett. In fact there are existing planning applications in progress to develop part of this area and other land owners (including parish council members) have indicated an intention to develop within GR2 and on a site adjacent to SR8 and opposite GR2.

The Hinton Blewett Conservation Area Parish Appraisal makes reference to a Saxon

enclosure having been identified south of the modern settlement; the location of the GR2 site is within this enclosure.

GR2 also includes West Close Ditch with its' associated wildlife assets and habitats, which drains to Mere pond (at The

| GR2 therefore in our opinion fulfils all of the criteria set out in the NPPF.   |                                |  |
|---|--------------------------------|--|
| Change requested:   |                                |  |
|   |                                |  |
|   |                                |  |
| Respondent 6575 Comment 3 Respondent Mr Nigel & Mrs Diane Westray Responde  | ant                            |  |
| Number: Name: Organisation  |                                |  |
| Agent ID: Agent Name:   |                                |  |
| Further Information available in the original comment?   Attachments sent with the original comments are account.                           | comment?                       |  |
|   |                                |  |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR2)   |                                |  |
|   |                                |  |
| Comment on the Site:  This site contributes to the visual landscape of the village as it affords views to the Mendip A                      | AONR It is traditional meadow  |  |
| land used for grazing and is part of the agricultural landscape of the village. The layout of th  |                                |  |
| possibility of it being an ancient Saxon settlement and should be preserved. It is a haven for  |                                |  |
|   |                                |  |
| Change requested:   |                                |  |
|   |                                |  |
|   |                                |  |
| Respondent 6575 Comment 4 Respondent Mr Nigel & Mrs Diane Westray Responde  | ent                            |  |
| Number: Name: Organisat   |                                |  |
| Agent ID: Agent Name:   |                                |  |
| Further Information available in the original comment?   Attachments sent with the original comments are according to the original comment. | comment?                       |  |
| ruttier information available in the original comment:   Attachments sent with the t  | .onninent:                     |  |
|   |                                |  |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR2)   |                                |  |
| Comment on the Site:  |                                |  |
| This site contributes to the visual landscape of the village as it affords views to the Mendip A  | AONB. It is traditional meadow |  |
| land used for grazing and is part of the agricultural landscape of the village. The layout of this space suggests the                       |                                |  |
| possibility of it being an ancient Saxon settlement and should be preserved. It is a haven for  |                                |  |
| Change requested:   |                                |  |
| Change requested:   |                                |  |

We would support this site being included as a Local Green Space

Meadows, Lower Road).

**Placemaking Options Plan Reference:** Hinton Blewett - Proposed Local Green Space (GR3)

Plan Order Number: 550

Respondent 1253 Comment 1 Respondent Emily Merko **Respondent** Hinton Blewett Parish Number: Number: **Organisation:** Council Name: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR3) Comment on the Site: Hinton Blewett Parish Council supports the allocation of GR3 and GR4 as a Locally Important Green Spaces. **Change requested:** Respondent 1253 Comment 8 Respondent Emily Merko **Respondent** Hinton Blewett Parish Number: Number: Name: **Organisation:** Council Agent ID: **Agent Name:** Further Information available in the original comment? 

Attachments sent with the comment? Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR3) Comment on the Site: Hinton Blewett Parish Council supports the allocation of GR3 as a Locally Important Green Space. **Change requested:** Respondent 6421 Comment 4 Respondent Joanna Burgess Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR3) Comment on the Site: I wholeheartedly support the proposed green space allocations GR3 and GR4. **Change requested:** 

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Respondent 6466 Comment 1 Respondent Mrs Christine Arnold Respondent Arnold Associates Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |
|   |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR3)   |
| Comment on the Site:  |
| am writing in support of GR3 as a valuable open space to the village of Hinton Blewett. It makes a significant contribution to the visual rural landscape and is rich in flora and fauna. It provides an ideal setting to St Margaret's Church.                         |
| Change requested:   |
|   |
|   |
| Respondent 6473 Comment 4 Respondent Mrs Liz Brimmell Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |
|   |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR3)   |
| Comment on the Site:  |
| This agricultural site is in the Conservation Area and its setting immediately adjacent to the Grade 1 Listed Church is of significant importance for both the character and the historical setting of the Conservation Area and the adjacent medieval planned village. |
| Change requested:   |
|   |
|   |
| Respondent 6575 Comment 5 Respondent Mr Nigel & Mrs Diane Westray Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Space (GR3)   |
|   |
| Comment on the Site:  We support this site for the reasons set out in the section 1.408 of the Placemaking Plan   |
|   |
| Change requested:   |

Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green

Space (GR4)

Plan Order Number: 552

| Respondent 1253 Comment 2 Respondent Emily Merko Number: Number: Name: | Respondent Hinton Blewett Parish Organisation: Council |
|--|--|
| Agent ID: Agent Name:  | •  |
| Further Information available in the original comment? $\ \Box$        | Attachments sent with the comment? $\Box$              |
| Placemaking Options Plan Reference: Hinton Blewett - Propo             | osed Local Green Space (GR4)                           |
| Comment on the Site:   |  |
| Hinton Blewett Parish Council supports the allocation of GR3 ar        | nd GR4 as a Locally Important Green Spaces.            |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 1253 Comment 9 Respondent Emily Merko Number: Number: Name: | Respondent Hinton Blewett Parish Organisation: Council |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\ \Box$        | Attachments sent with the comment? $\square$           |
| Placemaking Options Plan Reference: Hinton Blewett - Propo             | osed Local Green Space (GR4)                           |
| Comment on the Site:   |  |
| Hinton Blewett Parish Council supports the allocation of GR4 as        | a Locally Important Green Space.                       |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6411 Comment 1 Respondent Number: Number: Name:             | Respondent Emergy Limited Organisation:                |
| Agent ID: 32 Agent Name: Barton Willmore                               |  |
| Further Information available in the original comment? $\ \Box$        | Attachments sent with the comment?                     |
| Placemaking Options Plan Reference: Hinton Blewett - Propo             | osed Local Green Space (GR4)                           |

#### Comment on the Site:

This letter makes representations in response to the above consultation on behalf of Emergy Limited, in respect of a development opportunity on land at Lower Road, Hinton Blewett.

As detailed in this letter, we object to the proposed Local Green Space designation GR4 which we do not consider to be justified or supported by national policy.

We also consider that the number of dwellings proposed to be allocated at Hinton Blewett is inadequate and the selection of sites has not been informed by an appropriate evidence base and is not justified by the consideration of reasonable

alternatives. Finally, we make the case that our clients' site at Lower Road should be allocated for residential development.

Proposed Local Green Space GR4

By way of background, the area of land on which we are instructed (shown on attached plan) which is now proposed in the Placement Plan for "Local Green Space" has over the last two years been the subject of two applications for residential development. The first was for 19 dwellings. Following its determination we met with Officers to discuss the reasons for refusal and agreed to submit a revised application for 8 dwellings on a smaller part of the site identified in that meeting. Despite providing significant evidence to address the areas of concern, this second application was refused.

In short, we are now concerned that the current Placemaking Plan's proposal to identify this site as Local Green Space is reactionary and an unsubstantiated attempt to resist development on a site that would otherwise provide an opportunity to accommodate development.

This proposed Local Green Space (LGS) designation comprises three agricultural fields adjacent to Lower Road with a combined area of approximately 2.6 hectares.

The southern boundary of the fields abuts The Cam stream. Field boundaries are defined by hedgerows with some interspersed trees. There is no public access onto the land, which is private farmland.

In order to qualify for designation as a Local Green Space, paragraph 77 of the NPPF requires that a site should be:

- (1) in reasonably close proximity to the community it serves;
- (2) demonstrably special to a local community and hold a particular local significance;
- (3) local in character and is not an extensive tract of land.

We accept that the first criterion is satisfied for proposed LGS GR4, but we do not agree that criteria (2) and (3) are met.

Demonstrably Special and Holding Particular Local Significance

The draft plan makes a number of points in order to support its argument that site GR4 is 'demonstrably special'. We would rebut each of them and suggest the evidence demonstrates quite the opposite.

Specific reference is made to the contribution of the site to the setting of the Conservation Area. It is unclear why this land is specifically identified for its contribution to the Conservation Area's setting ahead of other land surrounding the Conservation Area, such as the land to the east of the core of the Conservation Area, which is crossed by public footpaths and the Conservation Area Appraisal (2014) identifies as being the site of key views into the area. The Conservation Area Appraisal's selection of "important views" was, in response to our clients' planning application, altered from draft versions to include viewpoint 3 which is not on a public right of way and overlooks our clients' site. We believe this change was made to overemphasise the contribution of our clients' land to the setting of the Conservation Area and to contrive evidence for use in opposing our clients' planning application. As a counterpoint to that Appraisal, we enclose the built heritage assessment submitted with our clients' planning application, which provides an assessment of the contribution of the site to the setting of designated heritage assets.

However, it should be borne in mind that land within the setting of Listed Buildings and Conservation Areas is already afforded protection by the Planning (Listed Buildings and Conservation Areas) Act 1990, through national policy and through the adopted Core Strategy. It is simply not appropriate to use the LGS designation as a "belt and braces" designation to further support these existing designations.

The proposed justification for LGS designation GR4 also makes reference to "Rich meadow land flora" and "supporting rich flora and fauna". No evidence is provided in support of these assertions. In fact we have evidence which suggests quite the opposite. An ecological survey was undertaken in relation to our clients' land in May 2014 (copy enclosed) which records that: "Overall, it is considered that the habitats within the Application Site are of low ecological value. However, the hedgerows are of some importance, mainly for the foraging and shelter opportunities they offer faunal species (see below)'. Generally, the recent ecological survey does not support the assertion that the site supports "rich flora and fauna", less still that it is demonstrably special in this regard.

Reference is also made to the land being "Part of the agricultural landscape across Cam Valley and to [sic] the Mendip Hills Area of Outstanding Natural Beauty and beyond' and to the land providing "a close connection to the countryside!'. The observations that the site is part of an agricultural landscape and provides a connection to the countryside would apply equally to all undeveloped agricultural land surrounding Hinton Blewett and indeed all other settlements in the District. This does not demonstrate any special quality or significance. In relation to proximity to the AONB, the AONB boundary is to the north and west, not to the south, of the village and so it is difficult to understand the reference linking site GR4 on the southern edge of the village to the AONB.

Finally, reference is made to the site being "part of the historic landscape setting and to it helping "to define the separation and the linear edge of the planned medieval village'. The former statement is misleadingly vague, and would again apply equally to all open land around the village. In relation to the linear edge of the planned medieval village, the Conservation Area Appraisal (2014) notes that Upper Road and Lower Road remained free of development until the 1950s, indicating that considerable change to the mediaeval village pattern in the vicinity of site GR4 has already occurred. Furthermore, the Placemaking Plan proposes new development through allocation SR8 which would breach the northern purported "linear edge of the village, as defined by Upper Road. Again, it is not clear why the whole of site GR4, less than half of which lies adjacent to the Conservation Area, is being suggested to possess a special contribution to the local historic environment. We enclose the archaeological desk based assessment with our clients' planning application, which shows that the site has limited archaeological potential.

#### Not and Extensive Tract of Land

The Planning Practice Guidance offers no guidance on what is and is not to be regarded as an extensive tract of land. However, the PPG advises that the LGS designation "should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Beit by another name. We consider that by proposing the designation of the strip of land south of Lower Road as LGS, the intention is to create a de facto Green Belt to the south of the village.

Furthermore, we consider that what is and is not an extensive tract of land needs to be assessed in its context. In the context of the small village of Hinton Blewett, we consider that the proposed LGS, which adjoins much of the southern boundary of the village, is an "extensive tract".

#### General

The selection of GR4 as a proposed LGS designation needs to be seen in the context of our clients' recent planning applications for residential development of part of that land (application references (13/05272/OUT and 14/02403/OUT). Seen in this context, the impression is that the LGS designation is being proposed here not because of the special or local significance of this tract of land, but instead as a means to frustrate any future development proposals in this location.

If it was not for the application for planning permission the site would not have been identified as proposed Local Green Space.

The NPPF advises that the LGS will not be appropriate for most green areas and, as we have seen, the PPG warns that it should not be used as a back door route to create new Green Belt. For the reasons set out above, we do not consider that GR4 is suitable for designation as LGS, and we consider that its proposed designation is not a result of its special local significance but of a desire of planners at Bath and North East Somerset Council (and the Parish Council) to create a de facto Green Belt and block any future planning applications on our clients' land. For these reasons we request that the draft proposed LGS allocation be deleted.

#### Proposed Housing Allocations SR8 and SR9

We do not consider that the process leading to the selection of sites SR8 and SR9 is justified in that it is not based on the consideration of reasonable alternatives. We understand from the documents entitled "Placemaking Plan Site Assessment Report" and "B&NES Parish Council sites unsuitable for allocation in the Placemaking Plan" that the sites considered for allocation were those suggested by parish/town Councils. We consider that this approach, rather than a more conventional approach based on a call for sites and preparation of a SHLAA, has led to a failure to consider reasonable alternatives.

The importance of considering reasonable alternatives is illustrated, for example, by the Inspector's 10th procedural letter (dated 2nd December 2013) on the Wiltshire Core Strategy examination, where he stated (at pages 6-7): "it is important for reasons of robustness and legal compliance, that the SAprocess dealswithreasonablealternativesinafairand comparablema enclosed).

We consider these shortcomings should be addressed now by reviewing the selection of sites based on a call for sites and consideration of reasonable alternatives in a fair and comparable manner.

Hinton Blewett and Housing Numbers Generally

Sites SR9 and SR8 are each identified as delivering 2-3 dwellings. The Placemaking Plan would therefore deliver insufficient sites in Hinton Blewett to meet even the 10-15 dwellings the plan says will need to be accommodated in the village to meet the Rural Areas housing target (see para 1.346 of the Placemaking Plan).

Generally, the size of the sites proposed to be allocated in Rural Areas in the Placemaking Plan appears to be insufficient to deliver the 1,120 houses in rural areas required in Table 1b of the Core Strategy. No housing trajectory is provided in the plan's evidence base to show how these 1,120 houses will be delivered within the plan period unless sufficient sites are allocated. There must accordingly be very significant doubts as to whether the proposed Placemaking Plan is positively prepared and consistent with the Core Strategy.

These issues of soundness are compounded by the likelihood that the housing requirement in the Core Strategy, and therefore the requirement for Rural Areas, will need to be revised upwards (most likely significantly) following the publication of the West of England SHMA this summer. This view is supported by the Barton Willmore West of England Objective Assessment of Housing Need (December 2014) which was submitted to the North Somerset Core Strategy reexamination and a copy of which we enclose for ease of reference.

A degree of overlap between the Placemaking Plan and the now-commenced strategic planning at the West of England level is now inevitable. For example, we note that a call for sites is currently ongoing on a West of England level, with sites capable of accommodating ten or more dwellings being sought. Indeed, it is our clients' intention to make a submission for Lower Road, Hinton Blewett to that call for sites.

In this context, the only sound approach in the Placemaking Plan is to plan positively and allocate sufficient sites in Rural Areas to accommodate at least the 1,120 dwellings required in the Core Strategy but with a significant additional buffer built in from the outset in view of the likely imminent evidence of increased housing requirements.

At present we consider that the Options document fails to achieve that sound approach. For Hinton Blewett in particular the emphasis is negatively on preventing development thought the allocation of Local Green Space rather than contributing to delivering much needed market and affordable housing. As we have stated above, the identification of options to contribute to providing housing needs to be based on a fair and comparable assessment of reasonable alternatives.

Proposed Allocation of Our Clients' Site at Lower Road

Our clients have not, prior to now, been provided with an opportunity to participate in the preparation of the Placemaking Plan. However, we would ask you to take this letter as formally proposing the allocation of our clients' land at Lower Road, as shown in the enclosed location plan, for residential development. Through our clients' previous applications it has been demonstrated that the site is available and capable of being developed to deliver up to 19 dwellings.

#### Recommendations

This letter raises very significant issues in relation to the soundness and legal compliance of the Placemaking Plan Options stage document.

Proposed LGS GR4 should be deleted as it is not suitable for designation as a Local Green Space.

The Plan should allocate sites to accommodate significantly more than the currently proposed 4-6 dwellings at Hinton Belwett. The selection of sites needs to be based on consideration of reasonable alternatives in a fair and comparable manner. These shortcomings should be addressed now by reviewing the selection of sites based on a call for sites and consideration of reasonable alternatives. Our clients' site at Lower Road should be considered as part of that process and should be allocated for residential development.

| Change requested:  |  |
|--|--|
|  |  |
|  |  |
|  |  |
| Respondent 6421 Comment 5 Respondent Joanna Burgess                                      | Respondent                             |
| Number: Number: Name:  | Organisation:                          |
| Traine.  |  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent           | with the comment? $\square$            |
|  |  |
|  | 1                                      |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Sp             | pace (GR4)                             |
|  |  |
| Comment on the Site:   |  |
| I wholeheartedly support the proposed green space allocations GR3 and GR4.               |  |
|  |  |
| Change requested:  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6466 Comment 2 Respondent Mrs Christine Arnold                                | Respondent Arnold Associates           |
| Number: Name:  | Organisation:                          |
| Agent ID: Agent Neme:  |  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\ \square$ Attachments sent      | with the comment? $\square$            |
|  |  |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Sp             | 2200 (CD4)                             |
| Placemaking Options Plan Reference:   militori Blewett - Proposed Local Green Sp         | Dace (GR4)                             |
|  |  |
| Comment on the Site:   |  |
| I am writing in support of g4 as a local green space. It is an intrinsically beautiful r |  |
| across the valley to the Mendip hills. It is rich in flora and fauna and supports the    | rural setting of main road through the |
| village.   |  |
| Change requested:  |  |
| Change requested.  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6473 Comment 5 Respondent Mrs Liz Brimmell                                    | Respondent                             |
| Number: Name:  | Organisation:                          |
| Agent ID: Agent Name:  |  |
|  |  |
| Further Information available in the original comment? $\Box$ Attachments sent           | with the comment? $\square$            |
|  |  |
| Placemaking Options Plan Reference: Hinton Blewett - Proposed Local Green Sp             | pace (GR4)                             |
| - Fracemaking Obtions Fran Reference, Hilliton Diewett - Frobosed Local Ofeen St         | Juce (GNT)                             |

#### **Comment on the Site:**

This agricultural site is a visually very important open space with beautiful views both into and out of the village which are part of the historical landscape and the setting for, and the defining edge of the medieval planned village. It is also an important visual setting for the Conservation Area.

| Number: Number: Na  | spondent Mr Nigel & Mrs Diane Westray Respondent me: Organisation:      |  |
|---|---|--|
| Agent ID: Agent Name:  Further Information available in the o | riginal comment? $\square$ Attachments sent with the comment? $\square$ |  |
| Placemaking Options Plan Reference:                           | Hinton Blewett - Proposed Local Green Space (GR4)                       |  |
|   |   |  |
| Comment on the Site:  |   |  |

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Temple Cloud (SR23) Number: 564 Respondent 49 Comment 1 Respondent Mrs Helen Richardson **Respondent** Clutton Parish Council Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Temple Cloud (SR23) Comment on the Site: The Temple Cloud Place making Options were considered at the Clutton Parish Council meeting on December 15th 2015 (Minute 164/14) and although the Parish Council was hesitant about commenting on a neighbouring councils plan, it was agreed that a comment should be made as the development of SR23 would be in breach of Local Plan saved policy BH16: Village Buffers, as the potential development would be directly adjacent to the Clutton Parish Boundary, and does not respect the separation of the settlements. Any development would also be clearly visible from Clutton. **Change requested:** Clutton Parish Council would question the inclusion of SR23 Respondent 259 **Comment** 2 **Respondent** Mr E Bruegger Respondent Number: Number: Name: Organisation: Agent ID: 36 Agent Name: GL Hearn Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Temple Cloud (SR23) **Comment on the Site:** The site requires a new access onto the A37, on the approach to the settlement from the north. It is usually the case that the highway authority will resist the creation of new accesses onto the strategic and primary highway network. The commentary to the plan indicates a potential use of third party land requiring further investigation and there can be no guarantee that an acceptable access onto the highway network can be brought forward, even if the in-principle new access creation onto the strategic highway network can be agreed. The creation of a new access will lead to additional junctions onto the A37 leading to the potential for additional points of conflict. A development of 25 units is not of sufficient scale to provide any contributions to addressing the Councils

# Change requested:

Temple Inn Lane junction.

Requirement for new site accesss to come from Temple Inn Lane, with no new access onto the A37.

concerns regarding the A37 Temple Inn Lane junction if a new access is constructed and as such the preference would be for access to this site to be via Temple Inn Lane with a contribution to improvements to assist the operation of the A37

|  | Schedule of Co                          | mments on the Placemaking Plan                                   | Options Document in Plan Order  |
|--|---|--|---|
| Respondent 837<br>Number:                | Comment 10 Number:                      | Respondent Mr David Redgewell Name:                              | <b>Respondent</b> South West Transport <b>Organisation:</b> Network, Railfuture   |
| Agent ID: 56 A                           | gent Name: Sou                          | th West Transport Network, Railful                               | ture Severnside, TFGBA  |
| Further Informati                        | on available in t                       | he original comment?   Attach                                    | ments sent with the comment? 🗹  |
| Placemaking Opti                         | ons Plan Refere                         | nce: Temple Cloud (SR23)   |   |
| Comment on the                           | Site:                                   |  |   |
|  |   | g of at least 50 dwellings to improve<br>e A376/A379 bus routes. | e rural housing and would like to see high quality  |
| Change requested                         | l:                                      |  |   |
| More affordable ho                       | ousing.                                 |  |   |
| Respondent 2546<br>Number:               | Comment 1 Number:                       | Respondent Mr & Mrs Michael & Name:                              | Pat Dean Respondent Organisation:   |
| Agent ID: A                              | gent Name:                              |  |   |
| Further Informati                        | on available in t                       | he original comment? $\Box$ Attach                               | ments sent with the comment? $\square$  |
| Placemaking Opti                         | ons Plan Refere                         | nce: Temple Cloud (SR23)   |   |
| Comment on the                           | Site:                                   |  |   |
| being created onto                       | the A37 (possib                         | 0 .  | 25 houses but it should be subject to a new accessing access). We feel the facilities as the school and   |
| Change requested                         | l:                                      |  |   |
|  |   |  |   |
| Respondent 2586<br>Number:               | Comment 1 Number:                       | Respondent Mr Paul Toseland Name:                                | Respondent The Bath & Wells Organisation: Diocesan Board of   |
| Agent ID: 129 A                          | gent Name: Gre                          | enslade Taylor Hunt  |   |
| Further Informati                        | on available in t                       | he original comment?   Attach                                    | ments sent with the comment? $\square$  |
| Placemaking Opti                         | ons Plan Refere                         | nce: Temple Cloud (SR23)   |   |
| Comment on the                           | Site:                                   |  |   |
| Our clients own lar<br>1. We contend tha | nd immediately a<br>t the site is suita | ble for residential development. Th                              | on SR23 as identified on the plan reference 2104 - skee site is available and suitable for development cifies a scheme for 100% affordable housing. |
| Change requested                         | ·                                       |  |   |

As identified above - an extension in the area of site allocation SR23 to include our clients land to the North East.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| Respondent 6362 Comment 1 Respondent Mrs Kate Atkinson Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Temple Cloud (SR23)  |
| Comment on the Site:   |
| Buildings around 'The Green' should be listed/considered as assets worth preserving. Perrin Hse, Corner House, The Refuge and adjoining cottages, Stanley Hse and Oxford Hse all appear more 'historical' and attractive than say the Temple nn.   |
| 2. Until the appeal against BANES refusal of P.P. on SR24/TC4b my comments are: housing should be split between SR24 and SR23.   |
| Change requested:  Access to A37 should be via SR23 for both sites, this would enable T.I.L/A37 junction to be closed, enhancing safety for all users of both roads.  2. Allocate a building adjoining U.H. car park for Drs/Public Health use as part of S106 obligations.  |
| Respondent 6417 Comment 2 Respondent Mr Ian Lapraik Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Temple Cloud (SR23)  |
| Comment on the Site:   |
| Preliminary Comment on existing proposals (sites SR23 and SR24) The two sites being proposed for development in the placemaking plan are both greenfield sites outside the HDB for Temple Cloud and have attracted considerable negative responses from local residents, especially but not entirely those iving in close proximity to the proposed sites. |
| Comments in the Placemaking Plan do appear to implicitly accept these local concerns:  |
| GR23 and 24 development and design principles "Have particular regard to site layout, building height, and soft andscaping, to minimise the visual impact of the development in this location";  |

SR24 "The site should be designed to safeguard the amenity of neighbouring residential properties around the site").

While there is a general acceptance that Temple Cloud does need to accommodate 50 new dwellings as part of the Local Plan, the main concern in the village seems to arise from those new dwellings being concentrated in one or two highly visible larger developments.

An alternative approach which would fit more comfortably with local sentiment, and have a less significant impact on residents, would be to spread the 50 dwellings out into smaller developments around the village.

This comment proposes one alternative site in Temple Cloud which would be suitable for up to 5 new dwellings, and requests that this be assessed for inclusion in the final Placemaking Plan.

| Change requested:  |
|--|
|  |
|  |
| Respondent 6433 Comment 1 Respondent Mr Michael Duckett Number: Number: Name: Organisation:  Agent ID: Agent Name:   |
| Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Temple Cloud (SR23)  |
| Comment on the Site:  I have a comment re the Temple Cloud new housing plan.   |
| A traffic study needs to be undertaken in relation to access onto the main road. The road is very busy at peak times and it is often difficult coming out of Paulmont Rise - especially when crossing the traffic to turn right.   |
| The new development of houses is strongly supported - but access needs careful consideration (lights / roundabout / etc).  |
| Change requested:  |
|  |
|  |
| Respondent 6539 Comment 1 Respondent Mrs Maria Musins Respondent Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Temple Cloud (SR23)  |
| Comment on the Site:   |
| This site (as previously identified by Wansdyke Council) is unsuitable for development due to the hazardous junction of the main A37 and Temple Inn Lane. Development in the village should be spread throughout to equal the load. The previous application of 10 houses on the Old Garden site with direct access onto the A37 which is north of this site is a much better option. You have not listed site SR24 to enable comment which again is totally unacceptable. |
| Change requested:  |
| <del>-</del> ·   |
|  |
| Respondent 6562 Comment 1 Respondent Miss Joan Swift Respondent Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Temple Cloud (SR23)  |

#### **Comment on the Site:**

I would like to comment on both sites SR23 and SR24. Whilst I support the proposal for 25 houses on each of these sites it would be necessary to look at a new access further along the A37 (heading north) to accommodate these new dwellings and subsequent increase in traffic. There is a wider section of the A37 heading towards Clutton which would create a safe entry/exit onto this busy main road. Those coming out of the two proposed sites and from the existing houses in that area would then have a choice of 3 directions for their journey which would spread the increase in traffic. The 3 being - (i) heading down the lane towards Clutton (ii) Temple Inn access onto the A37 and (iii) a new access onto the A37 further north of the A37.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

## Placemaking Options Plan Reference: Temple Cloud (SR24)

Plan Order Number: 567

|                        | _                 | spondent Mr E Bruegger<br>nme:           | Respondent<br>Organisation:     |
|------------------------|-------------------|--|---------------------------------|
| Agent ID: 36 Agent     | Name: GL Hear     | rn                                       |                                 |
| Further Information av | vailable in the o | riginal comment? $\square$ Attachments s | ent with the comment? $\square$ |
|                        |                   |  |                                 |
| Placemaking Options F  | Plan Reference:   | Temple Cloud (SR24)                      |                                 |

#### **Comment on the Site:**

Specific Site: TR24 - Temple Cloud Comment:

On behalf of the landowner, Mr Edmund Bruegger, the proposed allocation of site TR24 for residential development is supported in principle. However, it is considered that limiting development to the northern section of the site, and for just 25 dwellings, is an extremely ineffective approach and represents an artificial and arbitrary restriction that is not based on any assessment of the development capacity or overall sustainability credentials of the site.

Core Strategy

The Placemaking Plan allocations for the rural areas are framed around the requirements of Adopted Core Strategy Policies RA1 and RA2. The supporting text to Policies RA1 and RA2 refers to appropriate RA1 settlements taking "around 50" dwellings and policy RA2 settlements catering for "around 10 - 15" dwellings in the plan period.

This strategy is not related to any specific assessment of the capacity of any given RA1 or RA2 settlement; as we understand, the figure relates to a generic calculation based on the overall Core Strategy requirement to achieve delivery of 250 dwellings (in addition to existing commitments) in the rural areas within the CS plan period. It is noted that the Council considers that the delivery of housing in the rural areas will come forward in a combination of a) small sites within the existing Housing Development Boundaries; b) allocations in the Placemaking Plan; or c) through sites within or adjoining the HDB identified in adopted Neighbourhood Plans or Community Right to Build.

At no time during the Core Strategy process was the actual capacity of the rural settlements (including Temple Cloud) assessed. CS paragraph 5.15 refers to development in these settlements needing to be "appropriate to the scale and character to its location and in accordance with national policy, best practice guidance and the core policies set out in section 6 [of the CS]"; this is the means by which development in these areas will be judged.

The emerging Placemaking Plan only allocates sites to meet a proportion of the 250 dwelling target, whilst also seeking to designate a number of identified villages as either "RA1" or "RA2" settlements. The situation can be summarised as follows:

Settlement RA1 or RA2 settlementSites identified

Batheaston RA1SR16: 5 - 10 dwellings

Bathampton RA1No proposed options - any sites coming forward within t HDB considered on its merits.

Bathford RA1No proposed options - any sites coming forward within the HDB considered on its merits.

Camerton RA2No proposed options - landscape and highway issues

Clutton? Development to be Neighbourhood Plan-led

Compton Martin RA2SR17: up to 10 dwellings

East Harptree RA23 options put forward. Preferred option is SR6: up to 10 dwellings

High Littleton RA1No sites identified - "will need to identify site(s) to accommodate approximately 50 dwellings."

Farrington Gurney RA1No options identified - issue with regard to capacity of Primary School.

Hallatrow RA22 options identified; preferred option is SR22: up to 15 dwellings

Hinton Blewett2 sites identified (SR8 and SR9) - can accommodate up to 6 dwellings in total

Stowey Sutton Development to be Neighbourhood Plan-led

Temple Cloud RA12 sites identified (SR23 and SR24); to accommodate up to 50 dwellings in total

Timsbury RA13 options identified; (SR13, SR14 and SR15) - in combination will accommodate up to 50 dwellings in total Ubley RA2No proposed options - conservation, landscape and highway issues

West Harptree RA24 options put forward; Parish Council prefer sites SR3 and SR4, to bring forward up to 15 dwellings in total

TOTAL DWELLINGS IDENTIFIED (SPECIFIC SITES) - approx.166

In our view, this casts doubt on the deliverability of development at those RA1 and RA2 settlements identified within the Placemaking Plan, but not actually containing any specific allocations. There is a lack of certainty with such an approach and it is therefore considered that, where suitable, available and deliverable sites are identified, these should be allocated and the optimal development capacity of such sites maximised and based on the individual physical; social; and environmental merits of each site. In relation to site SR24, there is considerable certainty over its delivery, and for a quantum of development that exceeds the arbitrary figure contained in the Core Strategy.

In addition, it is very important to recognise that the housing requirement set out in the Core Strategy does not represent a cap on development. This was recognised by the Examination Inspector in his report. At paragraph IR78, where he refers to an analysis of housing supply undertaken by Savills (November 2013), he states:

"It does justify the need to make clear that the proposed provision in the plan is not a cap on housing development and that more than 13,000 can and should be permitted where consistent with other policies. This is accepted by the Council and reflected in the final wording relating to housing delivery suggested by the Council in BNES/56. Planned provision of around 13,000 would represent a reasonable, but not generous, response to market signals."

In paragraph IR87, he states:

"Equally importantly, there is scope for housing delivery to be increased above planned provision since the 13,000 is not a ceiling or cap to development."

By extension, therefore, the figure of "around 50" dwellings for RA1 settlements is not a definitive cap and any proposed development over and above this figure should be assessed on whether or not it would have any adverse planning or environmental consequences/impacts.

Site SR24 is capable of accommodating significantly more development than 25 dwellings, as has been demonstrated through a recent planning application (Planning Ref: 13/03562/OUT). This application is currently the subject of a planning appeal, following a Member decision to refuse planning permission at DC Committee on 3rd September 2014. However, the planning officer had recommended that the application be approved, and all technical consultation responses indicated no objection for the development. These can be summarised as follows:

Highways/Access

Site SR24 would be accessed by vehicles from Temple Inn Lane to the north. A secondary access can also be provided via the permissive right of way leading into the site on its western side, via the path running past St Barnabas Church.

The Statement of Common Ground agreed between the Appellant and the local planning authority as part of the planning Appeal related to application 13/03562/OUT (Ref No:

APP/F0114/A/14/2228577) confirms that the proposed vehicular access is appropriate for the scale of development and could achieve the required visibility splays onto Temple Inn Lane.

During determination of the above planning application, the Council's highways officers considered the application in depth and visited the site to survey average speeds on the main A37 and to measure the visibility splays at the Temple Inn Lane/A37 junction. This confirmed that the average speed at the junction was below 30 miles per hour (27.8 mph) and that at this speed the visibility splays are adequate. To ensure that speeds on the A37 are maintained at or below the 30mph speed limit, a contribution of £75,000 was sought to fund speed reactive signs and the installation of a speed camera on the A37 in the vicinity of the A37/Temple Inn Lane junction.

Highway officers also identified that there is a significant amount of "street clutter" immediately adjacent to the junction

and stated that steps would need to be taken to ensure that the signing is rationalised. This will provide clearer sight lines and reduce potential distraction. A contribution was sought to resolve this issue.

Highways officers confirmed that, in combination, the measures offered will resolve the highway safety concerns and lessen traffic speeds. They confirmed that overall the proposals are acceptable in highway safety terms.

#### **Environmental Impact**

The Statement of Common Ground referred to above confirms that the site is not constrained by local or national landscape designations; Green Belt; ecology designations; or heritage designations. It is agreed that development of the site for 70 dwellings can be incorporated into the landscape without causing any demonstrable harm to the wider landscape. The site is visually enclosed and contained by development and landform, a fact recognised by the Council's landscape officer in the consultation response received in relation to application 13/03562/OUT, who commented:

"I agree with the general findings of the outline Landscape and Visual Impact Assessment in terms of the attributes of and effects on the local landscape. I do not think that there would be any significant landscape (physical or character) or visual impacts. I would not object to the overall principle of development on this site."

It is agreed that, through the ecological mitigation proposed as part of the development, there will be no material adverse impact on ecology.

The site lies at the heart of Temple Cloud, which is a settlement that meets all the criteria required for designation as a "Policy RA1" settlement. Development of the site for 70 dwellings is deliverable and can be accommodated with no detrimental impact to existing infrastructure, the local community or any environmental issues.

#### **Change requested:**

| Change to the text relating to Site | 24, to allow for | r "up to 70 c | dwellings". |
|-------------------------------------|------------------|---------------|-------------|
|-------------------------------------|------------------|---------------|-------------|

| l  | pondent Mr David Redgewell<br>me:          | <b>Respondent</b> South West Transport <b>Organisation:</b> Network, Railfuture |
|--|--|---|
| Agent ID: 56 Agent Name: South W         | est Transport Network, Railfuture Sever    | nside, TFGBA  |
| Further Information available in the or  | riginal comment?   Attachments ser         | nt with the comment? 🗹  |
| Placemaking Options Plan Reference:      | Temple Cloud (SR24)                        |   |
| Comment on the Site:                     |  |   |
| Temple Cloud - We support housing of a   | at least 50 dwellings to improve rural ho  | using and would like to see high quality  |
| landscaping, improved pavements in the   | e centre of the village and public realm c | on the A376/A379 bus routes.  |
| Change requested:                        |  |   |
| more affordable housing in the rural are | ea   |   |
|  |  |   |
|  |  |   |
| Respondent 2546 Comment 2 Res            | pondent Mr & Mrs Michael & Pat Dean        | Respondent  |
| Number: Number: Na                       | me:  | Organisation:   |
| Agent ID: Agent Name:                    |  |   |
| Further Information available in the or  | riginal comment?   Attachments ser         | nt with the comment? $\Box$   |
| Placemaking Options Plan Reference:      | Temple Cloud (SR24)                        |   |

#### **Comment on the Site:**

SR24 We object to any development on this site due to the dangerous existing junction of Temple Inn Lane with the A37,

particularly since the planning permission has been given to The Temple Inn to use Temple Inn Lane for access to housing and pub car park. B.A.N.E.S. turned down outline planning on SR24, yet know you are suggesting in the Place making plan that it is suitable. Perhaps you should read your own comments and the Core Strategy.

| Ciialige Leuuesteu | ange requested | reauested | Change | C |
|--------------------|----------------|-----------|--------|---|
|--------------------|----------------|-----------|--------|---|

No development at all on this site, unless an alternative access can be made, which as far as we can see is impossible. The amount of traffic using Temple Inn Lane, because it is a designated H.G.V. route makes it an extremely dangerous road.

| Respondent 2586 Comment 2 Respondent Mr Paul Toseland Number: Name:   | Respondent The Bath & Wells Organisation: Diocesan Board of |
|---|---|
| Agent ID: 129 Agent Name: Greenslade Taylor Hunt  |   |
| Further Information available in the original comment? $\qed$ Attachments sent  | with the comment? 🗹   |
| Placemaking Options Plan Reference: Temple Cloud (SR24)   |   |
| Comment on the Site:  |   |
| . Alternatively plan 2104- sk4 identifies an alternative residential scheme for mark allocation SR24.   | ket housing in place of proposed site                       |
| Change requested:   |   |
| The deletion of site allocation reference SR24.   |   |
|   |   |
| Respondent 6362 Comment 2 Respondent Mrs Kate Atkinson Number: Name:  | Respondent Organisation:                                    |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                                    |
| Placemaking Options Plan Reference: Temple Cloud (SR24)   |   |
| Comment on the Site:  |   |
| 1. Buildings around 'The Green' should be listed/considered as assets worth prese<br>Refuge and adjoining cottages, Stanley Hse and Oxford Hse all appear more 'histo<br>Inn. |   |
| 2. Until the appeal against BANES refusal of P.P. on SR24/TC4b my comments are: and SR23.   | housing should be split between SR24                        |
| Change requested:   |   |
| 1. Access to A37 should be via SR23 for both sites, this would enable T.I.L/A37 jun all users of both roads.  | ction to be closed, enhancing safety for                    |
| 2. Allocate a building adjoining U.H. car park for Drs/Public Health use as part of S   | 106 obligations.  |
|   |   |
| Respondent 6417 Comment 3 Respondent Mr Ian Lapraik Number: Name:   | Respondent Organisation:                                    |
| Agent ID: Agent Name:   | •   |
|   | with the comment? $\Box$                                    |

| Placemaking Options Plan Reference: | Temple Cloud (SR24) |
|-------------------------------------|---------------------|
|                                     |                     |

#### **Comment on the Site:**

Preliminary Comment on existing proposals (sites SR23 and SR24)

The two sites being proposed for development in the placemaking plan are both greenfield sites outside the HDB for Temple Cloud and have attracted considerable negative responses from local residents, especially but not entirely those living in close proximity to the proposed sites.

Comments in the Placemaking Plan do appear to implicitly accept these local concerns:

SR23 and 24 development and design principles "Have particular regard to site layout, building height, and soft landscaping, to minimise the visual impact of the development in this location";

SR24 "The site should be designed to safeguard the amenity of neighbouring residential properties around the site").

While there is a general acceptance that Temple Cloud does need to accommodate 50 new dwellings as part of the Local Plan, the main concern in the village seems to arise from those new dwellings being concentrated in one or two highly visible larger developments.

An alternative approach which would fit more comfortably with local sentiment, and have a less significant impact on residents, would be to spread the 50 dwellings out into smaller developments around the village.

This comment proposes one alternative site in Temple Cloud which would be suitable for up to 5 new dwellings, and requests that this be assessed for inclusion in the final Placemaking Plan.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Plan Order Placemaking Options Plan Reference: Timsbury (SR14) Number: 575 Respondent 372 Comment 2 Respondent **Respondent** Timsbury Parish Council Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Timsbury (SR14) Comment on the Site: SR14 Brownfield Land off North Road1.412 The Parish Council supports redevelopment of this brown field site in principle. However, more details are required such 1. It is unclear whether the 1.48ha area of the site referred to incorrectly includes the area shown in the map which is offsite and which includes current housing. 2. The Vision should include employment by inclusion of a new paragraph with text such as; 'The previous employment use of the site should be preserved at least in part.' 3. The Design Principles point 2 should include policy not just to minimise negative but also to enhance positive visual impact, it being a gateway site to the village. 4. The Design Principles should include detailed references, as in the Vision, for improved vehicle and pedestrian access to the site and surrounding area. This should include pedestrian access to the west onto The Avenue. **Change requested:** Policy SR14 map outline should not include the area that encompasses the current houses on the south of the site. Respondent 6358 Comment 1 Respondent Mr Dudley Chappell Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Timsbury (SR14) Comment on the Site: SR14 Wheelers Yard. 1. A very good option would benefit the whole village but have points to make a. Not clear from the plan where the housing/industrial units would be situated and why is the whole site not being used.

b. Would need a roundabout placed at the junction of The Avenue/Bloomfield Rd where there have been several

accidents over the years, as this would control speed in this area.

C. Why is there no pedestrian crossing put in this location by the entrance to Lippiat Lane.

| Change requested:  |
|--|
| · · · · · · · · · · · · · · · · · · ·  |
|  |
| Respondent 6359 Comment 1 Respondent Mrs Jane Chappell Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
| Comment on the Site:   |
| SR14 Wheelers Yard   |
| 1. I think this is the best option as the site looks very untidy as it has been derelict for a number of years and is an eyesore for people entering the village.  |
| 2. The fact that there will be industrial units as well as housing will enable people to find jobs for the future.   |
| 3. I do think there needs to be a roundabout at the now crossroads as traffic does tend to get congested.  |
| Change requested:  |
|  |
|  |
| Respondent 6360 Comment 3 Respondent Mrs Lynn Rogers Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
|  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
| Placemaking Options Plan Reference: Timsbury (SR14)  Comment on the Site:  |
|  |
| Comment on the Site:  The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of   |
| Comment on the Site:  The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of 'around" 50.  SR14 is currently an eye-sore at the entrance to the village and sensitive development is urgently required.  Development of this site would hopefully include improvements to pedestrian walkways and improved traffic control at  |
| Comment on the Site:  The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of 'around" 50.  SR14 is currently an eye-sore at the entrance to the village and sensitive development is urgently required. Development of this site would hopefully include improvements to pedestrian walkways and improved traffic control at the busy crossroads where there have been many accidents.   |
| Comment on the Site:  The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of 'around" 50.  SR14 is currently an eye-sore at the entrance to the village and sensitive development is urgently required. Development of this site would hopefully include improvements to pedestrian walkways and improved traffic control at the busy crossroads where there have been many accidents.   |
| Comment on the Site:  The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of 'around" 50.  SR14 is currently an eye-sore at the entrance to the village and sensitive development is urgently required. Development of this site would hopefully include improvements to pedestrian walkways and improved traffic control at the busy crossroads where there have been many accidents.   |
| Comment on the Site:  The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of 'around' 50.  SR14 is currently an eye-sore at the entrance to the village and sensitive development is urgently required.  Development of this site would hopefully include improvements to pedestrian walkways and improved traffic control at the busy crossroads where there have been many accidents.  Change requested:  Respondent 6364 Comment 1 Respondent Miss Christine Bateman Respondent |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |   |                                 |  |
|---|---|---------------------------------|--|
| Placemaking Options Plan Reference:   | Timsbury (SR14)   |                                 |  |
| Comment on the Site:  | n Council's proposed Option (A) of develop  | ment at Wheelers Vard and land  |  |
| adjacent to Lansdown Cresent (SR14 &  |   | ment at wheelers fard and land  |  |
| essential in case of Wheelers Yard devo                                     | ite – though some improvement at Avenue<br>opment<br>R15). Removal of difficult / dangerous con |                                 |  |
| Change requested:   |   |                                 |  |
|   |   |                                 |  |
|   | spondent Marilyn Valentine  | Respondent                      |  |
|   | ime:  | Organisation:                   |  |
| Agent ID: Agent Name:  Further Information available in the or              | riginal comment?   Attachments sent   | with the comment?               |  |
| Turther information available in the o                                      | Tiginal comment: — Attachments sent   | with the comment:               |  |
| Placemaking Options Plan Reference:   | Timsbury (SR14)   |                                 |  |
| Comment on the Site: I think that SR15 and SR14 will be the n               | nost benficial to Timsbury the others will o  | nly make more problems          |  |
| Change requested:   |   |                                 |  |
|   |   |                                 |  |
|   |   |                                 |  |
| ·   | spondent Damien Valentine<br>nme:   | Respondent<br>Organisation:     |  |
| Agent ID: Agent Name:   |   |                                 |  |
| Further Information available in the o                                      | riginal comment?   Attachments sent   | with the comment? $\Box$        |  |
| Placemaking Options Plan Reference:   | Timsbury (SR14)   |                                 |  |
| Comment on the Site:  |   |                                 |  |
| SR14 and SR15 are closer to the school                                      | and shops. They are also closer to the ma   | in road exits from the village. |  |
| Change requested:   |   |                                 |  |
|   |   |                                 |  |
| Respondent 6373 Comment 1 Res   | spondent Mr Raymond Merchant  | Respondent                      |  |
|   | ime:  | Organisation:                   |  |
| Agent ID: Agent Name:   |   |                                 |  |
| Further Information available in the o                                      | riginal comment?   Attachments sent   | : with the comment? $\square$   |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |  |  |
|---|--|--|
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |
| Comment on the Site:  |  |  |
| Sites SR14 and SR15 are my preferred choice for an integrated solution  |  |  |
| Close to shops, garage, pub & school in the core of the village.  |  |  |
| • Would allow road improvements & safety at busy crossroads and on North Road. Much needed.   |  |  |
| • Ease of access to site.   |  |  |
| Site is flat and building would be such to retain view.   |  |  |
| Has support & cooperation of all landowners involved. Both working amicably together on outcome.  |  |  |
| Would improve gateway to village by removing current eyesore of Wheelers Yard.  |  |  |
| Change requested:   |  |  |
| Respondent 6379 Comment 1 Respondent Mrs Gill Jones Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |
| Comment on the Site:  I believe this site is a good place to put housing It is a brownfield site and in line with government policy brownfield sites should be used in preference to greenfield sites wherever possible. Appropriate housing on this land will improve the village and hopefully the Council will consider that there should be mostly starter homes here |  |  |
| Change requested:   |  |  |
|   |  |  |
|   |  |  |
| Respondent 6383 Comment 2 Respondent Keith & Norma Herbert Respondent Number: Name: Organisation:   |  |  |
|   |  |  |
| Number: Number: Organisation:   |  |  |

## **Comment on the Site:**

We therefore, whole heartedly support our parish Councils proposed option of housing and business development on SRI 4 (Wheelers old site) and housing on a small part of SRI 5 near Landsdown Crescent.

| Change requested:  | ns Document in Plan Order   |
|--|---|
| Respondent 6387 Comment 1 Respondent Mrs Janet Merchant Number: Number: Name:  Agent ID: Agent Name:   | Respondent<br>Organisation:   |
| Further Information available in the original comment?   Attachments   | s sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR14)  |   |
| Comment on the Site:  Sites SR14 and SR15 would be preferred and sensible choice at every level. pub. This would allow for road improvements on either end of North Road hazardous stretch should be encouraged. Safety of pedestrians, pushchairs Cheshire Home in Timsbury – would and should be improved.  Sites easy to access.  O Where if site wishing to co-operate to provide a suitable outcome. Would improve the entrance to village by removing the eyesore that is Whe SR15 is a flat site and views can and would be protected | and anything that improves safety along this and wheelchair uses – we love a Leonard  |
| Change requested:  |   |
| Respondent 6391 Comment 1 Respondent Dr Robert Jones Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments  | Respondent Organisation:  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |   |
| Comment on the Site:  SR14 is a brown field site and very suitable for development. Apparently the fully occupied, therefore, consideration should be given to using the whole of Development of SR14 will also be advantageous from a traffic point of view developing at the east end of North Road. SR14 is at the same end of the vitraffic an amenity point of view for the development to take place in these solutions. In summary, the SR14 is eminently appropriate for housing development.  | of SR14 for the housing development. as this will cause much less congestion than illage as SR13 and it makes good sense from a |
| Change requested:  |   |

| Schedule of Comments on the Placemaking Plan Options  | s Document in Plan Order                                |
|---|---|
| Respondent 6408 Comment 5 Respondent Mrs Elaine Martin Number: Name:  | Respondent Organisation:                                |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$                           |
| Placemaking Options Plan Reference: Timsbury (SR14)   |   |
| Comment on the Site: Options SR14 and SR13 are ideally placed to take the additional traffic. Little  | or no building has taken place on this side of          |
| the village and this could balance the flow of vehicles throughout the village. Road to get to Bristol, Wells and Bath.                                     |   |
| Change requested:   |   |
|   |   |
|   |   |
| Respondent 6441 Comment 3 Respondent Terence Richard Fisher Number: Name:   | Respondent Organisation:                                |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$                           |
| Placemaking Options Plan Reference: Timsbury (SR14)   |   |
| Comment on the Site:  | ·   |
| SR15 Wheelers Yard. Workshops or housing as we don't want high rise tenemed to our splendid village, like that imposed on Radstock. So much for the so call |   |
| In my humble opinion the best place for housing is to demolish the school wi  | th space for 20/25 dwellings.                           |
| Change requested:   |   |
|   |   |
|   |   |
| Respondent 6463 Comment 2 Respondent Graham & Iris Nicholls Number: Name:   | Respondent Timsbury Horticultural Organisation: Society |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments   | sent with the comment?                                  |
| Placemaking Ontions Plan Reference: Timshury (SR14)   |   |

## **Comment on the Site:**

With TIM1 (old Wheelers site) available for about 25 houses this will obviously increase North Road traffic but being a brownfield site and an eyesore for a number of years is ripe for developement. However several years ago when the developers showed plans of new building on the site at a meeting held at Conygre Hall, designated parking facilities for each house was space for one car. As is likely most people moving into the village and buying new homes here are commuters working in Bristol/Bath or some other convenient location and will most likely have two cars. MY first thought about the development on TIM1 was how many will be parking in Conygre Hall car park overnight and how many will be exiting onto North Road? That is a traffic problem at the west end of North Road near the crossroads which are already

dangerous but will have to be accepted. So to now put a development at the east end and quoting from the land owner's own conditions 'Due to the density of the development there would only be limited parking', is to my mind completely ridiculous. Limited parking will mean residents driving around looking for parking and where will they find it? On North Road!

| Change requested:   |  |  |
|---|--|--|
|   |  |  |
|   |  |  |
| December 19474 Comment 1 B  |  |  |
| Respondent 6471 Comment 1 Respondent Mr Peter Bradshaw Respondent Number: Name: Organisation:                       |  |  |
| Agent ID: Agent Name:   |  |  |
|   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$             |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |
| riacemaking Options Fian Reference. Innisbury (5R14)  |  |  |
| Comment on the Site:  |  |  |
| I support Timsbury Parish Council's preference for any future housing/employment development to be on SR14 & the    |  |  |
| western part of SR15.   |  |  |
| Change requested:   |  |  |
| <u> </u>  |  |  |
|   |  |  |
|   |  |  |
| Respondent 6484 Comment 3 Respondent Miss Jill Clarke Respondent Equestrian Centre                                  |  |  |
| Number: Number: Organisation:   |  |  |
| Agent ID: Agent Name:   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$             |  |  |
|   |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |
|   |  |  |
| Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SB14 |  |  |
| As the Parish Council has said there would be value to the village in the Development of SR14                       |  |  |
| I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg      |  |  |
| roundabouts at either end of the village on North Road.   |  |  |
| Change requested:   |  |  |
|   |  |  |
|   |  |  |
|   |  |  |
| Respondent 6485 Comment 2 Respondent Mr Roland Clarke Respondent  |  |  |
| Number: Number: Organisation:   |  |  |
| Agent ID: Agent Name:   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$             |  |  |
|   |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |

| Comment on the Site:  As the Parish Council has said there would be value to the village in the Develo  | opment of SR14                         |
|---|--|
| would like to express my support for both SR14 & SR15 as these sites will allow roundabouts at either end of the village on North Road.                                       | ow for traffic improvements, eg        |
| Change requested:   |  |
| Respondent 6486 Comment 1 Respondent Mr David Collett Number: Name:   | Respondent<br>Organisation:            |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments so  | ent with the comment? $\square$        |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |
| Comment on the Site:  Excellent proposal ,  |  |
| Change requested: would be even better if it included the removal of the protected batch.   |  |
| Respondent 6489 Comment 1 Respondent Mr Malcolm Cox Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments so             | Respondent Organisation:               |
| Placemaking Options Plan Reference: Timsbury (SR14)   | ent with the comment:                  |
| Comment on the Site: Close to village centre, would remove a current eyesore at entrance to the villwalkway in the Avenue and a roundabout would improve traffic circulation. | age. Opportunity to improve pedestrian |
| Change requested:   |  |
| Respondent 6504 Comment 1 Respondent Mr Michael Ford  | Respondent                             |
| Number: Name: Agent ID: Agent Name:   | Organisation:                          |
| Further Information available in the original comment?   Attachments so   | ent with the comment? $\Box$           |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |
| Comment on the Site:  |  |

I wish to support Timsbury Parish Council and vote for SR14 and SR15 as the options for development

| Schedule of Comments on the Flacemaking Flan Options Document in Flan Order  |
|--|
| Change requested:  |
|  |
|  |
| Respondent6505Comment3Respondent Mr Chris GittinsRespondentNumber:Number:Name:Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
| Comment on the Site:  I agree with the Parish Council that this is a good site for housing and employment as long as some changes are made to the policies for the Site, as follows: |
| Change requested:  |
| The area of the site on the map is unclear and should not include current housing to the south.  |
| The Vision should include employment uses for the site as it currently has an employment use designation .   |
| As a result of the point above, the expected potential provision of housing should be reduced to 20 to 25 units .  |
| Design Principles should include a policy to also enhance positive visual impact as a gateway/entrance to the village .  |
| Design Principles should include improved vehicle and pedestrian access plus pedestrian access to west via The Avenue.   |
| Respondent 6518 Comment 1 Respondent Mr Paul Hosford Respondent Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
|  |
| Comment on the Site:  Option A is better for Village. Site SR14needs to be developed first.  |
|  |
| Change requested:  |
|  |
|  |
| Respondent 6521 Comment 1 Respondent Mrs Elizabeth James Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
|  |

#### **Comment on the Site:**

I attended the Timsbury futures day - 10/01/2015, I listened to the presentation by Chris Gittins. Very informative... I have lived in the village for 25 years, my children attended the excellent Primary school at Lansdowne View. It was a dangerous situation 20 years ago and is more so now, with the increase of residents and traffic. I understand that a new Primary school is required?

Has anyone thought of building a new school at the "Wheelers" site. Installing a roundabout atthatjunction (the Avenue, Bloomfield road, North road) then demolishing the old school, to make room for possibly up to 100 properties? Just a thought from an old villager.....

| Change requested:  |   |
|--|---|
|  |   |
|  |   |
| Respondent 6522 Comment 1 Respondent Mr Raymond James Number: Name:  | Respondent Organisation:                    |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments  | s sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Timsbury (SR14)  |   |
| Comment on the Site:   |   |
| SR 14 is currently a derelict site, previously the Brickworks and is an eyesore A development that would comprise of business and an affordable housing utilise the space to the benefit of the village. |   |
| Change requested:  |   |
|  |   |
| Respondent 6529 Comment 2 Respondent Mr Robert Kirby Number: Name:   | Respondent<br>Organisation:                 |
| Agent ID: Agent Name:  | -   |
| Further Information available in the original comment?   Attachments   | s sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Timsbury (SR14)  |   |
| Comment on the Site:   |   |
| Site SR14 is currently an eyesore and as such should be developed. Howeve  | r any development of this site, whether for |
| nousing, business or a combination of both, is likely to cause a significant inc   | _   |
| Road, which is already a very busy road which can become very congested, primes, and would create an increased risk to nedestrians, a matter already of  | , , ,                                       |
| times, and would create an increased risk to pedestrians, a matter already o   | i concern to many vinagers.                 |
| Change requested:  |   |
|  |   |

|  | Schedule of   | Comments on the Placemaking P  | lan Options Document in Plan Order  |
|--|---|--|---|
| Respondent 6<br>Number:                                  | Comment Number:   | 1 <b>Respondent</b> Mrs Alexandra N Name:  | obbs Respondent North Bristol NHS Trust Organisation:   |
| Agent ID:  | Agent Name:   |  |   |
| Further Inform   | nation available ir   | n the original comment? $\Box$ At  | tachments sent with the comment? $\Box$   |
| Placemaking C  | )ptions Plan Refe   | rence: Timsbury (SR14)   |   |
| the village hall, school by foot.                        | gateway to the vi   | d, shops and school, and infrastru<br>r pathways / roundabout to acce                            | ed by residents to be a good site to develop. Close to acture to access village. Good access to local primary ss residences. Speech restrictions 20 mph. I am in  |
| Change reques  | sted:   |  |   |
|  |   |  |   |
| Respondent 6 Number:                                     | 5545 <b>Comment</b><br>Number:  | 2 Respondent Ms Mercedes Nu<br>Name:   | nez Respondent Organisation:  |
| Agent ID:  | Agent Name:   |  |   |
| Further Inform   | nation available ir   | n the original comment? $\Box$ At  | tachments sent with the comment? $\Box$   |
| Placemaking C  | )ptions Plan Refe   | rence: Timsbury (SR14)   |   |
| Comment on t   | he Site:  |  |   |
| I support the Pa   | arish Council plans   | s for housing and employment on  | this brownfield site  |
| Change reques  | sted:   |  |   |
| Stronger policie   | es to enhance visu  | al impact on entrance to the villa   | ge, and for traffic management and pedestrian facilities.   |
| Passandant 6   | 55.40. Comment  | 4.2  |   |
| Number:  | 5548 <b>Comment</b><br><b>Number:</b>   | 1 Respondent Mr Andrew Potti Name:   | nger Respondent Organisation:   |
| Agent ID:  | Agent Name:   |  |   |
| Further Inform   | nation available ir   | n the original comment? $\Box$ At  | tachments sent with the comment? $\Box$   |
| Placemaking C  | Options Plan Refe   | rence: Timsbury (SR14)   |   |
| Comment on t   | he Site:  |  |   |
| can't let this pa<br>the village 8 yea<br>with many obst | iss by without plea<br>ars ago and I have<br>tructions to visibil<br>n limit and much r | ading that these developments are been staggered by the complace ity, with narrow uneven pavemer | to be well considered and what I would expect; but I be used to make North Road more safe. We moved to ency over safety. It is a busy route, often used by lorries, nots and it's next to a school. Surely this criteria at least en I suspect any objections to development in the village |

Possible improvements could include:

Change requested:

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| A 20mph limit Pavement improvements Pavement changes to reduce the number of times people cross the road   |
| Obviously things could be done to improve traffic flow but I consider that far less important.   |
| Respondent 6567 Comment 5 Respondent Dr David Watson Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
| Comment on the Site:  A good site for development, though protected species that may be on the site and the old mine shafts need to be catered for. This is a key focal point for people arriving at the village and so the quality of the building design and materials should be an important consideration. It's also important to conserve trees on site; not just those on the adjacent batch (GR11) but also along The Avenue - where trees were clear felled when the site clearance began a few years ago. Thankfully they are regenerating and should be conserved as much as possible to screen the development from the road and vice versa. Given that the road is called The Avenue suggests that it should be tree-lined anyway. It is important that this site isn't over-developed i.e. isn't too high density, otherwise if may lack character and become an eyesore. I believe that business premises are also proposed for this site. Is there proven demand for this? I'd like to think there would be, but I'm not convinced there is. What market research has there been on this? What developer is going to build office space speculatively?  Change requested: |
|  |
| Respondent 6578 Comment 1 Respondent Ms Lorna Miller Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Timsbury (SR14)  |
| Comment on the Site:  I think that this site needs developing. I feel that if we need to increase the size of Timsbury then this is the best place to start. BUT most importantly the road network needs to be part of any planning permission. There have been quite a few accidents on the crossroads recently I feel that it needs to be made into a roundabout. This would slow the traffic down on the approach to the village, and hopefully it would make visibility better when you are leaving the village towards Farmborough.   |
| Change requested:  I would like a roundabout to be part of the planning permission for this site.  |

| Respondent6579Comment1RespondentDr Geoffrey SmithRespondentNumber:Number:Name:Organisation:   |  |  |  |  |
|---|--|--|--|--|
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |  |  |
| Comment on the Site:  I support the selection of this site for the reasons stated plus:   |  |  |  |  |
|   |  |  |  |  |
| (1) it will remove an existing eyesore, improving the visual amenity of the area.   |  |  |  |  |
| (2) it offers the opportunity to remove or ameliorate current safety hazards on the adjacent roads and pavements, improving the environment and safety of residents.  |  |  |  |  |
| (3) the housing will be as near to the village shops, primary school and recreational facilities as possible to minimise the potential increase in the use of vehicles.   |  |  |  |  |
| Change requested:   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |
| Respondent 6582 Comment 2 Respondent Sheila Clarke Respondent   |  |  |  |  |
| Number: Number: Organisation:   |  |  |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)   |  |  |  |  |
|   |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR14)  Comment on the Site: Wheeler's Yard  |  |  |  |  |
| Comment on the Site:  |  |  |  |  |
| Comment on the Site:  Wheeler's Yard  I agree to the development of this site as, at present, it is an eyesore, at the entry to the village, however the exact boundary of the proposed site is unclear as it includes existing housing. The Vision point "improved vehicle and pedestrian access to this site and surrounding area" is critically important to this site especially regarding the narrow footway and crumbling wall in The Avenue. There is a desperate need for a pedestrian crossing point at this crossroads. Unfortunately   |  |  |  |  |
| Comment on the Site:  Wheeler's Yard  I agree to the development of this site as, at present, it is an eyesore, at the entry to the village, however the exact boundary of the proposed site is unclear as it includes existing housing. The Vision point "improved vehicle and pedestrian access to this site and surrounding area" is critically important to this site especially regarding the narrow footway and crumbling wall in The Avenue. There is a desperate need for a pedestrian crossing point at this crossroads. Unfortunately this Vision point has not been carried on to the Design Policy Approach and I feel very strongly that it should be.   |  |  |  |  |
| Comment on the Site:  Wheeler's Yard  I agree to the development of this site as, at present, it is an eyesore, at the entry to the village, however the exact boundary of the proposed site is unclear as it includes existing housing. The Vision point "improved vehicle and pedestrian access to this site and surrounding area" is critically important to this site especially regarding the narrow footway and crumbling wall in The Avenue. There is a desperate need for a pedestrian crossing point at this crossroads. Unfortunately this Vision point has not been carried on to the Design Policy Approach and I feel very strongly that it should be.  Other comments  The Introduction of the Placemaking Plan states a desire to have "a multi-faceted approach to planning" "an understanding of its evolution, functionality and its impacts" "working in a collaborative way"  "to discover what their needs and aspirations are and how these can be addressed"  The selection of SR14 and SR15 has been the result of exactly these points. It is the result of a lot of village involvement, as evidenced by the turn out for the Consultation Day. It is an integrated plan, which in my view is best for the village as a |  |  |  |  |

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 6585 Comment 1 Respondent Mrs F Hardman Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR14) Comment on the Site: I support the Parish Council in their option of Option A (SR15 and SR14). I accept that we have to have some development in Timsbury. However, the Parish Council have worked hard to come up with a plan that accommodates the housing as a plan to benefit the village including the school which is an important feature in the village. Option B is quite unsuitable due to access, road structure and the proximity of the Cheshire Home. **Change requested:** Respondent 6853 Comment 1 Respondent Jacqueline Bates Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR14) Comment on the Site: I am writing in support of Timsbury Parish Council's choice of development on site SR15 and SR14. Sites SR15 and SR14 are in the heart of the village close to the shops, school and bus stops which will give easily walking access to these services. People living on site SR13, proposed by B&NES, are very likely to use their cars to access the village shops and may even, because they are in the car, drive out of the village to shop, therefore not supporting local facilities. I support development on site SR14, proposed by both the Parish Council and B&NES as this is a possible proposal for homes and commercial use and an opportunity to use a site which has been left derelict for a long time. Development of SR15 and SR14 does not increase the size of the village whereas site 13 encourages the village to sprawl further from the centre. **Change requested:**

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Timsbury (SR15) Number: 581 Respondent 300 Comment 3 Respondent Mr James Read Respondent Curo Group Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR15) Comment on the Site: With regard to site SR15 (Land to the north of Lansdown Crescent) I can confirm that Curo own the land, including garages, to the north of the entrance to Lansdown Crescent. We would welcome the opportunity to work with the council, parish council and landowner to bring forward this site. Hopefully the inclusion of the land we own would mean suitable access could be gained to the site, although this may mean that we have to demolish the existing garages. I would also add that given the size of the site that it could easily accommodate circa 25 dwellings. My only other comment is with regard to the potential Open Space. Clearly this is a benefit to the community, but could we remove the sharp point to the south west of the allocation. I mention this in case access should be needed from closer to no. 21. I wouldn't want to see the access blighted because it was allocated as open space. If this sharp point was included to ensure safe pedestrian access to the open space I am confident that we could include this if the access was moved closer to no.21. **Change requested:** Respondent 372 Comment 3 Respondent Respondent Timsbury Parish Council Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR15) Comment on the Site: SR15 Off Lansdown Crescent for housing 1.415 The PC supports the detailed proposals for this site as the site for housing development additional to SR14. Following are objections and corrections to the Options paper:

- 1. The mature tree boundary is not considered 'distinctive' as described because the trees are not very old and include only two species, beech and ash, especially compared to many other rows of trees in the area.
- 2. Also, whilst the protection of the trees is supported, the proposed 15 metre buffer from the trees in Emerging Policy SR15/3 is not justified in scale or time and is inconsistent with many B&NES planning decisions which have allowed buildings as little as 2m from mature trees. At most a buffer of 5m from the building is considered adequate, bearing in mind the likely scale of the roots and their water caption area. Over the 15 years of the Plan the trees may not remain in whole or part and this policy should not be used to limit the number of dwellings for the site.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order 3. The Parish Council has already provided a to-scale map plan defining the boundary to the site for housing and road access (as well as GR15 Option 1). The wording on that map of 'Approximate' can now be withdrawn. The site plan was developed to allow for a buffer from the tree and to include the dwellings and access road. Also it considered the sight lines to protect the views to Farmborough Common and Lansdown from Lansdown Crescent and to Tunley from The Mead. However, we would welcome further detailed advice on this. 4. The Design Principles point 2 should add views to Lansdown and Tunley. 5. The owner of the land which would include access to the site from Lansdown View to the south has declared an interest to B&NES in providing access and also assisting the development. Also, this will make reference to a 'small roundabout' too prescriptive and unnecessary as a range of highway designs may be possible. 6. In light of the matters raised in points 1 to 4 above the Parish Council believes that the number of potential dwellings for the site should be increased from '10-15' to '15-20'. **Change requested: Respondent** 6357 **Comment** 1 **Respondent** Mrs Margaret James Respondent Number: Number: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR15) Comment on the Site: The obvious advantage of school access with roads reducing congestion are good. It would be possible to add a few more houses/dwellings to this site and would not detract views etc from fewer local residents than some other sites. **Change requested:** 

Respondent6358Comment2Respondent Mr Dudley ChappellRespondentNumber:Number:Name:Organisation:

Agent ID: Agent Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Timsbury (SR15)

#### **Comment on the Site:**

SR15 off Lansdown Crescent

- 1. This is a good option being close to the centre of the village, school and shops.
- 2. Will give improved access to the school and a turning circle. This will eliviate the terrible congestion morning and afternoon but I feel a roundabout in the vicinity of this new site as it will control traffic along North Road which would be benefited by speed bumps and a 20 mile an hour speed limit.

| Schedule of Comments on the Placemaking Plan Opti  | ons Document in Plan Order  |
|--|---|
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6359 Comment 2 Respondent Mrs Jane Chappell   | Respondent  |
| Number: Name:  | Organisation:   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachmen  | its sent with the comment? —  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |
| Comment on the Site:   |   |
| SR15 off Lansdown Crescent.  |   |
| 1. Again this is a very good option. The fact that Farmborough Common, Lavery good.  | ansdown and Tunley views will not be lost is  |
| 2. Having just retired from St. Mary's School after 28 years I do feel that an View/Crocombe Road especially first thing in the morning and afternoons would be very beneficial.   |   |
| 3. Having houses so close to the school, shops and the centre of the village school.   | e would also help with traffic outside of the   |
|  |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6360 Comment 2 Respondent Mrs Lynn Rogers Number: Name:   | Respondent  |
|  | Organisation:   |
|  | nts sent with the comment? $\Box$   |
| Further Information available in the original comment?   Attachmen   | its sent with the comment? —  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |
|  |   |
| Comment on the Site:  I have serious concerns over the use of the field north of Loves Hill, known development of the land by Lansdown Crescent, known as SR15 and list the  | •   |
| - The majority of housing within the village is to the west of the shops & sc of the village. Any further development should be to the east in order to b spread of the village.   |   |
| - Access to the school is important as the majority of the proposed housing families. Many villagers to the west of the village use their cars to visit the walk (steep, lack of consistent pavements, parked cars, unlit areas). Any acthe traffic flow through North Road which is already causing great concern | school and shops as it is not an easy route to dditional residents to the west would increase |
| - SR15 development would include improved access to the school and relie<br>The viewing point could be moved slightly, retaining the views whilst allow<br>suggested that a new mini roundabout would also slow traffic entering No  | ving building development and it has been   |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |  |  |
|--|--|--|--|--|
| - The number of dwellings possible on the combined sites of SR14 & SR15 would be enough to satisfy B&NES criteria of "around" 50.  |  |  |  |  |
| Change requested:  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Respondent 6364 Comment 2 Respondent Miss Christine Bateman Respondent Organisation:   |  |  |  |  |
| Agent ID: Agent Name:  |  |  |  |  |
| Further Information available in the original comment?   Attachments sent with the comment?  |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |  |  |  |  |
| Comment on the Site:  I am writing to support Timsbury Parish Council's proposed Option (A) of development at Wheelers Yard and land adjacent to Lansdown Cresent (SR14 & SR15)  |  |  |  |  |
| Reasons:- i) Far better access than the Loves Hill site – though some improvement at Avenue / Hayeswood Road junction would be essential in case of Wheelers Yard devopment ii) Better traffic flow & school access (SR15). Removal of difficult / dangerous congestion in Crocombe. |  |  |  |  |
| Change requested:  |  |  |  |  |
|  |  |  |  |  |
| Respondent 6366 Comment 2 Respondent Marilyn Valentine Respondent Number: Number: Organisation:  |  |  |  |  |
| Agent ID: Agent Name:  |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |  |  |  |  |
| Comment on the Site:   |  |  |  |  |
| I think that SR15 and SR14 will be the most benficial to Timsbury the others will only make more problems  |  |  |  |  |
| Change requested:  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Respondent 6367 Comment 2 Respondent Damien Valentine Respondent Number: Name: Organisation:   |  |  |  |  |
| Agent ID: Agent Name:  |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |  |  |  |  |

# Comment on the Site: SR14 and SR15 are closer to the school and shops. They are also closer to the main road exits from the village. **Change requested:** Respondent 6373 Comment 2 Respondent Mr Raymond Merchant Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? **Placemaking Options Plan Reference:** Timsbury (SR15) Comment on the Site: • Sites SR14 and SR15 are my preferred choice for an integrated solution Close to shops, garage, pub & school in the core of the village. • Would allow road improvements & safety at busy crossroads and on North Road. Much needed. • Ease of access to site. · Site is flat and building would be such to retain view • Has support & cooperation of all landowners involved. Both working amicably together on outcome. Would improve gateway to village by removing current eyesore of Wheelers Yard. **Change requested:** Respondent 6379 Comment 3 Respondent Mrs Gillian Jones Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR15) Comment on the Site: SR15 should be kept as an open space GR15 option 2 and SR13 and 14 should be the sites for development in Timsbury. SR15 should not be developed for the following reasons: 1. Traffic on North Road. Timsbury Road Safety Group reports that it receives many complaints about the traffic in North Road. It is the main conduit through Timsbury used by both residents cars and cars and lorries cutting through to either Bath or Bristol/Wells/Keynsham; congestion increases further when the road width is reduced when lorries deliver to the Co-op

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

and McColls in North Road or farm vehicles travel through the village. I have witnessed the volume of traffic and congestion on the road daily and in the morning rush hour cars travelling east to west often turn round because the road is so blocked. It is dangerous for pedestrians and I have been concerned by cars pulling too near to the narrow pavement where I am walking. SR15 would further add significantly to this congestion; the road from the development SR15 would enter North Road at Lansdown Crescent on a blind corner making it very dangerous. People travelling from SR15 to work westwards would increase the volume of traffic passing through North Road. SR15 is the opposite end of North Road from the brownfield site SR14 (Wheelers Yard) which is well supported by many residents as a site to be developed for building of 25-30 dwellings. Developments at either end of North Road would increase the congestion of traffic enormously due to cars from each new development passing through this pinch point from opposite directions. SR13 (Land to the North of Loves Hill) is the same side of the village as SR14 and traffic would flow up the Avenue to get to Bristol/wells/Keynsham or more naturally along South Road to get to Bath not congesting North Road further and these 2 options (SR13 and 14 would be much safer, cause much less congestion and be more in keeping with the layout of the road network.

### 2. Visually Important Open Space

SR15 is designated a Visually Important Open Space (document sent separately) The field is used by walkers, joggers, dog walkers and visitors to the village; there is a footpath which is frequently used toward Priston, Tunley and the local countryside and SR15 brings the countryside into the village. There is a line of mature trees which have preservation orders and ancient hedges that add to the amenity

There is seating and a viewing point -lectern -(funded by public subscription and corporate organisations). I pass this area daily and have seen that it is well used by people of all ages as a meeting place and to enjoy the views, it is especially important for those of limited mobility who can walk on a level pavement to this point to enjoy the views across to Bath and Lansdown together with the local view of Farmborough Common and Two Tree Hill which is pictured on the School badge and the bus stop within the village.

Policy BH15 states that development which harms the openness and character of VIOSs will not be permitted; the development of SR15 would clearly do this.

When housing was considered for SR15 15 years ago the parish council were strongly in support of SR15 being maintained as an open space and stated that the village character is significantly enhanced by the amenity

### 3. St Mary's School

At the village Futures Day on January 10th the Parish Council spokesman encouraged those attending the meeting to support SR15 (the Parish Council's favoured option) as this would be favourable to the school. Following the meeting the Governors of the school sent to parents a letter clearly stating that none of the options were favoured by the school as they would have no positive impact on the school and that the Governors had not been consulted. (Letter sent under separate email) It is of great concern that the Parish Council may have caused some residents to support SR15 on the basis of misleading information

| Change requested:   |  |                             |
|---|--|-----------------------------|
|   |  |                             |
| Respondent 6381 Comment 2 Res<br>Number: Number: Na           | pondent Mrs Diana Lewis<br>me:           | Respondent<br>Organisation: |
| Agent ID: Agent Name: Further Information available in the or | riginal comment? $\Box$ Attachments sent | t with the comment? $\Box$  |
| Placemaking Options Plan Reference:                           | Timsbury (SR15)                          |                             |

### **Comment on the Site:**

The proposed plan for housing on part of the field by Lansdown Crescent would contribute towards both present and

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order future vital improvements in Timsbury, i.e. the construction of a new primary school and the amelioration of traffic problems on North Road. It would be shortOsughted not to seize the opportunity. **Change requested:** Respondent 6387 Comment 2 Respondent Mrs Janet Merchant Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR15) Comment on the Site: Sites SR14 and SR15 would be preferred and sensible choice at every level. They are close to shops, school and village pub. This would allow for road improvements on either end of North Road and anything that improves safety along this hazardous stretch should be encouraged. Safety of pedestrians, pushchairs and wheelchair uses – we love a Leonard Cheshire Home in Timsbury – would and should be improved. Sites easy to access. O Where if site wishing to co-operate to provide a suitable outcome. Would improve the entrance to village by removing the eyesore that is Wheelers Yard, SR15 is a flat site and views can and would be protected **Change requested:** Respondent 6391 Comment 2 Respondent Dr Robert Jones Respondent Number: Number: Name: Organisation:

**Agent Name:** 

Agent ID:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Timsbury (SR15)

#### Comment on the Site:

SR15 is not a suitable site for development for the following reasons:

1. Visually Important Open Space; SR15 is designated as a visually important open space (Policy BH15) and it was strongly argued by the Parish Council some years ago that "the village character is significantly enhanced by the amenity viewing area and its corresponding open land which allows the countryside to enter the village at this location which has the benefit of a mature tree-lined belt and ancient hedges that adjoin adjacent green field sites" The Policy (BH15) states; "Development which harms the openness and character of visually important open spaces...will not be permitted".

SR15 is a great amenity for the village as a whole, the viewing area is included in the BH15 designation. The green space is used by ramblers, joggers, families and dog walkers and the viewing area is used my many people of all ages. The viewing area was put in place as a result of local fund raising and contributions by many Companies and organisations. People with limited mobility are able to use this green space viewing area as access is flat and easy.

There is a preservation order on the trees on the western side of the site.

The "Land at Landsdown Crescent Timsbury Visually Important Open Space Designation" document will be sent into the consultation under a separate e-mail from me. The arguments and sentiments expressed in this document still hold good.

2. Roads and Traffic: Development of SR15 Would greatly increased road traffic on North Road. North Road is already an extremely dangerous thoroughfare with heavy traffic flow, delivery vehicles and a wide range of traffic. Inevitably, increased residential development will increase traffic flow in this already pressured and unsafe area. Having already participated in the B&NES consultation with regards to development of SR14, with increasing traffic at the SR14 end of the village traffic in north road would be increased from both ends causing increased congestion and North road would become an even more serious pinch point.

North Road is extremely dangerous for pedestrians in the area of SR15. To increase traffic in this area would make the situation even more dangerous that is currently is for children, their parents and carers making their way too and from the school.

The location of the co-op and McColls also gives rise to heavy traffic at the east end of North road. The shops are a very important asset to the village, but to increase the possibility of traffic flow, parking and congestion at the east end of North Road would great detract from the amenity of the village and more importantly would be very dangerous.

3. St. Mary's Cof E School Timsbury. At the consultation day in Timsbury the representative of the Parish Council presenting the case of the development of SR15 stated that the School Governing body and School in general were in favour of SR15 as the preferred site for housing development. It was stated that development in this area would also result in a new school being built.

Since the consultation is has become clear that the Governing Body are not supporting development specifically on any site and certainly have had no discussion with the Parish Council and have not supported SR15 as the site for development. This was put forward by the Parish Council in an extremely misleading way and may have led many people to support SR15 as a preferred site. I am sending a copy of a letter from the Governing body of the School as part of my contribution to the consultation with a further e-mail. This letter was sent to all parents with children at the school. In discussion with various parents I also believe correspondence has been sent to B&NES and to the Parish Council making the position of the School clear in this.

If SR15 is developed for housing, the pressure on road, walk way (pavements) and parking will be greatly increased and will be even more dangerous for pedestrians including children.

- 4. The Parish Council Process. seems to have been a fait accompli from an early stage of discussion on the building requirement for Timsbury. There are a number of points which demonstrate that the PC process has been flawed or lacking in transparency including:
- (a) The presentations given by the PC spokesperson at the Timsbury consultation day indicating the possibility of a new school, improved access, that the school supported the PC proposal, and that the chair or secretary of the Governing Body of the School had e-mailed the previous day with support for SR15; this was clearly not the case.
- (b) The PC omitted any opportunity for people to indicate a preference for GR15 Option 2 on their local voting paper "PC Options Reply Form" this must invalidate their voting process and consequently this element of the PC process should be ignored by B&NES.
- (c) The PC document "Have your say, Timsbury Futures Day" is extremely biased in favour of their option SR15 and this document excludes the map GR15 Option 2. It is clear from the document and this omission that it would be very difficult of people living in the village to obtain and unbiased clear understanding of ALL proposals.
- (d) The PC did not investigate all sites that might be possible within the village; I pointed out one such site to them myself where no response had been sent by the PC to a letter from an interested party with regard to possible availability of land.
- (e) Although the PC position states that 10 to 15 "dwellings would be built on SR15, We have received an e-mail from the PC Secretary stating that it would be the Parish Council wish to negotiated for more properties to be built on SR15 and for

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| the possible boundary between trees and buildings to be decreased.  |
| (f) As you will be aware the PC issued a document at the consultation day "Timsbury road safety group 'New Homes Equals more Traffic' This document is extremely biased in favour of SR15 setting out many supposed advantages whilst pointing out the disadvantages of SR13. The authorship of this document is unclear. I am a member of the Timsbury Road Safety and Transport Group and have attended all of the meetings. The topic of the proposed development in the village has never been discussed, the document seems to have been produced by a small number of people, but it is certainly not clear who is responsible for its production |
| (g) A local resident with architectural background has drawn plans for housing to be placed on SR15 and these have been seen widely around the village. No plans have been provided for other sites in the consultation, a seemingly biased approach  |
| (h) While not wishing to make any comments of a personal nature, it is not clear why the Chair of the Steering Group in Timsbury is not a member of the Parish Council - our local representative body - as clearly all those involved in the process would have signed up to the Nolan Principles for holding public office.   |
| In summary:   |
| I understand the need for increased housing and Timsbury, in common with other places, must play its part in this. I am strongly against the development of SR15 for housing or other building for reasons explained above. I also believe that the Parish Council process should have been conducted in a more transparent and open manner   |
| Change requested:   |
|   |
|   |
| Respondent 6409 Comment 2 Respondent Mrs Emma Stevens Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR15)   |
| Comment on the Site: SR15 is more centrally located within the village (than SR13) with closer access to amenities, shops and the school.   |
| SR15 have significantly better transport and pedestrian access (than SR13) and its location is more suited to increased vehicle movement, would be reduced road congestion and also increased overall pedestrian safety.  |
| SR15 would improve the overall access to the school which will see increased attendance as the village grows.   |

I confirm that I support the Parish Council preference to build on Wheelers Yard (SR14)/Lansdowne Crescent(SR15).

**Change requested:** 

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| Respondent 6441 Comment 1 Respondent Terence Richard Fisher Respondent Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
|  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |
| Comment on the Site:   |
| Having lived in Timsbury for 81 years and worked in and around the village for 51 years I have observed many changes and here are my comments on the place making plans.  SR15 If a new school is to be built, just get on with it. Either way I believe an access road off the junction of The Cresent /North road with a parking area on the present school land is essential for parents parking, Thus easing the present parking problems on North Road, Lansdown View, and the CO-OP car park. When a new school is built the old site can be used for housing. |
| Change requested:  |
|  |
| Respondent 6445 Comment 1 Respondent Rosie Studholme Respondent Organisation:  Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |
| Comment on the Site:   |
| I am emailing with regards to the Placemaking Plan in Timsbury and in particular the effects this will have on North Road. As a resident of North Road I am concerned about the additional strain your plans will put on an already busy road. I am also extremely concerned about whether you have plans to change any of the on street parking? We are one of several houses (and businesses) that do not have a driveway so rely solely on the on street parking that is currently available.   |
| Change requested:  |
|  |
|  |
| Respondent 6463 Comment 1 Respondent Graham & Iris Nicholls Respondent Timsbury Horticultural Organisation: Society  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |

### **Comment on the Site:**

Having read in the Timsbury Letter of proposals to develop the field known as Tim5 and being a member of the small group that reported on this site for Stage1 of the Placemaking Plan I asked for a copy of the report, namely the 'Timsbury Placemaking Plan Stage 2' where these proposals appear. On reading it I am amazed that the report produced in Stage 1 has been completely ignored and in fact the combined steering group and Parish Council together totalling just eleven

members, have even written in their report and I quote, 'In Stage 1 the site was assessed as 'unsuitable for allocation, although a different group of assessors may have reached a different conclusion.' If that isn't biased I don't know what is. Much has been said in other letters regarding the excellent scenic side of TIM5 and I cannot add much more to that apart from the pleasure of sitting on the seat by the lectern and enjoying the view towards Farmborough Common, something that MUST NOT be destroyed.

The Steering Committee noted the pros and cons of using TIM5 for housing but for some reason did not mention the obvious traffic problems in North Road. I have lived on North Road for 32 years and have gradually seen the volume of traffic through Timsbury increase year on year. During the rush hour both morning and afternoon there is a high volume of through traffic along North Road and in mornings there are often queues stretching from the turning to Lansdown View back around the corner to South Road. Quite often cars turn around using Lansdown Crescent as a turning point to go back and then turn right to use South Road and The Avenue as a 'Rat Run'. How many of the committee of eleven experience this scene every morning? The Timsbury Village Report and Action Plan was produced in December 2009 and on page 9 it states that there were problems with North Road parking then, this information coming from 52% of the village population who at the time returned their questionaires. At the end of the report are printed a number of comments about the village one of which is 'It would be good if North Road were less congested but cannot think how to solve the problem'. This was five years ago, now it is even worse. In addition to the amount of traffic going through North Road the entrance to the field TIM5 is on a dangerous, almost right angled bend and to find more traffic exiting here from a new road would be ridiculous. Again this is not mentioned in the Cons for the site. Have the steering committee ever looked at this?

I would also like to say that the suggestion of putting a small roundabout at the junction of North Road and Lansdown Crescent is utterly ludicrous.

| Change requ                        | ested:                                 |         |                |   |                            |                                   |
|------------------------------------|--|---------|----------------|---|----------------------------|-----------------------------------|
| Respondent<br>Number:<br>Agent ID: | 6463 Comment<br>Number:<br>Agent Name: |         | pondent<br>me: | Mary & Rob Trout via Grahan<br>Nicholls | Respondent<br>Organisation | Timsbury Horticultural a: Society |
|                                    | mation available i                     | n the o | riginal co     | mment?   Attachments se                 | ent with the com           | nment?                            |
| Placemaking                        | Options Plan Refe                      | erence: | Timsbur        | y (SR15)                                |                            |                                   |

### **Comment on the Site:**

My husband and I have noticed in the Timsbury Parish Newsletter that sites are required for up to 50 dwellings in Timsbury and one of these sites being proposed is on the western part of the field off Lansdown Crescent up to the boundary of the school. We understand that each village is requested to find these sites but we would like to express our opinions with regards to the proposals for a development on the field known as TIM05 (Great Mead).

We have lived in the village for over 50 years and recently due to my poor health with breathing problems and on medical advice we have moved to the bungalow 'Newlands Corner' on North Road next to a couple who are also disabled. We have a lovely view right across to Lansdown in Bath with fresh air channelling through. New houses would alter this flow and the field is part of green countryside with two significant footpaths stretching down into a green valley where children have played for years. Also of great importance is the potential increase in traffic from the old Wheelers site at one end of the village where the other development is proposed and at the Lansdown Crescent end resulting in increased pollution and density of traffic. The traffic jams in North Road are already bad enough especially when delivery articulated vehicles are parked servicing the Co-op and McColls and during the refuse collection day due to the bottleneck at the Seven Stars where pedestrians have to hug the wall when the vehicles pass so close to avoid being hit by wing mirrors. With a busy garage also on North Road and a YMCA (youth club) hall adjacent to the Co-op in fairly constant use, a new road on the already dangerous corner of North Road giving access to a new development will be an accident waiting to happen and I cannot imagine what the increase in pollution would be but without a doubt it wouldn't be conducive to my

# health. On these points alone we would like to express our disappointment in even thinking you would try to spoil our lovely village and turn it into a small town especially on the recommendation of just eleven people who have no experience of the North Road traffic problems. We vote and will continue to vote a resounding "NO" **Change requested:** Respondent 6463 Comment 8 Respondent Mrs Florence M Button via **Respondent** Timsbury Horticultural Number: Number: Name: **Graham Nicholls Organisation:** Society Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Timsbury (SR15)

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

### **Comment on the Site:**

Having read the Timsbury Placemaking Plan Stage2 I wish to express my concern as in my opinion the site known as Tim5 is completely inappropriate for the development envisaged. The introduction of more traffic onto North Road especially at the corner of Lansdown Crescent and North Road would increase the problem that already exists and is well documented from meetings with the Parish Council in the past and is still waiting a solution. Any vehicle attempting to join the flow onto North Road from the site would find it extremely difficult between the hours of 7.30 am to 8.30 am Mondays to Fridays when there can be queues on both sides of the road caused by the through traffic on their way to work. The large group of children travelling to Writhlington School by coach wait on the corner for their coach for something like 15minutes for a chat, overflowing into the road and when the coach arrives it is parked there for five minutes or so loading the children causing another bottleneck. This already dangerous situation for the children will only be made worse with more traffic coming from a new development on their way to work. From 8.30am to 9am the north side of North Road from Lansdown Crescent to Lansdown View has cars lined up nose to tail where the parents are delivering their children to the school. This parking also carries on down Lansdown View to Crocombe Lane and is repeated in the afternoon when the children are being collected from school. Any proposed development for either a new school or extension must include adequate parking facilities for staff and parents as a priority but of course this applies to any site in the village chosen for development particularly when nowadays most families have two cars. The corner of Lansdown Crescent and North Road is a favourite and convenient turning point for everyone and in particular delivery lorries and vans supplying the two shops in North Road and the Seven Stars public house, some of these occasionally parking up for rest periods. A couple of hours before I started writing this there was a situation in North Road where lorries were delivering to all three businesses at the same time. A bus came around the corner from Bath and was held up by traffic coming towards it squeezing through past the delivery vehicles, resulting in a build up of traffic behind the bus. The hold up was for some 15 minutes with the bus driver throwing his arms in the air in frustration. This isn't an isolated incident but happens quite often. Does anyone want more traffic on North Road?

In addition to the above the site Tim5 is of great importance to the village as a whole, offering as it does access to fields beyond for walkers, dog walkers and rambling groups which includes people from other areas apart from Timsbury. The spectacular views both local to Farmborough Common and further afield to Lansdown Racecourse and so many other historic sights are much valued by villagers and visitors alike. It also provides access to fields beyond for farm vehicles, cattle trucks, tractors and trailers and a combine harvester.

The villagers with help from various organisations, businesses, shops and individuals worked tirelessly to have the site listed as a protected area and the provision of the viewing site with seat and lectern that has been regularly used by villagers and visitors. The site should be protected and listed as a Green Space area.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |

| Respondent 6463 Comment 11 Respondent Graham Nicholls Respondent Timsbury Horticultural Organisation: Society  |
|--|
| Agent ID: Agent Name: Organisation: Society  |
| Further Information available in the original comment?   Attachments sent with the comment?  |
| Further information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |
| Comment on the Site:   |
| I have previously written about my objection to the Proposed housing on GR15 and that the Timsbury Parish Council kept all villagers in the dark about the BANES Option 2 on this site. Since then we have had the Timsbury Futures Day and I wish to add more to my previous comments. The Chairman (Chris Gittins) when giving a presentation on the events leading up to the meeting led everyone astray by not only making no mention of the BANES Option 2 in his presentation but intimating that a new school would be built and that with new housing and a new road built on GR15 all traffic problems on North Road and in Lansdown View would be solved. Since then the Governors of St. Mary's school have written to all parents making it clear that they disassociated themselves from all comments relating to a new road and solving the traffic problems. No doubt by now you will have received a copy of this letter.  Regarding the traffic problems the only thing that will happen if a new road is built is that extra vehicles from the new housing and drop offs for the school will park along this road and still park on North Road. The biggest problem with the traffic here is the bottleneck that will never be resolved and that is by the Seven Stars pub and until a 7.5 tonne limit is brought in, the car transporters and other HGVs will still clash with rush hour traffic and the Co-op and Warburtons delivery lorries. I have been living on North Road for 32 years and have gradually seen the traffic increase, especially after the restrictions in Paulton. We are now a rat run and a direct route through to the A39 and subequentally the M5. This proposed new housing and a new road enabling more traffic to enter North Road at a very dangerous corner to my mind is an accident waiting to happen. Only yesterday, 21st Jan, to reverse onto my drive just on the bend, with cars parked outside the house I had to drive across the road, stopping traffic coming around the bend before I could reverse. The advice to drivers about thinking ahead and slowing do |
|  |
| Respondent 6471 Comment 2 Respondent Mr Peter Bradshaw Respondent Number: Name: Organisation:  Agent ID: Agent Name:   |
| Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |
| Comment on the Site:   |
| I support Timsbury Parish Council's preference for any future housing/employment development to be on SR14 & the western part of SR15.   |
| Change requested:  |
|  |

| As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg   | Schedule of Comments on the Placemaking Plan Option   | s Document in Plan Order         |
|--|---|----------------------------------|
| Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:  |   | -                                |
| Placemaking Options Plan Reference:   Timsbury (SR15)    Comment on the Site:     agree with the parish council that this is the preferred option.    Change requested:   Respondent   2   Respondent   Mrs Jill Clarke   Respondent   Equestrian Centre   Organisation:   | Agent ID: Agent Name:   |                                  |
| Comment on the Site:   lagree with the parish council that this is the preferred option.   | Further Information available in the original comment? $\qed$ Attachments   | sent with the comment?           |
| Respondent 6484 Comment 2 Respondent Mrs Jill Clarke Respondent Equestrian Centre Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR14  Number: Number: Name:  Organisation:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  Levould like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road. | Placemaking Options Plan Reference: Timsbury (SR15)   |                                  |
| Respondent 6484 Comment 2 Respondent Mrs Jill Clarke Respondent Equestrian Centre Number: Number: Name: Organisation:  Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Number: Name: Organisation:  Agent ID: Agent Name: Further Information available in the original comment?   Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  It would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.   | Comment on the Site:  |                                  |
| Respondent 6484 Comment 2 Respondent Mrs Jill Clarke Organisation:  Agent ID: Agent Name: Organisation:  Agent ID: Agent Name: Further Information available in the original comment?   Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Organisation:  Agent ID: Agent Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  It would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.                                       | l agree with the parish council that this is the preferred option.  |                                  |
| Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:   Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Organisation: Agent ID: Agent Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:   Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.   | Change requested:   |                                  |
| Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:   Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Organisation: Agent ID: Agent Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:   Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.   |   |                                  |
| Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.   |   |                                  |
| Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.   |   | •                                |
| Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  | Agent ID: Agent Name:   |                                  |
| Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR14  It would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  | Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$    |
| As the Parish Council has said there would be value to the village in the Development of SR14  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.   | Placemaking Options Plan Reference: Timsbury (SR15)   |                                  |
| Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.  | Comment on the Site:  |                                  |
| Change requested:  Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.   | As the Parish Council has said there would be value to the village in the Deve  | lopment of SR14                  |
| Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.   | I would like to express my support for both SR14 & SR15 as these sites will all roundabouts at either end of the village on North Road. | low for traffic improvements, eg |
| Respondent 6485 Comment 3 Respondent Mr Roland Clarke Respondent Number: Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.   | Change requested:   |                                  |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.   |   |                                  |
| Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.   |   |                                  |
| Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site: As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.   |   | -                                |
| Placemaking Options Plan Reference: Timsbury (SR15)  Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, egroundabouts at either end of the village on North Road.  | Agent ID: Agent Name:   |                                  |
| Comment on the Site:  As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  | Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$    |
| As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  | Placemaking Options Plan Reference: Timsbury (SR15)   |                                  |
| As the Parish Council has said there would be value to the village in the Development of SR15  I would like to express my support for both SR14 & SR15 as these sites will allow for traffic improvements, eg roundabouts at either end of the village on North Road.  | Comment on the Site:  |                                  |
| roundabouts at either end of the village on North Road.  |   | lopment of SR15                  |
| Change requested:  | I would like to express my support for both SR14 & SR15 as these sites will all roundabouts at either end of the village on North Road. | low for traffic improvements, eg |
|  | Change requested:   |                                  |

| Schedule of Comments on the Placemaking Plan Options Do  | cument in Plan Order                    |  |  |
|--|---|--|--|
| Respondent 6486 Comment 2 Respondent Mr David Collett Number: Number: Name:  | Respondent Organisation:                |  |  |
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the original comment? $\qed$ Attachments sent   | with the comment? $\Box$                |  |  |
|  |   |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |  |  |
| Comment on the Site:  Excellent proposal, will be an asset to the village if access to the school is included Road junction.   | d and a roundabout is included at North |  |  |
| Change requested:  |   |  |  |
|  |   |  |  |
|  |   |  |  |
| Respondent 6489 Comment 2 Respondent Mr Malcolm Cox<br>Number: Number: Name:   | Respondent Organisation:                |  |  |
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the original comment? $\qed$ Attachments sent   | with the comment? $\Box$                |  |  |
|  |   |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |  |  |
| Comment on the Site:  Close to village centre, improved access to school. opportunity to develop school building, addition of preschool, nursery, after school centres in one location. Possibility of roundabout at junction of North Road and Lansdown Crescent would improve traffic circulation. Reduce traffic congestion on Lansdown View, current access to school. |   |  |  |
| Change requested:  |   |  |  |
|  |   |  |  |
|  |   |  |  |
| Respondent 6494 Comment 1 Respondent Mr Andrew Dix Number: Name:   | Respondent<br>Organisation:             |  |  |
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the original comment? $\ \Box$ Attachments sent   | with the comment? $\Box$                |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |  |  |
| Comment on the Site:  I fully support the Parish council's Option A, The development in Timsbury of SR15 and SR14.   |   |  |  |
| Change requested:  |   |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |  |  |  |  |
|---|--|--|--|--|
| Respondent 6505 Comment 2 Respondent Mr Chris Gittins Number: Name:   | Respondent Organisation:   |  |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$   |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)   |  |  |  |  |
| Comment on the Site:  |  |  |  |  |
| l agree with the Parish Council that this is a good site for about 15 to 20 houses as policies for the Site, as follows:  | s long as some changes are made to the   |  |  |  |
| Change requested:   |  |  |  |  |
| The mature trees on the west of the site are not very old compared to other nearly whole or part over 15 years, especially with Ash diseases being likely to spread to proposed Development and Design Principle requiring a 15m buffer for the building other B&NES planning decisions (some only 2m). 5m is adequate for likely scale of Principle regarding the trees should not be used to limit the number of dwellings, possible. | this part of the country. Also, the ngs from the trees is inconsistent with f roots/water caption. As a result the |  |  |  |
| The Parish Council already provided a scale map plan defining boundaries for house which includes buffer for trees and protects the views to Farmborough Common,  | •  |  |  |  |
| Design Principles should also include views toward Lansdown and Tunley Hill.  |  |  |  |  |
| Apparently the landowner has declared an interest to B&NES re: providing access and assisting the development. However, the reference to small roundabout is too specific at this stage as other traffic schemes may be possible.   |  |  |  |  |
| A Design Principle should be added to ensure possible access to the rear of St Marys school, in case the school at some point in the future is able to make improvements to the school and its vehicle access.  |  |  |  |  |
| As a result the number of potential dwellings could therefore increass to 15-20   |  |  |  |  |
|   |  |  |  |  |
| Respondent 6512 Comment 1 Respondent Mr Dan Hilton Number: Name:  | <b>Respondent</b> St Mary's C of E Primary <b>Organisation:</b> School   |  |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment?   Attachments sent with the comment?   |  |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR15)   |  |  |  |  |

### Comment on the Site:

As a Governing body of St. Mary's School Timsbury, we were dismayed and worried to be present at the recent "Timsbury futures dayâ€, where a presentation was given inferring that the School and the Governing body were supportive and in favour of one of the options put forward. This is not the case.

Whilst we have contributed to the neighbourhood plan; a strategic document outlining our aspirations and rationale for a new school in Timsbury as part of that plan, we have not contributed to the placemaking plan which deals specifically with the provision of extra housing.

Please find our submission to the neighbourhood plan attached to this letter, as reference for the issues and opportunities as seen by the Governing body.

The Governing Body are therefore deeply concerned about the reputation of the school in this matter. For the avoidance

of all doubt, we would wish to make it clear that the Governing Body of St Mary's Primary School are currently not in a position to support any of the options as set out in the Placemaking plan, either those put forward by the Parish Council or B&NES Council. This is on the basis that we have seen no evidence that any of these options would have a positive impact on the school. Furthermore, if any proposal were to include any alteration of the school's access, or impact upon our boundaries, we would expect to be involved in a full and open consultation process.

| Change requested:   |  |
|---|--|
| None - we are making this submission to be clear in our collective input of   | on the consultation process so far.                      |
| Respondent 6512 Comment 2 Respondent Mr Dan Hilton Number: Number: Name:  Agent ID: Agent Name:   | Respondent St Mary's C of E Primary Organisation: School |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment? —                            |
| Placemaking Options Plan Reference: Timsbury (SR15)   |  |
| Comment on the Site:  |  |
| I would personally think that it may be a better option to make use of the new school on SR15. There is no covenant on the land according to the lad doubt would have any problem with a new school building if the proceed to part fund a new school building. | and registry title (I checked) and the diocese I         |
| Change requested:   |  |
|   |  |
| Respondent 6519 Comment 1 Respondent Ms Rita Hyatt  | Dogwoodont   |
| Respondent 6519 Comment 1 Respondent Ms Rita Hyatt Number: Number: Name:  | Respondent Organisation:                                 |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachme  | ents sent with the comment? $\Box$                       |
| Placemaking Options Plan Reference: Timsbury (SR15)   |  |
| Comment on the Site: Hopefully this scheme will enable solution to school traffic problems in L problems in North Road.   | ansdown View/Crocombe - without causing more             |
| Change requested:   |  |
|   |  |
| Respondent 6522 Comment 2 Respondent Mr Raymond James Number: Number: Name:   | Respondent<br>Organisation:                              |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment?   Attachment   | ents sent with the comment? —                            |
| Placemaking Options Plan Reference: Timsbury (SR15)   |  |

### **Comment on the Site:**

The development o SR15 would provide major benefits to the village, particularly when it comes to getting access to Timsbury School, the current access is not sufficient for the amount of traffic that is a twice daily feature of village life during school terms affecting in particular North Road which is a traffic nightmare due to restricted road width in places plus on street parking. An access road to the school from the eastern edge of the village would contribute to alleviating this problem also providing more housing to this part of the village which would be more beneficial than other proposed sites.

| Change requested:   |
|---|
|   |
|   |
| Respondent 6523 Comment 1 Respondent Mrs Jeannette Jones Respondent   |
| Number: Name: Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Timsbury (SR15)   |
| Comment on the Site:  |
| As a fairly new resident to the village I can only comment on how this development may be detrimental to the immediate area to Lansdown Crescent. The access to the adjacent fields and walking routes plus the wonderful vista from the entrance to the Crescent attracted me to live here. I believe these should be retained for future generations to enjoy with the viewing point retained.  Having now lived here awhile the well known traffic / road problems have presented themselves to me. These issues obviously need attention despite whatever development occurs. To exit the Crescent at the Hook exit proves a challenge because of the speed of traffic approaching from the right. Would the development of this site with the suggested roundabout help to improve this? Would the extra traffic from the new site present even more problems?  As a general comment whatever developments affecting North Road are agreed, traffic flow and its management must be an overriding factor affecting the designs.  Change requested: |
|   |
| Respondent 6529 Comment 3 Respondent Mr Robert Kirby Respondent Number: Name: Organisation:  Agent ID: Agent Name:  |
| Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Timsbury (SR15)   |

#### **Comment on the Site:**

Site SR14 is currently an eyesore and as such should be developed. However any development of this site, whether for housing, business or a combination of both, is likely to cause a significant increase in the volume of traffic using North Road, which is already a very busy road which can become very congested, particularly at school drop off and pick up times, and would create an increased risk to pedestrians, a matter already of concern to many villagers.

### **Change requested:**

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 6542 Comment 1 Respondent Mrs Iris Nicholls Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR15) Comment on the Site: When I moved to Timsbury 32 years ago, the biggest incentive was the fact I could walk a few yards from my front door and see a wonderful view to Lansdown and Farmborough Common. I have often walked several miles in the fields here wandering down the hedges where I pick blackberries when in season and enjoying the freedom of the countryside. We have now been hit by the bombshell that the few members of the Parish Council and even fewer members of a Steering committee want to destroy all that we have enjoyed for years and years. We do not want the views, the peace and wildlife to be substituted by tons of brick and concrete, nor do we want more and more vehicles spewing out onto North Road when we already have dangerous traffic jams here. Part of GR15 is already designated as Local Green Space and to save our countryside from becoming a big blot I would like to vote for the BANES Option 2 that a larger area of land should be designated Local Green Space so that we, the villagers can still enjoy a peaceful and pleasant scene. **Change requested:** I am supporting 1.420 2. Local Green Space GR15 Option 2 **Respondent** 6543 **Comment** 2 **Respondent** Mrs Alexandra Nobbs **Respondent** North Bristol NHS Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR15) Comment on the Site: SR15 (north of Lansdown Crescent) - an alreaady well-established community and central location, it would encourage families to walk (rather than drive to school), preventing further traffic congestion especially with plans for further pathway. I believe this site is a very central accessible site to develop. **Change requested:** Development to go ahead with 25 dwellings on sites SR14 and SR15 Respondent 6545 Comment 1 Respondent Ms Mercedes Nunez Respondent

### Comment on the Site:

Number:

Agent ID:

I support the parish council plans for this site becuase it is the closest to the facilities of the village, may help with traffic

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

**Placemaking Options Plan Reference:** Timsbury (SR15)

**Agent Name:** 

Name:

**Organisation:** 

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |   |
|--|---|
| con North Road and may helop with access to the school.  |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6551 Comment 1 Respondent Mrs Rachel Quick Respondent Number: Name: Organisation:   |   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |
| Comment on the Site:   |   |
| This site is not suitable for housing, the site is a visually important green space for the local area, and has been ider as such by BNES with a viewing plinth, it has far reaching views in all directions and any element of housing would at these views. the western side of the land has mature trees that are home to owls, wildlife and must be maintained protected to ensure that the landscape remains intact. these trees would need a 15 meter buffer which would brin housing development further into the field and tthere is a public right of way ref BA2/34 right across the middle of field which needs to be safe guarded, and any development would restrict this. any housing would therefore have impact on the views and local area. the access to the area is very hazardous, the junction with Lansdown Crescent North Road is dangerous and is on a fast and sharp bend, any additional traffic to this area will make it even more dangerous, cars consistently park along the junction especially at the beginning and end of school day. vehicle acceptable the site would make this junction even more difficult. the other side of the council garages the junction that is Lans Crescent cul de sac / Lansdown Crescent is also not clear and regular near misses happen on a daily basis, an access to the site from this side would be inappropriate too.  The only sensible option is to keep GR15 as Local Green Space and find an alternative area of land for housing development.  Change requested: | obscure I and ng the this a bigger and ess to |
|  |   |
|  |   |
| Respondent6553Comment1Respondent Mr Ian RangerRespondentNumber:Number:Name:Organisation:   |   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |
| Placemaking Options Plan Reference: Timsbury (SR15)  |   |

### **Comment on the Site:**

I would like to support the proposal to develop sites SR14 & SR15 in Timsbury. I would also like to oppose any development of site SR13.

SR14 is in need of development as it is a derelict site and development here will improve the area.

SR15 seems a sensible place to develop as it will offer improved access to the school, it is a flat site and it is near the village centre.

SR13 seems a bad option as it is on a steep slope, is inaccessible and will add to traffic on South Road, and is far from the village centre.

| Change requested:   |
|---|
|   |
|   |
| Respondent 6566 Comment 1 Respondent Mrs Glynis Vincent Respondent  |
| Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Timsbury (SR15)   |
| Comment on the Site:  |
| I am writing to support Timsbury Parish Council's proposed option of housing and business development on SR14 and housing on a small part of SR15 near Lansdown Crescent. The SR15 site is far more preferable than the proposed alternative (SR13). It is in a central location within the village with level access to all amenities and would, therefore, be suitable for young and old alike and substantially reduce the need to "drive to the shops". The location is on a public transport route which could further improve the existing service. None of these positives can be attributed to the SR13 site. This is an un-biased opinion as neither option directly affects me. |
| Change requested:   |
|   |
|   |
| Respondent 6567 Comment 1 Respondent Dr David Watson Respondent   |
| Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
|   |
| Placemaking Options Plan Reference: Timsbury (SR15)   |
| Comment on the Site:  |
| Developing housing on part of this site is preferable to developing SR13. SR15 is in closer proximity to the main village amenities, will have better and safer access to the main road and will provide a new access to St Mary's Primary School and so will relieve traffic congestion on Lansdown View.  |
| Change requested:   |
|   |
|   |
| Respondent 6578 Comment 3 Respondent Ms Lorna Miller Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR15)   |
|   |

Currently a lot of children, parents and grandparents use this side of the village for the Pre School and School. Currently

**Comment on the Site:** 

the visibility out of the school road is poor, so something needs to be changed to improve the current roads, children's safety and pedestrian's welfare. I feel that a better road infrastructure is already needed. I feel that any planning permission around SR15 needs to INCLUDE something to address our current parking problems on North Road and our current problems whilst driving along North Road.

If this site is to be developed, I would like considerable road improvements to be PART of the planning permission.

| ^ | h | 2 | n | σ | e | r | ۵ | a |   | ۵ | c | t | ۵ | d | • |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| L |   | a | ш | ĸ | E |   | C | ч | u | C | 3 | ι | ᆫ | u | • |

| Respondent 6579 Comment 2 Respondent Mr Geoffrey Sr<br>Number: Number: Name:  | nith Respondent Organisation:                           |
|---|---|
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$   | Attachments sent with the comment?                      |
| Placemaking Options Plan Reference: Timsbury (SR15)   |   |
| Comment on the Site:  |   |
| I support the use of this site for the reasons given plus:  |   |
| (1) It would have little impact on the existing views currently lab desirable to keep, but which are less extensive and less well defi  |   |
| (2) It would provide opportunities for an additional access to the the existing approach road often reduced to single lane working Road due to inadequate sight lines for drivers, improving the heat | by parked vehicles, and poor exit conditions to North   |
| (3) Residents in the proposed housing would have easy access to minimising the increase in traffic.   | the Primary school without the need to use vehicles, so |
|   |   |

| Respondent Number:  | 6579 <b>Comment</b> Number: | 3 Respondent Mr Geoffrey Smith Name: | Respondent<br>Organisation: |  |  |  |
|---|-----------------------------|--------------------------------------|-----------------------------|--|--|--|
| Agent ID:   | Agent Name:                 |                                      |                             |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                             |                                      |                             |  |  |  |
|   |                             |                                      |                             |  |  |  |

## Comment on the Site:

This response is in addition to response numbered 21702:

Placemaking Options Plan Reference: Timsbury (SR15)

(4) The statement that there must be a 15m buffer beyond the existing tree line is unnecessarily restrictive considering the age and type of trees involved. 5m would be adequate.

### **Change requested:**

In all text regarding the safeguarding of the trees, amend 15m to 5m

| Schedule of Comments on the Placemaking Plan   | n Options Document in Plan Order   |
|--|--|
| Respondent 6582 Comment 3 Respondent Sheila Clarke Number: Name:   | Respondent<br>Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attac  | chments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR15)  |  |
| Comment on the Site:   |  |
| SR15 - Off Lansdown Crescent   |  |
| support the development of housing on this site because it is an oper school and shops which will encourage walking to school etc. I do not distinctive mature tree boundary". The trees are young and there a two species of tree. Internet research will provide much information with no detrimental effect to either. Insurance companies require to building so I think that a buffer of 15m is excessive and should not be Parish Council's view of 20 houses is more appropriate. There are severe traffic issues in relation to the school, so if an alternate peneficial to the whole village. There are also significant traffic issues the companies of the whole village. There are also significant traffic issues the proportion of the wall at this junction of the importance of this designated view, but great care siting of the housing, offering a safer location for young children. | ot agree that the western edge of the site has a re only on how it is possible for housing to be near to trees to be informed if there are trees within 5m of the e used to limit the number of houses. I think the native access could be created, this surely has to be s at the junction of North Road and Lansdown ection. The development at SR15 provides an |
| Other comments   |  |
| The Introduction of the Placemaking Plan states a desire to have "a ran understanding of its evolution, functionality and its impacts" working in a collaborative way" to discover what their needs and aspirations are and how these can the selection of SR14 and SR15 has been the result of exactly these passevidenced by the turn out for the Consultation Day. It is an integraphole, and uses the opportunity that new housing offers to address   | n be addressed" points. It is the result of a lot of village involvement, ated plan, which in my view is best for the village as a   |
| Change requested:  |  |
| <u> </u>   |  |
| Respondent 6584 Comment 1 Respondent Mr Vince & Mrs He Number: Name: Newman  | elen Respondent Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attac  | chments sent with the comment? 🗹   |

### Comment on the Site:

My preferred choice is Option A but ONLY if this incorporates a new access road and drop-off point to the school plus essential improvements made to North Road. If road improvements are not incorporated then I do not believe any further housing should be built in this part of the village as Lansdown View, Crocombe and North Road are already far too congested at school times and peak travel times. These roads simply cannot accommodate any more traffic as a result of extra housing.

Placemaking Options Plan Reference: Timsbury (SR15)

The school drop-off point is needed particularly for coaches as currently all vehicles (including coaches) have to stop along Lansdown View or Crocombe which is a narrow road causing daily congestion at school times. One evening before Christmas this whole area became completely grid-locked as several coaches were dropping children off at the school and it took 40 minutes to get from North Road to Crocombe (approx. 200 yards) which is longer than my journey took from Bath to Timsbury (approx. 8 miles). This situation is clearly unacceptable for all concerned including residents of this part of the village.

I understand that the school used to have a scheme whereby parents parked at Conygre Hall and walked their children to school. I don't know if this is still up and running but this sounds like an excellent idea or perhaps something similar could be introduced to help aid traffic congestion along North Road and outside the school at peak times.

The junction at the top of Lansdown View leading out onto North Road is hazardous as drivers ignore the white single advisory lines and park right up to the junction so it is virtually impossible to see traffic travelling in either direction until you have pulled out into the middle of the road, potentially into the path of an on-coming vehicle. It is essential that something is done about this junction, such as double yellow lines being painted either side of the junction, to enable visibility for drivers pulling out of Lansdown View onto North Road. As there is a car park behind the Co-op customers can still stop and utilise the Co-op and McColls without the need for parking right on top of the junction and creating a hazard when trying to pull out onto North Road.

North Road itself also needs some essential improvements due to severe congestion. As this is the main access road through the village it is heavily used by all vehicles, including lorries, and due to the on-street parking and narrowness of the road in parts it cannot accommodate 2 vehicles passing through at any one time. As the road cannot be widened, one option would be for double yellow lines to be implemented along part of the road to enable both sides of the road to be utilised or traffic lights could be installed to control the flow of traffic.

I understand that the Traffic Steering Group have been campaigning for improvements to this road for many years and lots of options have been discounted by BANES, including a one-way system incorporating South Road, and double yellow lines as they need to be policed. The options are limited due to the narrowness of the road but it is essential that something is done and some ideas put forward previously may need to be re-looked at before a serious accident occurs in this area. As North Road is an access route to and from other villages where more housing is planned, I feel this is a key issue to be considered in the overall development of the village and surrounding area.

| Change requested:  |   |
|--|---|
|  |   |
|  |   |
|  |   |
| Respondent 6585 Comment 2 Respondent Mrs F Hardman                                   | Respondent                              |
| Number: Name:  | Organisation:                           |
| Agent ID: Agent Name:  |   |
|  |   |
| Further Information available in the original comment? $\Box$ Attachments sent       | t with the comment? —                   |
|  |   |
| Placemaking Options Plan Reference: Timsbury (SR15)                                  |   |
|  |   |
| Comment on the Site:   |   |
| I support the Parish Council in their option of Option A (SR15 and SR14).            |   |
|  |   |
| I accept that we have to have some development in Timsbury. However, the Par         | •                                       |
| with a plan that accommodates the housing as a plan to benefit the village includ    | •                                       |
| feature in the village. Option B is quite unsuitable due to access, road structure a | and the proximity of the Cheshire Home. |
| Change requested:  |   |
| Change requested:  |   |
|  |   |

| Schedule of Con  | nments on the Placemaking Plan Options Do  | cument in Plan Order                     |
|--|--|--|
|  | Respondent Jacqueline Bates<br>Name:   | Respondent Organisation:                 |
| Agent ID: Agent Name:                                      |  |  |
| Further Information available in the                       | e original comment? $\Box$ Attachments sent  | with the comment? $\Box$                 |
| Placemaking Options Plan Reference                         | ce: Timsbury (SR15)  |  |
| Comment on the Site:                                       |  |  |
|  | Parish Council's choice of development on site of the shops, school and bus stops which will g |  |
|  | by B&NES, are very likely to use their cars to t of the village to shop, therefore not suppor  |  |
|  | proposed by both the Parish Council and B& opportunity to use a site which has been left of    |  |
| Development of SR15 and SR14 does further from the centre. | s not increase the size of the village whereas   | site 13 encourages the village to sprawl |
| Change requested:  |  |  |
| ·  |  |  |

Placemaking Options Plan Reference: Timsbury (SR13) - Vision / Paragraph

1.417

Plan Order Number: 585

|  | pondent<br>me:   | Respondent Timsbury Parish Council Organisation: |  |  |  |  |  |
|--|--|--|--|--|--|--|--|
| Agent ID: Agent Name:  | gent ID: Agent Name:   |  |  |  |  |  |  |
| Further Information available in the or  | riginal comment? $\square$ Attachments s                                       | ent with the comment? $\square$                  |  |  |  |  |  |
| Placemaking Options Plan Reference:  | Timsbury (SR13) - Vision / Paragraph   | 1.417  |  |  |  |  |  |
| Comment on the Site:   |  |  |  |  |  |  |  |
| 1. In the Timsbury section there are key unfortunately remain in the document.   |  | ch B&NES had agreed to correct but which say:    |  |  |  |  |  |
| "1.417 B&NES and Timsbury Parish Cou<br>approximately 25 dwellings. Timsbury P<br>development approach. B&NES have co<br>development in conjunction with SR14."  | rarish Council has identified SR15 in connsidered the evidence for SR13 and th | •  |  |  |  |  |  |
| This Parish Council's response to the B&NES Placemaking Plan Options paper has been prepared in good faith following wide scale consultations with many residents of the parish and other interested parties. The response is based on the information available at the time and within resources available. |  |  |  |  |  |  |  |
| Change requested:  |  |  |  |  |  |  |  |

Placemaking Options Plan Reference: Timsbury (SR13)

Plan Order
Number: 586

| Respondent 372<br>Number:   |                  | Respondent<br>Name: | <b>Respondent</b> Timsbury Parish Council <b>Organisation:</b> |  |  |  |  |
|---|------------------|---------------------|--|--|--|--|--|
| Agent ID: Agent Name: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                  |                     |  |  |  |  |  |
| Placemaking Optio   | ns Plan Referenc | ce: Timsbury (SR13) |  |  |  |  |  |

### Comment on the Site:

SR13 North of Loves Hill for housing 1.416

The Parish Council does not accept this site for development of 25 or indeed any housing units as it does not believe that it is viable or safe as a policy for the many reasons outlined below.

B&NES appears not to have taken account of the fact that the PC had already excluded the site for consideration following an assessment by the village which had already been provided to B&NES.

Also, the site does not provide the many benefits that the SR15 site provides regarding improved access to the school and improved traffic flow and congestion reduction in North Road/Lansdown View.

Whilst SR15 is viable and supported by the village, Parish Council and B&NES, the Options paper provides no evidence in para 1.414 for the need to include SR13 in the Options paper.

More detail illustrating the lack of evidence and reasons why SR13 is not safe in planning terms are given below:

- 1. The site is further away from the facilities in the core of the village than SR15, and so is likely to generate more traffic from vehicles driving into the village, including to the school. This contradicts the B&NES policies on sustainable transport.
- 2. No evidence is provided as to why or how only the south section of the site would be developed for housing. In fact the map indicates the whole field which contradicts this.
- 3. If 25 dwellings are permitted on this field then approximately 25% of the homes in the village would exit onto a 50m stretch of South Road which has been described as a "low quality road" in a letter dated 2010 from Mr Peter Dawson, Planning Policy and Transport, B&NES.
- 4. Southlands Drive is too narrow and congested to allow access to further vehicles.
- 5. There is no evidence that the additional landowner(s) between the site and Southlands Drive have shown interest in development or acceptability of access across their land.
- 6. There is no evidence of any interest by the landowner(s) that would involve the access road and highway splay to Loves Hill
- 7. No policy is provided to ensure protection of the amenity interests of adjacent properties at Southlands Drive and South Road
- 8. No detailed policy is provided for protection of the proposed green site on the north section, nor its extent or access.
- 9. No reference is made for the protection of adjacent mature trees (compared to reference in SR15).
- 10. No evidence is given concerning the loss of the wildlife on this longstanding grass meadow.

11. No detailed reference is made to protect the spectacular views across the Cam Valley and the Mendip Hills beyond, nor the 'Ha-ha' pedestrian route across the north of the site from St Mary's Close which is a Promoted Path on the Green Infrastructure Plan.

### **Change requested:**

In conclusion, there is little evidence or required policies to make this site credible for consultation purposes, especially when compared to SR15. As a result SR13 is not safe, viable or acceptable for development and should be withdrawn as an Option.

| Respondent 6355 Comment 1 Res<br>Number: Number: Na  | spondent Mr Michael Rogers nme: | Respondent Organisation: |  |  |  |  |  |
|--|---------------------------------|--------------------------|--|--|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                 |                          |  |  |  |  |  |
| Placemaking Options Plan Reference:  | Timsbury (SR13)                 |                          |  |  |  |  |  |

### Comment on the Site:

New houses in the field between Southlands Drive and the Leonard Cheshire

Home - SR13

There will be 50 new homes in Timsbury and one of the sites under consideration is the field on South Road, between Southlands Drive and the Cheshire Home - SR 13.

We consider the site to be wholly inappropriate for the following reasons;

- 1. Access from the site onto South Road is extremely dangerous because:-
- There is not a clear view of South Road from either direction. The gateway to the field is at the apex of a slight bend and there are always cars parked by the roadside at this point. This obscures the view of on-coming traffic.
- Vehicles travel far too quickly along this stretch of road in both directions.
- South Road and Loves Hill is a busy connecting route to several other villages so, not only would there be an increase of Timsbury traffic caused by any new houses in this village, but also an increase in traffic from surrounding towns and villages making it even busier and more dangerous especially, as these lanes are narrow and prone to flooding.
- The gateway to the field is directly opposite to the Laurels, a residential care home and near the Timsbury Leonard Cheshire Residential Care Home. Consequently there is a higher than average level of traffic at this point due to vehicles entering and leaving the home.
- There is an outlet of vapour from one of the buildings of the Laurels which emits immediately onto the road. In cold weather this condenses and causes an icy patch. This has resulted in accidents in the past.
- It is understood that poor access was the reason why this field was not developed when Southlands Drive was built forty years ago. If the access was considered to be too dangerous then, why is it being considered now, especially as traffic has increased in volume and speed!
- There is a ransom strip at the top of Southlands Drive
- Access via Southlands Drive is totally inappropriate. The road has steep inclines and difficult bends and there are always
  many cars parked on the road (and pavements). This situation, plus the fact that the road has been built to minimum
  standards makes access at present extremely difficult for emergency services and delivery vehicles as well as for cars of
  existing residents. In times of snowy weather it is impossible to reach the top of the road and cars have to be left on
  South Road.

- 2. Also at the bottom of this field is a Leonard Cheshire Care Home for some 30+ residents. Any new development would seriously impact on the tranquillity of life so necessary to the residents of |Greenhill House.
- 3. The field itself has always been used for grazing and remains a meadow of importance for wild flowers, small mammals that breed there and for the birds of prey (owls and buzzards) that hunt there. This field is the only one of the natural meadows left in the village. Sites such as these should be retained at every opportunity in order to protect those in danger eg bees!
- 4. Any development would create a considerable "run off' of rain water—as with Southlands Drive—which would greatly impact on the land and properties on South Road.
- 5. The site is not close to the centre of the village activity, viz shops, recreational amenities, public transport and is as far from the school as is possible from any point within the village. As such, development here would only add to the existing congested traffic problems within the village.
- 6. In South Road there is not a continuous pavement in some places no pavement at all! The junction between North Road and South Road is notoriously difficult and has been the site of many accidents. Driving along South Road is hazardous due to significant parking problems and blind junctions such as with Mill Lane or Radford Hill.
- 7. The limestone walls give Timsbury its character. Any development on this site will result in yet further loss of this valuable visual asset.
- 8. The top of the field it is bordered by the Ha-ha from which there are magnificent views. These must be retained.
- 9. Even though this site is being considered for a smaller number of houses at the bottom of the field it must be recognized that once a road has been created the whole site will be open for development!

### **Change requested:**

We, the undersigned strongly gige you to withdraw this site, SR13, from consideration for development in Timsbury.

| Respondent 6<br>Number:   | 355 <b>Comment</b> 2 <b>Number:</b> | Respondent Mr Michael Rogers Name: | Respondent Organisation: |  |  |  |
|---|-------------------------------------|------------------------------------|--------------------------|--|--|--|
| Agent ID:   | Agent Name:                         |                                    |                          |  |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |                                     |                                    |                          |  |  |  |
| Diagonalia O  | utions Dlan Defens                  | Timchury (CD12)                    |                          |  |  |  |

| r lacellaking Options i lan Kererence. | Titisbuty | (SILTS) |
|--|-----------|---------|
|  |           |         |

### Comment on the Site:

New houses in the field located between Southlands Drive and the Cheshire Home and to the rear of St Marys Green and the historically important Ha Ha. This has been identified as Tim 8 on the plan and marked by a red arrow.

We understand that one of the sites for the 50 new homes in Timsbury, is the field off South Road, between Southlands Drive and the Cheshire Home, is now being seriously considered for development.

In addition to the petition and reasons already submitted against the site the undersigned also consider this field to be wholly inappropriate for the following additional reasons:

- The field is home to natural fauna and flora, including bats and x2No. Important hedgerows.
- The access onto South Road is dangerous. The road curves at this point so there is not a clear view of South Road. Vehicles often travel too quickly along this stretch of road. It is understood that poor access was the reason why this field was not developed when Southlands Drive was built 40 years ago. If access was too dangerous then, why is it being

considered now bearing in mind increase in traffic?

- Access via Southlands Drive is inappropriate as the road was built to minimum specification and is winding with many cars parked on the road. There is a ransom strip at the top of Southlands Drive.
- There is real concern that any removal of tress is likely to cause heave or subsidence.
- The site is steep so water run-off will be a problem.
- This site is not close to village services, especially the school, for which other sites could provide safety and traffic congestion solutions for the whole villag
- Journeys to school will involve going along North Road an already heavily congested area which is also dangerous for pedestrians.
- There is no continuous pavement along South Road. Driving along South Road is difficult due to the width of the road and significant parking problems
- The stone walls give the village its character. Developing this site will result in yet further loss of this asset.
- Any building works and development in the field will seriously impact on the peace and tranquillity so necessary for health and wellbeing the residents of Greenhill House Timsbury Cheshire Home.
- The Laurels and Leonard Cheshire Residential Care Homes already generate a higher volume of traffic for this particular stretch of road and adding to it with a major junction into the estate will create a further hazard.

The field meadow in question is considered to be the rural perimeter of the village adjacent the Ha Ha which is a wildlife corridor and a cathartic corridor for residents to reach the views of the Mendips. We understand that many cases may have been put forward though I urge you to consider walking the Ha Ha with glimpsed views of the serenity of what should maintain a rural site perhaps followed by a cup of tea in Connies Tea Room on the square to consider your findings. We strongly urge you to consider the above and remove this field from the threat of development.

| Change requested:  |                               |                             |
|--|-------------------------------|-----------------------------|
| Number: Number: Name   | ndent Mr Michael Rogers       | Respondent<br>Organisation: |
| Agent ID: Agent Name:  Further Information available in the origin | nal comment?  Attachments sen | t with the comment? $\Box$  |
| Placemaking Options Plan Reference: Tir                            | nsbury (SR13)                 |                             |

### **Comment on the Site:**

I am writing to object to the B&NES planning option to build on the field in Timsbury known as SR13; this is in direct opposition to the option proposed by the Timsbury steering group. Just outside the conservation area of Timsbury, SR13 has managed to retain some of its character, and has some of Timsburys oldest buildings on its border or in close proximity; building on SR13 would seriously damage this.

With regards to SR13s position within the village, SR13 could not be further from the facilities, the School and local shops are a 15 minute walk each way, along inadequate pavements and in many cases no pavements at all, so most people in this area tend to drive for convenience and safety. The alternative site SR15 is a two minute walk from these facilities, with good pavements, so no need to drive.

Timsbury needs homes for its young adults, who have lived in the village all their lives, to enable them to continue to live here. This can only be done if we provide affordable housing. SR13 could not provide these; it has accessibility issues, and because the geology of the land, extra provision must be made to ensure that drainage and sewage is adequate. There are houses bordering SR13 which have suffered subsidence, there will need to be substantial foundations and backfill to prevent this from happening to any new build, all at build cost being substantially higher than those of SR15. This would suggest that any builder wishing to maximise their profit from SR13, would need to build high value homes i.e. 4 to 5 bed homes, these are not the type of homes that Timsbury needs.

I am concerned that there are no details with regards to which part or how much of SR13 would be developed, It could be seen that the entire field could be developed if permission was granted for the lower field, If the access to SR13 was via the top of Southlands Drive, It would be difficult to argue against this once the infrastructure was in place.

Cheshire Homes is a refuge for disabled adults, SR13 boarders its gardens, this gives the residence a wide ranging view of the meadow, and provides a buffer between the homes on Southlands Drive, this would be removed if houses were built on SR13. It is suggested that building on the south of SR13, leaving the north of SR13 would still provide this; however the residence cannot access the north of the field. The site is also used as a car park for events at the home, this relieves parking issues locally.

Building homes on SR13 would seriously increase the amount of traffic using South Road, already classified by B&NES as a low quality road. The junctions of Southlands Drive and Greenvale are sited opposite each other and accounts for a significant amount of traffic joining South Road, traffic approaching from Loves Hill is a major hazard when pulling out, due to the bend in the road, despite the splayed junctions, Loves Hill is already a busy rat run and this will only increase with development taking place in adjoining villages. During wintery weather, South Road from Loves Hill towards High Littleton is unpassable, and is often closed by the Police, this forces all traffic into the village.

There are a number of serious pinch points along South Road, particularly at the junctions with Maggs Hill, Radford Hill, Mill Lane and the road running alongside Bartholomew Cottages, this makes it impossible for two vehicles to pass, building more homes here would increase traffic along this road and only exacerbate this problem. The Avenue is another road that causes concern as there have been a number of accidents along this road too.

Since the sixties, the majority of new development has taken place to the West and South West of the School and Shops; this has caused a huge imbalance with less than 10% of homes (134) being to the East, another reason for traffic problems with most vehicles approaching from the West.

There are privacy issues with SR13, it has no natural barriers between the six privately owned houses at the bottom of the field and the proposed site, or houses bordering the top of the field, south of the sunken path known as the Ha Ha. Any new build would have to be located at a distance as not to have a detrimental effect on the lives of those who live in the existing homes, the alternative sites both have natural barriers. Trees and Hedgerows, SR15 also has a lane between the nearest homes and on SR14 a large batch, also existing homes on these sites are blessed with a significant distance from the proposed site, and one of the proposed sites also has a mix of both privately owned and social housing. There is a protected view at this site, even though, the site could be considered an eyesore by many in the village, due to the large block of garages that occupies the right hand side of the site, it could be suggested that any new build within that area could aesthetically enhance the outlook.

There is no mention in the PMP that address's this at SR13, unlike considerations afforded to the two other sites i.e. Tree preservation orders recently obtained for SR15, sensitivity of the area and the protected view, indeed a bit of clever work by Timsburys B&NES Councillor to protect the view from his house, if you asked the majority of Timsburys residents, they would not know where the view was.

It is hard to see how building on SR13 would benefit Timsbury, unlike the benefits that building on SR15 would have; the traffic and parking around the School could benefit with a new road to the rear of the school, relieving traffic on Lansdown View, and a possible roundabout at Lansdown Crescent, this would slow traffic approaching from Bath, Camerton.

| Change requested:   |   |
|---|---|
|   |   |
|   |   |
| Respondent 6355 Comment 4 Respondent Mr Michael Rogers Number: Name:  | Respondent Organisation:                  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments sen   | t with the comment? $\square$             |
| Placemaking Options Plan Reference: Timsbury (SR13)   |   |
| ·····oca···· (c··=c)  |   |
| Comment on the Site:  | the inclusion of CD42 (Timeless) as set   |
| I am writing to ask that the petition dated the 12th November 2014 objecting to out in the B&NES PMP document be taken into consideration in the Place Making | •   |
| This was sent to Mr Simon DeBeer and acknowledge receipt of by Julie O'Rourke   | on the 18th November 2014.                |
| Change requested:   |   |
|   |   |
|   |   |
| Respondent 6355 Comment 5 Respondent Mr Michael Rogers Number: Number: Name:  | Respondent Organisation:                  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment?   Attachments sent   | t with the comment? $\square$             |
|   |   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |   |
| Comment on the Site:  |   |
| Item 1.417 is incorrect. Timsbury Parish Council are not in agreement with B&NE   | •   |
| Council agrees that both SR14 and SR15 has been identified as the preferred devalso the preferred approach of the steering group.                             | elopment approach and not SR13, this is   |
| The Emerging Policy Approach for SR13, does not include the same build conside  | rations offered to SR14 & SR15            |
|   |   |
| <ol> <li>Have particular regard to site layout, building height, and soft landscaping, to r<br/>development</li> </ol>  | minimise the visual impact of the         |
| <ol><li>The site should be designed to safeguard the amenity of neighbouring residen</li></ol>  | itial properties to the South and East of |
| the site.   |   |
| Change requested:   |   |
|   |   |
|   |   |
| Respondent 6356 Comment 1 Respondent Mark B Jackson Number: Number: Name:   | Respondent<br>Organisation:               |
| Agant ID: Agant Name:   |   |
| Agent ID: Agent Name:   |   |

# Placemaking Options Plan Reference: Timsbury (SR13) **Comment on the Site:** I am writing to express my grace concern at the inclusion of "part of field off Loves Hill beside Greenhill House" as a potential options for housing development. South Road and Loves Hill are already very busy with traffic and congested and any development which increased the volume of traffic and required access onto the road would potentially be very dangerous. **Change requested:** Respondent 6357 Comment 2 Respondent Mrs Margaret James Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR13) **Comment on the Site:** This site affects more: at present residents than any other, especially already disadvantaged peoples in Greenhill House, and those who would be close to any new development, as Southlands Drive and Loves Hill. This site is also quite steep. Generally not a good idea; even though BANES in their wisdom think otherwise!! **Change requested:** Respondent 6358 Comment 3 Respondent Mr Dudley Chappell Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR13) Comment on the Site: SR13 Loves Hill North 1. I think this is the worst of the three options because it's the furthest away from the school and shops and therefore vehicles would be used for the school run and shopping. 2. Access to the site would be great problem either through Southland Drive or through the new estate off South Road. Both would have a problem when it snows as traffic cannot reach the top of the estate for sometimes as much as a week, therefore traffic parks off the estate therefore causing more problems to the local roads.

3. No mention has been made about destroying views over Cam Valley, Mendip Hills, The Ha- Ha Path and The Sleight.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

| Schedule of Comments on the Placemaking Plan Opt  | ions Document in Plan Order   |
|---|---|
| Change requested:   |   |
|   |   |
| Respondent 6359 Comment 3 Respondent Mrs Jane Chappell Number: Name:  | Respondent<br>Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachmen   | nts sent with the comment? $\Box$   |
| Attachment:   | its sent with the comment:  |
| Placemaking Options Plan Reference: Timsbury (SR13)   |   |
| Comment on the Site:  |   |
| SR13 Loves Hill North.  |   |
| 1. I feel this option is not viable at all.   |   |
| 2. The traffic which would have to enter Southlands Drive or South Road to proposal as Southlands Drive is narrow and gets congested and South Road   | •   |
| 3. The houses would be the furthest from the centre of the village, shops a to/from school especially.  | and school and therefore more traffic driving   |
| 4. Views of the Sleight, Ha-ha Path, Mendip Hills and Cam Valley would be   | obscured.   |
| Change requested:   |   |
|   |   |
|   |   |
| Respondent 6360 Comment 1 Respondent Mrs Lynn Rogers Number: Number: Name:  | Respondent Organisation:  |
| Agent ID: Agent Name:   | Organisation.   |
| Further Information available in the original comment?  | nts sent with the comment? $\square$  |
|   |   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |   |
| Comment on the Site:  I have serious concerns over the use of the field north of Loves Hill, known development of the land by Lansdown Crescent, known as SR15 and list the   | •   |
| - The majority of housing within the village is to the west of the shops & so of the village. Any further development should be to the east in order to be spread of the village.   |   |
| - Increased traffic through The Avenue, if SR13 were developed, would also parked cars to pass and the bend is very dangerous, with several "near mi SR14 should address this issue.  |   |
| - It is reported that B&NES Council already acknowledges that South Road sufficient for an increase in traffic which would be the case should SR13 be South Road beyond the end of Southlands Drive despite repeated pleas to coming through the lanes onto Loves Hill then South Road from adjoining | e developed. The Council doesn't even grit odo so! There may also be an increase of traffic |

are also preparing for future housing developments.

- What about The Laurels & Cheshire Home? These are well known & well respected institutions within the village. Developments beside or opposite these homes can only have a detrimental affect on them. For example, Cheshire Home recently had a new path built around its grounds, allowing wheelchair users to access the perimeter of their site. However, their view is across the field now known as SR13 to Southlands Drive, their path does not look up the field as the incline is too great. Should that part of the field be developed, this path would be wasted and the residents would lose the asset. Many residents already struggle with uneven pavements, cars parked on pavements etc. surely the poor access to Loves Hill from this site would cause them even greater problems?
- Westerly housing would also be some way from current public transport locations.
- The risk of accidents or incidents is increased the longer the journey!
- The cost of development on SR13 would be greater than most other sites because of the incline and drainage issues, access issues, road improvements etc. Local residents have experienced subsidence and there are rumours of underground paths/tunnels which were connected to the old house that was sited where St Mary's Surgery now stands. In order to recoup such costs, it would be necessary to build larger, more expensive dwellings which is not what the village needs. Low cost housing for our own children is what we need!
- SR13 is the last remaining natural meadow in the village. There is an array of wildlife and flora & fauna which should not be disturbed. There are nesting owls, bats and many other wildlife.
- SR13 is the only site of those proposed which does not have a natural barrier (trees or a lane) between it and existing dwellings, this would need to be addressed.
- It has already been acknowledged that access to SR13 is difficult. It would be dreadful to destroy any of the original limestone lias stone walls which are a recognisable part of our village. The view at the top of Loves Hill looking west hasn't changed for many years. Take away the cars and you could step back into the 1800s.
- There has been discussion about building only on the bottom, smaller part of the field at SR13 and making the top part a "Local Green Space", although the map shows the whole of SR13 with no reference to LGS. Once access has been created to the bottom of the field, surely it will only be a matter of time before the top is earmarked for development? If the top were a LGS, how would this be maintained and by whom? How will it be accessed? Whatever happens, the "Ha Ha" must be retained as a village asset.
- There are more mature trees in & around the SR13 site which have not as yet been protected as opposed to younger trees in SR15 which have been protected. Why is this?
- I believe there exists a letter dated November 1997 from L Majer, Planning Officer (Ref LM/SZ/WC17527) to a Timsbury resident, stating that permission would not be given to development on the field north of Loves Hill (now known as SR13), except for agriculture or forestry, as it would have a detrimental effect on the rural character of open land and conflict with Policy HO10.
- Finally, I am intrigued as to why the Parish's choice of SR14 & SR15 was overturned by the Council who insisted on the inclusion of SR13? There is NO benefit to the village to build on SR13, there are only negative factors and no advantages as compared with sites SR14 & SR15 which include positive paybacks for the village.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| Respondent 6361 Comment 1 Respondent Mr Stephen Riches Respondent Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR13)  |
| Comment on the Site:   |
| Proposed development site SR13 is not viable for 25 dwellings  |
| <ul> <li>Access via Loves Hill / South Road is already severely restricted due to rural nature of road</li> <li>Access via Southlands Drive would be severely restricted due to on road parking and impossible during ice/snow due to</li> </ul> |
| steepness of hill whereby only 4x4 vehicles can reach the upper portion of the drive.  |
| Change requested:  |
| Remove site SR13 from Placemaking Plan Options   |
|  |
| Respondent 6365 Comment 1 Respondent Mr Roger Tranter Respondent Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR13)  |

### **Comment on the Site:**

My comments regarding the unsuitability of SR13 as a building plot for up to 25 houses have been clearly stated in my letter to Mr S de Beer which was delivered by hand to Lewis House on 5th January.

A copy of this letter is included in the email package for clarity which gives 15 reasons why SR13 is unsuitable under 4 separate headings.

- Loss of privacy and overlooking ecology: 1-2
- Highway safety, inadequate parking of access: 3-10
- Ground stability, services and drainage: 11-13
- Village amenities: 14-15

Paragraph 1.423 also highlights some of these difficulties.

As a family unit we have lived at Greenlands for the past 34years. Greenlands is located within SR13 on the Southern boundary with South Road and originally the property belonged to the SR13 field owner Austin Smith. There is a clause within our house deeds signed by Mr Smith stating that no building shall be allowed within 30ft from our Northern boundary with SR13.

We are also in possession of a letter from BANES planning department dated 18November 1997, ref. LM/SZ/WC17527 to Mr T Goodman of 66 Southlands Drive (our neighbour and with his permission) stating that 'no building will be allowed outside the village boundary (within the now SR13) as it would have a significant detrimental effect on the rural character of this open land'. Further, it would conflict with Planning Regulation HO10 which states that permission will not be given for new dwellings unless essential for agricultural or forestry workers.

We have noted the recommendation from BANES within its Placemaking Plan for Timsbury to include SR13 as an option

for housing provision despite the Parish Council not backing this option.

As a consequence we are writing to state our objections to the proposed development for future housing on the site and to try and demonstrate the unsuitability of this plot for providing the classification of buildings that Timsbury Council or residents may require in the future.

Loss of privacy and overlooking, Ecology:

- 1. Total loss of visual amenity from our property and many other adjacent houses i.e. the destruction of the best natural wildflower /wildlife meadow in Timsbur
- 2. Total dominance of our property by new dwellings due to the sloping topography of the site.

Highway safety, inadequate parking & access:

- 3. Lack of suitable access pointed out by your own team in their report, without third party negotiation.
- 4. If access was to be allowed it would be on to South Road which is already over used as a short cut between Paulton/High Littleton and the A37 in both directions. From being a country lane when we moved in 1981 it has become very well used for most periods of the day and evenings. Road surveys have been carried out to confirm this.
- 5. The section of South Road between Southlands Drive and the top of Loves Hill is narrow and includes a long bend that will give particular visibility problems for any development access/egress.
- 6. The Highway Safety is of concern for there are two Nursing homes that would be directly affected by any SR13 development. The Laurels Care Home is located directly opposite any access/egress from SR13 and The Leonard Cheshire Home which would share its boundaries with any SR13 development. Traffic to and from these homes is substantial and car parking facilities are grossly inadequate resulting in overflow car parking along South Road badly affecting the through traffic visibility and creating massive potential for collision, witnessed daily by residents.
- 7. Wheelchair movements between the Leonard Cheshire Home and the village amenities are frequent and would be affected by increased traffic movement from SR13 and another obstacle would be created in crossing an additional road.
- 8. Emergency vehicles e.g. Ambulances frequently visit both homes and need to be assured of an easy access the introduction of another junction would complicate their journeys.
- 9. Any site line introduced within SR13 at its junction with South Road as it exists would have to accommodate driveways from Greenlands, Highfields and Little Orchard (opposite) causing more potential for collision.
- 10. This section of South Road is not gritted during the winter months and is very prone to ice.

Ground stability, services and drainage:

- 11. Surface Drainage from SR13 regularly forms a small lake in the gateway and on to South Road. Any development considered would need to address this problem.
- 12. There are a number of shallow utility services that run in the footpath along South Road and considerable disruption to residents would occur if a new road access was driven through due to necessary lowering and service protection.
- 13. The ground conditions on SR13 are not ideal for construction as can be seen by the large cracks in the stone walls and in most adjacent properties i.e. the hill is constantly on the move due to poor stability and the presence of underground streams and tunnels.

Village amenities:

14. SR13 is on the south western peripheral boundary and is not close to the villag amenities.

15. SR13 does not link with any other affordable homes within the village.

We hope that the above points demonstrate that SR13 is not a suitable site to be considered for the construction of any housing at all, not least of all because of the high cost involved in overcoming all the Highway Safety, drainage and ground stability issues involved in producing a satisfactory scheme.

A preferred solution would be to retain the field as a nature conserve for use by the village in much the same way as Prince Charles has been proposing which would then offer direct gain to all the village residences and link in well with the planted woodland adjacent the top level western boundary and the historic Ha-ha footway.

In conclusion, we feel that there are more sites identified within the Timsbury Placemaking Plan (and others not considered) that would be more suitable, cheaper and more beneficial to build on and we would ask for this site to be removed from consideration before the residents are given the mistaken choice on 10th January.

### **Change requested:**

I am requesting that SR13 be withdrawn from the Placemaking Plan Options Document and that it be designated a projected green space as an amenity & benefit to the village. This request is no more than Mr Majer stated in his lengthy letter/response where he totally rejected any building on what is now SR13.

| Respondent 6373 Comment 3 Respondent Mr Raymond Merchant Number: Name:                                     | Respondent Organisation:                |
|--|---|
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments                                  | sent with the comment? $\Box$           |
| Placemaking Options Plan Reference: Timsbury (SR13)  |   |
| Comment on the Site:   |   |
| <ul> <li>Access off South Road is on bend of a busy road and the highway splay caus</li> </ul>             | ses problems                            |
| <ul> <li>Alternative access off Southlands Drive not practical. Too narrow, heavy rograde road.</li> </ul> | adside parking, steep and windy. Low    |
| 3rd party landowner showing no interest.   |   |
| Site declared suitable only for agriculture & forestry in authority letter date                            | ed Nov 97, policy H010 from Mr L Majer. |
| Change requested:  |   |
| SR13 to be removed from the Placemaking Exercise as an option.   |   |
|  |   |
| Respondent 6376 Comment 1 Respondent Mrs C L Hay Number: Number: Name:                                     | Respondent Organisation:                |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment?   Attachments                                       | sent with the comment? $\Box$           |
| Placemaking Options Plan Reference: Timsbury (SR13)  |   |
| Comment on the Site:   |   |

I have read BANES Placemaking document with specific interest in the Timsbury section and also listened to Timsbury

Parish Councils' explanation at the Village Futures Day held on 10th January.

After consideration of the information gained I am writing to voice my objections to BANES including the land marked as SR13 as an option on which housing development may be considered,

Compared to the development of SR14 and SR15, the field SR13 is far less desirable or practical form many viewpoints and as such I am supporting the recommendations of the Parish Council.

SR13 is located at the furthest end of the village away from its core. Housing here would mean a car journey to the main shops and School which would be against BANES policy on sustainable transport. Access to the SR13 site is visibly poor and the entrance is flanked by stone walls of character and distinctiveness requiring protection, as you acknowledge. Also access would be off an already low grade busy road, with poor visibility splay. Again as you point out in your document. Yet another possible access through Southlands Drive has not got the support of a third party land owner and, is itself, a low quality narrow hilly road. SR13, unlike SR15, is a steep plot of land with considerable wildlife flourishing there.

As I feel the other two Sites are more suited to Timsbury and better positioned not to add to the Village traffic problems we already suffer-as well as having some additional traffic, which will result from other close Villages also having to build more housing, I am asking that you note my objection and withdraw this Site from the process.

| Change requested:  |   |
|--|---|
| Respondent 6379 Comment 4 Respondent Mrs Gillian Jones   | Respondent                                    |
| Number: Name:  | Organisation:                                 |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachmen  | nts sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Timsbury (SR13)  |   |
| Comment on the Site:   |   |
| SR13 should be identified for the 25 dwellings alongside SR14.   |   |
| Traffic from SR13 would be able to access Bath along South Road, Paulton and Bristol and Keynsham along The Avenue alleviating some pressure on      |   |
| SR13 and SR14 both lie to the West of the village and traffic would be mor reducing congestion in North Road   | re likely to flow in the same direction again |
| SR13 has no footpath across it and has no designation as a Visually importa<br>orderand the development of 25 dwellings would not have the same impa |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6381 Comment 1 Respondent Mrs Diana Lewis Number: Number: Name:   | Respondent                                    |
| Tourist  | Organisation:                                 |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachmen  | nts sent with the comment? $\square$          |
| Placemaking Options Plan Reference: Timsbury (SR13)  |   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Comment on the Site: Loves Hill is already a dangerous lane both for cars and walkers. Increasing traffic would add to the risk of accident. **Change requested:** Respondent 6383 Comment 1 Respondent Keith & Norma Herbert Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR13) **Comment on the Site:** the seemingly permanently parked vehicles stretching from just above the entrance to Greenhill Home at least IOOyards, already create a very dangerous situation in as much that when passing this obstacle, oncoming vehicles are almost invisible until after the drivers (us) have committed to pass the parked vehicles, and many near misses have resulted. To add still more vehicles to the mix from proposed development on SRI 3 would be utter madness. **Change requested:** Respondent 6384 Comment 1 Respondent Mr Mark (& Marilyn) Hulbert Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR13) Comment on the Site: **Change requested:** Respondent 6387 Comment 3 Respondent Mrs Janet Merchant Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR13)

### **Comment on the Site:**

access to site and on a bend on busy South Road and the highway splay would cause problems.

An alternative access through Southlands Drive - totally impractical. This road is too narrow, has much roadside parking – has twisting and very steep section. A low grade road for any increase in traffic. Site was declared suitable only for

agriculture and forestry in Authority letter dated Nov 1997 – Policy H010 from Mr Mayer.

This site would increase traffic along the length of the road with and difficult spots as present. Would impact onto Avenue and North Road with increase traffic to School. Traffic from 2 care homes, Southlands Drive, Green Vale and Stolhis Road all converging in close proximity to the through traffic from other villages. Totally not helping our traffic problems in this village.

| problems in this village.  |
|--|
| Change requested: SR13 – to be removed from the Placemaking Exercise now.  |
| Respondent 6391 Comment 3 Respondent Dr Robert Jones Respondent Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR13)  |
| Comment on the Site:   |
| I strongly support the B&NES proposal for housing development on site SR13 for the following reasons:  |
| 1. Both SR13 and SR14 are located at the west end of the village and there would be advantages when the development of the sites is taking place, all disruption and inconvenience to residents would be in a fairly close proximity making traffic management during the development has much easier.   |
| 2. The east end of North road adjacent to the SR15 site is very busy with the shops in close proximity, the school and the junction of north and south roads. The traffic situation is dangerous and very heavily congested in the SR15 area, whereas development of SR13 would could be managed (together with SR14) to make it safer than at the other end of the village. |
| 3. To develop SR13 would have a less detrimental effect on the amenities in the village. SR13 is not designated as a visually important open space and nor is there a public footpath across the land.   |
| In summary, SR13 is a logical proposal which would fit in with least disruption to the village as a whole and would facilitate the development of 25 properties which would fit in without causing danger for pedestrians, including school children.  |
| 4. SR13 would provide sufficient space for 25 properties, with the proposed development of SR14, this would achieve the B&NES target of 50 properties.   |
| Change requested:  |
|  |
| Respondent 6398 Comment 1 Respondent William and Christine Bowes Number: Number: Name: Respondent United States Organisation:  Agent ID: Agent Name: Respondent Lansdown Place Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Timsbury (SR13)  |

# Comment on the Site:

- We strongly believe that the development of the field known as SR13 would be totally inappropriate for the village. The traffic issues in Timsbury are well known, but the possibility of numerous additional cars using South Road, The Avenue and the dangerous crossroads by the recreation field is, in our opinion, untenable. Access into the site SR13 would be either through an entrance onto Loves Hill/South Road, just opposite The Laurels nursing home and next to Greenhill House Cheshire Home, or via Southlands Drive and then on to South Road (already officially described by B&NES as a "low quality road") either option would cause considerable extra traffic. This proposed plan does not appear to comply with B&NES' declared policies on sustainable transport!
- In addition to the traffic issues, several of the pavements in Timsbury are unsuitable for people using wheelchairs or pushchairs, elderly people (of whom there are a lot in Timsbury!) or parents with small children so even if people were not using their cars to travel from the SR13 site into the heart of the village (school, surgery, shops etc), there would be increased danger for pedestrians.
- The historic ha-ha footpath, which is a promoted path on the Green Infrastructure Plan, must be considered. There is some talk of the north end of SR13 being designated a green site, but this does not appear on any of the plans we have seen there is no clear indication as to which part of the southern area of SR13 would be used for building, as the map indicates the whole field. Even if the north part was made a green site, it would need to be maintained who would do this and how would access in to the green site be made?
- The lower part site SR13 is on a steep hill with poor drainage and with the strong possibility that there are mine works underneath the field. Our house in St Mary's Green shows signs of earth movement and/or subsidence we have many cracks in our walls and ceilings, our patio slabs have moved considerably and we had to replace a conservatory approximately 15 years after it was constructed, as there was evidence of subsidence and it was falling down.
- We understand that in 1997, the then Planning Officer Mr L Majer, stated that permission for the field now known as SR13 would not be given for new development except for Agriculture or Forestry, and that this policy still stands. The letter in which this is stated has the reference LM/SZ/WC17527.
- Finally, from an aesthetic point of view, far-reaching views to the Mendips and the Cam Valley would be seriously affected if development on SR13 were to go ahead. In our opinion, the sites SR14 and/or SR15 are far more suitable for development.

We would ask you to take into consideration the option preferred by Timsbury Parish Council and decide against the development of site SR13.

| development of site SR13.               |                               |                                  |
|---|-------------------------------|----------------------------------|
| Change requested:                       |                               |                                  |
|   |                               |                                  |
| Respondent 6398 Comment 2 Res           | pondent Mrs Christine Bowes   | Respondent                       |
| Number: Number: Na                      | ne:                           | Organisation:                    |
| Agent ID: Agent Name:                   |                               |                                  |
| Further Information available in the or | iginal comment?   Attachments | sent with the comment? $\square$ |
|   |                               |                                  |
| Placemaking Options Plan Reference:     | Timsbury (SR13)               |                                  |
|   |                               |                                  |

# **Comment on the Site:**

I have written separately to comment on SR13 development but feel that the site is unsuitable for housing due to:

- (1) Access and resulting increased traffic
- (2) Site is steep and unstable due to coal mines underneath
- (3) It is adjoining the historic ha-ha

| Steep hill, with difficult access.   |   |
|--|---|
| Change requested:  |   |
| The sites SR14 and SR15 would be much more suitable, with improved road acce                             | ess throughout the village, and possibly    |
| improved access to the village school.   |   |
|  |   |
| Respondent 6398 Comment 3 Respondent Mr William Bowes  | Respondent                                  |
| Number: Name:  | Organisation:                               |
| Agent ID: Agent Name:  | · ·   |
|  | A   |
| Further Information available in the original comment?   Attachments sen                                 | t with the comment? —                       |
|  |   |
| Placemaking Options Plan Reference: Timsbury (SR13)  |   |
|  |   |
| Comment on the Site:  SR13 (the steep hill off Loves Hill) should never have been considered for the bui | ilding of 'family' homes either now or at   |
| any time in the future. Reasons:   | numg of family nomes either now of at       |
| Steep hill, with difficult access.   |   |
| Narrow access road with heavy traffic flow   |   |
| Location – could not be worse, as is further possible journey to/from schools/sho                        | ops/post office, etc.                       |
| Change requested:  |   |
| SR14 (Wheelers Yard) is a 'given'.   |   |
|  |   |
| SR15 is so obvious the correct location for the 'family' homes, due to its proximit                      | ty to schools and shops. Both of which are  |
| within easy (and level) walking distance (i.e. Car not required).  |   |
|  |   |
| Respondent 6408 Comment 4 Respondent Mrs Elaine Martin   | Respondent                                  |
| Number: Name:  | Organisation:                               |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sen                            | t with the comment? $\Box$                  |
|  |   |
| Placemaking Options Plan Reference: Timsbury (SR13)  |   |
| Triacemaking Options Flam Reference.   |   |
| Comment on the Site:   |   |
| Options SR14 and SR13 are ideally placed to take the additional traffic. Little or r                     | no building has taken place on this side of |
| the village and this could balance the flow of vehicles throughout the village. The                      | ere is excellent access along Hayeswood     |
| Road to get to Bristol, Wells and Bath.  |   |
| Change requested:  |   |
|  |   |
|  |   |
|  |   |
| Respondent 6409 Comment 1 Respondent Mrs Emma Stevens  | Respondent                                  |
| Number: Name:  | Organisation:                               |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sen                            | t with the comment? $\Box$                  |
|  |   |

(4) Views from various loctions would be affected

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Placemaking Options Plan Reference: Timsbury (SR13) **Comment on the Site:** I am writing regarding the Placemaking Options plan for Timsbury, and want to provide reasons to object to option B -Wheelers Yard(SR14)/ site at Loves Hill (SR13). Very restricted vehicular access and narrow roads (Loves Hill/South Road/Southlands Drive), building on this site would increase traffic therefore impacting on congestion and road safety both for vehicles and pedestrians. The road before you exit the village is single lane, narrow and creates the need to stop to allow other vehicles to pass. Currently pedestrian access is very limited with narrow pavements, increased traffic movement as cars would need to be used more (as located on edge of village) would create safety issues for pedestrians. (close to Cheshire Home, care home What is the purpose of the Community space (SR13), how will this benefit the community if it is located on the outskirts of the village, with limited access and increased time to get to. **Change requested:** Respondent 6410 Comment 3 Respondent Ms Gaynor Parkinson **Respondent** Linden Homes Strategic Number: Number: Name: **Organisation:** Land **Agent ID:** 28 **Agent Name:** Nash Partnership Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR13) Comment on the Site: **Proposed Housing Number** 2.1 Core Strategy Policy DW1 provides for an increase of around 13,000 additional dwellings in Bath and North East Somerset (B&NES) over the plan period 2011 -2019. This total, the Core Strategy Inspector noted, represents a reasonable

- but not generous response to market signals. It is expressed as 'around' 13,000 and the total level of housing provision is not capped at this figure, as confirmed at paragraph 1.26e of the Core Strategy. As stated by the Core Strategy Inspector, more housing than this can and should be permitted where consistent with other policies.
- 2.2 This district-wide total for planned housing provision carries through into a figure of around 50 additional dwellings for each of the villages that meet the sustainability criteria set out in Core Strategy Policy RA1. However, it is noted that this figure of around 50 is contained in supporting text and does not form part of the policy itself. Where villages outside the Green Belt don't fulfil these criteria, Policy RA2 makes provision for limited residential development in order to deliver the spatial strategy target of 1,120 additional dwellings in the rural areas.
- 2.3 It is clear therefore that neither the planned total amount of additional housing for the district or the number for each of the villages that meet the Policy RA1 criteria is a cap on the level of additional dwellings to be provided over the Plan period. It is necessary that these totals are seen as minima in order that delivery of sustainable development and boosting significantly the supply of new homes in accordance with the provisions of the National Planning Policy Framework are not unjustifiably constrained.
- 2.4 Consequently, it is important that the policies of the Placemaking Plan (PMP) provide for flexibility. In the villages that satisfy the Policy RA1 criteria there may be opportunities for provision of a level of additional homes above the figure of 50, in a manner that is appropriate to the village and its setting, in terms of scale, character, appearance and other

policy requirements. Such provision could for example reduce the requirement for additional homes in villages that do not satisfy the Policy RA1 criteria, by definition thereby contributing to a more sustainable pattern of development.

- 2.5 The PMP Options Document sets out proposed residential allocations of 'about' 50 dwellings for the villages that meet the Policy RA1 criteria, with each site proposed to accommodate a specified number of dwellings, again with the prefix 'about'.
- 2.6 It is acknowledged that there is a need for some estimate of site capacities in order to plan for the district-wide and Rural Areas totals. However, the approach set out in the Options Document lacks precision with use of site totals prefixed by the term 'about' risking pre-judging full assessments of site capacity and potentially placing a policy constraint on delivery of sustainable development and boosting significantly the supply of housing. For example, in relation to a policy requirement for about, say 30 or 40 dwellings on a particular site, would a detailed design proposal for say, 8 more than this and acceptable in all other respects, conflict with such a policy provision because it is proposing a total number that is in fact about 40 or 50 dwellings?

To avoid such uncertainty and the potentially constraining effect of policy it is requested that, for residential site allocations, the policy provision is expressed as a minimum number, with the potential for a greater number of dwellings, subject to satisfying other policy requirements.

If for any reason this is not accepted then it will be vital that there is a clarification in the supporting text to the effect that neither the figure of about 50 dwellings for each of the villages that satisfy the Core Strategy Policy RA1 criteria or the figures given for the number of dwellings on individual site allocations are a cap on the number of dwellings that can be delivered. The potential for a different number of dwellings, where this would constitute sustainable development, as defined by paragraph 6 of the NPPF, must be allowed for.

Site Allocations in Timsbury

#### **Preferred Sites**

- 2.7 Three sites are identified as offering potential for delivering additional housing in Timsbury. These are land on Loves Hill (SR13), the former Wheelers Yard (SR14), and land north of Lansdown Crescent (SR15). The supporting text seeks to prioritise these sites but is inconsistent in this respect. At paragraph 1.419 it refers to the Parish Council as identifying sites SR14 and SR15 as preferred sites but at paragraph 1.424 it is stated that the Parish Council has identified SR13 in conjunction with SR14 as the preferred development approach, with B&NES also identifying SR15 as an option.
- 2.8 It is appreciated that at this stage it is appropriate to consider options. However, the preferred options and sites selected for allocation must be based on the available evidence.

In this respect we note that SR14 has been the subject of residential development proposals since at least 2002. A proposal for 37 dwellings was dismissed on appeal in 2008 and an application submitted in 2009 was formally disposed of by the Council in January 2014. Over a period of 14 years therefore, the site has failed to secure planning permission for residential development.

- 2.9 On the basis of the context information set out in the Options Document it is clear that site SR15 is extremely sensitive in terms of landscape setting and views. The long-distance views to Tunley Hill and Lansdown and the green wedge function of this land are very apparent from the viewing point on the edge of the village. There must therefore be doubt over the ability of this land to accommodate any development at all without unacceptable harm to landscape and views.
- 2.10 Whilst site SR13 is subject to a number of constraints, these are clearly capable of being addressed through appropriate layout, design and landscaping. The site owner is willing to bring the land forward for development and subject to securing planning permission for a satisfactory development proposal, the site is deliverable in the short term.

We welcome the identification of site SR13 as suitable for residential development.

We request that site SR13 is identified as a preferred site for provision of additional dwellings in Timsbury and that it is

allocated for development in the PMP.

Site SR13 Policy

- 2.11 The principle considerations in respect of the development capacity of site SR13 are its landscape setting, its relationship with adjacent residential properties, impact on heritage assets to the west and achieving an appropriate access from the highway.
- 2.12 The PMP Options Document at paragraph 1.423 states that site SR13 is further away from the core of Timsbury than site SR15 and that only the southern part of the site would be developed.
- 2.13 Distance from the core of the village depends on definition and at what point the measurement is taken from. Walking distance from site to the High Street is shorter from SR13 compared to SR15.
- 2.14 In respect of development coverage on the site there are a range of design considerations to be assessed. Tree belts, for example, are characteristic of the rural environment in this area and continuation of the tree belt along the northern edge of the site might be one means of integrating development satisfactorily into the landscape setting. The use of the site's topography and the way that development relates to this is another. It is not appropriate therefore for the PMP to be prescriptive in terms of which parts of the site might be developed. This might prejudice the optimum solution for sustainable development. A development proposal that is appropriate to the landscape setting must therefore be resolved through a comprehensive design process.

We therefore request that paragraph 1.423 is amended to read - 'Site SR13 is a greenfield site to the north of Loves Hill which currently adjoins but lies outside the HDB. It is within easy walking and cycling distance of village facilities and has existing development to both the east and west. The site is approximately 2.1ha in extent but the full extent of development will need to be determined through a comprehensive design process that takes account of local heritage assets and the landscape setting.

2.15 The Options Document sets out a description of the context for development of site SR13.

We make the following comments on the description of the context:

Bullet 1: This describes the site as a steeply sloping south slope. It would more accurately be described as a moderate slope.

We therefore request that the word 'steeply' is deleted and that this bullet commences with the words - 'The site is on a south facing slope ....'

Bullet 2: This refers to the low stone wall on the frontage of the site and the need for any development to protect this. While the wall is not afforded any statutory protection, we agree that stone walls are characteristic of the properties fronting onto Loves Hill. However, the requirement to protect the wall conflicts with the access option described in Bullet 7 and is unduly restrictive.

We therefore request that this bullet is amended to 'and any development woul need to ensure a stone wall on the Loves Hill frontage, either through retention of the existing or rebuilding'.

Bullet 3: This bullet identifies heritage assets to the west of the site and requires that any development ensures space between them and the development. The identified assets are Greenhill House, which is not listed, and the Grade II listed gates, piers and walls at the entrance to Rennys (has also been known as Hillside House and Rosewood Manor).

Greenhill House is some 85m to the west of site SR13. Between the house and the site there are three existing dwellings fronting Loves Hill and substantial trees. Whilst the grounds of Greenhill House, to the rear of these dwellings, extend to the boundary of the site, this area accommodates substantial modern development that effectively wraps around the northern and eastern sides of Greenhill House, diluting its heritage significance and screening the house from the site. The remaining relatively small area of green space within the grounds is separated from the site by mature trees and hedging.

The gates, piers and walls at the entrance to Rennys are on the road frontage over 100m to the west of the site.

Sustaining the heritage significance of these assets does not necessarily require space to be provided within the site, between them and any development. Such separation already exists as described above. It may be appropriate to provide some space within any development proposal but the PMP should not be prescriptive in this respect. A design and layout that responds to relevant aspects of heritage setting will be required and should be resolved through a comprehensive design process.

We therefore request that the final sentence of this bullet is amended to - 'Any development will need to be informed by and respond to an assessment of the significance of the heritage assets to the west of the site and any contribution made be their setting.'

2.16 The text supporting the emerging policy for SR13 also sets out a vision for development of the site. The first part of this vision seeks a conservation led development that provides a green space setting for the heritage assets to the west. This is considered too narrow and prescriptive for the reasons set out above. Conservation of heritage assets is only one of a number of considerations that should shape development proposals for the site.

We request therefore that the first bullet in the vision statement is amended to - 'A development that responds to the heritage and landscape context to create an extension to the village that contributes to its character and identity.

2.17 The emerging policy set out in the Options Document reflects some of the issues raised above and in our view the final PMP policy requires some amendment.

We request that points 1. and 2. of PMP policy SR13 are amended to:

- 1. A minimum of about 25 dwellings on the site, with potential for a greater number, subject to demonstrating an appropriate relationship to the site context and compliance with the provisions of other relevant policies.
- 2. The design should take full account of the site's context and ensure that the significance of heritage assets to the west is sustained and important aspects of the landscape setting are safeguarded.

#### Clarifications

- 2.18 The map notation GR15 appears to be an error and the emerging policy for SR13 is wrongly titled SR1. We therefore request that the map notation GR15 is amended to SR15 and that Emerging policy SR1 is amended to 'Emerging Policy SR13'.
- 3. HOUSING DEVELOPMENT BOUNDARY
- 3.1 The Options Document sets out four principles for Housing Development Boundaries (HDB). The first of these states that 'The HDB will be defined tightly around the housing of the village.' The second states that the HDB will be defined to include site allocations proposed in the PMP. For clarity it is considered that a minor amendment to the first principle would be beneficial.

We therefore request that principle 1 is amended to read:

Principle 1: The HDB will be defined tightly around the existing and planned housing of the village.

3.2 At paragraph 1.456 the Options Document invites proposals for revisions to the HDB.

We request that the HDB for Timsbury is amended to include site SR13 as shown in the attached drawing 13162 L001 Rev

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Respondent 6436 Comment 1 Respondent Mr Nigel Horwood Respondent Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
|   |
| Comment on the Site:  Southlands Drive is already too congested with cars parked either side of the road.  South Road is narrow and all ready too busy at peak times, without more traffic being added to it. Also if SR13 was to be agreed it would generate even more cars being used to and from the school run which is already a bottle neck during drop off and pick up times.  All councils should be encouraging new building on brown field sites and not destroying our Recs Field ones and their wildlife. |
| Change requested:   |
|   |
| Respondent 6441 Comment 2 Respondent Terence Richard Fisher Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
|   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  SR13 Not a good access on to South Road, poor field of vision with traffic parked on the road by the Cheshire Home, a busy entrance to the Laurels care home opposite. The road is narrow just past the old school with large amount of traffic from GreenVale joining the rat run traffic on the corner by the old Pub Tee junction with the volume coming up the Radford Hill from Radstock. I also believe some cars come along South Road to avoid being trapped in North Road.             |
| Change requested:   |
|   |
|   |
| Respondent 6443 Comment 1 Respondent Nadine Hennessy Respondent Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |

# **Comment on the Site:**

I write to register my heartfelt concern regarding the development of the SR 13, the development is within a beautiful hillside field and open meadow. I write as someone who believes in supporting the community and a mother, therefore wants see's the potential of new housing bringing additional houses for current and new community members but only if done collaboratively with existing infrastructure to make improvements not increase risks.

Previously SR13 has been used for grazing and occasional dog walker. It provides walkers both residential and visitors to the area (bringing additional trade for local businesses) along the historic haha giving the first scenic views across the valley. The field is adjacent the historic haha, leading to a close by memorial and informational plaque describing the vista. The 'views in' provide rural references of Timsbury and rural community which will be lost forever if development goes ahead.

The reasons where this site falls short of becoming a development over and above the reasons forementioned are the following:

- 1. Access is restricted by a narrow residential road with steep approach with suffers from congestion and treterous conditions at often suffering icy weather conditions. This road you will know is called Southlands Drive and two way traffic on this road I fear will increase the risk of car and pedestrian related trauma, of which many residents with prams etc use. The long standing safety issues and near-miss dangerous incidences on North road in particular, are serious concern to the whole village residents and businesses. With the current infrastructure we are struggling to resolve these safety problems, despite feeling it is only a matter of time until a serious incident occurs, the village residents welcome any development that would help relieve the congestion and lack of safe walking areas to key village focus points such as the coop, post box, mc Colls, per-school, park and school, that could be facilitated by other sites. This is my biggest concern of all, the safety of my and others children, being able to walk to school safely. I know there is also a large elderly population in the village and mobility users who must also have the same problems as pushchair users, but do to much of the initial and first communication being online not all members of the village are able to be fully aware or are likely to be in the appropriate position or health to be able to voice their opinions as easily as active local community members. I ask you to also consider those who have to consider health or family poverty issues who do not have the time to prioritise writing to you but clearly would have the same difficulties as myself and feel the same way. We are trying to build an inclusive community to help raise everyone higher and together safely; not tick the quota to get it done. Please let the new housing be an opportunity to improve the safety of the village and strengthen the community, by identifying a site that helps improve the safety problems of North road, not increase the safety concerns of an additional road in order for people to get to key facilities. Please talk to the GP surgery, use census data, the village survey to support the points I have raised in this paragraph and the consensus of the village, reflected in the original local parish proposal.
- 2. increasing the sprawl of housing into the rural surroundings and peripheral brown field sites does not reflect the development brief of infilling. The development of land close to the Timsbury North Road hub should take priority and be seen as an opportunity for Timsbury Parish and B&NES in securing funding and community benifits using the former priciples of a section 106 agreement.
- 3. The development of plot SR 13 in conclusion does not meet the brief and would be detrimental in ensuring a clear boundary to the village.
- 4. Loss of habitat and meadow simply through the process of development of the site would need to have conditions to restrict storage of material and plant on the upper plateau of the green meadow. This in addition will make this site an unviable development option and unattractive for developers. Bats and other protected wildlife would need to be considered.

Please consider all of these points seriously, especially the first point, I know you are looking to make stronger communities, improve facilities and without increasing risk to people's safety, for these reasons I am sure you can help the village find a suitable site that will help redistribute traffic and congestion along North road and the schools, without creating a new or additional safety concern and negative environmental impact by developing SR13.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |
|                   |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                             |                          |  |  |  |
|---|--------------------------|--|--|--|
| Respondent 6454 Comment 1 Respondent Austen Smith Number: Name:   | Respondent Organisation: |  |  |  |
| Agent ID: 205 Agent Name: Rocke Associates Ltd  |                          |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                          |  |  |  |
| Placemaking Options Plan Reference: Timsbury (SR13)   |                          |  |  |  |

# Comment on the Site:

I refer to the above matter, and am writing to make some brief submissions on behalf of my client, Austen Smith, who owns the site at Loves Hill to which emerging Policy SR13 relates.

Timsbury is a sustainable settlement that has a good range of community facilities and public transport services to the City of Bath. It is one of the largest of the RA1 villages in closest proximity to Bath, but with the advantage that it is at the outer limit of the Green Belt, and land to the south of the village is not constrained by the designation. Timsbury therefore offers a significant opportunity for accommodating needs for development that cannot be met in Bath, and for which sites must be found beyond the Green Belt.

A quantum of residential development approximating to 50 dwellings is suggested in the PMP. However, this figure would seem to be conservative bearing in mind the facilities that the village can offer, its proximity to Bath with sustainable transport links to it, and its comparative freedom from planning policy and environmental constraints, particularly to the south of the village.

The PMP identifies three options for development, one of which is a brownfield site close to the centre of the village and is therefore preferred by both the Parish Council and the local planning authority. The PMP canvasses the suggestion that the balance of the housing requirement be provided on one of two sites, one of which is the land at Loves Hill that is owned by my client. My client's site is an entirely suitable site for development, having no environmental constraints being outside the conservation area and not in a sensitive landscape area. It is well-contained between the existing Southlands Drive estate development to the east, and existing development to the west. The Loves Hill frontage to the west of the site is already occupied by dwellings, and therefore the site would not extend development beyond a clear existing limit of built form into open countryside. It would replicate the existing pattern of development comprising Southlands Drive which occupies the south-facing land together with land on the crest of the hill.

The Council suggests that only part of the site would be developed and the remainder provides an opportunity for open space. However, the PMP makes separate provision for Green Space and there is no requirement for additional provision in this location. Moreover, it would be a profligate use of land that is suitable for development which, if not required during the current plan period, will provide for a further phase to meet inevitable future requirements upon Plan review.

Given the constraints on development land in the district, owing to its extensive coverage by Green Belt and other environmental designations, the requirement for future development land in sustainable village locations on the outer edge of the Green Belt with good public transport services to the City, is an inevitability.

Emerging Policy Approach: SR13 is therefore supported in principle. However, the capacity of about 25 dwellings on a site that extends to 2.1 hectares would seem to be a profligate use of land. The site has capacity for 50-60 dwellings. If the full capacity is not required during the current plan period, then a phasing arrangement can be considered to allow for further development to come forward upon review of the housing requirement, or the Council being unable to demonstrate a five year supply of deliverable housing land. Given the constraints elsewhere in the district, it is inevitable that further housing land at Timsbury will be required in due course in accordance with a sustainable development strategy. Further development will also contribute to sustaining the viability of existing community facilities and bus services to Bath and other destinations.

The alternative option at Lansdown Cresent is much less contained in visual and landscape terms. It would extend a wedge of development into open countryside with expansive views towards Farmborough Common. The flat terrain would provide little in the way of topographical boundaries or containment of the site, particularly to the north and east. The fact that the site was identified as a Visually Important Green Space during the preparation of the Adopted Local Plan, and the presence of a viewing plinth adjacent to the site, endorses its comparative environmental sensitivity. It is also

understood that the landowner is only willing to make part of the site available, which would provide little in the way of future expansion land.

Summary

Emerging Policy Approach: SR13 is supported to the extent that it identifies land to the north of Loves Hill as a residential development option. However, the capacity should be increased to approximately 60 dwellings. The requirement for development to be 'conservation-led' is unnecessary bearing in mind that the site is not within a Conservation Area, and there is no need for land north of the site to be maintained as a green space bearing in mind the Local Green Space options proposed elsewhere in the village. To require additional green space beyond the requirements to which the community gives rise would be a profligate use of suitable development land that is required to meet housing requirements during the plan period, and possibly those arising from a future review of the plan.

Subject to an appropriate policy approach to the site, I can confirm that the owner is willing to make the site available for development, and to work with the Council towards an appropriate development framework for it.

| Change requested:  |  |
|--|--|
|  |  |
|  |  |
| Respondent 6475 Comment 1 Respondent Mr Neil Buchanan Number: Name:              | Respondent Organisation:                       |
| Agent ID: Agent Name:  | <b>0</b>                                       |
| Further Information available in the original comment? $\qed$ Attachments        | sent with the comment? $\square$               |
| Placemaking Options Plan Reference: Timsbury (SR13)                              |  |
| Comment on the Site:   |  |
| I would like to point out that paragraph 1.417 incorrectly states that SR13 is t | the parishes preferred option instead of SR15. |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6482 Comment 1 Respondent Mr Roland Clarke                            | Respondent                                     |
| Number: Name:  | Organisation:                                  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments        | sent with the comment? $\Box$                  |
| Placemaking Options Plan Reference: Timsbury (SR13)                              |  |
| Comment on the Site:   |  |
| As the Parish Council has said there is no value to the village in the Developm  | nent of SR13.                                  |
| I would like to express my support for both SR14 & SR15 as these sites will all  | low for traffic improvements, eg               |
| roundabouts at either end of the village on North Road.                          |  |
| Change requested:  |  |
|  |  |

| Respondent 6484 Comment 1 Respondent Miss Jill Clarke Respondent Equestrian Centre   |          |
|--|----------|
| Number: Name: Organisation:  |          |
| Agent ID: Agent Name:  |          |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |          |
| Placemaking Options Plan Reference: Timsbury (SR13)  |          |
| Comment on the Site:   |          |
| I have lived in the village for over thirty years and have certainly noticed the increase in traffic. I have a young daughte   |          |
| whom uses a pushchair and trying to get from our side of the village to the shops proves to be difficult due to inconsis   |          |
| pavements (along South Road & North Road), difficult road crossings (x roads by playing field)and the amount of traffi already on South Road not to mention the overwhelming congestion of North Road.   | <i>-</i> |
| I really don't think that granting planning permission on SR13 would be of any advantage to the village at all. Already,   |          |
| approaching quarter of Timsbury residents have immediate use of South Road to access the village, so more houses he  | ere      |
| would increase this situation on an already over used, low standard route into the village. Access should not be grante  |          |
| through Southlands Drive as there are already too many cars parkin on the road and as Southlands Drive are family ho   | mes      |
| there are lots of children playing in the immidate facinity. There is no obvious solution for improving this.  |          |
|  |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull  |          |
| North Road is always a congestion area and therefore any road safety developments that can be made to this area is of benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull  |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:   |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent   |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent   |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:   |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent Number: Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:   Timsbury (SR13)  Comment on the Site: |          |
| benefit to the village, ie SR14 & SR15 would be the most appropriate sites to facilitiate appropriate road safety improvements. SR15 would offer the School a new purpose built access which would ease congestion in Lansdown View/North Road junction. Any traffic improvements to Lansdown Crescent junction would be of benefit to those pull out of the South Road junction, ie roundabouts at SR14 and SR15 junctions would aid the situation considerably.  Change requested:  Respondent 6485 Comment 1 Respondent Mr Roland Clarke Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference:   Timsbury (SR13)                       |          |

| Schedule of Comments on the Placemaking Plan   | Options Document in Plan Order                         |
|--|--|
| Respondent 6486 Comment 3 Respondent Mr David Collett Number: Number: Name:  | Respondent<br>Organisation:                            |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\square$                 |
| Placemaking Options Plan Reference: Timsbury (SR13)  |  |
| Comment on the Site:   |  |
| This proposal makes no sense at all. New homes here will add nothing problems in terms of access and traffic flow.                               | to the benefit of the village and pose considerable    |
| Change requested:  |  |
| It should be discarded.  |  |
| Respondent 6489 Comment 3 Respondent Mr Malcolm Cox Number: Name:  | Respondent<br>Organisation:                            |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\Box$                    |
| Placemaking Options Plan Reference: Timsbury (SR13)  |  |
| Comment on the Site:   |  |
| Poor vehicular access. Furthest from village centre. Too far for young traffic into village.   | g children to walk to school resulting in increased    |
| Change requested:  |  |
|  |  |
| Respondent 6505 Comment 1 Respondent Mr Chris Gittins Number: Name:  | Respondent Organisation:                               |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\square$                 |
| Placemaking Options Plan Reference: Timsbury (SR13)  |  |
| Comment on the Site:   |  |
| I object to this site for housing as the Vision, Development and Design site development viable or benefit the village.                          | Principles are incomplete and so do not make the       |
| It is further from facilities in core of the village than SR15 and is likely As a result it contradicts B&NES policies on sustainable transport. | to generate more traffic driving to/from, inc. school. |

There is no clarity on exact area within southern section of the site, whilst the map indicates the whole field.

No evidence is provided as to how adequate access with appropriate site lines from 25 houses on the site onto Loves Hill,

other than for a vehicles from a few houses.

If there were 25 dwellings on this field, approximately 25% of houses in the village would exit onto a 50m stretch of South Road described as a low quality roa by Peter Dawson, Planning Policy and Transport, B&NES.

Southlands Drive is already narrow and congested, without further vehicles, and so is not a viable access to the site.

There is no evidence that additional/other landowner(s) between the site and Southlands Drive have shown interest in access across their land.

There is no evidence of interest by the landowner(s) regarding access road and highway splay to Loves Hill

Protection of amenity interests of adjacent properties at Southlands Drive and South Road is not provided

There is no policy mechanism for the protection of the owner's proposed green site on the north section, including extent and access.

There is no policy for protection mentioned for adjacent mature trees (unlike SR15).

There is no evidence or policy for the protection or loss of wildlife on this high grade pasture land.

There is no policy or protection mentioned for views across Cam Valley and Mendip Hills, orHa-ha footpath which is a Promoted Path on the Green Infrastructure Plan.

The site would provide no benefits other than housing for the village compared to SR15 which I favour.

Para 1.417 is incorrect and should read:

B&NES and Timsbury Parish Council are in agreement that allocation SR14 is the preferred site allocation for approximately 25 dwellings. Timsbury Parish Council has identified SR15 in conjunction with SR14 as the preferred development approach. B&NES have considered the evidence for SR13 and this has been included as another option for development in conjunction with SR14.

# **Change requested:**

The policy should be withdrawn as there is inadequate evidence that the site is viable and not contradictory of B&NES transport policies.

| Respondent 6508<br>Number:   | Number: Na          | spondent Mrs Deborah Griffin<br>ame: | Respondent<br>Organisation: |
|--|---------------------|--------------------------------------|-----------------------------|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                     |                                      |                             |
| Placemaking Option   | ons Plan Reference: | Timsbury (SR13)                      |                             |

# **Comment on the Site:**

Re: proposed development in Timsbury (Ref: SR13)

We have a number of concerns about the proposal for a housing development (SR13) off Loves Hill, Timsbury.

We live on South Road, Timsbury, directly opposite the proposed development site. Our comments are based on evidence gathered during the 10 years we have lived here.

Our main concern relates to vehicular access to the proposed development site and the implications for road safety:

South Road is a narrow and low quality road.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order There is a regular flow of traffic using the road through the day and into the nigh The vehicles are frequently speeding on this section of South Road as they exit and enter the village. This is evidenced by a traffic monitoring exercise carried out by the Road Safety Group (about 2 years ago). This recorded speeds of 68 miles per hour - in a 30 per hour zone. In December 2010, a vehicle crashed into the side of our house due to speeding in poor weather conditions (this was reported to the Police). We have reported our ongoing concerns about speeding traffic to the Police, the Highways Department (BANES) and the Timsbury Road Safety Group. Along with our concerns about speeding traffic: There would be a very poor line of sight from the new development which would contravene vehicle access standards There is only a pavement on one side of South Road; in addition a high number of cars are also parked on the road verge. For the reasons above, we do not support the proposed development off Loves Hill on the grounds of poor vehicular access to the site which would compromise the safety of road users and pedestrians and local residents. Change requested:

| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ | Respondent 6528 Comment 1 Res<br>Number: Number: Na<br>Agent ID: Agent Name: | spondent Mrs Annette Kirby<br>me: | Respondent<br>Organisation:      |  |
|---|--|-----------------------------------|----------------------------------|--|
|   | Further Information available in the o                                       | riginal comment?   Attachmen      | ts sent with the comment? $\Box$ |  |

# **Comment on the Site:**

The SR13 site is totally inappropriate for additional housing. The site is too steep and would seriously compromise the rear aspects of properties on Southlands Drive and South Road. Additionally, the residents of Greenhill House have hitherto had the benefit of apeaceful garden lying to the south west of the site and its tranquillity would be seriously compromised by new houses, as it is understood the development would be to the south of the site leaving the northern plateau free. Access for vehicles off South Road is too narrow without compromising the low stone wall at the entrance to the site. Alternative access via Southlands Drive would mean a greater volume of traffic using an already (at peak times) busy road with much on-street parking to negotiate and more traffic to emerge onto South Road. An estate originally designed for 68 houses (when car ownership was considerably less) could see a potential increased volume in traffic of 36%. Whilst there is currently little information about exact plans to inform our view, there seems to be very fewpositives with this particular option as it does not address the wider traffic problems within the village which are of considerable concern to many residents, particularly those using North Road.

# **Change requested:**

I support the Option of the development on SR14 combined with housing on a small part of SR15 near Lansdown Crescent.

| Schedule of Comments on the Placemaking Plan Options Docum   | ent in Plan Order  |
|--|--|
|  | pondent<br>anisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with  | the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury (SR13)  |  |
| Comment on the Site:   |  |
| Vehicular access is likely to be difficult to achieve to site SR13. The existing entrance of narrow with unsatisfactory sight lines. Widening the entrance and achieving satisfactory possible without obtaining third party land. If access to the site is proposed from South Road then, assuming vehicle ownership of any new houses on site SR13 to the existing properties on Southlands Drive, the effect of creating 25 new dwellings or number of current and new residents vehicles using Southlands Drive to access onto Saccess point of view alone, the southern part of site SR13 is considered inappropriate (Clause 1.417 is incorrect in its statement. Timsbury Parish Council has identified site the preferred development option, not SR13 with SR14.) | chlands Drive rather than directly be in similar proportion to that of a SR13 could add ca. 36% to the outh Road. Therefore from an for development. |
| Change requested:  |  |
| Demandant CE20 Comment of Demandant  |  |
| ·  | pondent<br>anisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with  | n the comment?   |
| Placemaking Options Plan Reference: Timsbury (SR13)  |  |
| Comment on the Site:   |  |
| This site is further from the core of the village on a road deemed to be of low quality. SR15 which will result in even more traffic travelling to Lansdown view and causing even will be forced to walk on a narrow pavement on North Road that is already recognised the development via Southlands Drive is unacceptable as the Drive is narrow and ofte Exiting from the Loves Hill site onto South Road will be difficult because of the lack of Laurels and the Cheshire Home. This stretch of road is not even gritted in spite of repermenths.   | en greater congestion. Pedestrians I as a real concern. The approach to n congested with parked cars. line of sight and the proximity of the         |
| Change requested:  |  |
| That the site SR 15 is identified instead as originally suggested by B&NES officers. It has approach and allows for a much easier access for pupils to the school taking congestic North Road meets Lansdown View.   | •  |
| · · · · · · · · · · · · · · · · · · ·  | pondent<br>anisation:  |
| Agent ID: Agent Name:  |  |
|  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  |
| Having had two children attend Timsbury Primary School whilst living here, and experienced the difficulty of getting them safely to and from school I think building more houses in this part of the village is extremely unwise.  The walking route to school which includes either South Road or North Road, neither of which have adequate pavements, is very hazardous. Speed limits are not remotely maintained in South Road and North Road is far too narrow at the Seven Stars for children, pushchairs etc to pass each other without stepping into the road. Parents regulary resort to the safer option of driving children to school from this end of the village, thereby further increasing the congestion and dangers at school time along North Road. Putting houses on site SR13 would increase all these problems whereas housing on Site SR15 could allow safer access to the school for existing residents and for the new residents of the new housing. Also the proposed access to SR13 through Southlands Drive is totally impractical. There is already a huge amount of on street parking and access is extremely difficult at times already. Emergency vehicles would very often not be able to access the top part of the road as it is. |
| Change requested:   |
| Site SR13 not to be developed.  |
|   |
| Respondent 6541 Comment 1 Respondent Mr Julian Newton Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  As South Road is a major access for children walking to St Mary's Primary School with already limited pathways, and the road is notorious for being driven at speeds in excess of the local limit, to increase the inevitable volume of children taking this route compared to the comparative safety of SR15 would be highly inadvisable.  Change requested:   |
|   |
| Respondent 6543 Comment 3 Respondent Mrs Alexandra Nobbs Respondent North Bristol NHS Trust Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  SR13 (north of Loves Hill) - further away from centre of village and local amenities including school. Would not suit families as much, as likely to use cars to get to school / go to shops etc, causing increased traffic congestion on both South and North roads which are already years busy. LDO NOT believe this is a suitable site for development.   |

No development on SR13 - further from village, will lead to more traffic problems

**Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 6545 Comment 3 Respondent Ms Mercedes Nunez Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR13) Comment on the Site: I object to this policy support the parish council proposals to not approve this site as it will not benefit the village much, is further away from teh village facilities copmpared to SR15 and will create more traffic. Also, there is not adequate access to the site or a lay out as to wherethe green space would be and how it would work **Change requested:** Remove the policy from the options Respondent 6549 Comment 1 Respondent Mrs Madeleine Potts Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR13) Comment on the Site: I live on Southlands Drive and am very worried about proposed site SR13. Southlands Drive is occupied by young families and retired people and I worry about the safety of the road. I don't feel it is appropriate to have as access to 25 new homes. It is narrow because people park on the road and safety is a big worry for me. Also, Loves Lane is very narrow and not suitable as access either. I cannot understand why this land has been put forward for these reasons alone. SR15 is more suitable because it could be accessed of a larger road and a roundabout put there to calm traffic. It is also closer to amenities which if I were moving to the village would be a consideration. I really hope BANES listen to local peoples views. **Change requested:** SR15 be considered more appropriate for development due to infrastructure. Respondent 6560 Comment 1 Respondent Mr Paul Stevens Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury (SR13) **Comment on the Site:**

1) Very restricted vehicular access with low grade narrow roads (Loves Hill/South Road/Southlands Drive), building on this site would increase traffic therefore impacting on congestion and road safety both for vehicles and pedestrians. The road

before you exit the village is single lane, narrow and creates the need to stop to allow other vehicles to pass.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order 2) Currently pedestrian access is very limited with narrow pavements, increased traffic movement as more cars would need to be used more (as located on edge of village) would create safety issues for pedestrians. (close to Cheshire Home, care home etc). 3) SR15 is more centrally located within the village with closer access to amenities, shops and the school. 4) SR15 have significantly better transport and pedestrian access and its location is more suited to increased vehicle movement, building here would be reduce road congestion and increase overall pedestrian safety. 5) SR15 would improve the overall access to the school which will see increased attendance as the village grows. 6) What is the purpose of the Community space (SR13), how will this benefit the community. Located on the outskirts of the village it would have limited access and take more time to get to. I confirm that I support the Parish Council/Steering Group preference to build on Wheelers Yard (SR14)/Lansdowne Crescent(SR15). **Change requested:** Respondent 6561 Comment 1 Respondent Mr Barry Stevenson **Respondent** Space Engineering Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Timsbury (SR13) Comment on the Site: I support the Timsbury parish council proposals "option A", as they provide value added elements such as improved access to the school, and much needed pedestrian access and upgrades to paving and road systems. The BANES alternative of SR13 instead of SR15 only benefits the landowner as far as I can see, the proposal is not properly developed or though through and will only provide additional traffic and access issues in my opinion. **Change requested:**

the development of SR15 and 14 as set out by the parish council

**Placemaking Options Plan Reference:** Timsbury (SR13)

| Respondent 6567<br>Number:  | Comment 4 Respo<br>Number: Name | ndent Dr David Watson<br>: | Respondent Organisation: |  |
|---|---------------------------------|----------------------------|--------------------------|--|
| Agent ID: Ag  | ent Name:                       |                            |                          |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                 |                            |                          |  |
| Further information available in the original comment? — Attachments sent with the comment? —           |                                 |                            |                          |  |

# Comment on the Site:

Developing part or all of this site would add to traffic for adjacent properties, hem-in the Cheshire Home, and would have a poor access onto South Road which already has quite a lot of traffic and no road crossing patrol to help children get to school. The site is also fairly distant from village amenities and is on a steep hill, making development difficult/costly.

| Change requested:   |
|---|
|   |
|   |
| Respondent 6577 Comment 1 Respondent Mrs Doreen Young Respondent Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  |
| I would favour the SR13 Loves Hill site for the development of 25 houses including a local green space along with the Wheelers Yard site (SR14). This would create the 50 dwellings originally suggested for Timsbury as well as a green space and some employment space.   |
| Change requested:   |
|   |
| Description of CE79 Comment 2 B   |
| Respondent 6578 Comment 2 Respondent Ms Lorna Miller Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  |
| If this site is to be developed I think that road improvements needs to be part of the planning permission. NOT a separate issue. A roundabout instead of a crossroads near SR14 would be needed. And a roundabout at the entrance to SR13 near Southlands Drive would also help ease the existing congestion, and the increased congestion caused by the extra houses. |
| Change requested:   |
| I would like the road network changes to be PART of the planning permission, if SR13 is to be developed.  |
|   |
| Respondent 6579 Comment 4 Respondent Mr Geoffrey Smith Number: Number: Name: Respondent Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Timsbury (SR13)   |
| Comment on the Site:  |
| I do not accept this site as an antion for development of 25 or indeed any housing units for the following reasons:   |

(1) This site has none of the advantages for the village which the choice of SR15 would provide regarding the potential for

improved access to the school and improved traffic flow and congestion reduction in North Road/Lansdown View.

- (2) SR15 and SR14 together are viable and supported by the village and its Parish Council. The Options paper provides no evidence in para 1.414 for the need to include SR13 in the Options paper. It is superfluous.
- (3) The site is further away from the facilities in the core of the village than SR15, and so is likely to generate more traffic from vehicles driving into the village, including to the school. This contradicts the B&NES policies on sustainable transport.
- (4) If 25 dwellings are permitted on this field traffic from them would exit onto a 50m stretch of South Road which has been described as a â€low quality road†in a letter dated 2010 from Mr Peter Dawson, Planning Policy and Transport, B&NES.
- (5) Southlands Drive is too narrow and congested to allow access for further vehicles.
- (6) There is no evidence that the additional landowner(s) between the site and Southlands Drive have shown interest in development or acceptability of access across their land.
- (7) There is no evidence of any interest by the landowner(s) that would involve the access road and highway splay to Loves Hill.
- (8) No policy is provided to ensure protection of the amenity interests of adjacent properties at Southlands Drive and South Road.
- (9) No detailed policy is provided for protection of the proposed green site on the north section, nor its extent or access.
- (10) No reference is made for the protection of adjacent mature trees (compared to reference in SR15).
- (11) No detailed reference is made to protect the spectacular views across the Cam Valley and the Mendip Hills beyond, nor the Ha-ha pedestrian route across the north of the site from St Marys Close which is a Promoted Path on the Green Infrastructure Plan.
- (12) In conclusion, there is little evidence or required policies to make this site credible when compared to SR15. As a result SR13 is not safe, viable or acceptable for development and should be withdrawn.

| Change requested:   |                       |               |  |  |
|---|-----------------------|---------------|--|--|
|   |                       |               |  |  |
|   |                       |               |  |  |
| Decreaded CESS Comment 1 D  |                       |               |  |  |
| Respondent 6582 Comment 1 Res   | pondent Shella Clarke | Respondent    |  |  |
| Number: Number: Na  | me:                   | Organisation: |  |  |
| Agent ID: Agent Name:   |                       |               |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                       |               |  |  |
|   |                       |               |  |  |
| Placemaking Options Plan Reference:   | Timsbury (SR13)       |               |  |  |

#### Comment on the Site:

SR13 Off Love's Hill/South Road.

Using the criteria set out by BANES, this site and others had already been considered and discounted. It is cause for concern that it has been put forward as an option now.

I think the SR13 is inappropriate as it is further from the school and shops and is likely to generate more traffic along North Road. North Road is already recognized by BANES Traffic Dept to be a significantly congested road.

1.416 states that only the steeply sloping, southern part of the site would be used for development, but there are no details of where the housing might be, as the map indicates the whole field. There are no details as to how the green site at the top of the field might be accessed, protected or maintained. Indeed if access is via Southlands Drive, then the road would be within this proposed green space.

It also states "Greenhill House is adjoining, and that space would be essential to ensure their settings are respected." If the buildings are at the bottom of the field then they would be adjacent to Greenhill House gardens-so no essential space would be available.

There is no evidence of how the housing would be accessed. If access is onto South Road, then approximately 25% of houses in the village would exit onto a small section of South Road. This road has already been described as "low quality" by Peter Dawson (Planning Policy and Transport) BANES, in a letter dated 2010.

The exit from the field is directly opposite a busy Residential Care Home on a slight bend and has no clear line of vision. This is made worse by parked cars.

The white lias limestone walls are a distinctive part of the character of the village. In order to provide a clear line of sight on to South Road much of this wall will be destroyed. Protection of these walls has not been carried through to the Emerging Policy Approach.

Access onto Southlands Drive will also create more hazards as this road is steep, narrow and congested by parked cars. Recently a fire engine had great difficulty in negotiating its way to the fire.

In addition there is no evidence of interest of any third party in addressing the access issue.

Unlike in SR15, there is no protection for adjacent mature trees and no concern shown for the protection of Timsbur/s last remaining meadow and attendant wildlife.

There is no concern shown for safeguarding the amenity of neighbouring residential properties.

Finally there is no protection for the outstanding views across the Cam Valley and Mendip Hills, or indeed the "Ha-ha" footpath. This footpath is a Promoted Path on the Green Infrastructure Plan.

In conclusion, this site has not been part of collaborative working. It has already been discounted. It is not part of an integrated plan. Unlike SR15, the development on this site will create difficulties, especially road safety issues and offers no benefits to the village at all. I suggest that it should be withdrawn as an Option.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)

Plan Order Number: 589

| Respondent 372 Comment 5 Respondent Number: Number: Name:  | Respondent Timsbury Parish Council Organisation: |  |  |  |
|--|--|--|--|--|
| Agent ID: Agent Name:  |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\square$                   |  |  |  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | (GR15)   |  |  |  |
| Comment on the Site:   |  |  |  |  |
| GR15 – GR15 Option 1 is supported only, bearing in mind comments on SR15 an Right of Way should be included in GR15.   | d SR13 above. Reference to the Public            |  |  |  |
| Change requested:  |  |  |  |  |
|  |  |  |  |  |
| Respondent 6374 Comment 1 Respondent Mrs Marilyn Elizabeth Deacon Number: Name:  | Respondent<br>Organisation:                      |  |  |  |
| Agent ID: Agent Name:  |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\Box$                      |  |  |  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | (GR15)   |  |  |  |
| Comment on the Site:   |  |  |  |  |
| No 1 The parcel of land should be designated a local green space NPPF Framework Paragraph 77.  No 2 Outstanding views to the Cotswold Area of Outstanding Natural Beauty |  |  |  |  |
| No 3 Important area that enhances village character.   |  |  |  |  |
| Change requested:  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Respondent 6375 Comment 1 Respondent Mr Douglas Deacon Number: Name:   | Respondent Organisation:                         |  |  |  |
| Agent ID: Agent Name:  | 9  |  |  |  |
| Further Information available in the original comment?   Attachments ser   | nt with the comment? $\Box$                      |  |  |  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | (GR15)   |  |  |  |

# **Comment on the Site:**

This area of land should be designated a local green space.

It provides special and important outward views to the Cotswold Area of Outstanding Natural Beauty along with local views to Farmborough Common.

This area of land is an important feature of village character.

The amenity viewing area allows the countryside to enter the village at this location.

| Schedule of Comments on the Placemaking Plan Op  | tions Document in Plan Order  |
|--|---|
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6379 Comment 2 Respondent Mrs Gillian Jones Number: Name:   | Respondent Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachmo   | ents sent with the comment? $\Box$  |
|  |   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Gree   | n Space (GR15)  |
| Comment on the Site:   |   |
| I am strongly in favour of GR15 option 2 that is: that the larger area of la<br>the land should be designated for housing and that houses should be acc  | • ,   |
| My reasons are:  |   |
| This land is currently designated a visually important open space and the order. It continues to meet the criteria to be a visually important open within the remit of policy BH15 which states that Development which have permitted. The designation of this land as a VIOS was "strongly and wamenity viewing area and its associated Greenfield sites compliments this frequently used by ramblers, joggers and dog walkers to enjoy access to | space as stated in Policy BH14 and I believe falls arms the openness and character of VIOS will not elcomed" by the parish council and "the visual e amenity value of public footpath CL21/11 which |
| GR15 has wide ranging views which are of outstanding natural beauty are and the people living in The Mead, Crocombe, Landsdown View, Landsdown There is a viewing point, lectern and seating (funded by public subscriptionary people to enjoy the views, including those with limited mobility. The safe area close to the village. I have noted that the bench is used as an appen place.  | own Crescent and for the villagers as a whole. on and corporate organisations) which enables the land is used by families and young people as a   |
| The land should be protected for the benefit of the residents and visitors   | s to the village  |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6391 Comment 4 Respondent Dr Robert Jones Number: Number: Name:   | Respondent Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachmo   | ents sent with the comment?   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Gree   | n Space (GR15)  |
| Comment on the Site:   |   |
| I strongly support the B&NES GR15 OPTION 2 Proposal and am opposed   | to GR15 OPTION 1.   |
| I am in favour of GR15 Option 2 for the following reasons:   |   |

GR15 is a Designated Visually Important Open Space meeting the criteria of Saved Policy BH15 in the 2007 Local Plan. This site should remain an open green space. Development would harm the openness and character of GR15 and in line

with Policy BH15, development should not be permitted (see Lansdown Crescent, Timsbury Visually Important Open Space and Plan to include viewing area within BH15 designation at land at Lansdown Crescent document attached to separate e-mail).

Reasons for supporting GR15 Option 2 also include:

- 1. The site including the viewing area is designated as a visually important open space. The green area is used by walkers, joggers, dog walkers and families, there is a footpath and the area is very well used.
- 2. The viewing area was funded by local subscription and businesses and other organisations, it is much loved and well used. The area facilitates many people with limited mobility to sit and enjoy the marvellous views across to Bath, Tunley, Two Tree Hill, a well known landmark for the village. This site is an important amenity for the whole village and provides outstanding views for the village as a whole.
- 3. The volume and weight of traffic (including heavy and large delivery vehicles) is a serious problem at the east end of North Road. The area is often heavily congested and it is not safe for pedestrians including school children attending the local School. Building on this site would increase traffic and the already serious danger for pedestrians and road users
- 4. There is no car parking in the area, houses on GR15 would increase parking problems.
- 5. There are trees with preservation orders on the west side of the site, these should not be lost, also ancient hedges around the site.
- 6. Use of sites SR13 and SR14 for the developments would enable the village to provide 50 houses as required by B&NES, wold be situated in a less congested part of the village and SR13 and SR14 are both to the west of the village.
- 7. The Parish Council representative at the Timsbury Consultation day stated that the School Governing Body is in favour of SR15, ie. also known as GR15 option 1; and that the Governors had written only the day before stating that they were strongly in favour of this site being developed; this is clearly not the case and misrepresents the position of the School Governing body who are not supporting any of the options as a corporate body. It was also stated that a decision in favour of GR15 as a development site would mean a new school for the village, this also misrepresents the facts.(see letter to parents from the School Governing Body on separate e-mail)
- 8. There appears to be many flaws around the lack of transparency and process adopted by the Parish Council indicating a biased position rather than a "level playing field". (please see my response to SR15 reference number 21672 for more detail on the parish council process and correspondence with Richard Daone and Julie O'Rourke).

The parish council process does not allow the opportunity for residents to "vote" for B&NES Option GR15 option 2 as this and the map indicating this option is entirely omitted from the Parish Council Documentation. This will seriously affect and bias the village residents response to the Parish Council. The omission of this crucial information invalidates the parish council consultation and voting process.

| Change requested:  | ongly in favour of BANES proposa           | TGK15 OPLION 2.   |  |
|--|--|---|--|
| Respondent 6391<br>Number:   | Comment 5 Respondent Gove<br>Number: Name: | Respondent St Mary's Church of Organisation: England Parish Prima |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |  |   |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)

#### **Comment on the Site:**

During those presentations you may have been given the impression that one of the options presented was advantageous to the school and that the school had expressed support for this options. Whilst we have contributed to the neighbourhood plan; a strategic document outlining our aspirations and rationale for a new school in Timsbury as part of that plan, we have not contributed to the Placemaking plan which deals specifically with the provision of extra housing.

You may also have been given the impression that one of the options would support and enable a new school to be built and that St Marys is on a priority list for the provision of a new school. This is not the case.

It was also claimed that one of the options would alleviate traffic issues by providing a rear access to the school. There is currently no evidence to support this statement and the school has not been consulted on such issues.

The Governing Body would like to state that there has been no communication of any kind from any member of the Governing Body, or the Full Governing Body to the Parish Council with regard to the Placemaking Plan.

The Governing Body are therefore deeply concerned about the reputation fo the school in this matter. For the avoidance of all doubt, we would wish to make it clear t hat the Governing Body of St Mary's Primary School is currently not in a position to support any of the options as set out in the Placemaking Plan, either for those put forward by the Parish Council or B&NES Council. This is on the basis that we have seen no evidence that any of these options would have a positive impact on the school. Furthermore, if any proposal were to include any alteration of the school's access, or impact upon our boundaries, we would expect to be involved in a full and open consultation process, which we would share with the wide school community. We will be sharing this same unequivocal message with B&NES Council and the Parish Council.

| Change requested:  |                                |                          |  |  |
|--|--------------------------------|--------------------------|--|--|
|  |                                |                          |  |  |
| Respondent 6408 Comment 1 Respondent Number: Number: Name:   | dent Mrs Elaine Martin         | Respondent Organisation: |  |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                |                          |  |  |
|  |                                |                          |  |  |
| Placemaking Options Plan Reference: Tim  | sbury - Proposed Local Green S | Space (GR15)             |  |  |

# Comment on the Site:

I would like to comment on the site named GR15 which is already saved under Policy BH.15 'visually important open space' in the 2007 open plan.

My main comment in respect of any building on this site is related to the increase in vehicles or vehicle access in this area of the village. In close proximity to GR15 is the local school and two reasonably sized convenience stores. All three of these village amenities are valued and required, despite the already sometimes inconvenient parking required for large lorries delivering to the food stores and the considerable flow of traffic at the start and end of school. It is right to accommodate these inconveniences to keep the village alive and thriving. This being said, all areas of Timsbury have the convenience of these amenities, and as such need to share the burden of increased traffic flow. I feel that any additional traffic in the village should be balanced by being kept away from this particular corner of the village and would support the BANES option that additional housing should be built on SR13. As the Site Allocation Options document points out, this is further away from the core of Timsbury village and must therefore balance up the burden of traffic and additional parking.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order I would also add that this green area (GR15) is constantly in use by people walking, children and dog walkers on an hourly basis, classed as consistent use. **Change requested:** Respondent 6408 Comment 3 Respondent Mrs Elaine Martin Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15) **Comment on the Site:** It is very clear on the BANES website that when finding new homes that these homes and communities will be delivered through brown field site allocation. Clearly the possibility of developing GR15 is outside this policy for numerous reasons. This is a green field site where the local community and business have invested money on seating and a lectern in facilitating the use and views towards Tunley, Beckford Tower, Lansdown Racecourse and Bath combined with local views of Farmborough Common and Two Tree Hill which is pictured on the school badge and the bus stop within the village. The North Road, near the shops and school suffers considerable congestion, which many of us living close by put up with as we are aware of the need to retain our shops and public house as this keeps the village vibrant and produces local jobs. To then put another development on the opposite end of the same road i.e. GR15 near a blind corner, would be overload and the strain this will put on the surrounding area would be too much. I am aware that there are other possible sites in the village but do not feel that the explanations or justifications for NOT using these are either weak or non existent. The Parish Council Placemaking Plan states: The proposals below are supported unanimously by those participating, representing an unusual and positive consensus about the future overall planning needs of the Parish. This statement was put together by 11 people and clearly does NOT represent the views of the village as a whole. I strongly feel that GR15 option 2 site should be designated a Local Green Space in the Place Making Plan and the Neighbourhood Plan. **Change requested:** Respondent 6427 Comment 1 Respondent Lyn Cheeseman Respondent Number: Number: Name: **Organisation:**

**Agent Name:** 

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)

#### Comment on the Site:

Agent ID:

With reference to the new development sites for future housing and business in the Village of Timsbury. My vote goes for option A.

Whilst I understand the need for additional, affordable housing for local people. It really is annoying to see buildings that were built for office use standing empty when there are homeless and other people in need of accommodation. This is a problem in every city.

| Change requested:   |
|---|
|   |
|   |
|   |
| Respondent 6463 Comment 4 Respondent Graham & Iris Nicholls Number: Name: Respondent Timsbury Horticultural Organisation: Society                               |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)  |
| Comment on the Site:  |
| I firmly support the policy to make the whole of TIM5 an official green space.  |
| Change requested:   |
|   |
|   |
| Respondent 6463 Comment 5 Respondent Graham Nicholls Respondent Timsbury Horticultural Number: Name: Organisation: Society                                      |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)  |
|   |
| Comment on the Site:  I fully support GR15 option 2 as so many people in Timsbury already use this site for recreation and it must be kept for the village use. |
| Change requested:   |
| Change requested.   |
|   |
|   |
| Respondent 6463 Comment 7 Respondent Mary & Rob Trout via Graham Number: Name: Nicholls Respondent Timsbury Horticultural Organisation: Society                 |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)  |
| Comment on the Site:  |
| I support GR15 option2 to make this area a Green Space for the use of villagers   |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Change requested:   |
|   |
|   |
| Respondent 6463 Comment 10 Respondent Mrs Florence M Button via Respondent Timsbury Horticultural Number: Name: Graham Nicholls Organisation: Society  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |
|   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)  |
| Comment on the Site:  |
| I am supporting GR15 option 2 to make the whole field Timsbury Green space to join up with the school playing field   |
| Change various tadi   |
| Change requested:   |
|   |
|   |
| Respondent 6463 Comment 12 Respondent Graham Nicholls Number: Name: Respondent Timsbury Horticultural Organisation: Society   |
| Agent ID: Agent Name:   |
|   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)  |
| Comment on the Site:  Regarding the Banes Option 2 for GR15 if this doesn't happen we are likely to lose all the wildlife that are in what is known as 'the paddock' the stretch of wooded area just adjacent to the school's garden. From this site we enjoy in our garden a variety of birds such as Coal Tit, Great Tit, Blue Tit, Long Tailed Tit, Blackbird, Thrush, Gold Finch, Bullfinch, Robin and just recently Redwing and a Blackcap. Owls also use this area for food coming over from Parish's We also have a family of grey squirrels visiting us every day. We pick blackberries along the hedges in the season and being a keen photographer I like to wander along the hedgerow and photograph the dog roses, and other wild flowers. All this will be lost once building starts. Please make this whole field a green space so the present beautiful view is protected and future chidren can enjoy it. |
| Both myself and my wife want BANES to implement Option 2 for this site and make it a complete green site.   |
| Change requested:   |
|   |
|   |
|   |
| Respondent 6464 Comment 1 Respondent Mrs Isabel Scott Evans Respondent Organisation:  Agent ID: Agent Name:   |
|   |
| Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)  |

# **Comment on the Site:**

Following publication of the recent Timsbury Letter, the Timsbury "Place Making plan" stage 2 has been issued and having looked at this I write to express my objection and concerns to the proposals to develop the field known as TIM5 (Great Mead) GR15 option 2.

It is very clear on the BANES website that when finding new homes that "these homes and communities will be delivered through brown field site allocation". Clearly the possibility of developing TIM5 GR15 option 2 is outside this policuy for numerous reasons. This is a green felid site where the local community and business have invested money on seating and a lectern in facilitating the use and views towards Tunley, Beckford Tower, Lansdown Racecourse and Bath combined with local views of Farmborough Common and Two Tree Hill which is pictured on the school badge, new mosaic on the school wall/entrance and the bus stop within the village.

It is widely felt that the Parish Council has already made their own decision on where these homes are to be biult, irrespective of the needs of the village. I understand that the site TIM1 (Wheeler's Yard) is marked to have 25 homes on it and whilst I agree with this proposition, I am very mindful of the traffic situation close to the shops and YMCA on North Road. This area suffers considerable congestion, which many of us living close by "put up with" as we are aware of the need to retain our shops and public house as this keeps the village vibrant and produces local jobs. I then put another development on the opposite end of the same road i.e. TIM5 GR15 option 2 near a blind corner, would be overload and the strain this will put on the surrounding area would be too much.

I am aware that there are other possible sites in the village but do not feel that the explanations or justifications for not using these are either weak or non-existent.

The Parish Council Place Making Plan states: "The proposals below are supported unanimously by those participating, representing an unusual and positive consensus about the future overall planning needs of the Parish". This statement was put together by eleven people and clearly does NOT represent the views of the village as a whole.

I strongly feel the TIM5/GR15 option 2 site should be designated a Local Green Space and the Place Making Plan and the Neighbourhood Plan.

| Change requested:  |                             |  |  |  |
|--|-----------------------------|--|--|--|
|  |                             |  |  |  |
| ·  | Respondent<br>Organisation: |  |  |  |
| Agent ID: Agent Name:  |                             |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent $v$   | with the comment? $\Box$    |  |  |  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (G   | GR15)                       |  |  |  |
| Comment on the Site:   |                             |  |  |  |
| . I also support the designation of the following as Local Green Spaces: GR10, GR11, GR12, GR14 & GR15(Option 1).  |                             |  |  |  |
| Change requested:  |                             |  |  |  |
|  |                             |  |  |  |
|  |                             |  |  |  |
|  | Respondent<br>Organisation: |  |  |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent or a sent | with the comment? $\Box$    |  |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |   |
|--|---|
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Sp   | pace (GR15)   |
| Comment on the Site:   |   |
| Comment on the Site:<br>My mother lives in the Mead, which is why I have an interest. Please keep tl   | he fields at the back of her house as green   |
| space and protect from any development. North road cannot take any more at my mother's house school time. There are frequently lorries delivering to both on different sides of the road. Tractors and trailers from the farm at Cr to wait up to 10 minutes to turn in to Crocombe lane. Traffic is saturated. Pl | e traffic. Sometimes I have had occasion to be the Coop, and another to the store opposite, rocombe and school traffic. It is not unknown |
| Change requested:  |   |
|  |   |
| Respondent 6492 Comment 1 Respondent Mrs Rita Day Number: Number: Name:  | Respondent<br>Organisation:   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments  | s sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Sp   | pace (GR15)   |
| Comment on the Site:   |   |
| would like all of gr15 to remain as a local green space thereby protected fr   | om development . My parish council did not  |
| give this option in its consultation pamphlet .  |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6493 Comment 1 Respondent Mr Nigel Day Number: Name:  | Respondent Organisation:  |
| Agent ID: Agent Name:  | Organisation.   |
| Further Information available in the original comment?   Attachments   | s sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Sp   | pace (GR15)   |
| Comment on the Site:   |   |
| unfortunately my parish coucil never gave me this option on the flyer which  | n they delivered through my door but i would  |
| like option 2 to keep gr15 a complete green field, protecting it from develop  | oment   |
| Change requested:  |   |
|  |   |
| Description CEOF Course to the   |   |
| Respondent 6505 Comment 4 Respondent Mr Chris Gittins Number: Number: Name:  | Respondent Organisation:  |
| Agent ID: Agent Name:  | <b>0</b> *  |
| Further Information available in the original comment?   Attachments   | s sent with the comment? $\square$  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |
|--|--|
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)   |  |
| Comment on the Site: I support GR15 Option 1 which I believe adequately protects the benefits of that field, whilst enabling development of SR15.  |  |
| Change requested:  |  |
| Should be reference to Tunley hill, not Tunley the village.  |  |
| Respondent 6513 Comment 1 Respondent Mrs Angela Holden-Roberts Respondent Organisation:  |  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)   |  |
| Comment on the Site: I wish to support GR15 Option 2 that no development would be permitted on the land known as Tim 5, which has previously been designated as a visually important space.  |  |
| Policy BH 15 states that any development which harms the openness and character of visually important Open Spaces will not be permitted.   |  |
| As a non-resident of Timsbury who regularly visits family in the village I was horrified to hear of the proposed deveopment of the field known as Tim 5, and would like to add my voice to that of residents of Timsbury in objecting to any development of Tim 5.                                 |  |
| Whenever I visit Timsbury I very much enjoy walking through the fields, and would be saddened if this proposed building scheme goes through. The view from this field is outstanding, and the outlook towards Two Tree Hill and beyond would be irreparably damaged if any development goes ahead. |  |
| urge that Option 2 for GR15 is adopted, as the loss of this wonderful village asset would be incredibly sad - this is such an important space for village and visitors alike, please don't lose it.  |  |
| understand that there is another potential brownfield development site within the village under consideration, which may well prove to be the more acceptable development site.  |  |
| Change requested:  |  |
|  |  |
| Respondent 6523 Comment 2 Respondent Mrs Jeannette Jones Respondent Organisation:  |  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR15)   |  |

# Comment on the Site:

In conjunction with my comments about SR15 I would support this option. Upon closer look at the site plan for SR15 It would appear that the viewing point at the entrance to Lansdown Crescent would be lost and then only the north facing properties of the Crescent and possibly the new housing would have access to this beautiful vista. This would deprive the recreational walker to this "stand a stare" opportunity. Such a pity in this fast crazy world of ours.

| Change requested:  |   |
|--|---|
| Respondent 6534 Comment 1 Respondent Mr William Martin Number: Name:   | Respondent<br>Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachment   | s sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green S  | pace (GR15)   |
| Comment on the Site:   |   |
| Having looked at the proposed plan, it appears that this side of the village be overall disruption. This is mainly caused by the school traffic and delivery to generated by the school and shops will naturally cause disruption, it seems development to an already busy area. It would also be worth mentioning the | the two shops. Whilst I understand that traffic unreasonable to add to this load by further |

# **Change requested:**

side of the village

The developments of SR13 and SR14 would be far more suitable as this is quieter in terms of traffic and pedestrians and is also much easier for traffic to access main roads to Bath, Bristol and Wells.

development being close to the village pub and village hall, both of which are far more easily accessed from the OTHER

resources and should therefore share the burden. Another point which I find interesting is the mention of this

Finally the proposed development of SR15 would impact the village, as the field is widely used by dog walkers ramblers etc and is a valuable resource with far reaching views

| Respondent 6537 Comment 1 Res<br>Number: Number: Namber: Namber | ·   | Respondent Organisation: |
|---|---|--------------------------|
| Agent ID: Agent Name:   |   |                          |
| Further Information available in the or                         | riginal comment? $\square$ Attachments sent | with the comment? $\Box$ |
| Placemaking Options Plan Reference:                             | Timsbury - Proposed Local Green Space (     | GR15)                    |

# **Comment on the Site:**

Re: The decision villagers are being asked to make for building on GR15 OR GR13.

The GR15 site is on a better road system, on the edge of the village making it more accessible whilst building is being progressed, and is near to local shops and the village school. Developing this site could lead to improved access to St Mary's school and help to reduce congestion in Lansdown View, North Road and Crocombe Lane. It would also enable a safer access to school. The GR13 site is more difficult to access, on a low quality road and further away from all local amenities; in fact it has already been noted that there are difficulties in achieving safe vehicular access to this site. Villagers have been unsuccessful in getting the road from Southlands Drive to Greenhill House gritted in spite of all attempts for more than a year. This piece of road would form the possible exit / entrance to the site of GR13. Southlands Drive is too narrow and congested to consider as a means of accessing site GR13

# **Change requested:**

To adopt the plan proposed by Timsbury Parish Council ie for housing on Wheelers Yard and Lansdown Crescent and NOT off Loves Hill for the reasons as outlined in 2.2 above

| Respondent6545Comment4RespondentMs Mercedes NunezNumber:Number:Name:   | Respondent Organisation:                   |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (G   | GR15)                                      |
| Comment on the Site:   |  |
| I support the parish council plans for only Option 1 for GR15.   |  |
| Change requested:  |  |
|  |  |
| Respondent 6547 Comment 1 Respondent Mrs Val Peters Number: Name:  | Respondent Applet Technology Organisation: |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (0   | GR15)                                      |
| Comment on the Site:   |  |
| Para 1.420 Option 1 is the only opportunity to make real progress on some of the many issue regards to the School and the area near the shops. Decline this option and any fur increase the amount of gridlock, road rage and pedestrian incidents along North R | rther development within the village will  |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6558 Comment 1 Respondent Mr Austin Sage Number: Number: Name:  | Respondent BFE Group Organisation:         |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (0   | GR15)                                      |
| Comment on the Site:   |  |

Our parish council have not given us option 2 in the consultation voting papers so giving a flawed consultation, why? This needs to be corrected, regardless of viewpoint so that everyone has a fair choice!

# **Change requested:**

A revised voting paper needs to be sent out and the reason why this choice was not offered. Without this proper consultation an objection could quite easily cause problems further down the process.

| Respondent 6567 Comment 2 Respondent Dr David Watson Number: Number: Name:  | Respondent Organisation:   |
|---|--|
| Agent ID: Agent Name:   | , and the second |
| Further Information available in the original comment? $\Box$ Attachments se  | nt with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space   | e (GR15)   |
| Comment on the Site:  |  |
| Making this site (minus the area SR15, proposed for housing) as green space wi countryside and easy access to views towards Priston. Designating this area as guse for informal recreation, dog walking etc by villagers. |  |
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 6574 Comment 1 Respondent Miss Katie Watson Number: Name:  | Respondent Organisation:   |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments se  | nt with the comment? $\Box$  |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space   | e (GR15)   |
| Comment on the Site:  |  |
| I would like to share my objections to the site alongside the Mead. I work week   | •  |
| administrator. It is a beautiful green belt which deserves protection. It seems in another location in the village.   | necessary to use the other brownfield site   |
| Change requested:   |  |
|   |  |

| Placemaking Options Plan Reference: Timsbury - (GR14)   | Proposed Local Green Space Plan Order Number: 592                    |
|---|--|
| Respondent 372 Comment 6 Respondent Number: Number: Name:   | Respondent Timsbury Parish Council Organisation:                     |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ At  | tachments sent with the comment?                                     |
| Placemaking Options Plan Reference: Timsbury - Proposed Loc   | al Green Space (GR14)  |
| Comment on the Site:  GR14- this is supported as an LGS for the following reasons:  |  |
| <ul> <li>The site is 2ha in size and is not considered to be an extensive tr</li> <li>The site is only five minutes walk from the core of the village an</li> <li>The site is used for a full range of field sports by St Mary's School</li> <li>The site is also used by the village football and cricket clubs for the extra-curricular and community use is facilitated by a sports pay</li> </ul> | d adjacent to the village primary school. bl. training and fixtures. |
| village sports clubs and grants from national bodies.  • The site affords its users extensive countryside views, including ancient Tunley hill fort.  | those to Farmborough Common and the site of the                      |
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 6408 Comment 2 Respondent Mrs Elaine Mart Number: Name:  | in Respondent Organisation:  |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$   | :tachments sent with the comment? $\Box$                             |
| Placemaking Options Plan Reference: Timsbury - Proposed Loc   | al Green Space (GR14)  |
| Comment on the Site:  I totally support the use of SR14 but question the need for some local trading estate known as "Timsbury Workshops". I understate to be "let".  | ·  |
| Change requested:   |  |
| Respondent 6472 Comment 6 Respondent Mr Peter Bradsh<br>Number: Number: Name:   | naw Respondent Organisation:   |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ At  | ttachments sent with the comment? $\Box$                             |

Plan Order

| Schedule of Comme                          | ents on the Placemaking Plan Options Document in Plan Order                    |
|--|--|
| Placemaking Options Plan Reference:        | Timsbury - Proposed Local Green Space (GR14)                                   |
| Comment on the Site:                       |  |
| . I also support the designation of the fo | ollowing as Local Green Spaces: GR10, GR11, GR12, GR14 & GR15(Option 1).       |
| Change requested:                          |  |
| <u> </u>                                   |  |
|  |  |
|  |  |
|  | pondent Dr David Watson Respondent me: Organisation:                           |
| Tunio en Tunio                             | me. Organisation.  |
| Agent ID: Agent Name:                      | riginal comment? $\square$ Attachments sent with the comment? $\square$        |
| Turther information available in the or    | Attachments sent with the comment:   |
| Placemaking Options Plan Reference:        | Timsbury - Proposed Local Green Space (GR14)                                   |
|  |  |
| Comment on the Site:                       | to retain as they are yide an important amonity for the school and for various |
| sports groups within the village.          | to retain as they provide an important amenity for the school and for various  |
| sports groups within the vinager           |  |
|  |  |
| Change requested:                          |  |

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space

(GR13)

Plan Order Number: 595

| Number: Number: Name:   | Respondent Timsbury Parish Council Organisation: |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sen   | It with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space   | (GR13)   |
| Comment on the Site:  |  |
| GR13 – we accept comments by B&NES not to allocate an LGS policy to this site.  |  |
| Change requested:   |  |
|   |  |
| Respondent 6536 Comment 1 Respondent Mr Simon Messent   | Respondent                                       |
| Number: Name:   | Organisation:                                    |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sen   | it with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space   | (GR13)   |
| Comment on the Site:  |  |
| Hi, its adjacent land and more than happy for that to be protected, its a quiet val mill. For note there were parish discussions about the sloping field below Parish' that development, we own the adjacent land to the south of this; the land is alre invite further encroachment on the rural area beyond this. | 's House, we would not be in favour of           |
| Change requested:   |  |
|   |  |
| Respondent 6547 Comment 2 Respondent Mrs Val Peters Number: Number: Name:   | Respondent Applet Technology Organisation:       |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sen   | It with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space   | (GR13)   |

#### **Comment on the Site:**

para 1.417 is confusing and contradicts other statements made throughout the plan, with respects to the Parish Councils preferred option which is NOT SR13 with SR14 but is SR15 with SR14. How can you undertake meaningful consultation when giving out misleading information?

SR13 why was this option included when the Parish Council followed your instructions and advice, set up working parties

that looked at all aspects of the Neighbourhood plan, talked to landowners, neighbours and all interested parties and came up with well considered recommendations which were considered best for the village. B&NES then came along and said they also had to include SR13 - WHY? It seems to fly against democracy.

#### **Change requested:**

Para 1.417 should be corrected to accurately reflect the view of the Parish Council.

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space

(GR12)

Plan Order Number: 597

| Respondent 372 Comment 8 Respondent Number: Name:  | Respondent Timsbury Parish Council Organisation: |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments see  | nt with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | e (GR12)   |
| Comment on the Site:  GR12 – It should be noted that this site is within the Green Belt. With the detail   | given support for this site as LGS is agreed.    |
| Change requested:  |  |
| Respondent 6471 Comment 5 Respondent Mr Peter Bradshaw Number: Name:   | Respondent Organisation:                         |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments set  | nt with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | e (GR12)   |
| Comment on the Site:   |  |
| . I also support the designation of the following as Local Green Spaces: GR10, ${\sf G}$   | R11, GR12, GR14 & GR15(Option 1).                |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6567 Comment 3 Respondent Dr David Watson Number: Number: Name:   | Respondent Organisation:                         |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments set  | nt with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | e (GR12)   |
| Comment on the Site:   |  |
| Designating this area as green space will hopefully ensure the area remains as a asset for the village and if anything we need more of them on the southern side | •  |
| Change requested:  |  |
|  |  |

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space

(GR11)

Plan Order Number: 599

| Respondent 372 Comment 9 Respondent Number: Name:   | <b>Respondent</b> Timsbury Parish Council <b>Organisation:</b> |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                                       |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (   | GR11)  |
| Comment on the Site:  GR11 – LGS for this site is supported.  |  |
| Change requested:   |  |
|   |  |
| Respondent 6471 Comment 4 Respondent Mr Peter Bradshaw Number: Name:  | Respondent Organisation:                                       |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                                       |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (   | GR11)  |
| Comment on the Site:  . I also support the designation of the following as Local Green Spaces: GR10, GR1  | 11, GR12, GR14 & GR15(Option 1).                               |
| Change requested:   |  |
|   |  |
| Respondent 6486 Comment 4 Respondent Mr David Collett Number: Name:   | Respondent Organisation:                                       |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                                       |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (   | GR11)  |
| Comment on the Site:  This batch should not be classified as a Green space and should be cleared. It exist by accident remains merely as a nostalgic eyesore in the heart of the village. Then did gain access it is probably dangerous. The mature trees at the Eastern edge blo in Newmans Lane. It may be that badgers enjoy the area, nobody else does. | e is no access for people and if anyone                        |
| Change requested:   |  |

# Respondent 6567 Comment 6 Respondent Dr David Watson Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR11) **Comment on the Site:** Vital that this is conserved for biodiversity, local history and visual amenity. Building on SR14 should be off-set some distance from the woodland otherwise trees will just end-up being felled or severely trimmed. This area may need to be bigger than anticipated if protected species are found to be associated with old structures on site. Margins will need to be replanted with native species and access restricted, otherwise biodiversity e.g. breeding birds will decline. **Change requested:**

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space

(GR10)

Plan Order Number: 601

| Number: Name:  | <b>Respondent</b> Timsbury Parish Council <b>Organisation:</b>                                  |
|--|---|
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment?   Attachments s   | ent with the comment? $\square$   |
| Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  | ce (GR10)   |
| Comment on the Site:  GR10 - LGS for this site is supported for the following reasons:   |   |
| <ul> <li>The site is 2.4ha in size and is not considered to be an extensive tract of land.</li> <li>The site is close to the core of the village and adjacent to the village hall.</li> <li>The site is used by village sports clubs for soccer, cricket, five-a-side football at the site incorporates a children's play area with swings and other play equipate.</li> <li>The site is used by villagers for general relaxation.</li> <li>The site is used for special village events including an annual 'Fun Day' and the There are good views of The Sleight and Farmborough Common from the site.</li> </ul> | and tennis.<br>ment.<br>ne Horticultural Society Show.  |
|  |   |
| Change requested:  |   |
|  |   |
| Respondent 6471 Comment 3 Respondent Mr Peter Bradshaw Number: Name:   | Respondent<br>Organisation:   |
|  | Organisation.   |
| Agent ID: Agent Name:  | Organisation.   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments s  |   |
|  | ent with the comment? $\Box$  |
| Further Information available in the original comment?  Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space   | ent with the comment? $\Box$  |
| Further Information available in the original comment?   Attachments s   | ent with the comment?   ce (GR10)   |
| Further Information available in the original comment?  Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  Comment on the Site:   | ent with the comment?   ce (GR10)   |
| Further Information available in the original comment?   Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  Comment on the Site:  I also support the designation of the following as Local Green Spaces: GR10,  | ent with the comment?   ce (GR10)   |
| Further Information available in the original comment?   Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  Comment on the Site:  I also support the designation of the following as Local Green Spaces: GR10,  | ent with the comment?   ce (GR10)   |
| Further Information available in the original comment?   Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  Comment on the Site:  I also support the designation of the following as Local Green Spaces: GR10,  | ent with the comment?   ce (GR10)   |
| Further Information available in the original comment?  Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  Comment on the Site:  I also support the designation of the following as Local Green Spaces: GR10,  Change requested:  Respondent 6505 Comment 5 Respondent Mr Chris Gittins   | ent with the comment?   ce (GR10)  GR11, GR12, GR14 & GR15(Option 1).  Respondent               |
| Further Information available in the original comment?  Attachments s  Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space  Comment on the Site:  I also support the designation of the following as Local Green Spaces: GR10,  Change requested:  Respondent 6505 Comment 5 Respondent Mr Chris Gittins  Number: Name:  | ent with the comment?   ce (GR10)  GR11, GR12, GR14 & GR15(Option 1).  Respondent Organisation: |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Comment on the Site: I support GR10 except that it should include the play area to the south. **Change requested:** GR10 should include the play area to the south as it is part of the wider benefits of the site. Respondent 6545 Comment 5 Respondent Ms Mercedes Nunez Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: |Timsbury - Proposed Local Green Space (GR10) **Comment on the Site:** I support this site policy **Change requested:** The policy must include the play area on the map. Respondent 6567 Comment 8 Respondent Dr David Watson Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR10) **Comment on the Site:** Village playing fields at Conygre Hall are a very important visual and recreational amenity for people in the village. I'm not sure why the children's play area has been excluded from this area - it's a very important component of the facilities on this site. **Change requested:**

**Placemaking Options Plan Reference:** Timsbury - Proposed Local Green Space (GR9)

Plan Order Number: 603

Respondent 372 Comment 11 Respondent **Respondent** Timsbury Parish Council Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR9) Comment on the Site: **Change requested:** Respondent 6441 Comment 4 Respondent Terence Richard Fisher Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space (GR9) **Comment on the Site:** Of course the best place looking to the future is GR9 although, I realise this is probably outside the parish boundary, traffic from this site could join the vehicles from Frome, Radstock and Peasdown that run through our village with a direct route to Bristol and Bath that use The Avenue and North Road, two hours in the mornings and two in the evenings. I suppose I'm lucky now being retired, standing at my gate and smiling as the traffic pile-up, thinking I'm not going anywhere and neither are they. **Change requested:** 

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space

(GR8)

Plan Order Number: 605

| Respondent 372 Comment 12 Res              | •   | Respondent Timsbury Parish Council |
|--|---|------------------------------------|
| Number: Number: Na                         | me:                                       | Organisation:                      |
| Agent ID: Agent Name:                      |   |                                    |
| Further Information available in the or    | riginal comment? Attachments sent         | ; with the comment? $\Box$         |
|  |   |                                    |
|  |   |                                    |
| Placemaking Options Plan Reference:        | Timsbury - Proposed Local Green Space (   | GR8)                               |
|  |   |                                    |
| Comment on the Site:                       |   |                                    |
| GR8 – LGS for this site is supported, wit  | h additional reasons as follows:          |                                    |
| The site has many mature trees             |   |                                    |
| • The site is directly adjacent to housing | from which residents access it            |                                    |
| • The site has a public path adjacent to   | it to access it and enjoy the green space |                                    |
|  |   |                                    |
| Change requested:                          |   |                                    |
|  |   |                                    |
|  |   |                                    |

Placemaking Options Plan Reference: Timsbury - Proposed Local Green Space

(GR7)

Plan Order Number: 608

|   | spondent<br>ame:   | <b>Respondent</b> Timsbury Parish Council <b>Organisation:</b> |  |  |
|---|--|--|--|--|
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |  |  |  |
|   |  |  |  |  |
| Placemaking Options Plan Reference:   | Timsbury - Proposed Local Green Space (  | GR7)   |  |  |
| Comment on the Site:  |  |  |  |  |
| GR7 - we accept comments by B&NES r   | not to allocate an LGS policy to this site, as   | long as other B&NES detailed policies                          |  |  |
|   | e Green Infrastructure Plan. As a result sor onal references to access, leisure and visito |  |  |  |
| Change requested:   |  |  |  |  |
|   |  |  |  |  |

Placemaking Options Plan Reference: West Harptree - Site Allocation Options /

1.442

Plan Order Number: 613

Respondent 1649 Comment 1 Respondent Mrs Janet Burdge **Respondent** West Harptree Parish Number: Number: Name: **Organisation:** Council **Agent Name:** Agent ID: Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: | West Harptree - Site Allocation Options / 1.442 Comment on the Site: The Placemaking Plan was always going to be a contentious issue within this Parish, and so West Harptree Parish Council (WHPC) decided to hold several public meetings in late 2013 to discuss the options and sites available. The outcome of this was that Parishioners felt the housing allocation should not be on one large site, but spread across several smaller sites and so be sympathetic and less intrusive with their surroundings. The last meeting culminated in a Referendum where the attending Parishioners were asked to rate the 5 small sites that had been proposed in order of preference, and the top 3 were then progressed by WHPC to B&NES as the preferred options. WHPC then subsequently completed assessments on these sites (and also on the larger and rejected smaller sites) using the relevant B&NES toolkits supplied, which were then submitted to B&NES by the required deadline. When all these sites were inspected by B&NES Officers in summer 2014 (accompanied by 2 Parish Councillors), the 2 larger sites were found wanting in certain criteria, but 2 of the 3 WHPC preferred options were found to meet the B&NES

criteria, and could accommodate the allocation between them, so B&NES advised WHPC that these 2 preferred small sites would now progress to the next stage of the process.

Having undertaken all of this work, far in excess of what was required, to obtain the views and aspirations of the

Parishioners who we represent, WHPC is extremely disappointed to see that the 2 larger sites that both failed certain B&NES criteria and were rejected by the Village Referendum, have still been included in the Options Document for this

Parish, and consider that these should be withdrawn for the above reasons.

| Respondent 6396 Comment 2 Respondent Mr and Mrs Payne                     | Respondent                       |
|---|----------------------------------|
| Number: Name:   | Organisation:                    |
| Agent ID: 218 Agent Name: Peter Brett Associates                          |                                  |
| Further Information available in the original comment? <a> Attachment</a> | ts sent with the comment? $\Box$ |

Placemaking Options Plan Reference: West Harptree - Site Allocation Options / 1.442

#### **Comment on the Site:**

**Change requested:** 

1 Introduction

- 1.1.1 These representations are submitted on behalf of Mr & Mrs Payne, who are the owners of land at Leacroft, Bristol Road, West Harptree.
- 1.1.2 The representations relate to the PlaceMaking Plan Options Consultation and the document which was issued on 27th November 2014.

- 1.1.3 The representations relate to the proposed allocation of land within the village of West Harptree, where Mr & Mrs Payne have lived for the majority of their lives.
- 1.1.4 A planning application (reference 14/05899/OUT) has been submitted in regard of the land owned by the Payne's and is currently subject of consideration by the Council. This application is in outline but demonstrates how the site which they own might be developed for 17 new dwellings, with one dwelling (Leacroft House) being retained and a second dwelling (Leacroft Bungalow) being demolished. The material supporting this application and the proposed masterplan are referred to in this submission.
- 2 West Harptree para 1.441 1.443
- 2.1.1 The introductory paragraphs relating to the village set out the background to the site and the required level of dwellings that the settlement might be expected to accommodate.
- 2.1.2 Para 1.442 states that the village is "washed over by the Mendip Hills Area of Outstanding Natural Beauty and is required to accommodate housing development of around 10-15 dwellings".
- 2.1.3 This is reiterated in the following paragraph which states that
- 2.1.4 "There is no preferred option for development in West Harptree. Not all of the sites shown on the map on the page below would need to be allocated in order to enable provision of between 10-15 dwellings required by the Core Strategy. West Harptree Parish Council's preferred approach is to develop SR3 in conjunction with SR4. B&NES have considered the evidence for sites SR1 and SR2 and these sites have been included as alternative options for development."
- 2.1.5 The statement that the Adopted Core Strategy indicates a provision of between 10-15 dwellings for the village is incorrect. The village meets the criteria as a RA1 settlement and as such the housing target for West Harptree is actually "around 50 dwellings".
- 2.1.6 POLICY DW1 District-wide spatial Strategy states that
- 2.1.7 "The overarching strategy for B&NES is to promote sustainable development by: 1d. development in rural areas is located at settlements with a good range of local facilities and with good access to public transport."
- 2.1.8 West Harptree is in the Rural Area as defined in the Core Strategy and Table 1- Locational Policy Framework indicates the relevant policy which might apply to each settlement in the district.
- 2.1.9 In the case of West Harptree, the village is included in a group with Bathampton, Batheaston, Bathford, Bishop Sutton, Clutton/Temple Cloud, Compton Martin, East Harptree, Farrington Gurney, Farmborough, Hinton Blewett, Saltford, Camerton, Ubley, and Whitchurch which are noted to be either RA1 or RA2 settlements.
- 2.1.10 Policy RA1 provides a set of criteria for settlements to be considered to provide "a good range of local facilities" and "good access to public transport".
- 2.1.11 These are: at least 3 of the following key facilities within the village: post office, school, community meeting place and convenience shop, and
- at least a daily Monday-Saturday public transport service to main centres
- 2.1.12 The village does not have a school (though there is one in East Harptree), but it does have a shop, post office and the Memorial Hall (All shown on Figure 2 attached within Appendix A). Therefore West Harptree meets this criterion.
- 2.1.13 In addition it also has a surgery, hairdressers, church and pub (The Crown).
- 2.1.14 In regard to bus services, the table below sets out the frequency of bus services through the village. The table shows a level of service frequency that would be typical of rural bus routes, providing 5 services for the settlement on most days and an additional service on some days. The majority of services operate once per direction per day.

- 2.1.16 Service 672 operates more frequently with three services outbound in the AM peak period and three services returning in the PM peak period on Monday to Saturday. This level of service could be used for commuting or leisure journeys to destinations which include Bristol City Centre.
- 2.1.17 Therefore, the criterion for "good access to public transport" is met by West Harptree.
- 2.1.18 The village is also outside of the Green Belt, which is a further criteria referred to in Policy RA1.
- 2.1.19 As a result, West Harptree clearly meets the criteria as a RA1 settlement within the definition of the Adopted Core Strategy.
- 2.1.20 Para 5.21 of the Core Strategy goes on to state that "The strategy for the rural areas therefore is to enable housing developments of around 50 dwellings at each of the villages which meet the criteria of Policy RA1".

#### Change requested:

- 2.2.1 Para 1.442 and 1.443 should both be amended to reflect the fact that West Harptree is an RA1 Settlement, as defined in the Adopted Core Strategy.
- 2.2.2 Therefore, para 1.442 should state:
- 2.2.3 West Harptree meets the criteria of an RA1 Settlement and as such around 50 dwellings should be provided within the plan period.
- 2.2.4 Para 1.443 should be deleted and replaced by a statement which confirms the agreed strategy to meet this requirement in the village. Based on the following comments, it is suggested that this might include allocation of both sites SR2 and SR3 as shown on the accompanying map.

# Placemaking Options Plan Reference: West Harptree (SR1)

Plan Order Number: 619

| Respondent 1649 Comment 2 Res<br>Number: Number: Na   | spondent Mrs J anet Burdge<br>me: | Respondent West Harptree Parish Organisation: Council |  |  |
|---|-----------------------------------|---|--|--|
| Agent ID: Agent Name:   |                                   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                   |   |  |  |
|   |                                   |   |  |  |
| Placemaking Options Plan Reference:   | West Harptree (SR1)               |   |  |  |
|   |                                   |   |  |  |

#### Comment on the Site:

The Placemaking Plan was always going to be a contentious issue within this Parish, and so West Harptree Parish Council (WHPC) decided to hold several public meetings in late 2013 to discuss the options and sites available. The outcome of this was that Parishioners felt the housing allocation should not be on one large site, but spread across several smaller sites and so be sympathetic and less intrusive with their surroundings. The last meeting culminated in a Referendum where the attending Parishioners were asked to rate the 5 small sites that had been proposed in order of preference, and the top 3 were then progressed by WHPC to B&NES as the preferred options.

WHPC then subsequently completed assessments on these sites (and also on the larger and rejected smaller sites) using the relevant B&NES toolkits supplied, which were then submitted to B&NES by the required deadline.

When all these sites were inspected by B&NES Officers in summer 2014 (accompanied by 2 Parish Councillors), the 2 larger sites were found wanting in certain criteria, but 2 of the 3 WHPC preferred options were found to meet the B&NES criteria, and could accommodate the allocation between them, so B&NES advised WHPC that these 2 preferred small sites would now progress to the next stage of the process.

#### **Change requested:**

Having undertaken all of this work, far in excess of what was required, to obtain the views and aspirations of the Parishioners who we represent, WHPC is extremely disappointed to see that the 2 larger sites that both failed certain B&NES criteria and were rejected by the Village Referendum, have still been included in the Options Document for this Parish, and consider that these should be withdrawn for the above reasons.

| Respondent 1649<br>Number: |                      | spondent Mrs Janet Burdge ime: | <b>Respondent</b> West Harptree Parish <b>Organisation:</b> Council |
|----------------------------|----------------------|--------------------------------|---|
| Agent ID: Ag               | ent Name:            |                                |   |
| Further Informatio         | n available in the o | riginal comment?   Attac       | hments sent with the comment? $\Box$                                |
|                            |                      |                                |   |
| Placemaking Ontic          | ns Plan Reference:   | West Harntree (SR1)            |   |

#### **Comment on the Site:**

Placemaking Plan Launch Document Pg 3

What is the Placemaking Plan?

"These initiatives, where they are supported by robust evidence and previous stakeholder engagement, will contribute significantly to the aspirations for development sites and the planning requirements that will eventually be set out in the Placemaking Plan."

The West Harptree stakeholders were engaged

Pg 5

The Core Strategy is Key!

"Protect and enhance the District's natural, built and cultural assets and provide green infrastructures"

"Deliver well constructed places"

" Flood risk management"

All these issues were taken into account during the site selection process.

Purpose of the Launch Document

This initial stage in the preparation of the Placemaking Plan provides the catalyst to work with local communities." How can this be working effectively if the wishes of Local Community are being ignored?

Pg 6

Link with Neighbourhood Plans "Localism Act"

"The Placemaking Planthe Council will take forward and

no referenda required" Local Community Engagement

"The output fromwill informPlacemaking Plan"

**Engagement with Council** 

"This enableswidespread community and stakeholder input"

Overview of External Engagement"

Localism Act - Local Community engagement. How can the Authority say that these principles apply in the site selection of SR1 and SR2?

Placemaking Plan Part 2 of the Local Plan Options Document

Pg 119

1.343

Context

"The Core Strategy seeks to restrain new development in rural areas in comparison with the urban areas, although provision is made to meet local needs"

Restrained new development in Rural areas to meet local needs.

The development of SR1 and SR2 would far outstrip local needs!

1.345

Core Strategy Policy RA1

"At the villages outside the green belt, proposals for residential development of a scale, character and appearance appropriate to the village and it's settingwithin the housing boundary"

"daily Monday to Saturday public transport service"

We are RA1 however as we are washed over by ANOB we are required to find a site or sites for between 10 and 15 dwellings as stated in the Rural Facilities Audit April 2014

West Harptree meets the criteria of Policy RA1 however it does not have a daily or regular public transport service. Furthermore, West Harptree lies within the Mendips Hill Area of Outstanding Natural Beauty (AONB) which could inhibit opportunities for residential development. Therefore the Core Strategy relies on a smaller number of dwellings (e.g. 10-15) coming forward in the plan period in this settlement.

Rural facilities Audit 2014 designated Washed over area of ANOB states 10-15 in Mendip hills ANOB

Scale character and appearance of any development must be appropriate to the village and its Mendip Hills ANOB setting Limited and appropriate residential development on sites adjoining HDB at this village would be inappropriate.

Sites SR1 and SR2 are therefore inappropriate for the reasons stated above.

PG 120

Background

1.350

"Consideration of the site allocations in the rural areas — has been

progressed through work undertaken with the Parish Council

supplemented by BANES Council"

The sites SR1 and SR2 were allocated by BANES.

SR1 has not been put forward by the owner or any agent.

SR2 has been vigorously advanced by the owner's agent.

"Whilst protecting and enhancing the character of the villages"

How can the proposal to develop SR1 and SR2 be seen as achieving this objective?

**Housing Development Boundaries** 

pg 166

1.448

"and must follow the existing housing limts of the village and exclude valued landscape, nature conservation sites and must be in accordance with the character of the settlement"

The inclusion of SR1 and SR2 is in conflict with this policy.

Principle 1

"The HDB will be defined tightly around the housing of the village" The inclusion of SR1 and SR2 is in conflict with this policy.

Site SR1 exceeds this requirement as a one off large site.

SR1 and SR2 would require the construction of long lengths of footpaths to gain access to the village centre.

Policy RA2 Core Strategy Criterion (a)

Development will be acceptable where they are of a scale character and appearance appropriate to the village.

The development SR1 or SR2 would be inappropriate.

In addition:

Scale too many potential dwellings on SR1 and SR2 Core Strategy states 10 - 15

Character - there is no existing backland development along the road where SR1 and SR2 are located.

**Placemaking** 

Emerging policy approach UD.2 Criterion 4

States that the design should enhance and respond to natural features including landscape green infrastructure sky line topography and landform.

SR1 and SR2 would be in conflict with this emerging policy No street lighting

Pg 162

Alternative Options Site SR1

A. Valuable Landscape

B.No small businesses exist along the Bristol Road.

C.Extends beyond village boundary into undeveloped countryside.

D.Open view from A368.

E.Existing house would need to be demolished.

F.Any development would impact on the soft edge of the village and would not protect and enhance the conservation area.

G.No pedestrian access to village.

| Change requested:                                    |                                 |                              |
|--|---------------------------------|------------------------------|
| Respondent 6396 Comment 3 Res<br>Number: Number: Nam | pondent Mr and Mrs Payne<br>me: | Respondent Organisation:     |
| Agent ID: 218 Agent Name: Peter Br                   | <u></u>                         |                              |
| Further Information available in the or              | riginal comment? 🗹 Attachmer    | nts sent with the comment? — |
| Placemaking Options Plan Reference:                  | West Harptree (SR1)             |                              |

#### **Comment on the Site:**

4.1.1 The Option Document states that the land is 1.52ha and opposite the doctors surgery.

4.1.2 However, the site is not located opposite to the surgery and it is clearly nowhere near 1.5ha in size. The land which our clients own at Leacroft House total 1.7ha, including the existing house and bungalow. This is a far greater area than is shown as SR1.

- 4.1.3 SR1, as drawn, includes a dwelling fronting onto Bristol Road and glasshouses to the rear. The glasshouses are located within the Green Belt boundary, whilst the house is excluded. The location in the Green Belt is not referred to in the Options Document and this would mean that exceptional circumstances would need to be proven to develop on this land (As per para 5.20 of the Adopted Core Strategy).
- 4.1.4 The Development & Design Principles for the site indicate a maximum of 15 dwellings, however, there is no practical way that 15 dwellings could be accommodated on the land show in an acceptable manner. The principles do not refer to the demolition of the dwelling at the front of the site, which will be necessary in order to create an access and it is very unlikely that sufficient visibility could be created at this junction to enable a significant development to take place.
- 4.1.5 The Principles further indicate the need for a pedestrian and cycle link to the village centre to be provided and that this could not be on the highway. However, it is not clear that there is any way that such a link could be created and it is certainly not possible for the site as shown to provide such a link.

#### **Change requested:**

Given the difficulties of delivering the site identified, it is requested that site SR1 be omitted as it is clearly not deliverable.

| Respondent 6397<br>Number: |                    | Respondent Chris Lawson Name:     | Respondent Lansdown Place Organisation: |
|----------------------------|--------------------|-----------------------------------|---|
| Agent ID: Age              | ent Name:          |                                   | _                                       |
| ·                          | a available in the | e original comment? 🗌 🛮 Attachmer | nts sent with the comment? $\square$    |

#### **Comment on the Site:**

I wish to make public my objection to the proposed development of site SR1 in West Harptree for the following reasons:-

- 1. The site is not ideal as the road is very narrow at the entrance of the site (single line traffic). Therefore an already busy road will be made even worse. It will also present a danger and a potential traffic 'blackspot' a danger to cars, pedestrians and cyclists that use this road.
- 2. There is no footway or pavement to take pedestrian traffic to the village nor is there any way of widening the road or adding a footway to take pedestrian traffic to the village.
- 3. In note 1.443 of the consultation report (page 160), it states that 'there is no preferred option for development in West Harptree'. This is incorrect. The report goes on to state 'West Harptree parish councils preferred approach is to develop SR3 in conjunction with SR4'. The local residents of West Harptree had several meetings (organised by the Parish Council) these were well attended and a democratic process where all views were shared and debated and after due consideration, votes were cast and Sites SR 3 and 4 (out of 7 or 8 different site development options) were selected as the villages preferred option, largely because of the difficulties of developing the other sites (as mentioned in the report) and because of the impact that the size of the proposed development of SR1 (and SR2) would cause to the village.
- 4. I dispute the boundaries of the site SR1 as marked on the map in the placemaking plan report (on page 161). The boundaries with Rosecroft, the Linney and Little Orchard are incorrect as land was purchased from the property owned by Rosecroft House (owner of SR1) and this means the area marked for development are different and substantially reduced in size.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

| Schedule of Comments on the Placemaking Plan Opti   | ions Document in Plan Order   |
|---|---|
| Respondent 6429 Comment 1 Respondent Mr Mark Allen Number: Number: Name:  | Respondent Apetito Organisation:  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachmen   | nts sent with the comment? $\square$  |
| Placemaking Options Plan Reference: West Harptree (SR1)   |   |
| Comment on the Site: I would like to confirm my objection is to the proposed development of sireasons:  | te SR1 in West Harptree for the following   |
| •Site SR1's entrance is positioned on a very narrow stretch of road which in Already the road is busy and frequently blocked by tractors, farm machine personal vehicles. There is a high level of congestion, frequent blockages a "passing places". Therefore it would be a high risk to the safety of pedestr    | ery, school buses and other commercial & and large vehicles reversing as there are no         |
| •There is no footpath or pavement to take pedestrians safely to the heart busy shop, other small businesses, a doctors surgery and dentist. A particulate a daily walk to and from the school bus from houses adjacent to SR1 congestion nor is there the opportunity of creating a pavement and/or for pedestrians | ular concern is the safety of the children who . There is no way of widening the road to ease |
| <ul> <li>Page 160 of the consultation report - Note 1.443 states "there is no preference". This is I believe factually incorrect. The Parish Council arranged meetings to allow the villagers to understand, review the options and the options.</li> </ul>   | several well publicised and very well attended  |
| <ul> <li>As a result of this vote sites SR3 &amp; SR4 were selected as the two democrators are selecting these sites were they were the most logical options that would whole especially from a traffic safety perspective</li> </ul>   |   |
| •Later in the report it states 'West Harptree parish councils preferred appr<br>SR4'. I believe it is important to re-confirm there was a clear well supporte   |   |
| •I am concerned to see the boundaries of site SR1 which are marked on the A sizeable proportion of this land was sold and therefore transferred from Linney in 2012. The land shown as under consideration is partially owned by two other pacconsidered within the placemaking plan                                | Rosecroft House to Little Orchard and The   |
| Please let me know if there is any further information I can provide  |   |
| Change requested:   |   |
|   |   |
| Respondent 6472 Comment 2 Respondent Mrs Margaret Brain Number: Name:   | Respondent<br>Organisation:   |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachmen   | nts sent with the comment? $\square$  |

| Placemaking Options Plan Reference:  | West Harntree (SR1)  |
|--|--|
| riacemaking Options Flam Kererence.  | west Harptree (SK1)  |
| Comment on the Site:   |  |
| •  | Placemaking Plan without consultation or agreement of the people of West     |
| •  | ok place and this was not one of the sites formally put forward. Therefore I |
| uestion why it was attached to the Pl  | acemaking Plan. It seems to make a mockery of local democracy.               |
| Change requested:  |  |
| or the site to be removed from the W   | est Harptree Placemaking Plan  |
|  | · · · · · · · · · · · · · · · · · · ·  |
|  |  |
| Respondent 6526 Comment 1 Re   | spondent Mr William Jory Respondent  |
|  | spondent Mr William Jory Respondent ame: Organisation:                       |
| Number: Number: N  | •  |
| Number: Number: Na<br>Agent ID: Agent Name:  | ome: Organisation:   |
| Number: Number: Na<br>Agent ID: Agent Name:  | •  |
| Number: Number: Name: Agent ID: Agent Name: Further Information available in the o   | original comment?   Attachments sent with the comment?                       |
| Number: Number: Name: Agent ID: Agent Name: Further Information available in the o   | original comment?   Attachments sent with the comment?                       |
| Number: Number: Na<br>Agent ID: Agent Name:  | original comment?   Attachments sent with the comment?                       |
| Number: Number: Name: Agent ID: Agent Name: Further Information available in the of the comment on the Site:   | Organisation:  Organisation:  Organisation:                                  |
| Number: Number: Name:  Agent ID: Agent Name:  Further Information available in the of the Information available in the of the Information available in Informatio | Organisation:  Organisation:  Organisation:                                  |

# Placemaking Options Plan Reference: West Harptree (SR2)

Plan Order Number: 623

| Respondent 63  | 396 <b>Comment</b> | 4 Respondent Mr and Mrs | Payne Respondent                          |
|----------------|--------------------|-------------------------|---|
| Number:        | Number:            | Name:                   | Organisation:                             |
| Agent ID: 218  | Agent Name: P      | eter Brett Associates   |   |
| Further Inform | ation available in | the original comment? 🗹 | Attachments sent with the comment? $\Box$ |
|                |                    |                         |   |

| <b>Placemaking Options Plan Reference:</b> | West Harptree (SR2) |
|--|---------------------|
|  |                     |

#### **Comment on the Site:**

- 5.1.1 The site shown as SR2 is owned by Mr & Mrs Payne and is part of their wider land ownership, which also includes Leacroft House and Leacroft Bungalow, which front onto Bristol Road.
- 5.1.2 The land is a total of 1.7ha when all of the land ownership is included and this area is currently subject of a planning application (Ref 14/05899/OUT). The application is supported by a full suite of evidence material and it is not intended to replicate all of this here. However, it is all available on the council's website and can be provided on request.
- 5.1.3 The land in question is partly within the existing housing development boundary of West Harptree, and partly outside. Drawing no 28867/09 shows the current boundary line which cuts across the existing builders yard and storage areas associated with the former businesses.
- 5.1.4 The drawing also indicates a new boundary, which reflects the extent of development proposed in the current planning application and shown in the illustrative masterplan (MP04 002 Appendix A). The plan clearly shows the limited change between the existing and proposed boundaries and also the extent of previously developed land within the site.
- 5.1.5 The majority of the green field area to the west of the site is retained as open space.
- 5.1.6 The supporting text of SR2 includes reference to concerns regarding ground water flooding and this is addressed in detail in the Flood Risk Assessment which was submitted with the planning application. The illustrative masterplan accompanying the application incorporates a surface water strategy (including pond) which will control surface water run off to green field rates, despite the fact that some of the site is already developed.
- 5.1.7 The Development Principles for the site indicate a maximum of 15 dwellings. However, the illustrative masterplan demonstrates clearly how a net increase of 16 dwellings can be accommodated on the site without significant impact and still retaining a significant element of open space.
- 5.1.8 The proposals include the retention of the most significant trees on the site and the creation of a small public open space which will ensure their retention. A significant portion of the site is not proposed to be developed for housing and this is proposed to be retained as a paddock, which will also accommodate the swales and storage facility associated with the Sustainable Urban Drainage of the site.
- 5.1.9 The proposals remove all of the buildings associated with the former builder's yard as they are in very poor condition and are generally of timber and tin construction. Therefore, there is no requirement to provide for commercial vehicles, though the layout has been designed in order to accommodate refuse vehicles.
- 5.1.10 A new access is proposed to Bristol Road to accommodate traffic and enhancements to pedestrian facilities are proposed which will enhance the existing connections to the facilities in the village centre.
- 5.1.11 Overall the proposals are considered to represent a sustainable approach to the development of the village to meet some of the housing need identified in the Core Strategy.
- 5.1.1 The site shown as SR2 is owned by Mr & Mrs Payne and is part of their wider land ownership, which also includes

Leacroft House and Leacroft Bungalow, which front onto Bristol Road.

- 5.1.2 The land is a total of 1.7ha when all of the land ownership is included and this area is currently subject of a planning application (Ref 14/05899/OUT). The application is supported by a full suite of evidence material and it is not intended to replicate all of this here. However, it is all available on the council's website and can be provided on request.
- 5.1.3 The land in question is partly within the existing housing development boundary of West Harptree, and partly outside. Drawing no 28867/09 shows the current boundary line which cuts across the existing builders yard and storage areas associated with the former businesses.
- 5.1.4 The drawing also indicates a new boundary, which reflects the extent of development proposed in the current planning application and shown in the illustrative masterplan (MPO4 002 Appendix A). The plan clearly shows the limited change between the existing and proposed boundaries and also the extent of previously developed land within the site.
- 5.1.5 The majority of the green field area to the west of the site is retained as open space.
- 5.1.6 The supporting text of SR2 includes reference to concerns regarding ground water flooding and this is addressed in detail in the Flood Risk Assessment which was submitted with the planning application. The illustrative masterplan accompanying the application incorporates a surface water strategy (including pond) which will control surface water run off to green field rates, despite the fact that some of the site is already developed.
- 5.1.7 The Development Principles for the site indicate a maximum of 15 dwellings. However, the illustrative masterplan demonstrates clearly how a net increase of 16 dwellings can be accommodated on the site without significant impact and still retaining a significant element of open space.
- 5.1.8 The proposals include the retention of the most significant trees on the site and the creation of a small public open space which will ensure their retention. A significant portion of the site is not proposed to be developed for housing and this is proposed to be retained as a paddock, which will also accommodate the swales and storage facility associated with the Sustainable Urban Drainage of the site.
- 5.1.9 The proposals remove all of the buildings associated with the former builder's yard as they are in very poor condition and are generally of timber and tin construction. Therefore, there is no requirement to provide for commercial vehicles, though the layout has been designed in order to accommodate refuse vehicles.
- 5.1.10 A new access is proposed to Bristol Road to accommodate traffic and enhancements to pedestrian facilities are proposed which will enhance the existing connections to the facilities in the village centre.
- 5.1.11 Overall the proposals are considered to represent a sustainable approach to the development of the village to meet some of the housing need identified in the Core Strategy.

#### **Change requested:**

- 5.2.1 SR2 should be retained as an allocation within the PlaceMaking Plan.
- 5.2.2 The extent of the allocation should be extended to reflect the area shown on drawing 28867/01 which relates to that of planning application 14/05899/OUT.
- 5.2.3 The Development Principles should be amended:
- 1. The total number of dwellings on the site should state "Between 15 20 dwellings"
- 6. Should be deleted

# Placemaking Options Plan Reference: West Harptree (SR2)

Plan Order Number: 626

| Respondent 1649 Comment 3 Res<br>Number: Number: Namber: Namber: | spondent Mrs Janet Burdge<br>ame:            | Respondent West Harptree Parish Organisation: Council |
|--|--|---|
| Agent ID: Agent Name:  |  |   |
| Further Information available in the o                           | original comment? $\square$ Attachments sent | with the comment? $\Box$                              |
|  |  |   |
| Placemaking Options Plan Reference:                              | West Harptree (SR2)                          |   |
|  |  |   |

#### Comment on the Site:

The Placemaking Plan was always going to be a contentious issue within this Parish, and so West Harptree Parish Council (WHPC) decided to hold several public meetings in late 2013 to discuss the options and sites available. The outcome of this was that Parishioners felt the housing allocation should not be on one large site, but spread across several smaller sites and so be sympathetic and less intrusive with their surroundings. The last meeting culminated in a Referendum where the attending Parishioners were asked to rate the 5 small sites that had been proposed in order of preference, and the top 3 were then progressed by WHPC to B&NES as the preferred options.

WHPC then subsequently completed assessments on these sites (and also on the larger and rejected smaller sites) using the relevant B&NES toolkits supplied, which were then submitted to B&NES by the required deadline.

When all these sites were inspected by B&NES Officers in summer 2014 (accompanied by 2 Parish Councillors), the 2 larger sites were found wanting in certain criteria, but 2 of the 3 WHPC preferred options were found to meet the B&NES criteria, and could accommodate the allocation between them, so B&NES advised WHPC that these 2 preferred small sites would now progress to the next stage of the process.

#### **Change requested:**

Having undertaken all of this work, far in excess of what was required, to obtain the views and aspirations of the Parishioners who we represent, WHPC is extremely disappointed to see that the 2 larger sites that both failed certain B&NES criteria and were rejected by the Village Referendum, have still been included in the Options Document for this Parish, and consider that these should be withdrawn for the above reasons.

| Respondent 1649 Comment 5 Res<br>Number: Number: Na   | spondent Mrs Janet Burdge<br>me: | Respondent West Harptree Parish Organisation: Council |
|---|----------------------------------|---|
| Agent ID: Agent Name:   |                                  |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                  |   |
|   |                                  |   |
| Placemaking Ontions Plan Reference  | Wast Harntrag (SD2)              |   |

#### **Comment on the Site:**

Placemaking Plan Launch Document Pg 3

What is the Placemaking Plan?

"These initiatives, where they are supported by robust evidence and previous stakeholder engagement, will contribute significantly to the aspirations for development sites and the planning requirements that will eventually be set out in the Placemaking Plan."

The West Harptree stakeholders were engaged

Pg 5

The Core Strategy is Key!

"Protect and enhance the District's natural, built and cultural assets and provide green infrastructures"

"Deliver well constructed places"

" Flood risk management"

All these issues were taken into account during the site selection process.

Purpose of the Launch Document

This initial stage in the preparation of the Placemaking Plan provides the catalyst to work with local communities." How can this be working effectively if the wishes of Local Community are being ignored?

Pg 6

Link with Neighbourhood Plans "Localism Act"

"The Placemaking Planthe Council will take forward and

no referenda required" Local Community Engagement

"The output fromwill informPlacemaking Plan"

**Engagement with Council** 

"This enableswidespread community and stakeholder input"

Overview of External Engagement"

Localism Act - Local Community engagement. How can the Authority say that these principles apply in the site selection of SR1 and SR2?

Placemaking Plan Part 2 of the Local Plan Options Document

Pg 119

1.343

Context

"The Core Strategy seeks to restrain new development in rural areas in comparison with the urban areas, although provision is made to meet local needs"

Restrained new development in Rural areas to meet local needs.

The development of SR1 and SR2 would far outstrip local needs!

1.345

Core Strategy Policy RA1

"At the villages outside the green belt, proposals for residential development of a scale, character and appearance appropriate to the village and it's settingwithin the housing boundary"

"daily Monday to Saturday public transport service"

We are RA1 however as we are washed over by ANOB we are required to find a site or sites for between 10 and 15 dwellings as stated in the Rural Facilities Audit April 2014

West Harptree meets the criteria of Policy RA1 however it does not have a daily or regular public transport service. Furthermore, West Harptree lies within the Mendips Hill Area of Outstanding Natural Beauty (AONB) which could inhibit opportunities for residential development. Therefore the Core Strategy relies on a smaller number of dwellings (e.g. 10-15) coming forward in the plan period in this settlement.

Rural facilities Audit 2014 designated Washed over area of ANOB states 10-15 in Mendip hills ANOB

Scale character and appearance of any development must be appropriate to the village and its Mendip Hills ANOB setting Limited and appropriate residential development on sites adjoining HDB at this village would be inappropriate.

Sites SR1 and SR2 are therefore inappropriate for the reasons stated above.

PG 120

Background

1.350

"Consideration of the site allocations in the rural areas — has been

progressed through work undertaken with the Parish Council

supplemented by BANES Council"

The sites SR1 and SR2 were allocated by BANES.

SR1 has not been put forward by the owner or any agent.

SR2 has been vigorously advanced by the owner's agent.

"Whilst protecting and enhancing the character of the villages"

How can the proposal to develop SR1 and SR2 be seen as achieving this objective?

**Housing Development Boundaries** 

pg 166

1.448

"and must follow the existing housing limts of the village and exclude valued landscape, nature conservation sites and must be in accordance with the character of the settlement"

The inclusion of SR1 and SR2 is in conflict with this policy.

Principle 1

"The HDB will be defined tightly around the housing of the village" The inclusion of SR1 and SR2 is in conflict with this policy.

SR1 and SR2 would require the construction of long lengths of footpaths to gain access to the village centre.

Policy RA2 Core Strategy Criterion (a)

Development will be acceptable where they are of a scale character and appearance appropriate to the village.

The development SR1 or SR2 would be inappropriate.

In addition:

Scale too many potential dwellings on SR1 and SR2 Core Strategy states 10 - 15

Character - there is no existing backland development along the road where SR1 and SR2 are located.

Placemaking

Emerging policy approach UD.2 Criterion 4

States that the design should enhance and respond to natural features including landscape green infrastructure sky line topography and landform.

SR1 and SR2 would be in conflict with this emerging policy No street lighting

Site SR2

A. Valuable Landscape

B.No small businesses exist along the Bristol Road.

C.Extends beyond village boundary into undeveloped countryside.

D.Open view from A368.

E.Existing road frontage tree lined and has a natural stone wall. New access to the site would impact on this existing valuable feature.

F.Any development would impact on the soft edge of the village and would not protect and enhance the conservation area.

G.No pedestrian access to village.

H.The existing site is entirely green field.

I.Site is subject to flooding. Any development would increase the existing flood risk.

#### **Change requested:**

Respondent6396Comment1Respondent Mr & Mrs PayneRespondentNumber:Number:Name:Organisation:

Agent ID: 218 Agent Name: Peter Brett Associates

Further Information available in the original comment? <a> Attachments sent with the comments sent with the comments

Placemaking Options Plan Reference: West Harptree (SR2)

#### **Comment on the Site:**

Site SR2 should be allocated for development.

A document has been prepared which considers the requirement for housing in West Harptree and sets out the case supporting the allocation of SR2.

A planning application has been submitted which reflects this case and includes detailed supporting material which

| addresses the Development Principles of the Options Document.   |
|---|
| Change requested:   |
| Site SR2 should be allocated in the PlaceMaking Plan  |
| The boundary of site SR2 should be amended to reflect that shown in the associated documentation  |
|   |
| The Housing Development Boundary of the village should be amended to reflect the changes  |
| Powerdowt 6420 C  |
| Respondent 6428 Comment 1 Respondent M Taviner Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: West Harptree (SR2)   |
| Comment on the Site:  |
| This site was not put forward by the village vote on place making plan.  My objection to the site is on a flood plane with a pipe going through the middle of the site  The pipe takes water from the drains and culvert from the village.  The pipe should be made bigger or reinstated to a ditch,  The site is off a busy road and by the Doctors Surgery car park   |
| The road floods to 18" deep when we get a lot of rain.  |
| Change requested:   |
|   |
| Respondent 6472 Comment 1 Respondent Mrs Margaret Brain Respondent Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: West Harptree (SR2)   |
|   |
| Comment on the Site:  This has been added to the West Harptree Placemaking Plan without discussion or agreement of the people of West Harptree. A process of consultation took place to identify the preferred sites and the owner of this site refused to put it forward at the meeting. It was also the wish of the meeting that small developments took place. This proposal is for 17-far exceeding the reqirement of RA2.So it seems to me that this process has been highjacked and makes a mockery of local democracy. |
| Change requested: That the site is removed from the West Harptree Placemaking Plan  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |  |
|---|--|--|
|   |  |  |
|   |  |  |
| nt?   |  |  |
|   |  |  |
|   |  |  |
| the proposed  |  |  |
| entre of the village  |  |  |
|   |  |  |
|   |  |  |
|   |  |  |

## Placemaking Options Plan Reference: West Harptree (SR3)

Plan Order Number: 627

| Respondent 1649 Comment 6 Res<br>Number: Number: Na           | spondent Mrs Janet Burdge<br>nme:            | <b>Respondent</b> West Harptree Parish <b>Organisation:</b> Council |
|---|--|---|
| Agent ID: Agent Name:  Further Information available in the o | original comment? $\square$ Attachments sent | with the comment? $\Box$  |
| Placemaking Options Plan Reference:                           | West Harptree (SR3)                          |   |

#### **Comment on the Site:**

Pg 4

What is Placemaking?

"It is fundamentally about responding to the context of a place, through an understanding of its evolution, its functionality, and its impacts."

"In response to good practice and the localism agenda, be prepared in a collaborative way with key stakeholder and local communities. The process of producing the Placemaking Plan is intended to nurture a long lasting collaborative partnership with the communities of Bath and North East Somerset empowering local people to shape their surroundings" "Take account of different roles and and characters of different areas" "Conserve and enhance the natural environment" "Conserve heritage"

All of these aspects apply to the site selection of SR3 and SR4

1.346

Core Strategy Policy RA2

"Through Policy RA 2 such development will be permitted within the HDB"

Sites proposed by the Parish SR3 and SR4 meet this criteria

Principle 2

HDB a.

No unimplemented planning permissions are included in West Harptree Revised HDB only sites SR3 and SR4.

West Harptree Pg 160

1.441

"The historic Core is designated a Conservation Area"

Site Allocation Options

1.442

"West Harptree is required to accommodate housing development of around 10 - 15 dwellings."

Sites SR3 and SR4 meet this requirement.

Preferred Approach

1.443

"West Harptree's Parish Council's preferred approach is to develop SR3 in conjunction with SR4. B&ANES have considered the evidence for sites SR1 and SR2 and these sites have been included as alternative options for development." This demonstrates B&NES is paying little regard to it's own policies and the wishes of community.

In addition to the above the following Core Stategy Objectives must be taken into account as part of West Harptree's response, reference the inclusion of sites SR1 and SR2:

Core Strategy

Objective 2

States that maintaining an outstanding built and natural environment by ensuring that new development responds appropriately to the locally distinctive context and meets high standards of design

In this village there is no backland development along the Bristol Road

Objective 5

The Core Strategy states that the development of new homes is aligned with the provision of all the necessary

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| infrastructure.<br>Sites SR3 and SR4 are near to the village centre with footpath access.   |
| A.Supported through Parish referendum.<br>B.Pedestrian access to village centre.  |
| Change requested:   |
|   |
| Respondent 6526 Comment 3 Respondent Mr William Jory Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: West Harptree (SR3)   |
| Comment on the Site:  |
| Problem 1: Concerned regarding flooding for this development more than run-off to other near-by properties.   |
| Asset 1: Good access to site as situated on major road out of village. Asset 2: The plan states the need for good quality design of the development due to its situation. |
| Change requested:   |
|   |

## Placemaking Options Plan Reference: West Harptree (SR4)

Plan Order Number: 631

| Respondent 1649 Comment 7 Res<br>Number: Number: Na           | spondent Mrs Janet Burdge<br>ame:            | <b>Respondent</b> West Harptree Parish <b>Organisation:</b> Council |
|---|--|---|
| Agent ID: Agent Name:  Further Information available in the o | original comment? $\square$ Attachments sent | with the comment? $\Box$  |
| Placemaking Options Plan Reference:                           | West Harptree (SR4)                          |   |

#### **Comment on the Site:**

Pg 4

What is Placemaking?

"It is fundamentally about responding to the context of a place, through an understanding of its evolution, its functionality, and its impacts."

"In response to good practice and the localism agenda, be prepared in a collaborative way with key stakeholder and local communities. The process of producing the Placemaking Plan is intended to nurture a long lasting collaborative partnership with the communities of Bath and North East Somerset empowering local people to shape their surroundings" "Take account of different roles and and characters of different areas" "Conserve and enhance the natural environment" "Conserve heritage"

All of these aspects apply to the site selection of SR3 and SR4

1.346

Core Strategy Policy RA2

"Through Policy RA 2 such development will be permitted within the HDB"

Sites proposed by the Parish SR3 and SR4 meet this criteria

Principle 2

HDB a.

No unimplemented planning permissions are included in West Harptree Revised HDB only sites SR3 and SR4.

West Harptree Pg 160

1.441

"The historic Core is designated a Conservation Area"

Site Allocation Options

1.442

"West Harptree is required to accommodate housing development of around 10 - 15 dwellings."

Sites SR3 and SR4 meet this requirement.

Preferred Approach

1.443

"West Harptree's Parish Council's preferred approach is to develop SR3 in conjunction with SR4. B&ANES have considered the evidence for sites SR1 and SR2 and these sites have been included as alternative options for development." This demonstrates B&NES is paying little regard to it's own policies and the wishes of community.

In addition to the above the following Core Stategy Objectives must be taken into account as part of West Harptree's response, reference the inclusion of sites SR1 and SR2:

Core Strategy

Objective 2

States that maintaining an outstanding built and natural environment by ensuring that new development responds appropriately to the locally distinctive context and meets high standards of design

In this village there is no backland development along the Bristol Road

Objective 5

The Core Strategy states that the development of new homes is aligned with the provision of all the necessary

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| nfrastructure.<br>Sites SR3 and SR4 are near to the village centre with footpath access.   |
| ontes 5N5 and 5N4 are near to the vinage centre with rootpath access.  |
| A.Supported through Parish referendum.   |
| 3.Pedestrian access to village centre.   |
| Change requested:  |
|  |
|  |
| Respondent 6396 Comment 5 Respondent Mr and Mrs Payne Respondent Number: Name: Organisation:   |
| Agent ID: 218 Agent Name: Peter Brett Associates   |
| Further Information available in the original comment? $lacktriangle$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: West Harptree (SR4)  |
|  |
| Comment on the Site:   |
| 5.1.1 The site is located to the rear of dwellings on Ridge Crescent.  |
| 5.1.2 On plans there appears to be an access route between no 4 and no7 Ridge Crescent. However, on visiting the site the access seems to have been appropriated by the residents and is now part of a garden. |
| the access seems to have been appropriated by the residents and is now part of a garden.   |
| 5.1.3 It is therefore far from clear that the access can now be provided.  |
| 5.1.4 The site itself is a green field and any development would represent a south eastwards extension of the settlement, which may be visible from views to the north.  |
| 5.1.5 There are footpaths within Ridge Crescent. However, to access any of the local facilities residents will need to travel along Ridge Lane which has neither footpaths nor streetlights.                   |
| Change requested:  |
| 5.2.1 Site SR2 is not considered to be deliverable nor is it desirable to develop in this location.  |
| 5.2.2 Therefore, it is requested that site SR4 is not allocated in the PlaceMaking Plan.   |
|  |
| Respondent 6464 Comment 2 Respondent Mr Ben Tilling Respondent Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |
| Placemaking Options Plan Reference: West Harptree (SR4)  |
| Comment on the Site:   |
| don't think this is a good area to expand and develop.   |

It has the worse access to the proposed new developments in West Harptree, with SR1, SR2 & SR3 being a lot easier to

Ridge Lane is a small lane onto Ridge Crescent, in passable in places if you meet other traffic , resulting in having to

# Bath and North East Somerset Council

access.

reverse back out onto the main road. This is already an issue without bring in further traffic from the development of new properties.

Parking is already very difficult in Ridge Crescent, particularly for visiting friends and family, adding more properties will only add to this problem.

#### **Change requested:**

I believe there are better sites in the village to accommodate the expansion of the 10 to 15 properties required. More land and easier access to these new properties would support this.

| Respondent 6526 Comment 4 Resp<br>Number: Number: Nan   |                                | Respondent Organisation: |  |
|---|--------------------------------|--------------------------|--|
| Agent ID: Agent Name:   |                                |                          |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                |                          |  |
| Placemaking Options Plan Reference:   | West Harptree (SR4)            |                          |  |
| Comment on the Site:  |                                |                          |  |
| Asset 1: Adding housing without making  | a large impact on the village. |                          |  |
| Asset 2: Easy access to centre of village   |                                |                          |  |
| Change requested:   |                                |                          |  |
|   |                                |                          |  |

**Placemaking Options Plan Reference:** Housing Development Boundaries / Number: 632 Paragraph 1.448 Respondent 96 Comment 1 Respondent Dawn Drury **Respondent** Keynsham Town Council Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448 Comment on the Site: Keynsham Town Councillors have reviewed the Housing Development Boundary Plans and respond as follows. 1. Request that the boundary be extended to the North East to include the gardens of the bungalows at the end of St. Francis Road to the west of Broadlands School (site K14 on the November 2013 SHLAA Map). It is suggested that the boundary be taken to follow the treeline at the back of the four bungalows so that these gardens are incorporated into the housing development boundary. 2. Request that the housing development boundary be extended to incorporate the Somerdale site which currently has housing under construction and future planned. The extension of the boundary to be up to and to include the factory site which has plans for conversion including apartments. Request that the housing development boundary be extended to include land to the North of the A4 on Bath Road Keynsham to include land belong to Mr J Pinkerton (Broadleaze Nursey). **Change requested:** Respondent 279 Comment 22 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448 Comment on the Site: EH strongly recommends that the HDB have regard to the implications for effected heritage assets and their settings, applying great weight to conservation of significance. An understanding of the historic character of each place, their distinctiveness including any non-designated asset and or landscape feature should be formally considered. I note in paragraph 1.448 that nature conservation sites are a consideration. Clarification of how the significance of the

historic integrity of these settlements will be given equally consideration would be appreciated.

**Change requested:** 

Plan Order

# Respondent 1556 Comment 7 Respondent Respondent Strategic Land Number: Name: Organisation: Partnerships Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? Attachments sent with the comment?

Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448

#### **Comment on the Site:**

Housing Development Boundaries paragraph 1.448

The Placemaking plan sets out the process of making adjustment to the Housing Development Boundaries and there is an opportunity to suggest or propose revisions to the boundaries. While the text refers to settlements the principles refer only to villages. Which means either that it does not apply to market towns such as Midsomer Norton, or that it is currently worded incorrectly.

The plan sets out 3 principles and we object to principle 1 and its wording which says The HDB will be defined tightly around the housing of the village. This currently gives no flexibility and there is no justification for this. It should be reworded to allow some future flexibility, and redrawn for Midsomer Norton as shown in the attached plan. Principle 3 criterion d and e are very similar and also very subjective. It is currently not clear what criteria will be used to consider whether development would harm the structure, form and character of the settlement. This does not meet the tests of planning policy because it is not clear how it will be interpreted. It is currently written as a catch all to prevent anything that the Council does not like, rather than as a proper development management policy. It is not clear what structure and form actually mean, and if these terms are going to be used to define boundaries, they need to be applied consistently and the terms accurately defined.

The current development boundary around the southern edge of Midsomer Norton is not logical and excludes the existing commitment West of Fosseway, although we support the intention to redraw the boundary to include this land. It is noted that the settlement boundary also excludes the school, as well as a number of houses and gardens along Silver Street, which are very much considered part of the settlement and provide a contiguous and continuous built up impression of the settlement. The current boundary stops short of the edge of the settlement and includes an illogical and very small self-contained boundary around some of the houses off Silver Street. This boundary to the south should be changed and logically extended in line with the Fosseway development to include the new proposal for a mixed use development along Silver Street as shown on the attached plan. Drawing a robust and defensible boundary ensures that it will endure for the long term which would provide flexibility and the opportunity for future growth of the settlement.

The site identified on the attached plan at Appendix B at Silver Street should be included within the development boundary because it is an ideal site for a mixed use development of high quality sustainable low carbon development including housing primarily for elderly people including a retirement village and care home incorporating open space, community gardens or cemetery on the western part of the site and facilitating links with the railway line, improving public footpaths and use of this recreational resource. This is an excellent site which can facilitate considerable improvements in accessibility with the provision of cycle and pedestrian links into the town centre, enable the 30 mph limit to be moved south to the BANES/Mendip boundary, fund improve broadband speeds, and enable the possibility of additional parking for the rugby club. Identifying this site for development and including it within the boundary will provide further long term flexibility and building of defensible boundaries, providing for necessary development, and community infrastructure and improving the connectivity with the rest of Midsomer Norton.

#### **Change requested:**

The housing development boundary to the south of Midsomer Norton should be amended and extended to include an additional site as set out above and shown on the attached plan at Appendix B

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 3095 Comment 2 Respondent Dr N J T Long **Respondent** Bath and North East Number: Number: Name: **Organisation:** Somerset Branch of the Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448 Comment on the Site: The CPRE supports the concept of Housing Development Boundaries (HDB's) as well as welcoming the opportunity for review of HDB's within the Placemaking Plan. Without HDB's the CPRE feels that there would be greater threats from straggling development on the outskirts of village communities leading to a blurring of the distinction between settlements and open countryside. The review of HDB's should not be seen as a blanket opportunity to increase the size of built-up areas. **Change requested:** Respondent 3701 Comment 1 Respondent Mr & Mrs G V Jones Respondent Number: Number: Name: **Organisation: Agent ID:** 47 **Agent Name:** CSJ Planning Consultants Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448 Comment on the Site: Introduction This representation concerns itself with the Housing Development Boundary (HDB) as designated around this part of Chew magna. Chew Magna is a village washed over by the Green Belt. Current Policy as set out in Policy HG.6 fi the B&NES Local Plan allows for limited infill, partial or complete redevelopment of a brownfield site or of sub division of an existing dwelling as long as it preserves the openness of the Green Belt. Emerging Policy GB2 of the Placemaking Plan – Option Report carries the thrust of Policy HG6 forward. The proposed revision of the HDB is brought forward to provide for the re-development of 3 Streamside to potentially provide for two dwellings as an infill site. Background 3 Streamside is a modern single storey dwelling with garage below on a steep frontage site which extends to the rear with approximately 1.5 acres of garden (see Appendix 1). The owners of the dwelling have lived at the house for 36 years. The current HDB is drawn tightly (no more than 3m from the rear elevation of their property), unlike adjacent properties where the HDB boundary runs along the rear boundaries of the gardens. Due to the very steep pedestrian access to the current property the owners would like the opportunity to redevelop the site with either a replacement dwelling or two dwellings, one of which would be a small property suitable as a retirement dwelling for which there is unmet demand within the village. In order to accomplish this it would be necessary to locate the dwelling(s) further back into the site. This would also provide the opportunity to design pedestrian access at a reduced gradient than currently exists and therefore would provide the occupants with safe and practical access into old age. **Policy Compliance**

The Placemaking Plan Options report provides advice and guidelines on the proposed revision to HDB's in the form of four Principles. Landowners are asked when proposing a revision to HDB' to justify the revision against these Principles.

Principle 1 states that HDB's will be defined tightly around the housing of the village. In this instance it is proposed to revise the boundary so as to still be defined tightly around 3 Streamside but not to the extent, as is currently the case, where it is drawn to the back of the rear elevation (see Appendix 2). This proposal will bring the HDB into line with other adjacent properties.

Principle 2 – Criteria (a) is not relevant. The second criteria, (b) states that HDB's will be defined to include land within residential curtilages, except large gardens or other open areas which are visually detached from the settlement.

Although we would contend that the large garden, in this instance is not visually detached from the settlement, we are only proposing that a small proportion of the existing garden be included within the HDB, which is very much visually attached to the settlement. Indeed this part of the garden is screened from views from the core of the village and is very much part of the domestic curtilage to the property.

The remainder of the garden, which is not proposed within the revision, is bounded by a well used footpath leading to the village core and the southern boundary of the village Conservation Area. This part of the garden, although domestic in appearance, could be defined as being more open and visually detached. Hence, it has been excluded from the HDB.

Principle 3 provides six areas that will be excluded from HDB's. Exclusions (a), (b), and (f) are of no relevance to this proposed revision.

Exclusion (c) refers to large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement. The proposed revision allows for a small portion of this large garden to be included within the HDB which relates to the surrounding curtilages of properties which are within the HDB and which visually relates to the village rather than the countryside. Indeed open countryside in this instance would be defined as the land to the north of the Conservation Area boundary and footpath. There is a strong belt of vegetation in this vicinity that defines the edge of settlement along with the footpath itself.

Criteria (d) refers to large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the village.

The structure, form and character of the village would be improved by the inclusion of the proposed area of garden within the HDB and modest development as described earlier would have a positive impact on the structure, form / character of the village and this part of the Conservation Area, as setting the new dwelling(s) further back into the site will improve the visual impact of development along this part of Streamside. The revision of this boundary will also be consistent with the boundary around adjoining properties and would provide consistency of approach.

Principle 4 – This deals with the HDB having flexibility in terms of being continuous or in two or more separate elements. The proposed revision would fall into the continuous HDB definition and indeed provides logic in providing for a continuous HDB in this particular area of Chew Magna.

#### Ongoing Consultation

The owner of 3 Streamside is in discussion with Chew Magna Parish Council regarding the revision to the HDB in this area and it is noted that Parish and Town Councils have been invited to make suggested changes and proposals where they deem appropriate.

#### Conclusion

I would respectfully ask that B&NES consider this revision to the HDB positively and that the evidence provided above shows that this revision does not conflict with the principles and criteria for HDB's provided within the Placemaking Plan – Options Report

| Change requested:  |  |  |  |
|--|--|--|--|
| Respondent 4803 Comment 5 Respondent Number: Number: Name: Agent ID: 128 Agent Name: Peter Brett Associates  | Respondent Waddeton Park Limited Organisation: |  |  |
|  | ent with the comment?   expersed 1,448         |  |  |
| Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448   |  |  |  |
| Comment on the Site: 3.1.1 The Placemaking plan sets out the process of making adjustment to the Housing Development Boundaries and there is an opportunity to suggest or propose revisions to the boundaries. While the text refers to settlements the principles refer only to villages. Which means either that it does not apply to market towns such as Midsomer Norton, or that it is currently worded incorrectly.  |  |  |  |
| 3.1.2 The plan sets out 3 principles and we object to principle 1 and its wording which says 'The HDB will be defined tightly around the housing of the village'. This currently gives no flexibility and there is no justification for this. It should be reworded to allow some future flexibility, and redrawn for Midsomer Norton as shown in the attached plan. Principle 3 criterion d and e are very similar and also very subjective. It is currently not clear what criteria will be used to consider whether 'development would harm the structure, form and character' of the settlement. This does not meet the tests of planning policy because it is not clear how it will be interpreted. It is currently written as a catch all to prevent anything that the Council does not like, rather than as a proper development management policy. It is not clear what structure and form actually mean, and if these terms are going to be used to define boundaries, they need to be applied consistently and the terms accurately defined. |  |  |  |
| 3.1.3 The current development boundary around the southern edge of Midsomer Norton is not logical and should be redefined on a proper and consistent basis taking account of the need for long term flexibility and the need for future growth of the town, as well as being mindful of the administrative boundary. We note that the boundary currently excludes the existing commitment West of Fosseway, although we support the intention to redraw the boundary to include this land.   |  |  |  |
| Change requested:  |  |  |  |
|  |  |  |  |
| Respondent 6380 Comment 1 Respondent John Hooke Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment? ✓ Attachments se  | Respondent Organisation: ent with the comment? |  |  |
| Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448   |  |  |  |
|  |  |  |  |

#### **Comment on the Site:**

This proposal to amended the Housing Development Boundary has been prepared on behalf of Mr J Mason who is a longstanding resident of Radstock. Mr Mason owns the land adjacent to 3 Kilmersdon Road, Radstock jointly with his mother. Planning permission has recently been refused, primarily as the land is outside of the identified Housing Development Boundary.

The land is of an open character, with an existing fteld gate that access the land.

The existing position of the Housing Development Boundary has been in the current position for a considerable period of time and was reaffirmed as by the Bath and North East Somerset Local Plan and identified by the Local Plan Map.

During the consideration of the Core Strategy the Inspector identified the need for sites for additional dwellings to be identified through the Bath and North East Somerset Council area. As a consequence the adopted version of the Core Strategy indicates the following:-

4.15a Local designations such as Housing Development Boundaries and Core Business Areas shown on the Policies Map (saved from the existing Bath & North East Somerset Local Plan) will be reviewed as part of the Placemaking Plan.

This approach is embodied in the adopted Core Stratagy policy SV.I which states:

#### 4. Housing

Enable around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John, by amending the housing development boundary as necessary and to reflect existing commitments. This will include affordable housing, providing more choices of housing to meet the needs of the local communities. (Policies RA1 and RA2 are applicable to the other settlements in Somer Valley.)

The vehicle to achieve the above is the Placemaking Plan, The consultation document has been published for consultation and to which this representation is a response.

The current position of the Housing Development Boundary in this part of Kilmersdon Road, follows the road in a southerly direction and turns along the southern boundary of 3 Kilmersdon Road in an easterly direction and in this location, there are currently no proposals to adjust the alignment.

However, circumstances within this part of the settlement are the subject of ongoing change. Land on the eastern side of the valley will be the subject of development and the land is included within the Radstock regeneration proposals. It is understood that planning permission for new residential development is proposed to the east of the watercourse that forms the eastern boundary of Mr Masons land. As a consequence this development will establish a new boundary to development, to assist this is indicated on the attached drawing. As a result the Housing Development Boundary will in future be staggered line when extended the existing alignment is extended to the future development across the valley with the proposed development appearing to extend slightly further into the open land.

| ing to extend slightly further | into the open land.                  |
|--------------------------------|--------------------------------------|
|                                |                                      |
|                                |                                      |
|                                |                                      |
| nondent                        | Respondent Boystown Ltd              |
| me:                            | Organisation:                        |
| ssociates Ltd                  |                                      |
| riginal comment?  Atta         | chments sent with the comment? 🗹     |
|                                |                                      |
| Housing Development Bour       | darias / Daragraph 1 449             |
|                                | ssociates Ltd iginal comment?  Attac |

#### Comment on the Site:

My clients support the intention to review and adjust HDBs through the emerging PMP. Moreover, they support the principle that HDBs do not need to be continuous, and that it may be appropriate given the nature and form of the village to define two or more separate elements.

Pursuant to the paragraph 1.451 of the PMP, my clients consider that the former depot at Cold Bath, Bath Road, Farmborough should be included in a separate HDB for Farmborough. Although separated from the main part of the

village by undeveloped land, there is a nucleus of development at Cold Bath that is part of Farmborough in physical and community terms, and in which residential development will be consolidated through the planning permission for redevelopment of the former depot site for residential purposes. The land the subject of that permission (Ref: 14/00862/OUT) is identified on the enclosed plan. This site and neighbouring land should be included in a new HDB for the Cold Bath area of Farmborough to be discussed and agreed with my clients as part of the ongoing engagement towards the preparation of the draft Plan.

We look forward to discussing this matter with you further as the Plan evolves.

| Respondent 6510<br>Number: | Comment 1 Number: | Respondent Mrs V Hamilton-Davies Name:  | Respondent Organisation:              |
|----------------------------|-------------------|---|---------------------------------------|
| Agent ID: 272 Ag           | gent Name: Pla    | nning Ventures Ltd                      |                                       |
| Further Information        | n available in t  | he original comment? $\square$ Attachme | ents sent with the comment? $\square$ |
|                            |                   |   |                                       |

#### **Comment on the Site:**

**Change requested:** 

Housing Development Boundaries Policy

Proposed Amendment to the Chew Magna Housing Development Boundary

This rep is submitted on behalf of Mrs. V Hamilton-Davies of Old North Chew Farm, Norton Lane, Chew Magna.

The site is situated in the north of the village on a principal route into the village from Bristol.

Placemaking Options Plan Reference: Housing Development Boundaries / Paragraph 1.448

It is immediately adjacent to the northern boundary of the largest of the three HDBs covering Chew Magna.

This rep is seeking an alteration to the largest of the three HDBs to include this property and its curtilage for the following reasons:

The inclusion of this site within the largest of the three HDBs accords with the relevant tests of the four defined principles for HDBs.

The exclusion of the property and its curtilage is an illogical exclusion from the existing HDB.

The property and its curtilage lies immediately adjacent to Chew Magnas largest HDB.

The property and its curtilage lies within the village conservation area.

Although a former farm complex, the property and its curtilage has been subdivided from its associated agricultural landholding and now forms a residential property, with a series of holiday lets, workshops and redundant buildings within its curtilage.

The majority of associated out buildings have already either been converted into ancillary residential space and alternative business uses, including holiday accommodation and business/workshop units or benefit from planning permission for conversion into these alternative uses.

Inclusion of this site within the HDB will not lead to future development that will have an unacceptable impact on the character and form of the village.

Inclusion of this site within Chew Magnas HDB complies with the four guiding principles as follows:

# Principle 1:

The HDB will be defined tightly around the housing of the village.

The existing site forms an integral part of the character of Chew Magna and Norton Lanes street scene. It is the first property into the village on Norton Lane.

It is immediately adjacent to the existing northern boundary of the largest of the three HDBs.

The sites exclusion is illogical in light of the way the HDBs have been drawn for the rest of the village and in light of the drawing of many HDBs around other rural villages in BANES. With the exception of this site the Chew Magna HDBs have been drawn tightly around the last property on the roads into/out of the village.

It would be logical for the HDB to follow the boundary of this property and its curtilage or the line of the conservation area.

Although covered by Green Belt, this is not an open site, it is a brownfield site with a residential dwelling and a range of converted buildings and large, redundant barns. It therefore appears illogical to continue to exclude it on the basis that it is within Green Belt.

Principle 2:

HDBs will be defined to include:

existing commitments for built development i.e unimplemented planning permissions and site allocations (including those proposed in the draft Placemaking Plan)

Land within residential curtilages except large gardens or other open areas which are visually detached from the settlement.

The site in question contains a residential dwelling, a range of commercial holiday lets, a workshop, vacant barns and buildings, some of which benefit from an extant permission for holiday lets and workshops, and land.

In accordance with test A the site benefits from an extant permission for conversion of six of the nine existing outbuildings into holiday lets and workshops ref 10/04371/FUL and 10/04373/CA.

In accordance with test B the site is not visually detached from Chew Magna. It forms an integral part of Norton Lanes street scene and is a highly prominent site at the entrance to the village.

The site does have land within its curtilage, but this land does not serve to create a sense of visual detachment of the site from the village.

It is the first building into the village on Norton Lane and serves and sets the scene for the character of the village through its architectural vernacular, materials, boundary treatments, positioning of buildings within the site and the integration of mature landscape and buildings.

Principle 3:

HDBs will exclude:

Playing fields or open space at the edge of settlements (existing or proposed)

Isolated developments which are physically or visually detached from the village (including farm buildings or agricultural buildings on the edge of settlement which relate more to the countryside than the settlement

Large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement Large gardens or other areas whose inclusion or possible development would harm the structure, form and character of the village

Areas where development and intensification would harm the character of the village or would have an unacceptable impact on the highway or on the character and landscape

Significant employment sites that are important in providing sources of local employment

In accordance with test A this site is not a playing field or open space at the edge of the village. So is applicable for inclusion.

In accordance with test B the site is not an isolated development that is physically or visually detached from the village, nor is it a farm building or agricultural building that relates more to the countryside than Chew Magna. It is a residential property and its curtilage that contains a range of buildings and uses that form part of a dense cluster of buildings and a strong element of townscape at the entrance to Chew Magna. So the site is applicable for inclusion within the HDB.

In accordance with test C the majority of the garden area contained within the curtilage of the site it is not visually open. It is bounded by residential properties to the east and south and relates more to the village than open countryside. So the site is applicable for inclusion.

In accordance with test D any further development within the wider site area would not harm the structure, form and character of the village. So the site is applicable for inclusion within the HDB.

In accordance with test E the site is applicable for inclusion within the HDB. It is not located where any development or intensification would harm the character of the village or have an unacceptable impact on highways or character and landscape.

There are existing, large, unsightly buildings within the site that currently form part of Norton Lanes townscape and local environment. Re-development of this part of the site would not result in an overall loss of space or an increase in built form in terms of building footprint and height.

Furthermore due to the sites existing screening due to positioning of buildings, boundary treatments and strong boundary landscape there wouldn't be an unacceptable impact on the character of the village or the immediate landscape.

In accordance with test F this is not a significant employment site. The site is therefore applicable for inclusion within the HDB.

#### Principle 4:

HDBs do not need to be continuous. It may be appropriate given the nature and form of village to define two or more separate elements

There are already three separate defined areas of HDBs covering the vast majority of Chew Magna. The inclusion of this site within the Chew Magna HDB ensures that the line of the HDB remains continuous. This site does not sit separately from the village nor does it sit separately within the street scene. It forms a strong and definite entrance to the village.

There appears to be an anomaly with the drawing of the existing HDBs in Chew Magna. The drawing of the boundaries of the three HDBs in Chew Magna is tightly drawn around residential properties and their curtilages. This site is the only place where this is not done. The location of this site is the only one where the last property on the street has been excluded. Inclusion within the HDB provides the opportunity to rectify this.

#### **Change requested:**

No Changes to the policy or supporting text, but an alteration is sought to the largest of the three housing development boundaries covering Chew Magna.

| Placemaking Options Plan Reference: General Policies Comment   | Plan Order<br>Number: 643   |
|--|-----------------------------|
| Respondent 23 Comment 1 Respondent Dr Lucy Rogers Respondent Organisation:   | Avon Wildlife Trust         |
| Agent ID: Agent Name:  |                             |
| Further Information available in the original comment?   Attachments sent with the comments are also as a second s | ment?                       |
| Placemaking Options Plan Reference: General Policies Comment   |                             |
| Comment on the Site:   |                             |
| Avon Wildlife Trust welcomes the opportunity to comment on the above document and would future stages of the consultation process and the Plan's implementation as necessary.  | like to be involved in      |
| Generally, the Trust is very impressed with the Plan's emphasis on green infrastructure, ecology environment within the development and place context and we appreciate the fact that many chave been taken on board.  |                             |
| Change requested:  |                             |
|  |                             |
| Respondent 23 Comment 3 Respondent Dr Lucy Rogers Respondent Number: Name: Organisation:   | Avon Wildlife Trust         |
| Agent ID: Agent Name:  |                             |
| Further Information available in the original comment? $\Box$ Attachments sent with the com-   | ment?                       |
| Placemaking Options Plan Reference: General Policies Comment   |                             |
| Tracemaking Options Flan Reference:  |                             |
| Comment on the Site:   |                             |
| However, we recommend that the wording of the following phrase used in these sections i.e. 'n integrity and connectivity of the green infrastructure' should be reinforced so that it reads "mai integrity and connectivity of the green infrastructure".  | _                           |
| This will ensure that the wording of policies across the Plan is consistent for both green infrastrutor for example,   | ucture and biodiversity, as |
| <ul> <li>Core Strategy objectives 'Protect and enhance the District's natural, built and cultural assets ar<br/>infrastructure';</li> </ul>  |                             |
| • Core Strategy CP7-GI reads 'a requirement to protect and enhance a strategic green infrastruct   | ture network' (p230);       |
| <ul> <li>GI strategy quoted on p230 of the Placemaking Plan reads 'enhancing biodiversity';</li> <li>p231 Emerging Policy NE2 'Ensure that a coherent network of wildlife corridors is retained and</li> </ul>   | enhanced'                   |
| Change requested:  |                             |

| Schedule of Comments on the Placemaking Plan Options Doo   | cument in Plan Order                     |
|--|--|
| Respondent 81 Comment 1 Respondent Kathryn Manchee Number: Name:   | Respondent Camerton Parish Organisation: |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$                 |
| Placemaking Options Plan Reference: General Policies Comment   |  |
| Comment on the Site:  Just a quick note to explain why Camerton Parish Council will not be responding to consultation - as we were so involved in the process the parish council felt there we consultation.   |  |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 93 Comment 1 Respondent Sean Walsh Number: Name:  | Respondent Highways Agency Organisation: |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\qed$ Attachments sent   | with the comment? $\square$              |
| Placemaking Options Plan Reference: General Policies Comment   |  |
|  |  |
| Comment on the Site:   |  |
| Thank you for providing the Highways Agency with the opportunity to comment ounderstand that the document is Part two of the Local Plan, complementing the sadopted Core Strategy which is Part one. It sets out detailed development principwell as for other development across BANES. | trategic framework in the Council's      |
| The Agency is responsible for operating, maintaining and improving the Strategic loommunities and the development industry to deliver sustainable development a safeguarding the primary function and purpose of the SRN. In Bath and North East A46/A36.                                | nd, thus, economic growth whilst         |
| The Agency is keen to ensure that development locations identified in the Placem transport and land use planning to be closely integrated and that the principles of development of the site.  | _  |
| We need to ensure that as far as possible the Agency's interests are protected wh from the purpose of the document. Our comments are made only on the parts of context of the Highways Agency's remit.   | _  |
| Change requested:  |  |

| Schedule of Comments on the Placemaking Plan Options D   | ocument in Plan Order   |
|--|---|
| Respondent 93 Comment 3 Respondent Sean Walsh Number: Name:  | Respondent Highways Agency Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\Box$   |
|  |   |
| Placemaking Options Plan Reference: General Policies Comment   |   |
| Comment on the Site:   |   |
| The Agency understands and supports the role of the development managemen high quality development.  | nt policies in order to ensure and maintain   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 95 Comment 6 Respondent Chris MacArthur for and on Number: Name: behalf of Miss Rachael A Bust  Agent ID: Agent Name:   | Respondent The Coal Authority Organisation:   |
| Further Information available in the original comment?   Attachments ser   | nt with the comment? $\Box$   |
|  |   |
| Placemaking Options Plan Reference: General Policies Comment   |   |
| Comment on the Site:   |   |
| The Coal Authority supports the intention that relevant designations/constraints online Policies Map. It is useful for plan users to understand the broad spatial ex Coal Authority would suggest that the "Development High Risk Area" which we included on the Policies Map. This is the GIS layer that we provided to your Development they can identify instances where submission of a Coal Mining Risk Assessment of the Proposal. | ktent of such designations/constraints. The define for coal mining legacy could be elopment Management team, in order |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 224 Comment 21 Respondent Number: Name:   | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b>  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\Box$   |
| Placemaking Options Plan Reference: General Policies Comment   |   |
| Comment on the Site:   |   |
| All saved local plan policies should be transferred and modified where appropria   | ate and the Local Plan should be obsolete.  |
| This means that coverage below needs to be widened to cover e.g. Shop fronts, such topics (all of which have LP policies) are not to have PMP policies the basis   |   |

indicated (CS, NPPF &c)

All section cover pages should indicate relevant Core Strategy policies/intentions and all policy approaches should

indicate which LP policies they replace (where relevant). Care needs to be taken to avoid overly permissive policies which may have unintended consequences e.g. LP HG.17 on student accommodation. Policies containing "will be permitted" should also include reference to need for compliance with other policies in the plan. **Change requested:** Respondent 281 Comment 1 Respondent Alison Howell Respondent Natural England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: General Policies Comment Comment on the Site: We consider the proposed draft policies to be generally positive, particularly with respect to the natural environment, including landscape, biodiversity and public access. We are also satisfied that the draft policies appear to be in accordance with the Core Strategy and we welcome the continuing emphasis throughout on the importance of creating and enhancing Green Infrastructure and Ecological Networks. **Change requested:** Respondent 301 Comment 1 Respondent **Respondent** South West HARP Number: Number: **Organisation:** Planning Consortium Name: **Agent ID:** 43 **Agent Name:** Tetlow King Planning Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: General Policies Comment **Comment on the Site:** It would be pertinent to add some reference in the introduction to the likely need to review the Placemaking DPD over the plan period, and to perhaps outline the circumstances which would instigate a review. **Change requested:** Respondent 821 **Comment** 1 **Respondent** Deborah Porter Respondent Cam Valley Wildlife Number: Number: Name: **Organisation:** Group Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: General Policies Comment

#### **Comment on the Site:**

Strategic approach

The B&NES website page on biodiversity includes the following statement:

"The government confirms the need for a cultural change that puts the value of the natural environment at the heart of decision making. Changes to the planning system are particularly important."

The B&NES strategic approach to Placemaking does not put the value of the natural environment at the heart of decisionmaking. The context presented appears to work in opposition to implementation of development and design principles that should protect and enhance natural resources and fully reflect the core principles laid out in the NPPF and flagged up on the B&NES website (above). B&NES presents a context at the start of its Plan that works against the desired cultural change when it indicates on its website that it should rightly be fostering it.

The role of the Placemaking Plan in meeting the 3 key strategies of the Council is laid out at the start. These three strategies are to be "achieved by the Core Strategy". The Core Strategy includes its own objectives, set out in para 11, but in setting out the role of the Core Strategy as achieving these three strategies, the Placemaking Plan is presented in a particular context. This context does not properly reflect the Government's overarching key strategies regarding delivery of plans and development, as set out in the NPPF and does not adequately reflect the principles for plan making and decision-taking in para 17 of the NPPF. To reflect the NPPF as a whole is a key requirement in plan making. The prominence of these key strategies and role of the Core Strategy and Placemaking Plan in their delivery cold be said to work against delivery of net gains to nature, a requirement in the NPPF.

The aim of meeting the three key strategies cited in this introduction not only distances the implementation of development control and Placemaking principles from the key principles of the NPPF, but also from the Council's duty to conserve biodiversity through its normal functioning (NERC Act, Section 40). This affects the soundness of the plan as a whole and the context in which councillors making decisions will take decisions. The context for decision-making is effectively skewed away from consideration of biodiversity as an imperative matter and, therefore, through focussing on the three key criteria it is more likely that B&NES will continue to lose important biodiversity and other natural assets to development and change. Loss of such assets in B&NES has been significant.

Although maintaining certain levels of these natural assets is implicated in attention to health and well-being and economy, there are other ways of achieving health and well-being outputs and some of these work against the conservation and enhancement of the natural assets of the District.

Budgetary constraints have led to lack of funding for the identification and for appropriate management of biodiversity assets of current value and potential future value. Whilst it is true that biodiversity resources outside the sphere of influence of development control have deteriorated in many cases, leading to losses, the losses to permitted development have been significant. The value of biodiversity resources are too often only revealed through a planning application, and then only where rigorous efforts have been made to identify the value of the sites in question or an erroneous account challenged.

The B&NES Local Plan's Overall Strategy was Balanced Communities, which was divided into sections according to location with biodiversity referred to only with reference to Bath and the Rural areas. Its focus was clearly economic, social and aesthetic, as is the focus regarding the 3 key strategies of the Council cited in the Placemaking Plan.

The Key objectives alongside the main strategy in the Local Plan included Environmental Assets, and made reference to securing effective stewardship of the area's biodiversity. It was backed up with targets that worked against this, however, specifically achieving 50% of new dwellings on brownfield land and the net change to the area covered by designated sites as a result of development. Brownfield land supported significant important biodiversity in the Avon corridor in Bath and in the Somer Valley area. Lack of political will and budget for a comprehensive review of current and potential biological designations meant that the process of site evaluation for development suitability and assessment of the biological resource was not carried out. The Local Plan provided the opportunity to fail to achieve "effective stewardship" whilst simultaneously meeting the targets set and satisfying the indicators in the Plan used to gauge success or failure. Clearly

this was not satisfactory, but this plan does not set any targets or measures that could be used to gauge success or failure of the policy, say at review.

The biodiversity efforts of the Council in the B&NES Local Plan was to be in coordinating the activities of outside groups already involved in biodiversity conservation (para A4.36), and to be a partner in some large partnerships, which included promoting some biodiversity action in the Avon and Frome Valley corridors through the Avon Valley Partnership (which became the Avon Frome Partnership) – this also relied on volunteer work. Financial contributions were small and in the main not aimed at biodiversity initiatives. This has proved not to be effective, yet this seems to be pretty much the approach that is being taken in pursuit of the objectives in this plan, outside the sphere of development control.

Objectives that sit alongside the 3 key strategies In the Placemaking Plan Options document, other strategies and initiatives supporting the 3 key strategies include strategies relating to climate change, development and regeneration, housing, education, cultural heritage and Fit for Life. Again, these are mainly economic, social and aesthetic. There is nothing about wildlife and biodiversity there of any particular import, yet these strategies, B&NES says, will contribute significantly to the aspirations for development sites and planning requirements that will be set out in the Placemaking plan.

Natural environment, assets and climate change

There appears to be no reference to the NPPF policy that instructs that high value brownfield sites are not suitable for development (NPPF para 111) or NPPF para 110 that instructs to allocate to land with the least environmental or amenity value where consistent with other policies in the framework. Recent university research has revealed that brownfield sites can be significant carbon sinks due to the level of carbon sequestration associated with plants growing in close association with deteriorating concrete, rubble and cement and other lime-rich stony substrates such as former rail beds.

The B&NES Environmental Sustainability and Climate change strategy to 2015 sees the natural environment as a tool for soaking up carbon dioxide, mitigating flood risk through natural drainage systems, and supplying food, clean energy and sustainable transport. Delivery of any biodiversity elements appears to be viewed more as a side-effect of initiatives rather than an aim in itself, and relies on volunteers working through partnerships, which has limited value added. There are no strategic commitments regarding biodiversity gains or gains to nature, as required in the NPPF to be delivered through policy making and decision-taking. It is difficult to see how the policies in the Options plan are going to achieve this in practice.

The B&NES 2015 – 2026 Environmental sustainability and climate change strategy has aspirations to change the way we think and act now but biodiversity seems fairly disconnected with the strategy. A work-stream approach is taken. There is a rather vague promise of ensuring that the quality of the natural and built environment is maintained and enhanced through the agency of development of a new leadership forum (yet another Partnership) and a Climate Change Initiative. There is no commitment to increase biodiversity or enhance the value of the nature resource - "quality" can encompass many facets, including aesthetic, economic and social value.

The 2013 work-stream to deliver natural environment benefits is to promote delivery of a Green Infrastructure network and to work in partnership with other agencies, volunteers and community groups, which again relies almost entirely on volunteers in order to deliver biodiversity benefits. Defra is funding the development of an Avon Catchment Plan that may deliver biodiversity benefits in the future, but this hardly constitutes a District Strategy. Given that there is no funding for identifying the GI network, again this relies heavily on the good will of volunteers and consequently commits the Council to little real action of its own in defence of biodiversity.

The combination of strategies appear not to be strong enough to fit what the Government is asking local authorities to do.

Although there is a woodlands and trees policy, it is essentially protective. We would like to see encouragement of coppiced woodland for generation of local wood for burning in areas where wood burners and fires are still in significant use, as this will replace some use of fossil fuels whilst providing good local amenities and a developing carbon sink along with benefits for wildlife and biodiversity and potentially for crafts and associated economic benefits. This might be achieved through community initiatives with the aid of the Council.

| Change requested:  |  |  |
|--|--|--|
|  |  |  |
| Respondent 828 Comment 1 Respondent Number: Name:  | Respondent Deeley Freed Estates Ltd Organisation: and DFE Projects Limited |  |
| Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent   | with the comment? $\Box$   |  |
| Placemaking Options Plan Reference: General Policies Comment   |  |  |
| Comment on the Site:   |  |  |
| As you will know, Deeley Freed Estates - through its associated companies - and D Somerset, especially in the City of Bath where they are working with the Council t development sites in the city centre and within Bath City Riverside Enterprise Area | to secure the regeneration of several key                                  |  |
| Deeley Freed Estates and DFE Projects welcome the content of the Placemaking P and helpful step towards:   | Plan Options Document as an important                                      |  |
| (a) providing a clear basis for decision making as part of the statutory developmen  | nt plan; and   |  |
| (b) creating a more attractive place within which people will people will be keen to   | o live and work- and to visit.   |  |
| The document appears to be well-researched and soundly based overall. It is hope comments constructive and helpful. I confirm that Deeley Freed Estates and DFE I queries regarding the representations now submitted.                                   |  |  |
| Change requested:  |  |  |
|  |  |  |
|  |  |  |
| Respondent 3343 Comment 1 Respondent Louis Number: Name:   | Respondent Organisation:   |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent   | with the comment? $\Box$   |  |
| Placemaking Options Plan Reference: General Policies Comment   |  |  |

# **Comment on the Site:**

The natural and planted environment is being consumed by 'developments'. The tone of the report, is to mitigate, and attempt to save existing habitats rather, than ensuring this essential aspect into planning, to incorporate more growing spaces in the built environment on an equal footing to architecture.

The recent pace of development raise issues concerning the "Green, Environmental, and Natural Environment' sections of this report, that will escalate during the life of these guide lines. (2029)

In Bath, the river Avon is an important pathway to the natural environment, but has any consideration been taken north and south of the river to provide pathways and stepping stones across the city for wildlife? Will natural pathways feature in the other built up areas under the Council's responsibility?

Is there sufficient recognition of the variety natural habitats that might require protection, beyond those covered by statute?

Green spaces, with the increasing density of residents of all ages, puts pressure on these spaces are there enough, variety, sufficient access for those beyond the immediate vicinity, and stewardship in the long term? Could adoption of marginal

strips, supplement / increase these spaces and the planted landscape.

Increase in allotments is welcome but, is this the only approach to encourage people to grow plants, to reach a wider audience?

Trees shrubs and hedges, provide a wide scope of possibilities, in the landscape, are needed and should be actively encouraged. Reassurance even expectation for more trees and shrubs in an urban context, can co-exist around buildings. The benefits are highlighted in the report.

B.A.N.E.S is not able to create these living spaces but to plan/identify opportunities, emphasise, encourage, support a push beyond what is currently available, and increase the community's expectation for our surroundings.

| push beyond what is currently available, and increase the communi  | ity's expectation for our surroundings.   |
|--|---|
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 4803 Comment 1 Respondent Number: Name:   | Respondent Waddeton Park Limited Organisation:  |
| Agent ID: 128 Agent Name: Peter Brett Associates   |   |
| Further Information available in the original comment? $\Box$ Atta   | achments sent with the comment? 🗹   |
| Placemaking Options Plan Reference: General Policies Comment   |   |
| Comment on the Site:   |   |
| 1.2 General Comments   |   |
| 1.2.1 Proceeding with the plan in the context of and by reference to great waste of resources) because the Core Strategy is out of date, requirement for the Housing Market Area using up to date informal National Planning Policy Framework or Planning practice Guidance. West of England is progressing and is likely to provide the relevant within BANES before the Placemaking plan is formally put in place. | as it is not based on a full assessment of the housing tion and specifically it is not compliant with the . The Strategic Planning process for the whole of the |

- 1.2.2 In addition it is recognised by the Core Strategy Inspector at paragraph 136 of his report that 'an early review of the strategy for B&NES would be triggered either by its inclusion in the outputs of the West of England SHMA or by any unmet housing needs of the sub-region'. Indeed the Council acknowledge that that the first review will be timed to coordinate with the review of the West of England Core Strategies. The NPPF is very clear about the need to plan positively. Paragraph 14 states that Local Plans should positively seek opportunities to meet the development needs of their area and meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.
- 1.2.3 Relying on the housing number set out in the existing Core Strategy as a proper and robust figure up to 2029 is wrong, this level of provision will not meet the needs that exist and will certainly fail to deliver the essential affordable housing required. Reliance on previously developed land to deliver this housing puts further pressure on the numbers and means even less affordable units will be delivered. Consequently, the numbers should be acknowledged as only an interim figure, which are minimum and the plan should provide more flexibility to deal with this know update in evidence and imminent review. Consequently progressing this Placemaking plan on the basis of the out of date Core Strategy and evidence is ludicrous and exceptionally short sighted.

| Change requested: |
|-------------------|
|                   |
|                   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 6389 Comment 4 Respondent Respondent Cycle Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: General Policies Comment Comment on the Site: Cycle Bath supports the aim of "creating good places that promote people's health, happiness, and well-being" and states that cycling is one of the best ways to do this, particularly because it gets regular exercise, which is vital for both physical & mental health, into daily life. Cycling is also the ideal from of transport to create the vision of "a 'connected' area ready to create an extraordinary legacy for future generations", and helps fulfills 6 out of 7 of the Core Strategy's strategic objective:-Yes – It is low carbon and will contribute to a sustainable future Yes - Helps protect and enhance natural and built assets Yes - The economic benefits are huge long term [see links below] Yes – It is a great opportunity to invest in our city, town and local centres, with the huge number of improvements for cycling that are possible Yes - Promotes health and well being, absolutely Yes - Delivers well connected places accessible by sustainable means of transport To deliver this, cycling needs a network of direct, well connected, comfortable to use and segregated routes to create a stress free cycling environment in which to cycle to school, work, local shops, city centre, train station or for leisure. The associated benefits of cycling are huge; whether it is improved air quality, obesity, freedom and independence for children, long term economic benefits, quieter spaces, lowering CO2 emissions, the list goes on. Everyone should have the right to reach their home safely by bicycle whether they be 8 or 80 years old. Supporting documents Design standards **CROW** manual http://www.crow.nl/publicaties/design-manual-for-bicycle-traffic Welsh Government – Active Travel Design Guidance http://wales.gov.uk/topics/transport/walking-cycling/active-travel-design-guidance/?lang=en Health and economic benefits http://grist.org/list/one-mile-on-a-bike-is-a-42-economic-gain-to-society-one-mile-driving-is-a-20-loss/ https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/348943/vfm-assessment-of-cyclinggrants.pdf http://heatwalkingcycling.org/index.php?pg=cycling&act=introduction http://activitycommission.com https://www.gov.uk/government/uploads/system/uploads/attachment data/file/371096/claiming the health dividend.

pdf

Page 18 - http://www.cycling-embassy.dk/wp-content/uploads/2011/05/Bicycle-account-2010-Copenhagen.pdf

-----

- \* That cycling provision should be provided following desire lines
- \*\* Along highly desirable routes where there is a high over 3000 per hr volume of traffic segregated tracks must be provided
- \*\*\* Junction must be improved for priority of cycling over vehicles
- \*\*\*\* That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, , secure, convenient and easy to access

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Additional Development Management

Policies

Plan Order Number: 645

| Respondent 1366 Comment 2 Respondent Lisa Bullock Number: Name:   | Respondent Network Rail Organisation:               |
|---|---|
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment?   Attachm  | ents sent with the comment? $\Box$                  |
| Placemaking Options Plan Reference: Additional Development Manag  | gement Policies                                     |
| Comment on the Site:  |   |
| Any traveller site is deemed the same as any residential development ne increased numbers of young people and minors using the site, there is a the railway as a short cut and failing to recognise the risks involved by cr                                      | n increased risk of trespass with residents using   |
| Any existing Network Rail fencing at any potential site which is next to the account of the risk posed at the time the fencing was constructed and not of the site.   | •   |
| Therefore, any proposed residential traveller development site may imp<br>therefore, should the Council chose to develop a site next to the operati<br>proof steel palisade fence of a minimum 1.8m in height to mitigate any i                                   | ional railway they must provide a suitable trespass |
| Any fencing installed must not prevent Network Rail from maintaining it Rail is a publicly funded organisation with a regulated remit it would not boundary works and enhancements necessitated by commercial or third operational railway and Network Rail land. | be reasonable to require Network Rail to fund       |
| There must be a minimum of a 2 metres gap between any buildings or so   | tructures and the Network Rail boundary.            |
| We would appreciate the Council providing Network Rail with an opport applications or proposed site allocations should they be submitted for si proximity to the railway as we may have more specific comments to ma  | ites adjoining the railway, or within close         |
| Change requested:   |   |

Placemaking Options Plan Reference: Residential Development - Aims /

Paragraph 2.6

Plan Order Number: 648

| Respondent 102 Comment 24 Respondent Robin Kerr Number: Name:   | Respondent Federation of Bath  |
|---|--|
| Traine.   | Organisation: Residents' Associations  |
| Agent ID: Agent Name:   | _  |
| Further Information available in the original comment? $\Box$ Attachm   | ents sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Residential Development - Aims  | s / Paragraph 2.6  |
| Comment on the Site:  |  |
| his section should also cover policy towards the use of properties for sl   | hort-term rentals (party houses).  |
| Change requested:   |  |
| change requested.   |  |
|   |  |
|   |  |
|   |  |
|   |  |
| Respondent 3095 Comment 13 Respondent Dr N J T Long Number: Name:   | Respondent Bath and North East Organisation: Somerset Branch of the  |
| Number: Name:   | •  |
| Number: Name: Agent ID: Agent Name:   | <b>Organisation:</b> Somerset Branch of the  |
| Number: Name:   | Organisation: Somerset Branch of the   |
| Number: Name: Agent ID: Agent Name:   | <b>Organisation:</b> Somerset Branch of the  |
| Number: Name: Agent ID: Agent Name:   | Organisation: Somerset Branch of the ents sent with the comment?   |
| Number: Name: Agent ID: Agent Name: Further Information available in the original comment?  Attachm   | Organisation: Somerset Branch of the ents sent with the comment?   |
| Number: Name: Agent ID: Agent Name: Further Information available in the original comment?  Attachm   | Organisation: Somerset Branch of the ents sent with the comment?   |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachm  Placemaking Options Plan Reference: Residential Development - Aims  Comment on the Site:  1.6 We welcome the policy on bringing empty properties back into use.   | Organisation: Somerset Branch of the ents sent with the comment?   |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachm  Placemaking Options Plan Reference: Residential Development - Aims  Comment on the Site:  1.6 We welcome the policy on bringing empty properties back into use. Employment space, empty buildings can spoil the character of nearby properties.   | Organisation: Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment? |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachm  Placemaking Options Plan Reference: Residential Development - Aims  Comment on the Site:  1.6 We welcome the policy on bringing empty properties back into use.  Imployment space, empty buildings can spoil the character of nearby pruggest the document makes it clear that the Council will use any power | Organisation: Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment? |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachm  Placemaking Options Plan Reference: Residential Development - Aims  Comment on the Site:  1.6 We welcome the policy on bringing empty properties back into use. Employment space, empty buildings can spoil the character of nearby properties.   | Organisation: Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment? |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachm  Placemaking Options Plan Reference: Residential Development - Aims  Comment on the Site:  1.6 We welcome the policy on bringing empty properties back into use.  Imployment space, empty buildings can spoil the character of nearby pruggest the document makes it clear that the Council will use any power | Organisation: Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment?  Somerset Branch of the ents sent with the comment? |

Placemaking Options Plan Reference: Policy H1

|  | Number: 659   |
|--|---|
| Respondent 224 Comment 23 Responder Number: Number: Name:  | Respondent Bath Preservation Trust Organisation:                            |
| Agent ID: Agent Name:  |   |
| Further Information available in the original of   | comment?  Attachments sent with the comment?                                |
| Placemaking Options Plan Reference: Policy   | H1  |
| Comment on the Site:   |   |
| Generally agree with policy approach.  |   |
|  |   |
| This needs to be clearer (see comments on 2.10 Provision ought to be guaranteed through the a  | ·   |
| Trovision ought to be guaranteed through the   | anocation of specific sites.  |
| Change requested:  |   |
|  |   |
|  |   |
| B 1. 244 B   |   |
| Respondent 244 Comment 1 Responder Number: Number: Name:   | nt Susan E Green Respondent Home Builders Organisation: Federation          |
| , and the second | Organisation. Federation  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original of   | comment?   Attachments sent with the comment?                               |
|  |   |
| Placemaking Options Plan Reference: Policy   | H1  |
|  |   |
| Comment on the Site:   |   |
| ·  | r of policy proposals (H1, UD1, SCR4, and SCR8) which the Council will have |
| are correctly aligned and consistent with nation   | Housing Standards Review are known in order that the Council's policies     |
| are correctly diighted and consistent with hation  | idi poney.  |
| Change requested:  |   |
|  |   |
|  |   |
|  |   |
| Respondent 301 Comment 2 Responder Number: Number: Name:   | •   |
| , and the second | Organisation: Planning Consortium   |
| <b>Agent ID:</b> 43 <b>Agent Name:</b> Tetlow King Pla   | nning   |
| Further Information available in the original of   | comment?  Attachments sent with the comment?                                |
|  |   |
| Placemaking Options Plan Reference: Policy   | H1  |
|  |   |
| Comment on the Site:   |   |

We do however, note concern in relation to paragraph 2.13 and option 2. The distinction between Use Class C2 and C3 is

A development's Use Class should be decided dependant on their particular characteristics and restrictions; and in the

important. Various Care and Extra Care Housing models straddle the C2 and C3 Use Class definitions.

We support the inclusion of this policy.

Plan Order

context of national policy, guidance and precedence. The regulatory framework is not indicative of Use Class, and reference to this should be removed.

We would support the Council's comment that potential indicators of Use Class could be identified in the policy, whilst ensuring there is some flexibility.

Reference could be made to the volume on non-saleable space, minimum care requirements (secured through s106), occupation restrictions etc.

| Change requested:  |  |
|--|--|
|  |  |
|  |  |
|  |  |
| Respondent 1556 Comment 8 Respondent Number: Name:   | Respondent Strategic Land Organisation: Partnerships   |
| Agent ID: 128 Agent Name: Peter Brett Associates   |  |
| Further Information available in the original comment?   | nts sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy H1  |  |
| Comment on the Site:   |  |
| Residential Development  |  |
| Paragraph 2.4 (p174) recognises that the plan should provide housing to ractually says at paragraph 47 that LPAs should use evidence base to ensure Over the plan period. This is important because it is about meeting the fuby the present communitys resistance to development. More particularly meet these needs because there does not seem to have been any local her the local need which exists. These up to date needs studies are fundament robust evidence base is essential for a good and sound plan. Before proper examined, it is necessary to understanding how each place works, its role needs are the main driver of change and growth, and it is clearly set out with the population should be met. Is it the intention to undertake local hous plan? | re plan meets the full objectively assessed needs. Iture communitys needs and not being defined it is not clear how housing is being provided to busing needs surveys which clearly demonstrate intal to placemaking in general. An up to date osals and opportunities for each area are and essentially what its needs are. Housing within national planning policy that the needs of |
| Change requested:  |  |
| Local housing needs surveys are required   |  |
| Respondent 2611 Comment 20 Respondent Number: Name: Agent ID: Agent Name: Further Information available in the original comment?   Attachment  | Respondent Transition Bath Organisation:  nts sent with the comment?   |
| Placemaking Options Plan Reference: Policy H1  |  |

#### **Comment on the Site:**

Full support for housing that promotes health and well-being. (2.6 bullet point 4)

Qualified support: Gardens should include raised beds for residents to do their own gardening. Grounds should include a vegetable plot so that meals can include fresh vegetables (not the tinned vegetables and powdered soups provided in some residential units.) There should also be a 'daily needs' shop within reasonable walking distance.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Strongly agree external areas being 'home zones' **Change requested:** Modification required: Facilities required for on-site production of fruit and vegetables to provide residents with a healthy diet. Gardens should include residents' own gardening space, including provision of raised beds. Walking distance to a 'daily needs' shop should be identified. Respondent 3069 Comment 12 Respondent Clir Anketell Jones Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy H1 Comment on the Site: 2.7 - 2.16 The development process should ensure there is Extra Care housing where it is most effective in meeting the needs of its residents. Purpose built flats in isolated developments will not serve as well as city centre locations where residents are close to amenities they use most frequently. **Change requested:** Respondent 4803 Comment 6 Respondent **Respondent** Waddeton Park Limited Number: Number: Organisation: Name: Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? Attachments sent with the comment?

#### Comment on the Site:

4.1 Residential Developmet

Placemaking Options Plan Reference: Policy H1

- 4.1.1 Paragraph 2.4 (p174) recognises that the plan should provide housing to 'meet community's needs'. However, the NPPF actually says at paragraph 47 that LPAs should use evidence base to ensure plan meets the full objectively assessed needs .... over the plan period'. This is important because it is about meeting the future community's needs and not being defined by the present community's resistance to development. More particularly it is not clear how housing is being provided to meet these needs because there does not seem to have been any local housing needs surveys which clearly demonstrate the local need which exists. These up to date needs studies are fundamental to placemaking in general. An up to date robust evidence base is essential for a good and sound plan. Before proposals and opportunities for each area are examined, it is necessary to understanding how each place works, its role and essentially what its needs are. Housing needs are the main driver of change and growth, and it is clearly set out within national planning policy that the needs of the population should be met. Is it the intention to undertake local housing needs surveys to inform the next stage of the plan?
- 4.2 Housing and Facilities for the Elderly, housing for people with other Supported Housing or Care Needs
- 4.2.1 In paragraph 2.8 the figures used only go to 2021 as it says 'The number of people of retirement age is predicted to increase by nearly 6,000 (18.3%) by 2021'. This is important but is only part of the story. The data in the table supporting this section is out of date, uses the interim population data and only goes to 2021. Given that the Placemaking Plan goes

to 2029, it is essential that the information used is as up to date as possible and properly attempts to predict what the change is likely to be at the end of the plan period. The latest full set of Population Projections are the 2012 based sets which have been available since June 2014 and go beyond the end of the plan period. Consequently, these figures should be used to inform the policies, options and strategy within the Placemaking Plan. It should be noted that the new 2012 based household projections are due next month and also that the West of England are embarking on a proper strategic planning review which will include a comprehensive assessment of the whole area and its needs through the SHMA. This up to date and emerging evidence must be assessed and used to inform this Plan.

4.2.2 Using the most up to date 2012 based population projections to update the information on the growth in elderly demonstrates that there is going to be a far greater increase in the number of people at retirement age than set out currently in the plan. This is demonstrated by the figures below:

Age20112029% increase 65-7415,92821,59235 75-8410,98117,93563.3 85+4,90810,819120.4

- 4.2.3 It is essential that the Placemaking Plan uses the most up to date information to provide a true picture of what is likely to happen by the end of the plan period. This may change the strategy and in this instance may mean than more provision for elderly care should be made.
- 4.3 Policy H1
- 4.3.1 While this policy makes some positive provision for new extra care accommodation, it includes reference to including storage for bikes, at a level which is entirely inappropriate. Obviously some bike provision in terms of storage and parking may be appropriate to encourage visitors to use this form of transport, however, the reality of residents being able to cycle on a regular basis and owning a bicycle is highly unlikely.
- 4.3.2 It is entirely appropriate to identify specific sites for this use and as such the opportunity should be taken to comprehensively assess the opportunities to the south of the town and identify suitable sites.

|  | pondent<br>me: | Respondent McCarthy & Stone Organisation: Retirement Lifestyles Ltd |
|--|----------------|---|
| Agent ID: 204 Agent Name: The Plan Further Information available in the or | ŭ              | with the comment? $\Box$  |
| Placemaking Options Plan Reference:  | Policy H1      |   |

#### **Comment on the Site:**

**Change requested:** 

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the B&NES Placemaking Plan, insofar as it affects or relates to housing for the elderly.

We have previously provided commentary on other aspect of the B&NES Local Development Framework, in particular the emerging Community Infrastructure Levy and Planning Obligations DPD. In our previous representation we outlined how, in line with the rest of the country, the demographic profile of B&NES is projected to age, with the largest proportional increases in the older population expected to be of thefrail elderly, those aged 75 and over, who are more likely to require specialist care and accommodation. This raises concerns over the future provision of adequate support and

accommodation for elderly persons.

We commend the Council for their willingness to engage with this matter proactively and the positive guidance provided within Policy H1 and its accompanying justification. We support the Policy accordingly.

#### **Change requested:**

We note that the wording of policy H1 relies heavily on guidance provided by Housing LIN and their definition(s) of Extra Care. This is not by and of itself problematic however, as the Council articulates within the wording of the policy, there is significant variation in the 'Extra Care concept.

We appreciate this is a niche form of accommodation and neighbouring Authorities have found it useful to visit a McCarthy and Stone Assisted Living (Extra Care)development in order to provide further insight on this form of development and some of the benefits, and issues, associated with it.

We would like to extend the offer for Council Officers and other interested parties to visit a nearby scheme on this basis. Should this be of interest please feel free to contact me on the details provided.

| Respondent 6392 Comment 5 Respondent Number: Number: Name:                          | pondent Dr Virginia Williamson<br>me:     | Respondent Bath Area Growers Organisation:   |
|---|---|--|
| Further Information available in the or   | riginal comment?   Attachments ser        | nt with the comment?                         |
| Placemaking Options Plan Reference:   | Policy H1                                 |  |
| Comment on the Site:  |   |  |
| vegetable plot so that meals can include some residential units.) There should also | e fresh vegetables (not the tinned vegeta |  |
| Change required for an site production  | of fruit and vogetables to provide resis  | dents with a healthy diet. Gardens should    |
| ,   | including provision of raised beds. Walk  | king distance to a 'daily needs' shop, where |
|   |   |  |
|   | pondent Mr Edward Cade<br>me:             | Respondent Student Castle Organisation:      |
| Agent ID: 222 Agent Name: Nathanie  | el Lichfield & Partners                   |  |
| Further Information available in the or   | iginal comment?   Attachments ser         | nt with the comment? $\Box$                  |
| Placemaking Options Plan Reference:   | Policy H1                                 |  |

# **Comment on the Site:**

Our Client supports the aims outlined at paragraph 2.6 but, in addition to those points listed, considers that reference should be made to encouraging the efficient use of land by reusing land that has previously been developed. The policy approach would then accord with paragraph 17 of the NPPF.

## **Change requested:**

Please refer to separate letter submitted via e-mail by NLP on behalf of SC Pulteney Road Ltd (Student Castle). (N.B. CANNOT FIND EMAIL AS REFERENCED)

Placemaking Options Plan Reference: Policy H1 / Paragraph 2.16

Respondent 224 Comment 22 Respondent Number: Name: Organisation:

Agent ID: Agent Name:

Further Information available in the original comment? 

Placemaking Options Plan Reference: Policy H1 / Paragraph 2.16

Comment on the Site:

What does 2.16 actually mean? Is, or is not, extra care to be counted in the affordable housing provision? Can a developer build a care home or sheltered housing complex and call it all affordable?

**Change requested:** 

Plan Order

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy H2 Number: 664 Respondent 93 Comment 4 Respondent Sean Walsh Respondent Highways Agency Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H2 Comment on the Site: Policy H2 Emerging Policy Approach - The Agency supports the wording of this policy to ensure that scale of development is appropriate to the site in terms of its location and accessibility. If however a site is particularly accessible with good facilities then the Agency is potentially receptive to higher than normal densities. **Change requested:** Respondent 224 Comment 24 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H2 Comment on the Site: Agree with policy approach. Higher net densities are supported within the limitations of height control, and not at the expense of the character of Bath. An element of option 2 should be included, with reference to character and design. **Change requested:** Respondent 244 Comment 14 Respondent Susan E Green **Respondent** Home Builders

# **Comment on the Site:**

Number:

Agent ID:

Finally if the Council wishes to encourage custom build (including self-build) based on evidence of such needs this should be positively done to increase the overall amount of new housing development rather than by a restrictive policy requirement for inclusion of such housing on larger development sites (H2). Such a policy approach only changes the form of delivery of allocated / permissioned plots from one type of house builder (traditional) to another (custom builder or self builder) without any consequential additional contribution to boosting housing supply in these circumstances housing delivery is likely to be slower and in some case may not even happen.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

**Agent Name:** 

Placemaking Options Plan Reference: Policy H2

Name:

**Organisation:** Federation

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Change requested:** Respondent 301 Comment 3 Respondent Respondent South West HARP Number: Number: Name: **Organisation:** Planning Consortium Agent ID: 43 Agent Name: Tetlow King Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H2 Comment on the Site: We support the policy in its currently proposed form. **Change requested:** Respondent 1556 Comment 10 Respondent Respondent Strategic Land Number: Number: Name: **Organisation:** Partnerships Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H2 Comment on the Site: This policy is unnecessary as density should be a function of character and design. **Change requested:** delete policy Respondent 2611 Comment 21 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy H2 Comment on the Site: Strongly agree – Higher density and good local facilities **Change requested:**

| Schedule of Comments on the Placemaking Plan Options Doo  | cument in Plan Order  |
|---|---|
| ·   | Respondent Organisation:  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy H2   |   |
| Comment on the Site:  |   |
| Density must play its part in the efficient use brownfield space. Taking pressure of term conservation as a rural city.             | ff Greenbelt sites is vital to Bath's long                          |
| Change requested:   |   |
|   |   |
| ·   | Respondent Bath and North East Organisation: Somerset Branch of the |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\qed$ Attachments sent  | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy H2   |   |
| Comment on the Site:  |   |
| The CPRE supports Policy H2 in that it recognizes that the preservation of rural chafar lower density in rural than in urban areas. | aracter generally requires housing of a                             |
| Change requested:   |   |
|   |   |
| Decreadest ACCO Comment 2 2   |   |
| Respondent 4660 Comment 3 Respondent Ms Jan Brown Number: Name:   | Respondent Organisation:  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy H2   |   |
| Comment on the Site: Please continue with previous wording from Local Plan H7 i.e. minimum density 3                                | Odph  |
| Change requested:   |   |

|  |                      |                       | aking Plan Options Document in Plan Order                      |
|--|----------------------|-----------------------|--|
| Respondent 4803<br>Number:                 | Comment 8 Res        | spondent<br>ime:      | <b>Respondent</b> Waddeton Park Limited <b>Organisation:</b>   |
| Agent ID: 128 Ag                           | ent Name: Peter B    | rett Associates       |  |
| Further Information                        | n available in the o | riginal comment?      | Attachments sent with the comment?                             |
| Placemaking Optic                          | ns Plan Reference:   | Policy H2             |  |
| Comment on the S                           | ite:                 |                       |  |
| 4.4.1 This policy is                       | unnecessary as den   | sity should be a fund | ction of character and design.                                 |
| Change requested:                          |                      |                       |  |
| Respondent 6389                            | Comment 23 Res       | cnandant              | Posnondont Ovelo Path  |
| Number:                                    | _                    | ime:                  | Respondent Cycle Bath Organisation:                            |
| Agent ID: Ag                               | ent Name:            |                       |  |
| Further Information                        | n available in the o | riginal comment?      | $\square$ Attachments sent with the comment? $\square$         |
| Placemaking Option                         | ns Plan Reference:   | Policy H2             |  |
| Comment on the S                           | ite:                 |                       |  |
| Agree – Cycling sup                        | ports high density A | dd accessible by sus  | stainable transport modes including cycling                    |
| That cycling provision                     | on should be provid  | ed following desire   | lines  |
| That all developmen<br>needs covered, seco |                      |                       | well designed appropriate for the development ie long term     |
| Change requested:                          | :                    |                       |  |
|  |                      |                       |  |
| Respondent 6414<br>Number:                 | Comment 2 Res        | spondent<br>ime:      | Respondent Radstock Land LP Organisation:                      |
| Agent ID: 162 Ag                           | ent Name: Pegasus    | S                     |  |
| Further Information                        | n available in the o | riginal comment?      | $\square$ Attachments sent with the comment? $\square$         |
| Placemaking Optic                          | ns Plan Reference:   | Policy H2             |  |
| Comment on the S                           | ite:                 |                       |  |
| Emerging Policy App                        |                      |                       |  |
| NPPF naragranh 50                          | states that "design  | policies should avoi  | d unnecessary prescription or detail and should concentrate on |

guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation

In this context, it is considered that there is no justification for Policy H2. Guidance on density can be effectively dealt with

to neighbouring buildings and the local area more generally."

through site allocations and general design policies. There is no need to set minimum or maximum densities; density must be informed on a site specific basis so as to respect the character and context of a particular site.

| Respondent 6415 Comment 2 Respondent Number: Name:  | Respondent Strongvox Homes Organisation:  |
|---|---|
| Agent ID: 162 Agent Name: Pegasus   |   |
| _   | chments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy H2   |   |
| Comment on the Site:  |   |
| Emerging Policy Approach: H2  |   |
| NPPF paragraph 59 states that "design policies should avoid unnece guiding the overall scale, density, massing, height, landscape, layout to neighbouring buildings and the local area more generally."  In this context, it is considered that there is no justification for Polic through site allocations and general design policies. There is no nee be informed on a site specific basis so as to respect the character are | y H2. Guidance on density can be effectively dealt with d to set minimum or maximum densities; density must |
| Change requested:   |   |
|   |   |
| Respondent 6426 Comment 2 Respondent Mr Steven Kerry Number: Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Atta  | chments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy H2   |   |

#### **Comment on the Site:**

Change requested:

With regard to Emerging Policy Approach: H2, Housing Density we have concerns over the effectiveness of a specific density policy, rather we find alternative option 2 to be more suitable. Basing housing densities on character and design would allow schemes to be more site-specific and respond more pertinently to local contexts, as in keeping with the nature of the NPPF. This is in fact stated in paragraph 2.18 'Density should be informed by local context including local character, urban morphology and landscape and visual impact,' which corresponds with our argument for alternative policy option 2 and conflicts with the actual emerging policy approach of a specific density policy.

Alternative Policy Option 2 would give greater weight to the local context of the development meaning dwellings can potentially be more suitably designed to reflect the existing environment whilst also meeting housing targets.

Higher densities should be acceptable if character and design of the development does not comprise but enhances the existing environment. If the policy is retained we assume the reference should be to average densities below 35 dwellings per hectare.

| Schedule of Comments on the Placemakir                             | ng Plan Options Document in Plan Order                      |
|--|---|
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6446 Comment 2 Respondent Number: Number: Name:         | Respondent  |
| Turner   | Organisation:   |
| <b>Agent ID:</b> 233 <b>Agent Name:</b> Turley Associates Limited  | _   |
| Further Information available in the original comment? $\ \Box$    | Attachments sent with the comment? $\square$                |
|  |   |
| Placemaking Options Plan Reference: Policy H2                      |   |
| Comment on the Site:   |   |
| We consider the wording of alternative option 2 be incorporat      | ed into Emerging Policy Approach H2, to allow               |
| developments to respond appropriately to their context. There      | efore we suggest that paragraph 3 of Emerging Policy        |
| Approach H2 to be amended to read as follows:-                     |   |
| Densities below 35 dwellings per hectare will not generally be     | supported, in order to make efficient use of land. However, |
| lower densities could be justified as a result of function of char |   |
| Change requested:  |   |
| Change requested.  |   |
|  |   |

Plan Order Placemaking Options Plan Reference: Policy H3 Number: 671 Respondent 224 Comment 25 Respondent **Respondent** Bath Preservation Trust Number: Number: Organisation: Name: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy H3 Comment on the Site: Agree with policy approach. Add general presumption against loss of family sized homes within walking distance of primary schools – e.g. specify in exception ii.] vi. this should safeguard upper floors appropriate for residential HMO use – along the lines of the last paragraph of LP policy HG12. **Change requested:** Respondent 304 Comment 1 Respondent **Respondent** University of Bath Number: Number: Name: **Organisation:** Agent ID: 44 Agent Name: Define Planning and Design Ltd Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy H3 Comment on the Site: Change requested: Respondent 322 Comment 3 Respondent **Respondent** Bath Spa University Number: Number: Name: **Organisation:** Agent ID: 47 Agent Name: CSJ Planning Consultants Limited Further Information available in the original comment? ✓ Attachments sent with the comment? └ Placemaking Options Plan Reference: Policy H3 Comment on the Site: 4. EMERGING POLICY APPROACH H3 AND H4

4.1. Taking account of adopted Core Strategy Policies B1(7a) and Policy B5 which set out the adopted policy background for delivering additional on-site and off-site student bed spaces and teaching and research space, we would have the

following comments on emerging policies approach H3 and H4 within the Placemaking Plan.

- 4.2. As regards off-campus student accommodation, Policy B5 of the adopted Core Strategy states "proposals for off-site, off-campus student accommodation will be refused within the central area, the enterprise area and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development".
- 4.3. In addition to the above policy background the recently introduced Article 4 Direction to control future growth and geographical spread of houses in multiple

occupation across the City, restricts the future growth HMOs to 2011 numbers that are around 3,000. As a percentage of housing stock this will reduce over the plan

period as implementation of further housing allocations takes place up to a level of c.7,000.

- 4.4. Given that there is now limited opportunity at the Newton Park Campus for further provision of additional bed spaces within the existing MEDS or defined area of previously developed land as defined under Paragraph 89 of the NPPF, these policies taken together provide for a high level of restriction on opportunities for the University to deliver additional bed spaces within the central area of Bath and the University campus.
- 4.5. It is therefore worthwhile to provide some additional definition of Policy B5 as it relates to the delivery of the vision for residential and employment uses within the central area of Bath. It is assumed that the vision is translated into the allocation of sites within the Placemaking Plan. It may be worth confirming this as a policy objective in order that potential sites of a windfall nature that become available within the central area and have potential for alternative use for student

accommodation, can be brought forward in the knowledge that there is not a policy presumption against them, as they do not adversely affect the spatial vision for the central area.

4.6. Managed student accommodation within the central area of Bath is unlikely to have adverse impacts on the amenity of residents generally within the central area and can create significant benefits to the city, in terms of its economic spend and vibrancy. It would be useful for BANES to clarify its stance towards student accommodation of a managed nature per se within the central area, within the defined restrictions of Policy B5 of the Core Strategy.

| 55155571  |   |   |  |
|---|---|---|--|
| Change requested:                                   |   |   |  |
|   |   |   |  |
|   |   |   |  |
| Respondent 2484 Comment 9 Res<br>Number: Number: Na | pondent James Warren<br>me:             | <b>Respondent</b> Bath Heritage Watchdog <b>Organisation:</b> |  |
| Agent ID: Agent Name:                               |   | e-gamouno   |  |
| Further Information available in the or             | iginal comment? $\square$ Attachments s | sent with the comment? $\square$                              |  |
| Placemaking Options Plan Reference: Policy H3       |   |   |  |
| тысының ортыны тып кетегене                         | . 6.164 1.15                            |   |  |

#### Comment on the Site:

#### **Change requested:**

Add:

vii. Licensing will be integrated with planning, so that no licence for greater than six units will be issued to any property which has not successfully obtained planning permission for Sui Generis Use Class for a number greater than six. A licence will always be limited to a maximum of the number of units given planning permission.

viii. Whenever retrospective planning permission for conversion to HMO is refused, enforcement for reversal of any conversion work to change the property back to Use Class C3 will be pursued.

2.25 needs to be amended such that the wording of "with off-campus provision playing a supplementary role if campus capacity cannot come forward in a timely fashion." is improved to "with a presumption that new off-campus provision will

only be permitted in exceptional circumstances" so that off-campus provision should be permitted only when there is demonstrably no on-campus solution. This is because if permission is to be granted simply because of time pressures, the universities only have to delay on-campus provision or bring forward expansions in numbers and they can avoid the need for most of the additional on-campus accommodation. Once land is used off-campus for student accommodation, it is no longer available to meet housing targets; and delivering permanent housing is a greater priority than more students in a short timescale.

| · · · · · · · · · · · · · · · · · · ·   | Respondent Transition Bath Organisation: |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment?   Attachments sent                                     | with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Policy H3   |  |
| Comment on the Site:  |  |
| <b>Change requested:</b> 1v – needs to say priorities sustainable modes of transport, walking, cycling then P | Т  |
| · · · · · · · · · · · · · · · · · · ·   | Respondent<br>Organisation:              |
| Agent ID: Agent Name:   | _  |
| Further Information available in the original comment?   Attachments sent                                     | with the comment? $\Box$                 |
| Placemaking Options Plan Reference: Policy H3   |  |
| Comment on the Site:  |  |
| Agree H3 should supersede saved policy HG12   |  |
| Change requested:   |  |
|   |  |
| · · · · · · · · · · · · · · · · · · ·   | Respondent Cycle Bath Organisation:      |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment?   Attachments sent                                     | with the comment? $\square$              |
| Placemaking Options Plan Reference: Policy H3   |  |
| Comment on the Site:  iv Cycling should be the preferred mode and therefore provided for                      |  |

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term

That cycling provision should be provided following desire lines

needs covered, secure, convenient and easy to access

# Change requested: Respondent 6406 Comment 3 Respondent Mr Edward Cade Respondent Student Castle Number: Name: Organisation: Agent ID: 222 Agent Name: Nathaniel Lichfield & Partners Further Information available in the original comment? Attachments sent with the comment?

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### Comment on the Site:

Placemaking Options Plan Reference: | Policy H3

Paragraph 2.25 states that the strategy for student accommodation is set out in the Core Strategy (adopted 2014) at paragraph 1.26, Policy B1(7a) and Policy B5. The Placemaking Plan Options Document does not, therefore, propose a new policy to supplement that which is contained in the Core Strategy reflecting the fact that the policies contained within the Core Strategy are appropriate for development management purposes.

We are concerned therefore that paragraphs 2.25 & 2.26 of the Options Document seek to provide a summary of the policy context for student accommodation which is inconsistent with, and goes far beyond, the Core Strategy policy requirements. Given that this element of the Options Document is not in conformity with the Core Strategy, it raises questions of Legal Compliance under s20(5)(a) of the Planning and Compulsory Purchase Act 2004.

Specifically, Core Strategy Policy B1(7a) supports off campus student housing subject to complying with policy B5. In turn policy B5 (Strategic Policy for Baths Universities) simply confirms that proposals for off-campus student accommodation will be restricted in the Central Area, the Enterprise Area and on MoD land with no such restrictions on unallocated sites outside of these area (i.e. outwith these areas there is no policy objection for proposals for student accommodation which will be subject to general development management policies).

Despite recognising that the strategy for student accommodation is set out in the Core Strategy, paragraph 2.26 of the Options Document goes on to fundamentally contradict this with a much more prescriptive commentary stating that off-campus provision should not prejudice the implementation of on-campus capacity if this can be avoided i.e. This would only be acceptable where on-campus delivery cannot demonstrably come forward to keep up with additional demand. It goes on to suggest that there will be certain sites where the opportunity cost is too great.

The Placemaking Plan should help deliver the development requirements and strategic objectives established in the Core Strategy rather than seek to establish new strategies especially where these directly conflict with the Core Strategy. Furthermore, when there is no established policy context to differentiate between on and off site campus locations such a distinction risks conflicting with the NPPF (para 46) which states that potentil competition should not form a planning issue. Given that the text at paragraph 2.26 is not in accordance with policy in the Core Strategy it should be deleted to ensure that this part of the Options Document is sound.

#### **Change requested:**

Please refer to separate letter submitted via e-mail by NLP on behalf of SC Pulteney Road Ltd (Student Castle). (N.B. CANNOT FIND EMAIL AS REFERENCED)

Placemaking Options Plan Reference: Policy H4 / Paragraph 2.25

Plan Order Number: 673

| Respondent 102<br>Number:  | Comment 3<br>Number:  | Respondent Robin Kerr<br>Name:         | Respondent Federation of Bath Organisation: Residents' Associations               |
|--|-----------------------|--|---|
| Agent ID: Ag   | ent Name:             |  |   |
| Further Informatio   | n available in th     | e original comment?   Attachments sent | with the comment? $\Box$  |
| Placemaking Optio  | ns Plan Referen       | ce: Policy H4 / Paragraph 2.25         |   |
| Comment on the Si  | te:                   |  |   |
| The lack of a Student Housing Policy. Firstly, B&NES has published as evidence two documents which need revision as they are seriously inaccurate: the SPD for Houses in Multiple Occupation (HMOs) (July 13) and the Student Numbers and Accommodation Requirements Information Paper (July 13, updated Aug 14). FoBRA has developed a more accurate Student Numbers document, which is attached. Secondly, although you have a good policy for HMOs, you do not for student housing blocks in the city, and one is needed. Applications to build these blocks in Bath are accelerating and yet there is no policy satisfactorily to regulate this. Other Local Authorities have adopted wording which seems to work and which might be "borrowed". |                       |  |   |
| Change requested:  |                       |  |   |
|  |                       |  |   |
|  |                       |  |   |
| Respondent 102<br>Number:  | Comment 25<br>Number: | Respondent Robin Kerr<br>Name:         | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
| Agent ID: Ag   | ent Name:             |  |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |                       |  |   |

#### **Comment on the Site:**

Student Housing - See comments for pages 50 & 55 above.

Placemaking Options Plan Reference: Policy H4 / Paragraph 2.25

A Student Housing Policy which recognizes the increasing number of students who live, and will live, in the city is essential. It has to balance the appearance of the city, and the needs of the universities, students, residents and commerce. There are several suitable examples in Local Plans which could be modified for Bath (eg Leeds, Leicester, Loughborough and Brighton & Hove). Brighton & Hove's is written around the following Main Principles:

- Effectively to support and enhance the quality and management of housing and residential environments within HMO-dominated studentified neighbourhoods, in conjunction with the recognition of the need to continue to support private sector landlords to supply high-quality student accommodation.
- To reduce the over-concentration of HMO in some neighbourhoods by promoting and enabling the appropriate development of purpose-built student accommodation at suitable locations within the city, that will appeal to the locational and residential preferences of students.
- To ensure that new developments of student accommodation are well-managed, and do not impact on existing residential communities in negative ways
- To monitor the changing geographic patterns of student housing in the city and identify signs of destudentification.

|                   | chedule of Comments on the | Placemaking Plan Options L | Document in Plan Order |  |
|-------------------|----------------------------|----------------------------|------------------------|--|
| Change requested: |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |
|                   |                            |                            |                        |  |

# Placemaking Options Plan Reference: Policy H4

Plan Order Number: 678

| Number:       | Number:                | Respondent Chris Beezley Name: | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|---------------|------------------------|--------------------------------|---|
| Agent ID:     | Agent Name:            |                                |   |
| Further Infor | mation available in th | ne original comment? 🗹         | Attachments sent with the comment? $\Box$   |

| Placemaking Options Plan Reference: | Policy H4 |
|-------------------------------------|-----------|
|                                     |           |

#### **Comment on the Site:**

B&NES has produced an updated Information Paper which predicts that an ongoing stock of around 2,800 HMOs in Bath, supplemented by the Universities' plans for future campus accommodation plus the planning permissions already granted for six Private Sector Accommodation Blocks in the city, will provide sufficient capacity to house the likely increase in student numbers over the next twelve years.

FoBRA has undertaken its own analysis of essentially the same data and has arrived at a very different conclusion with far more significant consequences, i.e. that it is more likely that by 2026 an additional 3,000 students would need to be accommodated in the private sector.

FoBRA is therefore concerned at the potential effects of such demand on the current proliferation of student accommodation blocks in the city and restates its call on B&NES to develop urgently a workable Student Housing Strategy and to incorporate this in its forthcoming Placemaking Plan.

Reference A: Bath and North East Somerset Local Plan. Student Numbers and Accommodation Requirements 2011-2029. Part of the Strategic Housing Market Assessment. August 2014.

## Introduction

The Federation of Bath Residents' Associations (FoBRA) has long been concerned at the effects of the demand for private sector housing in Bath from increasing numbers of students at the city's two highly successful universities, initially in terms of the conversion of large numbers of family homes into Houses in Multiple Occupation (HMOs) and, more recently, in terms of a proliferation of planning applications for Private Sector Accommodation Blocks (PSABs) in the city. It has repeatedly called on B&NES to implement a workable Student Housing Strategy such that provision is made in the Local/Placemaking Plan for housing students for a credible range of future number scenarios.

In July 2013 B&NES published a Student Numbers and Accommodation Requirements Information Paper as part of its Local Development Framework. This concluded that likely future increases in student numbers would be more than compensated for by the provision of University campus halls of residence, thus freeing up significant numbers of Houses in Multiple Occupation (HMOs).

Fobrack Fobrac

In August 2014 B&NES published a revised version of the July 2013 document (Reference A) using revised data and assumptions, this time concluding that by 2026 the demand for private sector beds could increase by between about 250 and 1,100 relative to the 2011 baseline of 11,330.

One Private Sector Accommodation Block has been completed since 2011 and, at August 2014, B&NES had granted planning permission for five more, and expects these to provide between 905 and 1,280 PSAB bed spaces by 2022.

B&NES thus concludes that the universities can "consume their own smoke" (Ref.A, para.1.9e).

FoBRA has again carried out its own analysis of essentially the same data and suggests that B&NES' conclusions are again

significantly understated in that demand for further student private sector bed spaces, above and beyond the existing 2,800 HMOs, the likely new build on campus and the six PSABs already approved, could be as high as 3,000.

The results of B&NES' analysis (Scenarios 1 & 2) and FoBRA's interpretation of essentially the same data (Scenarios 3, 4 & 4a) are discussed below. Scenario 4a was added (see Table 4a) on receipt of updated student number projection information received from the University of Bath on 24 September 2014 (see Annex B).

Agreed Facts and Assumptions

FoBRA does not challenge the following facts and assumptions presented by B&NES in Ref.A:

- For Bath Spa University (BSU), the private sector student bed demand is likely to rise by 324 from 4,992 in 2011 to 5,316 by 2023.
- For The University of Bath:
- o Long-term (1996-2012) average student number growth rate = 4.34% pa (Ref.A, para.2.2, Fig.11)
- o Total Student Roll\* 2012/13 = 15,182 (\* excluding visiting students) o Total Student Roll\* 2013/14 = 15,660 (an annual increase of 3.14%) o The UofB Masterplan predicts growth between 1% and 3% pa from 2009 to 2026. The lower end of this range can be discounted since the 2026 total has already been exceeded (Ref.A, para.2.17)
- o Assumed growth rate going forward = 3% pa (in line with Masterplan) o 65% of Total Student Roll require housing in the Bath area (Ref.A, Appendix 1) o Current provision of UofB-managed bed spaces (on and off campus) = 3,347 o UofB Masterplan provides for up to 2,400 additional campus bed spaces by 2026 o Of these, 704 will be delivered in Autumn 2014
- o It is unlikely that the remaining 1,696 new campus bed spaces will come forward at the required rate (Ref.A, para.1.9e)
- In 2011, approximately 11,300 students were accommodated in 2,833 HMOs in the Bath area. This had risen to 11,600 students in 2,915 HMOs by 2013/14.
- Going forward, the strategy of the B&NES Development Plan is to maintain the number of student HMOs at 2011 levels (i.e. around 2,833) (Ref.A, para.5.22)
- Planning permission has already been granted for 1,280 student bed spaces in six Private Sector Accommodation Blocks (PSAB) in Bath, of which 905 are likely to have been delivered by 2022 (delivery of the 375 attributed to Bath Western Riverside is said to be 'uncertain' Ref.A, para.4.3)
- At August 2014, a further 1,243 PSAB bed spaces in Bath were at the planning application or pre-application enquiry stage (Ref.A, para.4.4)

A comparison of UofB and other facts and assumptions made across Scenarios 1 to 4a is presented in Table A.

Differences in Interpretation

Despite the considerable consistency of approach between the B&NES and FoBRA analyses listed above, three aspects emerge where there is a significant difference in interpretation:

- The likely level of provision of new UofB-managed campus accommodation
- The ultimate level to which UofB student numbers may rise
- The way in which the assumed 3% pa UofB growth rate is applied.

It is shown below how these aspects have the potential to very significantly affect the outcome of the analyses. Each is

discussed in turn.

(a) The likely level of provision of new UofB-managed campus accommoation

The University of Bath guarantees managed accommodation, mostly on campus, for all new undergraduate entrants and all new international postgraduates. Over the years this level of provision has consistently hovered between 21% and 26% (average 24%) of the total student roll, depending on the phasing of the build of new halls of residence. For example, the 2013/14 provision of 3,347 bed spaces for 15,660 students equates to 21.3% and this will shortly rise to about 25.3% (4,051 for 16,000 students) when The Quads (704 bed spaces) opens on campus in Autumn 2014 - precisely in line with the historical range.

Although the UofB Masterplan provides for up to 2,400 new campus bed spaces between 2011 and 2026, there is uncertainty as to how many more (if any) will be built beyond The Quads (704) (Ref.A, paras.2.23, 2.29). At a recent meeting chaired by the UofB Deputy Vice Chancellor (see Annex A, Q.1) the University's Director of Policy and Planning stated that UofB "does not have a forward plan for specific construction projects beyond The Quads".

FoBRA considers B&NES' analysis at Ref.A to be flawed in assuming unprecedented levels of provision of up to 31.1% (e.g. 5,751 bed spaces for 18,488 students in 2023/24 - Ref.A, Table 3a), preferring to assume levels within the historical range in its own analysis (Tables 3, 4 & 4a). Indeed, with increasing competition from the proliferation of city centre public sector student accommodation blocks, FoBRA suggests that, in percentage terms, university provision is more likely to reduce than to increase in future.

(b)The ultimate level to which UofB student numbers may rise

B&NES chooses to rely solely on an unreferenced graph (reproduced below as Figure 1) that appears in the UofB Masterplan (Fig. 5) and indicates that total student numbers would plateau at 16,000 Full Time Equivalents (FTE) in about 2020. The veracity of this graph is highly questionable, particularly in the light of a recent response from senior UofB management to the question "Is a 16,000 cap formal University policy?". Annex A, Q.3 shows that response to be "The 16,000 FTE figure is not a formal cap..." and "The ultimate capacity of [the] campus will depend on the nature of our provision". Confidence in the accuracy and continued relevance of the Masterplan graph is therefore questionable, particularly when Ref.A. Fig. 6 shows that UofB student numbers already exceed even its highest 2013 prediction (3% pa) by about 600 students and even exceed the lower line (1% pa) 2026 prediction.

Figure 1. University of Bath Projected Growth Rate Range - Full Time Equivalent (FTE) Students (from Masterplan 2009-2026 Summary Update)

FoBRA finds it equally difficult to accept B&NES' assertion (Ref.A, para.2.4) that UofB does not see its share of lucrative overseas students rising much further, if at all, beyond the current level of 21.3% of total students - consistently up from just 5% in 1995.

Further, in providing for up to 2,400 additional campus bed spaces between 2011 and 2026 (the total up to 5,751), FoBRA considers it reasonable to assume from the UofB Masterplan that total student numbers could in theory reach something like 24,000 during that period since managed accommodation has consistently been guaranteed for all new undergraduate entrants and all new international postgraduates (24% of 24,000 = 5,760). Again, senior management has recently confirmed that the UofB plans to continue to deliver on those guarantees (Annex A, Q.2).

As explained at (a) above, if the ultimate capacity of UofB is deemed to be less than this figure (as in its own analysis), FoBRA considers it reasonable to assume that proportionately fewer than the maximum 2,400 new bed spaces allowed for in the Masterplan will be built in practice.

(c) The way in which the agreed 3% pa UofB growth rate is applied

Between 1995 and 2012 the average annual growth of UofB student numbers has been 4.34% (Ref.A, para.2.2). Since 2009, UofB growth has significantly exceeded the maximum 3% pa rate predicted in its Masterplan (by about 600 students) and B&NES (in Scenarios 1 to 3) assumes that growth from 2014 will reduce to 2.4% pa to bring the total back 'on track' by 2020 (Ref.A, Fig.6). In contrast, and particularly in view of the popularity of the University, FoBRA prefers (in Scenario 4) to apply the University's prediction of 3% pa growth going forward from the 2013/14 actual total student roll

(15,660). UofB has subsequently provided FoBRA (at Annex B) with the following assumed student growth projections: 2014/15: 800, 2015/16: 450, 2016/17: 500, 2017/18: 500. Scenario 4a has been added which applies these figures to the 2013/14 actual (15,660) and assumes a 3% pa increase thereafter.

Scenarios 1 to 4a

This paper compares five scenarios as follows (each is discussed in detail below):

- Scenario 1. B&NES' 'Best Case' scenario with future UofB growth at 2.4% pa from 2013/14 up to 18,488 total students (by 2020/21) then no further growth; 2,400 new campus bed spaces provided between 2014 and 2023.
- Scenario 2. B&NES' 'Alternative' scenario as Scenario 1 but with 1,550 new campus bed spaces provided between 2014 and 2019
- Scenario 3. FoBRA's 'Modified B&NES' scenario as Scenario 1 but with only 704 new campus bed spaces (The Quads) provided in 2014.
- Scenario 4. FoBRA's '3% scenario' with future UofB growth at 3% pa (uncapped) from 2013/14; 1,400 new campus bed spaces provided between 2014 and 2020.
- Scenario 4a. FoBRA's '3% Modified scenario' with UofB projections to 2017/18 and growth at 3% pa (uncapped) thereafter; 1,400 new campus bed spaces provided between 2014 and 2020.

Scenario 1 (Table 1)

This represents B&NES' assumptions for what it terms a 'Best Case' scenario (Ref.A, para.5.18), and simply reflects the figures presented in Ref.A, Table 3a. Since 2009, UofB growth has significantly exceeded the 3% pa rate predicted in its Masterplan (by about 600 students) and B&NES assumes that growth from 2014 will reduce to 2.4% pa to bring the total back 'on track' by 2020 (Ref.A, Fig.6). In contrast, and due to the undoubted popularity of the University, FoBRA prefers (in Scenario 4) to apply the University's prediction of 3% pa growth going forward from the 2013/14 actual total student roll (15,660).

This scenario further assumes that 2,400 new campus bed spaces will have been built by 2023, even though this would result in 31% of Total Students being accommodated by the University. The historical average is 24%. FoBRA suggests (in Scenario 4) that it would be more pragmatic to assume that only sufficient new campus bed spaces would be built to maintain the historical average. Scenario 1 also assumes that 375 student bed spaces at Bath Western Riverside (BWR) will come forward in 2022. Since there is considerable uncertainty as to whether the BWR provision will materialise (Ref.A, para. 4.3), FoBRA prefers to discount these 375 bed spaces from the calculations (as does B&NES in Scenario 2).

Scenario 1 also assumes that Total Student numbers will plateau at 18,488 (said by B&NES to be equivalent to 16,000 Full Time Equivalents (FTEs)). This is based purely on the graph (Figure 1 above) whose credentials are questionable, that appears in the University's 2009-2026 Masterplan. FoBRA was represented at a meeting of the University of Bath/Local Residents' Forum on 3rd June 2014 and was advised by the Director of Policy and Planning (see Annex A, Q.3) that it is not formal University policy to place an upper limit on growth as depicted in the graph and neither is there any defined 'absolute capacity' for the campus, which remains 'proportional to provision'. FoBRA therefore considers it more appropriate to assume uncapped growth of 3% pa (Scenario 4, Table 4) which would result in a Total Student roll of 22,327 by 2025/26. At that rate, the 18,488 cap assumed by B&NES would be exceeded within 6 years.

Scenario 2 (Table 2)

This represents B&NES' assumptions for what it terms an 'Alternative' scenario (Ref.A, para. 5.20), and simply reflects the figures presented in B&NES' Table 3a (Scenario 1) but assuming that 850 fewer new campus bad spaces would be built at Claverton Down (total 1,550 instead of 2,440) and that the questionable 375 private sector bed spaces at Bath Western Riverside would not materialise.

Scenario 3 (Table 3)

FoBRA replicates B&NES' Scenario 2 but assumes no further new UofB campus bed spaces beyond the current 704 that comprise The Quads. Table 3 confirms that this assumption would result in university-managed accommodation being provided for between 21% and 25% of Total Students - precisely in line with historical provision. FoBRA terms this 'B&NES' Modified Scenario'.

Scenario 4 (Table 4)

This represents the UofB Masterplan's prediction that the Total Student roll will increase at 3% pa and applies this rate (uncapped) from the 2013/14 actual level. It is assumed that 1,400 new campus bed spaces would be built to maintain provision within historical percentage levels, and that the questionable 375 private sector bed spaces at Bath Western Riverside would not materialise.

Scenario 4a (Table 4a)

This represents the UofB projections to 2017/18 (from Annex B) followed by the Masterplan's prediction that the Total Student roll will increase at 3% pa and applies this rate (uncapped) beyond 2017/18. It is assumed that 1,400 new campus bed spaces would be built to maintain provision within historical percentage levels, and that the questionable 375 private sector bed spaces at Bath Western Riverside would not materialise. Scenario 4a gives very similar results to Scenario 4.

Conclusions

Figure 2 and Table B summarise the results for Scenarios 1 to 4a. These are discussed below.

Series I Seris 2 Seris 3 Seris 4 Seris 5

Figure 2

Comparison of Results for Scenarios 1 to 4a.

Net Private Sector Beds Demand vs Years 1 (2011/12) to 15 (2025/26)

(above and beyond the Private Sector Accommodation Blocks already approved)

(Series1 = Scenario 1, Series2 = Scenario 2, etc, Series 5 = Scenario 4a)

B&NES' Scenario 1 (blue) suggests that private sector bed demand in 2025/26 (Year 15 above) would reduce by over 1,000 (9%) compared to the 2011/12 (Year 1) level. This scenario is inconsistent with the assertion (Ref.A, para. 1.9e) that it is unlikely that the UofB new campus bed spaces will come forward at the required rate.

B&NES' Scenario 2 (red), with 850 fewer UofB bed spaces than Scenario 1, suggests that private sector bed demand would not significantly exceed the 2011/12 baseline level. FoBRA challenges the assumed 2.4% pa future UofB growth rate.

Further, Scenarios 1 and 2 anticipate that UofB student numbers will plateau at 16,000 FTEs within 6 years, contrary to advice provided by senior UofB management, and would result in university- managed accommodation being provided for an unprecedented proportion of students. FoBRA considers these assumptions to be unrealistic even without considering the competition for bed spaces that will be introduced by the proliferation of public sector accommodation blocks within the city.

By contrast, FoBRA's Scenario 3 (green) maintains the proportion of UofB managed accommodation at historical levels whilst applying the same cap on student numbers as Scenarios 1 & 2, and results in an increased demand for private sector bed spaces by 2025/26 of 1,046 - a 9% increase relative to the 2011/12 baseline.

The assumed 16,000 FTE cap on student numbers is considered by FoBRA unlikely to materialise in practice, given advice from senior UofB management that it is not formal university policy.

FoBRA's Scenario 4 (purple) assumes continued modest growth across the period (3% pa compared to the 1995 to 2012 average of 4.34% pa) whilst maintaining university managed accommodation at historical proportions (around 24% of Total Students). This scenario would result in a 25% increase in demand for 2,846 private sector bed spaces above the

2011/12 baseline.

FoBRA's Scenario 4a (black) is considered to be the most pragmatic and represents an update to Scenario 4 as a result of new information contained in Annex B, resulting in a broadly similar outcome, i.e. A 27% increase in demand for 3,080 private sector bed spaces above the 2011/12 baseline.

With B&NES' stated policy of maintaining student HMO numbers at 2011 levels and the Universities experiencing unprecedented competition for bed space provision, it is most likely that this extra demand would be satisfied by further private sector accommodation blocks within the city. It should be noted that such extra demand represents well over double the number of beds that would be delivered by the five further disparate planning applications and pre-application enquiries that were in the pipeline as at August 2014, namely James St West (2), Brougham Hayes Transport Depot, Upper Bristol Road Old Gas Works and Hartwells Newbridge Road.

Again, FoBRA calls on B&NES to develop urgently a meaningful and workable Student Housing Strategy and to incorporate this in its forthcoming Placemaking Plan.

| Change requested:   |  |  |
|---|--|--|
|   |  |  |
|   |  |  |
| Respondent 224 Comment 26 Respondent Number: Name: Agent ID: Agent Name:  | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |  |
| Further Information available in the original comment?   Attachme   | ents sent with the comment? $\Box$                             |  |
| Placemaking Options Plan Reference: Policy H4   |  |  |
| Comment on the Site:  |  |  |
| A Student Housing Policy which recognizes the increasing number of studessential.   | lents who live, and will live, in the city is                  |  |
| The plan should allocate appropriate specific sites if a shortfall of student   | thousing is identified.  |  |
| H4 sub-division of existing buildings ( refers to more than dwellings. Add caveat (as per H3v re housing balance, include general presumption against loss of family sized homes within walking distance of primary schools). |  |  |
| NB typo (redundant 'not' in para ii reverses meaning).  |  |  |
| Change requested:   |  |  |
|   |  |  |
|   |  |  |
| Respondent 301 Comment 5 Respondent Number: Number: Name:   | Respondent South West HARP Organisation: Planning Consortium   |  |
| Agent ID: 43 Agent Name: Tetlow King Planning   |  |  |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment? $\square$                          |  |
| Placemaking Options Plan Reference: Policy H4   |  |  |

### **Comment on the Site:**

We support the Council's intention to consider this section of the DPD when more detail is published from the national

standards review. We assume that appropriate consultation will take place on this particular aspect at a later stage.

| Change requested:  |  |  |
|--|--|--|
|  |  |  |
|  |  |  |
| Respondent 304 Comment 2 Res<br>Number: Number: Na   | spondent<br>me:  | <b>Respondent</b> University of Bath <b>Organisation:</b>  |
| Agent ID: 44 Agent Name: Define F  | Planning and Design Ltd  |  |
| Further Information available in the or  | riginal comment?   | Attachments sent with the comment? $\square$   |
|  |  |  |
| Placemaking Options Plan Reference:  | Policy H4  |  |
| Comment on the Site:   |  |  |
| Paras 2.25-2.27 Student Residences   |  |  |
| limited unless provision on campus can   | not come forward in a ti   | odation policy, and states that off-campus provision will be mely fashion. However, that approach does not accord udent residences in the Central Area, the Enterprise Area  |
| will come forward on the Campus in acc<br>the Campus, the proposed approach in<br>Universitys growth and success. Consec | cordance with the Maste<br>the PMP presents an irr<br>quently it is the Universi | cy SB26, whilst further student bed space development explan proposals, given the finite development capacity of econcilable position that will ultimately constrain the tys view that the PMP should also consider alternative impus, elsewhere in and around the City. |

### **Change requested:**

In that light a flexible student accommodation policy is required, that allows off-campus proposals to be considered on their own merits.

| Respondent 828<br>Number:   | Comment<br>Number: | • | <b>Respondent</b> Deeley Freed Estates <b>Organisation:</b> Limited and DFE Projects |
|---|--------------------|---|--|
| Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner                               |                    |   |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                    |   |  |

| Placemaking Options Plan Reference: | Policy H4 |
|-------------------------------------|-----------|

### **Comment on the Site:**

Paragraphs 2.35 – 2.39 (page 181 of the PPOD) summarises the Council's intended approach to residential and access standard. No emerging policy approach has been specified pending anticipated publication of new government regulations on these matters in spring 2015.

There is real concern that unjustified new space standards could make new-build starter dwellings significantly more expensive and thereby less accessible to first time buyers. Such an effect would exacerbate current shortfalls in the housing market in the Council's area, especially in Bath.

In paragraph 2.39 it should be made clear that the reference in the Council's Planning Obligation SPD (post-CIL) is to affordable housing standards.

### **Change requested:**

In paragraphs 2.35 – 2.39 or in a future policy, the Council should not specify local space and access standards to be applied in preference to national standards without strong justification, based on detailed research and stakeholder consultation, demonstrating that such standards are necessary and would not have the effect of restricting access to market housing by residents in the area.

Paragraph 2.39 should be amended to clarify that it is referring solely to affordable housing.

| Respondent 2562 Comment 1 Re<br>Number: Number: N  | espondent<br>lame: | Respondent UNITE Group PLC Organisation: |
|--|--------------------|--|
| Agent ID: 127 Agent Name: CgMs Consulting  Further Information available in the original comment? ☐ Attachments sent with the comment? ✓ |                    |  |
| Placemaking Options Plan Reference: Policy H4  |                    |  |

### **Comment on the Site:**

I write in respect of the above on behalf of UNITE Group PLC (hereafter 'UNITE'). The representation focuses upon (i) the emerging site specific allocations and (ii) the general approach to student accommodation and references relevant national and local policy guidance. Mindful of the development plan context, the representations then suggest various minor alterations to the emerging plan.

Background to Representations

UNITE have previously submitted representations to the BNES Core Strategy over period 2011 - 2013. The resultant adopted policy seeks student accommodation focused upon the University Campuses within the Greenbelt surrounding the City of Bath, with delivery of off-campus student accommodation acceptable only where this does not prejudice the delivery of other Core Strategy objectives for the City Enterprise Area.

Three specific areas of the emerging plan are identified as being unsound:

- 1. Paragraph 2.26
- 2. The Roseberry Place Site Allocation
- 3. Emerging Policy ED.18

This is demonstrated in the following paragraphs.

Government Guidance and Strategic Planning Policy

National Planning Policy Framework (March 2012)

Paragraph 47 requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements. Requirement must be identified through objectively assessed need for market and affordable housing over the housing market area, over the plan period.

Paragraph 50 (NPPF), requires LPAs to plan for mix of housing to meet various community groups, including students.

National Planning Policy Guidance re Community Infrastructure Levy (as amended (June 2014))

The PPG reference to Housing Needs Assessment (Paragraph 1), requires the LPA to review strategic housing need in line with the assessment structure set out in the NPPF. Paragraph 38 of the NPPG confirms student accommodation contributes to overall housing need (see appendix 1).

Core Strategy (July 2014)

Policy B1 (7a) supports off-campus student accommodation as part of overall student accommodation supply to meet identified need and to facilitate growth of the Universities whilst minimising growth in the private rentals (HMO) market. Policy B5 supports specifically the delivery of student accommodation on university campuses and states "Proposals for off-campus student accommodation will be refused within the Central Area, then Enterprise Area... where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development."

The Core Strategy also seeks to maintain HMO numbers at current levels (effective 1% reduction).

Representations to Draft Place-making Plan

The emerging draft Place-making Plan reflects the Core Strategy objective regarding student accommodation however it adds an additional criteria which does not reflect national guidance and therefore this element of the emerging plan cannot be considered 'sound' within the definition of soundness (NPPF Paragraph 182).

The proposed additional policy test for off-campus student accommodation comprises (Paragraph 2.26):

- It would only be acceptable where on-campus delivery cannot demonstrably come forward to keep up with additional demand
- Even where off-campus may be acceptable, certain sites represent an opportunity cost that is too great

University accommodation is an integral element of the student experience and it is essential to ensure a choice of accommodation tenures is available to students throughout the duration of their course. The requirement to provide for a choice of accommodation is reflected within NPPG Paragraph 50 and mindful that student accommodation forms part of conventional housing supply (particularly within Bath where students have a direct impact upon the local housing market/ demographic and this reflects NPPG Paragraph 038) it is essential the emerging Place-making plan provides sufficient flexibility to meet identified housing need.

The Core Strategy policy objective to ensure other plan objectives are not prejudiced provides sufficient control over student accommodation. The additional punitive controls within the emerging policy are unnecessary and do not reflect national guidance nor the local housing market within Bath.

This is compounded by the latest BNES assessment of student housing need. The Student Numbers and Accommodation Requirements 2011-2029 report (BNES, August 2014) confirms a shortfall of bed spaces to meet identified need of 777 bedspaces, assuming 2.4% growth per annum for the University of Bath. The combined current shortfall (both universities) is estimated at 200 bedspaces. The higher % growth forecast is now the most reliable particularly mindful of Bath Spa University expansion plans for international students.

The Core Strategy policy objective also seeks to reduce reliance upon HMO provision (effective 1% decrease over the plan period).

It is therefore necessary to ensure a degree of flexibility is built into the emerging policy, i.e. to provide ability to adapt to updated accommodation needs (reviewed on an annual basis as per the NPPF requirement) rather than the punitive requirement to demonstrate need cannot be met on-campus. Indeed, the emerging policy does not allow for University-led schemes off-campus. This prejudices the Council's ability to ensure housing choice is accounted for.

Where:

(a) identified sites are accessible and provide sufficient capacity to deliver a mix of uses;

and mindful of:

- (b) the policy / guidance context at national level and
- (c) the current undersupply

It is necessary to amend the merging policy. This can be achieved through the identification of alternative/ additional key development sites within the Plan to deliver student accommodation as part of a mix of site uses.

The Roseberry Place site is of sufficient scale and is located within a highly accessible location to accommodate student accommodation alongside the various mix of potential uses. This ensures the housing and employment objectives of the plan are not prejudiced, notwithstanding that student accommodation could be delivered under the 'housing' element of this site mix mindful of the NPPG definition confirming students form part of conventional housing supply.

Allowing an element of student accommodation as part of the overall mix of uses will ensure deliver of a development which redefines the local area (as required by the emerging Plan - Paragraph 1.109) through provision of additional cultural vibrancy and economic activity that students facilitate.

Emerging Policy ED.18 - this policy sets an inconsistent approach to protection of office accommodation between redevelopment for (i) conventional residential and (ii) student accommodation. The policy test for (ii) is prohibits loss of any office space to students, whereas the loss to conventional residential is only prohibited where the offices are deemed to be the 'most strategically important...'. There is no national guidance/ strategic development plan policy to support this inconsistent approach.

Conclusion and amendment sought

'Off-campus' or purpose built student accommodation has a positive impact on housing supply thorough meeting an identified specialised housing need.

The following alterations are necessary to ensure the emerging Place-Making Plan is considered sound: -

Paragraph 1.109 (new text underlined): Roseberry Place - a development that redefines this area, enhances access to the river and hosts a mix of residential, student and variety of business uses.

1. Mix of uses to include residential (including students) and employment.

Policy ED.18:Point 2 should be amended to read (new text underlined):

2. In respect of student accommodation, proposals involving the loss of the most strategically important office space will be refused if.

Paragraph 2.26 (deleted text struck through):

off-campus provision should not prejudice the implementation of on-campus capacity delivery if this can be avoided i.e. this would only be acceptable where on-campus delivery cannot demonstrably come forward to keep up with additional demand.

Focusing delivery of all student accommodation need within on-campus sites is inherently unsustainable and does not comply with government guidance regarding meeting overall housing needs and provision of housing choice. The associated environmental constraints of delivery on-campus student accommodation potentially undermines this strategy further. Additional flexibility to deliver student accommodation within off-campus sites where this meets Core Strategy B5 should be delivered through the adopted Place-Making Plan.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

| Schedule of Comments on the Placemaking Plan Optic  | ons Document in Plan Order                 |  |
|---|--|--|
| Respondent 2611 Comment 23 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:   |  |
| Agent ID: Agent Name:   |  |  |
| Further Information available in the original comment? $\Box$ Attachment  | ts sent with the comment? $\Box$           |  |
| Placemaking Options Plan Reference: Policy H4   |  |  |
| Comment on the Site:  |  |  |
| Change requested:   |  |  |
| 1 – needs to say priorities sustainable modes of transport, walking, cycling  | then PT                                    |  |
| Respondent 3069 Comment 14 Respondent Cllr Anketell Jones   | Respondent                                 |  |
| Number: Name:   | Organisation:                              |  |
| Agent ID: Agent Name:   |  |  |
| Further Information available in the original comment? $\Box$ Attachment  | ts sent with the comment? $\square$        |  |
| Placemaking Options Plan Reference: Policy H4   |  |  |
| Comment on the Site:  |  |  |
| 2012/13 is described as the high water mark for HMOs. On campus building  |  |  |
| absorb the growth of student numbers over the Core Strategy period. If thi dissent and the universities will find integration with Bath even more difficu | , ,  |  |
|   |  |  |
| Change requested:   |  |  |
|   |  |  |
|   |  |  |
| Respondent 6389 Comment 25 Respondent Number: Name:   | Respondent Cycle Bath Organisation:        |  |
| Agent ID: Agent Name:   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |  |
| Placemaking Options Plan Reference: Policy H4   |  |  |
| Comment on the Site:  |  |  |
| Cycling should be the preferred mode and therefore provided for   |  |  |
| That cycling provision should be provided following desire lines  |  |  |
| That all developments have cycle parking / storage that is well designed ap needs covered, secure, convenient and easy to access                          | propriate for the development ie long term |  |
| Change requested:   |  |  |
| - ·   |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |                                     |  |
|--|--|-------------------------------------|--|
|  | spondent<br>ame:                             | Respondent Cycle Bath Organisation: |  |
| Agent ID: Agent Name:  |  |                                     |  |
| Further Information available in the o   | original comment? $\square$ Attachments sent | with the comment? $\Box$            |  |
| Placemaking Options Plan Reference:  | Policy H4                                    |                                     |  |
| Comment on the Site:   |  |                                     |  |
| Cycling should be the preferred mode and therefore provided for  |  |                                     |  |
| That cycling provision should be provided following desire lines   |  |                                     |  |
| That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access |  |                                     |  |
| Change requested:  |  |                                     |  |
|  |  |                                     |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy H5 Number: 683 Respondent 224 Comment 27 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H5 Comment on the Site: **Change requested:** Agree with policy approach, but consider that more than generalities required to avoid current situation at MoD sites. Amend 2nd para – An element of self-build should be included in large development sites and enforced. Respondent 301 Comment 4 Respondent **Respondent** South West HARP Number: Number: **Organisation:** Planning Consortium Name: Agent ID: 43 Agent Name: Tetlow King Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H5 **Comment on the Site:** We support the intention of this policy in encouraging self build housing. There is no reference as to how the Council would manage proposals for affordable self build. It may be pertinent to add a reference. **Change requested:** Reference to CIL exemption should be removed, as this is a national exemption which could change. It may be pertinent to add a reference as to how the Council would manage proposals for affordable self build.

**Respondent** 6410 **Comment** 4 **Respondent** Ms Gaynor Parkinson

**Respondent** Linden Homes Strategic

Number: Number: Organisation: Land Name:

Agent ID: 28 Agent Name: Nash Partnership

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy H5

### **Comment on the Site:**

4.1 At paragraph 2.31 the Options Document states that the PMP provides an opportunity to encourage self-build housing but a policy requirement for self-build housing is inhibited by the NPPF. The first part of policy H5 states that proposals for self-build will be supported. However, the second part of the policy then goes on to state that self-build should be included in larger development sites.

# **Change requested:** We request therefore that the second sentence in policy H5 is deleted. Respondent 6414 Comment 3 Respondent **Respondent** Radstock Land LP Number: Number: Name: Organisation: Agent ID: 162 Agent Name: Pegasus Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H5 Comment on the Site: Emerging Policy Approach: H5 The requirement for self build plots to be incorporated in larger development sites is unjustified in light of a lack of evidence of demand for such development. B&NES is not a Right to Build Vanguard area and in order to be justified in requiring the delivery of self build plots, B&NES should have a register for prospective 'self build' customers. Furthermore, the impact upon viability must be considered before the Council considers asking large developments to contribute a proportion of self-build plots. **Change requested:** Respondent 6415 Comment 3 Respondent **Respondent** Strongvox Homes Number: Number: Name: **Organisation:** Agent ID: 162 Agent Name: Pegasus Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H5 **Comment on the Site:** Emerging Policy Approach: H5 The requirement for self build plots to be incorporated in larger development sites is unjustified in light of a lack of evidence of demand for such development. B&NES is not a Right to Build Vanguard area and in order to be justified in requiring the delivery of self build plots, B&NES should have a register for prospective 'self build' customers. Furthermore, the impact upon viability must be considered before the Council considers asking large developments to contribute a proportion of self-build plots. **Change requested:**

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |
|--|--|--|
| Respondent 6426 Comment 3 Respondent Mr Steven Kerry Number: Number: Name:   | Respondent Persimmon Homes Organisation: Severn Valley |  |
| Agent ID: Agent Name:  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |  |  |
| Placemaking Options Plan Reference: Policy H5  |  |  |
| Comment on the Site:   |  |  |
| We agree that a simple self build policy is more appropriate than a percentage policy if the Council consider a self build policy is required, however option 3 is not understood as the policy makes no reference to density. In addition the 2nd sentence of the policy stating 'Self-Build should be included in the incorporation of self-build housing in larger development sites' is meaningless and should be deleted. |  |  |
| Change requested:  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy H6 Number: 687 Respondent 224 Comment 28 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H6 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 300 Comment 7 Respondent Respondent Curo Group Number: Number: Name: **Organisation:** Agent ID: 171 Agent Name: Barton Willmore Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H6 **Comment on the Site:** Whilst the principle of Emerging Policy Approach H6 is broadly supported, the current policy wording takes a development control approach to the loss of residential dwellings. It is considered that either through this or a separate policy, the Placemaking Plan should include policy wording that provides a positive approach to the potential social, economic and environmental benefits that could arise from the regeneration of existing housing estates. These are the components of sustainable development which the Planning System seeks to achieve and paragraph 152 of the NPPF requires that in plan-making Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. The addition of a positive approach to regeneration proposals will help to ensure that the policy is consistent with National Policy. **Change requested:** The new or revised policy should recognise that the Council is supportive of proposals for the regeneration of existing estates where such proposals can deliver economic, social or environmental benefits. Curo would be happy to discuss the nature of the policy sought in greater detail with the Council to inform revisions to the policy. Respondent 6414 Comment 4 Respondent Respondent Radstock Land LP Number: Number: Organisation: Agent ID: 162 Agent Name: Pegasus

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy H6

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Comment on the Site: Emerging Policy Approach: H6 This policy must refer to 'net loss' as opposed to 'loss' of existing stock otherwise it would prevent the replacement of an existing dwelling. Furthermore, many large sites often involve the demolition of a small number of existing dwellings, for example to deliver access to a site. As currently worded the policy is unjustifiably too restrictive. **Change requested:** Respondent 6415 Comment 4 Respondent **Respondent** Strongvox Homes Number: Number: Name: Organisation: Agent ID: 162 Agent Name: Pegasus Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H6 Comment on the Site: Emerging Policy Approach: H6 This policy must refer to 'net loss' as opposed to 'loss' of existing stock otherwise it would prevent the replacement of an existing dwelling. Furthermore, many large sites often involve the demolition of a small number of existing dwellings, for example to deliver access to a site. As currently worded the policy is unjustifiably too restrictive. **Change requested:** Respondent 6426 Comment 4 Respondent Mr Steven Kerry **Respondent** Persimmon Homes Number: Number: Name: **Organisation:** Severn Valley Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H6 **Comment on the Site:** The principle of the policy is accepted, however it is inappropriate to include a list of examples in a policy unless it is comprehensive: Therefore we suggest this reads as '...benefits that outweigh any harm' and the words 'such as' and the 3 examples are deleted. If considered necessary, a comprehensive list of examples could be included in an explanatory paragraph, and an additional example should be added 'where it is required to provide access or enable an overall review in the number of residential units.'

**Change requested:** 

Placemaking Options Plan Reference: Space and Standards / Paragraph 2.35 Number: 689 Respondent 102 Comment 2 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: **Organisation:** Residents' Associations Name: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Space and Standards / Paragraph 2.35 Comment on the Site: The need for Housing Space Standards. About half of English Local Planning Authorities impose minimum space standards on new commercial housing, but not B&NES, with the result that many of our new-build houses are cramped, often with less space than social housing (where standards still exist). This is not worthy. DCLG is currently consulting on a scheme to rectify this, and we commend its introduction here. **Change requested:** Respondent 102 Comment 26 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: **Organisation:** Residents' Associations Name: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Space and Standards / Paragraph 2.35

### Comment on the Site:

### **Change requested:**

First words, delete "In response to..". After "Sept 14", delete "there are now" and substitute "proposes".

Plan Order

Placemaking Options Plan Reference: Space and Standards / Paragraph 2.36

Plan Order Number: 690

| Respondent 102 Comment 27 R Number: Number: N  | espondent Robin Kerr<br>Name:           | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|--|---|---|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |   |   |
| Placemaking Options Plan Reference   | e: Space and Standards / Paragraph 2.36 |   |

### **Comment on the Site:**

### **Change requested:**

Insert as first words "The Government states". After "need, and" delete "the Government states". Before "Any optional..." insert "According to the Government statements..". Delete last 6 words "(according to current Government statements)."

Placemaking Options Plan Reference: Space and Standards / Paragraph 2.37

Plan Order Number: 691

| Respondent 102 Comme<br>Number: Number   | ent 28 Respondent Robin Kerr er: Name: | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|--|--|---|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |  |   |
| Placemaking Options Plan   | Reference: Space and Standards /       | Paragraph 2.37  |

### **Comment on the Site:**

### **Change requested:**

Insert as first words "Notwithstanding, key stakeholders including..." After "space standards" add "but they remain concerned that, if these Government standards are not to be made mandatory, LPAs, developers of new property and converters and adapters of existing property will be able to continue to produce sub-standard dwellings. Moreover, they believe that the logic for the introduction of a national minimum space standard is to ensure that efficient, desirable and sustainable dwellings are produced country-wide.

Placemaking Options Plan Reference: Space and Standards / Paragraph 2.38

Plan Order Number: 692

| Respondent 102<br>Number:  | Comment 29<br>Number: | Respondent Robin Kerr<br>Name: | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|--|-----------------------|--------------------------------|---|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                       |                                |   |
| Placemaking Optio  | ns Plan Referer       | Space and Standards /          | Paragraph 2.38  |

### **Comment on the Site:**

### **Change requested:**

Substitute the following wording: "Once enabling legislation and national policy is in place, the Council will ensure that the criteria are met locally and, exceptionally, what evidence will be needed to justify any reduction of agreed specific standards. Until this point, even if it is difficult to determine what the policy would look like, the Council will begin to take measures to implement minimum space and access standards. However, it recognises that the position is likely to be clearer during 2015, to inform preparation of the draft Plan.

Placemaking Options Plan Reference: Space and Standards / Paragraph 2.39

Plan Order Number: 693

| Respondent 102 Comment 30 Respondent Robin Kerr Number: Name:   | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|---|---|--|--|
| Agent ID: Agent Name:   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |   |  |  |
|   |   |  |  |
| Placemaking Options Plan Reference: Space and Standards / Paragraph 2.39                                |   |  |  |
| Comment on the Site:  |   |  |  |
| Change requested:   |   |  |  |
| , • •   |   |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy H7 Number: 705 Respondent 154 **Comment** 3 **Respondent** Mrs J ane Hennell **Respondent** The Canal & River Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy H7 Comment on the Site: Policy H7 In an increasingly fast-paced and crowded world, our historic canals and rivers provide a local haven for people and nature. The Canal & River Trust (the Trust) is the charity entrusted with the care of 2,000 miles of waterways in England and Wales. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding. The Trust has a range of charitable objects including: To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; To protect and conserve objects and buildings of heritage interest; To further the conservation, protection and improvement of the natural environment of inland waterways; and To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. Within the Bath & North Somerset district The Canal & River Trust act as Navigation Authority for parts of the River Avon, although in some sections we also own adjoining land which is used as a towpath. We also own and maintain the Kennet & Avon Canal. The Canal & River Trust recognise the Councils desire to set out a policy for Boat dwellers and for residential and other moorings but suggest that the topic is either split into two or the section title amended, as many moorings in the district are not used by or relating to boat dwellers. The Trust wishes to discuss this issue and emerging Policy H7 further with the Council prior to the adoption of the policy. **Change requested:** Respondent 224 Comment 29 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

# Comment on the Site:

Agree with policy approach.

Placemaking Options Plan Reference: Policy H7

| Sc  | hedule of Co         | nments on the Placemal         | ing Plan Options Do    | cument in Plan Order  |
|---|----------------------|--------------------------------|------------------------|---|
| Where? The plan shou  | ıld identify loo     | ations                         |                        |   |
| Where: The plan shou  | na racritiny roc     | ations.                        |                        |   |
| The current Bath mari<br>which meets in-town o  |                      | ve residential moorings.       | Suggest Travelodge ir  | n Widcombe – this is the only space                                   |
| Change requested:   |                      |                                |                        |   |
|   |                      |                                |                        |   |
|   |                      |                                |                        |   |
| •   | omment 3<br>Number:  | Respondent Mr Andy Re<br>Name: | eading                 | Respondent Environment Agency Organisation:                           |
| Agent ID: Agen  | t Name:              |                                |                        |   |
| Further Information a   | available in th      | e original comment? $\Box$     | Attachments sent       | with the comment? $\Box$  |
|   |                      |                                |                        |   |
| Placemaking Options   | Plan Referen         | ce: Policy H7                  |                        |   |
| Comment on the Site   | :                    |                                |                        |   |
| •   |                      |                                |                        | moorings (H7) includes the need to take                               |
| nto account EA opera  | tional require       | ments and that developr        | nent will need to be s | safe during a flood.  |
| Change requested:   |                      |                                |                        |   |
|   |                      |                                |                        |   |
|   |                      |                                |                        |   |
| Respondent 4660 C<br>Number:  | omment 5<br>Number:  | Respondent Ms Jan Bro<br>Name: | wn                     | Respondent Norfolk Crescent Green Organisation: Residents Association |
| Agent ID: Agen  | t Name:              |                                |                        |   |
| Further Information a   | available in th      | e original comment? $\Box$     | Attachments sent       | with the comment? $\Box$  |
| Placemaking Options   | Dian Poforon         | co: Policy H7                  |                        |   |
| Flacemaking Options   | Piali Referen        | te. Folicy H7                  |                        |   |
| Comment on the Site   | :                    |                                |                        |   |
| Please add to the effect "There is no adverse impact on green corridors along river banks, their biodiversity or the habitat chey provide." |                      |                                |                        |   |
| Change requested:   |                      |                                |                        |   |
|   |                      |                                |                        |   |
|   |                      |                                |                        |   |
| Respondent 6389 C<br>Number:  | omment 27<br>Number: | Respondent<br>Name:            |                        | Respondent Cycle Bath Organisation:                                   |
| Agent ID: Agen  | t Name:              |                                |                        | -   |
| Further Information a   | available in th      | e original comment?            | Attachments sent       | with the comment? $\Box$  |
| Placemaking Options   | Plan Referen         | re: Policy H7                  |                        |   |
| i laccinaking Options   | . iaii iveleleli     | cc. I Oney 117                 |                        |   |

# Comment on the Site: 3. Cycling should be the preferred mode and therefore provided for That cycling provision should be provided following desire lines Change requested:

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

Placemaking Options Plan Reference: Office Development (B1a and B1b uses

classes) - Bath Core Office Employment

Plan Order Number: 714

Area / Paragraph 2.56

| Respondent 102 Comment 31 Re<br>Number: Number: Na  | espondent Robin Kerr<br>ame: | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |
|---|------------------------------|---|--|
| Agent ID: Agent Name:   |                              |   |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$           |                              |   |  |
|   |                              |   |  |
| Placemaking Options Plan Reference: Office Development (B1a and B1b uses classes) - Bath Core Office Employment A |                              |   |  |
| Comment on the Site:  |                              |   |  |
| Change requested:   |                              |   |  |
| Not clear.  |                              |   |  |

# Plan Order Number: 716 Respondent 93 Comment 5 Respondent Sean Walsh Number: Number: Name: Organisation: Agent ID: Agent Name: Attachments sent with the comment?

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

| Agent ID: Agent Name:  |  |  |  |
|--|--|--|--|
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$            |  |  |  |
| Placemaking Options Plan Reference:  | Policy ED1A  |  |  |
| Comment on the Site:   |  |  |  |
| development but it is essential that sites   | es two wording options for the policy. The Agency is supportive of economic sare sustainable as possible. Option 1 is therefore the preference as sites within erally be more accessible via sustainable means of transport reducing the potential |  |  |
|  |  |  |  |
| Respondent 224 Comment 30 Responder: Number: Number: Namber  | •  |  |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |  |  |  |
| Placemaking Options Plan Reference:  | Policy ED1A  |  |  |
| Comment on the Site:   |  |  |  |
| Preference for option 1.   |  |  |  |
| Change requested:  |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy ED1B Number: 728 Respondent 224 Comment 31 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ED1B Comment on the Site: Agree with policy approach. **Change requested:** Respondent 301 Comment 6 Respondent **Respondent** South West HARP Number: Number: Name: **Organisation:** Planning Consortium **Agent ID:** 43 **Agent Name:** Tetlow King Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ED1B Comment on the Site: In line with practice elsewhere, we would request reference to the demand for premises. It is not immediately clear from the determination criteria in the policy, what would happen if a proposal came forward on a site which had been

In line with practice elsewhere, we would request reference to the demand for premises. It is not immediately clear from the determination criteria in the policy, what would happen if a proposal came forward on a site which had been unsuccessfully marketed for a period of time. Reference in the policy is made to current market signals, but it also makes reference to long term targets. The meaning of this is unclear. The NPPF is clear, that protecting sites where there is no reasonable prospect of the site being brought forward is not appropriate (paragraph 22). This applies equally to sites which the Council seek to designate through a district-wide policy protection.

We would ask the Council to insert reference to demand for a site. It is then for the Council to indicate how they would assess demand; for example, evidence that the site has been marketed for not less than 12 months at an appropriate value.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

# Placemaking Options Plan Reference: Policy ED1C Respondent 224 Comment 32 Respondent Number: Name: Respondent Number: Name: Schedule of Comments on the Placemaking Plan Options Document in Plan Order Number of Number Number

Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy ED1C Comment on the Site: Agree with policy approach. **Change requested:** Respondent 304 Comment 3 Respondent Respondent University of Bath Number: Number: Name: **Organisation:** Agent ID: 44 Agent Name: Define Planning and Design Ltd Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy ED1C **Comment on the Site:** 

Policy ED.1C Change of Use from Offices

The intent of the policy is understood, but the policy as drafted is too broad in its application and as a consequence would prevent a potential change of use of office space that would have an equivalent economic benefit for the city. The University is actively pursuing off campus opportunities to meet its operational accommodation requirements, and therefore, a change of use to D1 use could be justified given the wider economic benefits that directly derive from the Universitys activities.

### **Change requested:**

The policy should, therefore, be revised to facilitate those opportunities.

# Placemaking Options Plan Reference: Policy ED2A Number: 745 Respondent 224 Comment 33 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ED2A Comment on the Site: Agree with policy approach. **Change requested:** Respondent 6389 Comment 28 Respondent **Respondent** Cycle Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ED2A **Comment on the Site:** Cycling should be provided for a priority for commuters Cyclist should not share space with Lorries & HGV That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access **Change requested:** Respondent 6393 Comment 1 Respondent **Respondent** Hallatrow Business Parks Number: Number: Name: Organisation: Ltd Agent ID: 217 Agent Name: Sellwood Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

### **Comment on the Site:**

These representations are submitted on behalf of Hallatrow Business Parks Ltd which owns the Hallatrow Business Park, White Cross, Wells Road (BS39 6GX). As you will be aware, this is a thriving employment site comprising a previously developed MAFF storage depot. It is occupied by the Bookbarn, Concept Finishing Ltd. and Andy Loos Ltd. In addition, planning permission was granted for the erection of a Garden Centre in October 2006 (No. 05/00316/FUL). A start was

Placemaking Options Plan Reference: Policy ED2A

Plan Order

made on this development in 2009 and hence it should be regarded as a 'live' retail commitment.

The Core Strategy vision for the rural area is that the "rural economy will evolve and new types of jobs and ways or working will provide more locally based employment opportunities". Paragraph 5.38 further states the creation of new and the retention of existing businesses will be encouraged and that the conversion of existing buildings should be considered in the first instance This policy approach is broadly reflected in emerging Policy ED.2A which identifies the Hallatrow Business Park as a Strategic Economic Development site. This recognition of the importance of the Hallatrow Business Park is welcomed and the whole site, including the extant Garden Centre commitment, should be identified on the Proposals Map. For completeness, I enclose a plan showing the full extent of this site.

The Placemaking Plan contains a note relating to Policy ED.2A which queries whether car showrooms should be regarded as an appropriate use on the ED.2A sites. It is considered that car showrooms should be acceptable in these locations since it may enable some existing car showrooms to relocate from more central locations and allow a higher density central redevelopment to take place.

| Change requested:   |  |  |
|---|--|--|
|   |  |  |
|   |  |  |
| Respondent 6426 Comment 5 Respondent Mr Steven Kerry Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley |  |
| Agent ID: Agent Name:   |  |  |
| Further Information available in the original comment? $\Box$ Attachmen   | ts sent with the comment? $\square$                    |  |
| Placemaking Options Plan Reference: Policy ED2A   |  |  |
| Prince Education Prince Education   |  |  |
| Comment on the Site:  |  |  |
| We object to Part 2 of the proposed policy. The policy should provide guida   |  |  |
| response to 'current circumstances'. Secondly it is unclear what the 'aforei  | ·  |  |
| consider the policy contrary to NPPF paragraph 51, and also conflicts with  | •  |  |
| more permissive than the wording here, and which anyway provides appro  | ppriate guidance which does not need to be             |  |
| repeated in the Plan:   |  |  |
| 'They (LPA's) should normally approve planning applications for change to residential use where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development |  |  |
| would be inappropriate.'  |  |  |
|   |  |  |
| Change requested:   |  |  |
|   |  |  |
|   |  |  |

# Number: 746

| Respondent 2611 Comment 24<br>Number: Number:   | Respondent<br>Name: | Respondent Transition Bath Organisation: |  |
|---|---------------------|--|--|
| Agent ID: Agent Name:   |                     |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                     |  |  |
|   |                     |  |  |
| Placemaking Options Plan Reference: Policy ED2B   |                     |  |  |
| Comment on the Site:  |                     |  |  |
| Change requested:   |                     |  |  |
| 1 – needs to say priorities sustainable modes of transport, walking, cycling then PT                    |                     |  |  |
|   |                     |  |  |

Respondent

**Organisation:** 

Agent ID: Agent Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy ED2B

Number:

Respondent 2663 Comment 5 Respondent Ms Jacky Wilkinson

Name:

Placemaking Options Plan Reference: Policy ED2B

### **Comment on the Site:**

Number:

Cultural /creative industries workspace.

The DCMS has just released (13/1/15) figures showing that the creative industries contribute £8.8 million to the UK economy an hour. There can be no doubt that such "industries†make an important contribution to the economy and quality of life in the District. Moreover, to have a sustainable economy, cities require a balance of both "strategic†employment space and small affordable spaces. This even more important in Bath, where there has been a long historical tradition of buildings being used for many purposes over time, with small scale enterprises being scattered about the city in a unique and attractive way. Innovation will not take place without suitable places for small businesses and cultural activities to start up and grow.

The Cultural Strategy for BANES, 2011, identifies a weakness in the district relating to cultural provision as high property prices and lack of suitable affordable workspaces.

In addition to this, the new rules allowing changes of use to residential use will have an even greater effect on this now limited supply of suitable premises. Only recently in my area alone, we have lost to residential use the small workspaces at the Dispensary and the long standing artists studios/workshops in the Larkhall local centre. Both were in active use, not derelict. The highly active community of artists studios at Comfortable Place are shown "washed over†for residential development as part of the Western Riverside scheme.

Wherever the Council has control over the loss of small units it should resist their change of use to residential. The very limited contribution to the housing stock would be far outweighed by the benefit to the economy and creative energy of the city. This is essential if the city is to aim for high sustainability credentials. At the moment people occupying such premises are being forced to look outside the city, either to move out or commute, and we are losing our balanced economy.

I object to the terms of policy ED.2B as this will only worsen the loss of local workspaces for the cultural/creative/startup industries. They should be given the same protection level as strategic industrial sites and their change of use to

Plan Order

residential should be resisted until it is clear that the premises have been marketed widely at a reasonable rent and on reasonable terms for a minimum of 12 months as light industrial/workspace/ office space. If they are occupied by a small enterprise/cultural activity, this should be sufficient to demonstrate that they are needed.

| Change requested: |  |
|-------------------|--|
|                   |  |
|                   |  |
|                   |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy RE1 Number: 752 Respondent 151 Comment 3 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE1 Comment on the Site: Employment in the Countryside p193 We support EPA RE1. We are not too worried that in offering options a policy cannot be proscriptive and flexible at the same time. We believe we should avoid being too proscriptive, as such policies tend to become overly long, complicated and stifling. We believe Parish Councils are well-placed to develop local interpretations and make decisions and/or recommendations that encourage the rural economy whilst preserving and enhancing their sense of Place. **Change requested:** Respondent 224 Comment 34 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy RE1 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 2611 Comment 26 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE1 **Comment on the Site:**

Fully support.

**Change requested:** 

| Respondent 3095 Comment 4 Respondent Dr N J T Long Number: Name:                  | <b>Respondent</b> Bath and North East <b>Organisation:</b> Somerset Branch of the |  |  |
|---|---|--|--|
| Agent ID: Agent Name:   |   |  |  |
|   | ent with the comment? $\Box$  |  |  |
| Further information available in the original comment:                            | ent with the comment:   |  |  |
|   |   |  |  |
| Placemaking Options Plan Reference: Policy RE1                                    |   |  |  |
|   |   |  |  |
| Comment on the Site:  |   |  |  |
| The CPRE supports the concept of encouraging a thriving rural economy by per      | = -   |  |  |
| in RA1 and RA2 villages but is concerned that extending this principle to village | ·   |  |  |
| damaging impact on visual amenity as well as giving rise to an unacceptable in    | crease in traffic volume (particularly  |  |  |
| involving commercial vehicles).   |   |  |  |
|   |   |  |  |
| Change requested:   |   |  |  |
|   |   |  |  |
|   |   |  |  |
|   |   |  |  |
| Respondent 6392 Comment 7 Respondent Dr Virginia Williamson                       | Respondent Bath Area Growers  |  |  |
| Number: Name:   | Organisation:   |  |  |
| Agent ID: Agent Name:   |   |  |  |
|   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments so      | ent with the comment? —   |  |  |
|   |   |  |  |
| Placemaking Options Plan Reference: Policy RE1                                    |   |  |  |
|   |   |  |  |
| Comment on the Site:  |   |  |  |
| Full support from the approach outlined in paragraph 2.86                         |   |  |  |
| We support policy RE1.  |   |  |  |
| ,   |   |  |  |
| Change requested:   |   |  |  |
|   |   |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy RE2 Number: 760 Respondent 151 Comment 4 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE2 Comment on the Site: Agricultural Development p194 We would wish to see some specific reference made to the future of Prior Notification/AGRN in the emerging policy approach. The use of AGRNs developed from the war years when farmers needed to be able to erect agricultural buildings as speedily as possible without undue planning delays, but the process seems long overdue an update. We would wish to see the retention of a system for farmers to request permission for the erection of agricultural buildings which avoided them having to make full planning applications but which was more in keeping with present day electronic application methods. **Change requested:** Agricultural Development p194 We would wish to see some specific reference made to the future of Prior Notification/AGRN in the emerging policy approach. Respondent 224 Comment 35 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE2 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 2611 Comment 25 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:**

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy RE2

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Comment on the Site:** Fully support this approach. **Change requested:** Respondent 3095 Comment 5 Respondent Dr N J T Long **Respondent** Bath and North East Number: Number: Name: **Organisation:** Somerset Branch of the Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE2 **Comment on the Site:** The CPRE strongly supports the encouragement of local food production and the underlying agricultural infrastructure which maintains it. **Change requested:**

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy RE3 Number: 766 Respondent 151 Comment 5 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE3 Comment on the Site: Farm Diversification p195 We support EPA RE3. The comments above about RE1 and the balance between flexibility and rigidity in policy-making should apply here too. **Change requested:** Respondent 2611 Comment 27 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE3 Comment on the Site: Priority should be given to accommodation for agricultural workers. Qualified Support: Concerned that (iii.) conflicts with (ii), i.e. could allow loss of 9/10ths of agricultural function. **Change requested:** Modification required: Change "wholly" in (iii.) to "significantly". Respondent 3095 Comment 6 Respondent Dr N J T Long

### **Comment on the Site:**

Number:

Agent ID:

The CPRE offers cautious support to the policy on agricultural diversification. While recognizing that traditional agricultural activities are unlikely of themselves to generate a prosperous countryside, the CPRE is concerned that our rural communities retain as much of their traditional character as possible and would discourage developments which have few links to the countryside.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Placemaking Options Plan Reference: Policy RE3

**Agent Name:** 

Name:

**Respondent** Bath and North East

**Organisation:** Somerset Branch of the

| Schedule of Comments on the Placemaking Plan Options  | Document in Plan Order                                   |
|---|--|
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 6392 Comment 8 Respondent Dr Virginia Williamson Number: Name:                       | <b>Respondent</b> Bath Area Growers <b>Organisation:</b> |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments se                    | ent with the comment? $\square$                          |
| Placemaking Options Plan Reference: Policy RE3  |  |
| Comment on the Site:  |  |
| Qualified support for RE3 (see below): Diversification schemes (2.96) should no                 | ot squeeze out food production; and that                 |
| priority be given to accommodation for agricultural workers before describing                   | a farm building as 'redundant' (para 2.97)               |
| Change requested:   |  |
| Section iii. of RE3 should be amended to " it does not significantly replace ag                 | gricultural function "                                   |
| Section III. of NES should be afficilited to It does not significantly replace ag               |  |
|   |  |
| Respondent 6576 Comment 5 Respondent Mr Sam Willitts Number: Number: Name:                      | Respondent Keynsham Community Organisation: Energy       |
| Agent ID: Agent Name:   | -  |
| · ·   |  |
| Further Information available in the original comment? $\Box$ Attachments se                    | ent with the comment? —                                  |
|   |  |
| Placemaking Options Plan Reference: Policy RE3  |  |
| Commant on the Site.  |  |
| Comment on the Site:  How does the Council intend to support renewable energy schemes on farms? | The Council needs to snell out its                       |
| commitment and support more clearly in this document.   | The council fields to spell out its                      |
| ,   |  |
| Change requested:   |  |
|   |  |

| Placemaking Options Plan Reference: Policy RE4   | Plan Order<br>Number: 770                         |
|--|---|
| Number: Name:  | Respondent DUNKERTON PARISH Organisation: COUNCIL |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent w               | vith the comment?                                 |
| Further information available in the original comment:   Attachments sent w                                      | itii tile tollillelit:                            |
| Placemaking Options Plan Reference: Policy RE4   |   |
| Comment on the Site:   |   |
| Essential Dwellings for Rural Workers p196   |   |
| We agree that for the reasons stated under Alternative Options it is better not to be time and seasonal workers. | roaden the EPA RE4 to include part-               |
| Change requested:  |   |
|  |   |
|  |   |
| l · · · · ·  | Respondent Bath Preservation Trust Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments sent w                                 | vith the comment? $\Box$                          |
| Placemaking Options Plan Reference: Policy RE4   |   |
| Comment on the Site:   |   |
| Agree with policy approach.  |   |
| Change requested:  |   |
|  |   |
| Respondent 2611 Comment 28 Respondent  | Respondent Transition Bath                        |
| Number: Name: C  | Organisation:                                     |
| Agent ID: Agent Name:  | with the commont?                                 |
| Further Information available in the original comment?   Attachments sent w                                      | itii the comments —                               |
| Placemaking Options Plan Reference: Policy RE4   |   |
| Comment on the Site:   |   |
| Full support.  |   |
| Change requested:  |   |

Plan Order

| Schedule of Comm  | ents on the Placemaking Plan Options Do    | cument in Plan Order                       |  |  |
|---|--|--|--|--|
| Respondent 6389 Comment 29 Re<br>Number: Number: Na   | spondent<br>ame:                           | Respondent Cycle Bath Organisation:        |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the o  | original comment?   Attachments sent       | with the comment? $\Box$                   |  |  |
| Placemaking Options Plan Reference:   | Policy RE4                                 |  |  |  |
| Comment on the Site:  |  |  |  |  |
| Everyone should have the right to reac  | h their home comfortably and safely by bio | cycle whether they be 8 or 80 years old    |  |  |
| Change requested:   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |
| Respondent 6392 Comment 9 Re<br>Number: Number: Na  | spondent Dr Virginia Williamson            | Respondent Bath Area Growers Organisation: |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |  |  |  |
| Placemaking Options Plan Reference:   | Policy RE4                                 |  |  |  |
| Comment on the Site:  |  |  |  |  |
| We support policies RE4, RE5 and RE6.   |  |  |  |  |
| Change requested:   |  |  |  |  |

# **Placemaking Options Plan Reference:** Policy RE5 Number: 777 Respondent 151 Comment 7 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE5 **Comment on the Site:** Protection of the Best Agricultural Land p197 We note and support EPA RE5. **Change requested:** Respondent 224 Comment 37 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE5 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 2611 Comment 29 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE5 Comment on the Site: Full support. **Change requested:**

Plan Order

| Schedule of Comments on the Placemaking Plan Option                            | s Document in Flan Order  |
|--|---|
| Respondent 3095 Comment 7 Respondent Dr N J T Long Number: Number: Name:       | <b>Respondent</b> Bath and North East <b>Organisation:</b> Somerset Branch of the |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments      | sent with the comment? $\Box$   |
|  |   |
| Placemaking Options Plan Reference: Policy RE5                                 |   |
| Comment on the Site:   |   |
| The CPRE fully supports a policy which gives the strongest level of protection | to high grades of agricultural land.  |
| Change requested:  |   |
|  |   |
|  |   |
|  |   |
| Respondent 6392 Comment 10 Respondent Dr Virginia Williamson Number: Name:     | <b>Respondent</b> Bath Area Growers <b>Organisation:</b>                          |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments      | sent with the comment? $\Box$   |
|  |   |
| Placemaking Options Plan Reference: Policy RE5                                 |   |
|  |   |
| Comment on the Site:   |   |
| We support policies RE4, RE5 and RE6.  |   |
| Change requested:  |   |
|  |   |
|  |   |
| Pospondont 6/1/ Commont F Bassandont   | Page and art. Dadatash Land D   |
| Respondent 6414 Comment 5 Respondent Number: Number: Name:                     | Respondent Radstock Land LP Organisation:   |
| Agent ID: 162 Agent Name: Pegasus  |   |
| _  | sent with the comment? $\Box$   |
| Further Information available in the original comment? $\square$ Attachments   | sent with the comment? —  |
|  |   |
| Placemaking Options Plan Reference: Policy RE5                                 |   |
| Comment on the Site:   |   |
| There are numerous appeal decisions which confirm that the loss of high grad   | de agricultural land is not a sufficient reason                                   |
| to refuse planning permission or even a matter which should be weighed up      | _   |
| development proposals.   |   |
| In the context of an appeal decision in Bloxham (Ref: APP/C3105/A/12/21892     | 191, para 129), the Secretary of State was  |
| clear that "Government policy is strongly directed towards an increase in hou  | •   |
| Nowhere is there guidance that requires the retention of agricultural land pe  | r se for food security. This is not therefore a                                   |
| matter that can weigh against the proposed development."                       |   |
| Change requested:  |   |
| Emerging Policy RE5 is therefore unjustified and should be deleted.            |   |

| Respondent 6415<br>Number:  |  |   |   | pondent Strongvox Homes   |
|---|--|---|---|---|
| Agent ID: 162 Age   |  |   | 0.8   |   |
| Further Information   | available in th  | e original comment?   | Attachments sent with   | n the comment? $\Box$   |
| Placemaking Option  | ıs Plan Referen  | ce: Policy RE5  |   |   |
| <b>Comment on the Sit</b><br>Emerging Policy Appr                                       |  |   |   |   |
|   | ermission or ev  | ns which confirm that the l<br>en a matter which should l                         |   | Itural land is not a sufficient reason lance when considering   |
| clear that "Governmo<br>Nowhere is there gui  | ent policy is str<br>dance that req  | ongly directed towards an   | increase in housing desi  | 129), the Secretary of State was igned to stimulate the economy. bood security. This is not therefore a   |
| Change requested:   |  |   |   |   |
| Emerging Policy RE5   | is therefore un  | justified and should be del   | eted.   |   |
|   | Number:<br>ent Name:   | Respondent Mr Steven Ko<br>Name:<br>ne original comment?                          | Org   | pondent Persimmon Homes ranisation: Severn Valley   |
| Placemaking Option  | ıs Plan Referen  | ce: Policy RE5  |   |   |
| Comment on the Sit  | :e:  |   |   |   |
| required need and proof the agricultural lare process. Obviously lothis may not provide | rovide significated on the signification of the sig | nt economic and social benations should be determined icultural land should be co | nefits to the local commed on a case-by-case basensidered for developme | opment could greatly contribute to unity which would outweigh the loss is through the usual planning ent first, however in the case that cricultural land would, then the |
| Change requested:   |  |   |   |   |
|   |  |   |   |   |
| Respondent 6511<br>Number:  | Comment 2<br>Number:   | Respondent Chris Head<br>Name:  |   | pondent<br>anisation:   |
| Agent ID: Age   | ent Name:  |   |   | _   |
| Further Information   | available in th  | e original comment?   | Attachments sent with   | n the comment? $\square$  |
| Placemaking Ontion  |  | p. l: . p.s.s   |   |   |

# Comment on the Site: Emerging Policy RE5 states it "would replace saved Local Plan policy NE.14" This should be changed to policy NE.16 Change requested:

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Policy RE6 Number: 782 Respondent 224 Comment 38 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE6 Comment on the Site: Agree with policy approach. RE6. Is provision 4 too restrictive given the potential isolation of farmsteads and buildings. **Change requested:** Respondent 2611 Comment 30 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Policy RE6 Comment on the Site: Qualified support: Conversion of buildings should not conflict with RE4. **Change requested:** Modification required: Qualify by making reference to RE4. Respondent 3095 Comment 8 Respondent Dr N J T Long **Respondent** Bath and North East Number: Number: Name: **Organisation:** Somerset Branch of the Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy RE6

#### Comment on the Site:

The CPRE supports the policy on alternative uses for redundant agricultural buildings particularly those that support sustainable economic use in keeping with their rural location.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |  |  |  |
|---|--|--|--|--|
| Respondent 6392 Comment 11 Respondent Dr Virginia Williamson Number: Name:  |  | Respondent Bath Area Growers Organisation: |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the o                                      | riginal comment? $\Box$ Attachments sent | with the comment? $\Box$                   |  |  |
|   |  |  |  |  |
| Placemaking Options Plan Reference:   | Policy RE6                               |  |  |  |
| Comment on the Site:  |  |  |  |  |
| We support policies RE4, RE5 and RE6.                                       |  |  |  |  |
| Change requested:   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |

Placemaking Options Plan Reference: Visitor accommodation

# Number: 789 Respondent 151 **Comment** 8 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Visitor accommodation Comment on the Site: Visitor Accommodation (B&Bs) p199 We support option 1 at para 2.113. **Change requested:** Respondent 224 Comment 39 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Visitor accommodation

#### **Comment on the Site:**

The plan should include a stated policy which takes into account option 1. There needs to be a presumption against the change of use of residential buildings into short term holiday lets.

#### **Change requested:**

Plan Order

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy CR1 Number: 800 Respondent 93 Comment 6 Respondent Sean Walsh **Respondent** Highways Agency Number: Number: Organisation: Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR1 Comment on the Site: Emerging Policy Approach CR 1 states that retail and other main town centre uses should be located in town centres which the Agency supports. The sequential approach if this is not possible suggested in the wording of this policy seems reasonable, but development should be on a scale and intensity proportionate to the development. The Agency will need to be satisfied that any unacceptable impacts on the SRN can be mitigated against by the applicant. **Change requested:** Respondent 224 Comment 40 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR1 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 828 Comment 5 Respondent **Respondent** Deeley Freed Estates Number: Number: Name: **Organisation:** Limited and DFE Projects Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR1

#### Comment on the Site:

Paragraph 2.122 cross-refers to the site allocations section which identifies how and where the identified quantitative and qualitative need for retail floorspace is intended to be met. The site allocations section includes Roseberry Place where small scale retail will be permitted. This is welcomed as being both necessary and appropriate.

However, the size of small-scale local needs retail in Policy CR1 – 200 sq m - has simply been carried forward in the PPOD from Bath & NE Somerset Local Plan, a document with its origins in the 1990s and retail surveys in 2000. Consumer

requirements have since changed - and the local convenience offer of the major, quality retailers has similarly changed. Day-to-day local shopping needs can be met conveniently in the "local"-type format. They cannot be met in isolated 200 sq m units and there is a significant risk that a unit of such a size, if provided, would remain vacant. The 200 sq m figure therefore lacks justification in 2015 looking forward to 2029. The local-type format needs typically to be in the order of 1,000 sq m (net). The policy, as drafted, would inhibit such provision.

#### **Change requested:**

The definition of "small-scale" in Policy CR1 would be counter-productive and would be likely to inhibit provision of quantitative and qualitative needs. Accordingly, the definition should be deleted and the term "small-scale" interpreted on the basis of its normal meaning and site-specific circumstances.

| Respondent 837 Comment 12 Respondent Mr David Redgewell Number: Name:   | <b>Respondent</b> South West Transport <b>Organisation:</b> Network, Railfuture   |
|---|---|
| Agent ID: 56 Agent Name: South West Transport Network, Railfuture Sev   | vernside, TFGBA   |
| Further Information available in the original comment? $\Box$ Attachments s   | sent with the comment? 🗹  |
| Placemaking Options Plan Reference: Policy CR1  |   |
| Comment on the Site:  |   |
| We wish to see more bulky (white goods) retail provision in Bath to reduce ca<br>Longwell Green and Brislington.  | r journeys to out of town centres such as   |
| Change requested:   |   |
| A policy that allows more bulky goods to be sold in the City of Bath on good p Riverside or Lower Bristol, Twerton. This also applies in Keynsham.  | ublic transport corridors situated in Western   |
| Respondent 1667 Comment 11 Respondent Number: Name:   | Respondent Widcombe Assocation Organisation:  |
| Agent ID: Agent Name:   | •   |
| Further Information available in the original comment?   Attachments s  | sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy CR1  |   |
| Comment on the Site:  |   |
| CR.1: associated Policy Map amendment: The WA supports the proposed Emethe vitality and viability of the existing defined centres (with reference to Core Widcombe Parade local centre (urban local centre no. 12) as defined on the erestrictive. In the new Policies Map the area should be extended to incorporate store and Widcombe Social Club at its eastern end and including the White Haprior Park Road and sensibly also the Baptist Church on the north side, which and also westwards on its southern side to include the Widcombe Surgery who vital services within the heart of the community, together with the office account shop window frontage. The boundary as so defined will more accurately local centre, within which retail and other community uses and services should | e Strategy CP12). However, the area of the xisting Proposals Map is out-of-date and too te the new Morrisons local convenience art at the junction of Widcombe Hill and is also a valued social community amenity; sich is a busy and active premises providing ommodation attached which is also designed reflect the cohesive whole of the Widcombe |
| Change requested:   |   |
|   |   |

| Schedule of Comments on the Placemaking Plan Optio  | ns Document in Plan Order                    |
|---|--|
| Respondent 2611 Comment 32 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:     |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachment  | is sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Policy CR1  |  |
| Comment on the Site:  |  |
| Qualified support, as it appears to promoting local shopping, easily accessib transport.  | ple by residents on foot, by cycle or public |
| Change requested:  Modification required: Priority should be given to shops providing 'daily ne   | eds', e.g. fresh food                        |
| Respondent 2611 Comment 33 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:     |
| Agent ID: Agent Name:   | _  |
| Further Information available in the original comment?   Attachment   | is sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Policy CR1  |  |
| Comment on the Site:  |  |
| Qualified Agree   |  |
| Change requested:   |  |
| ·   |  |
|   |  |
| Respondent 3069 Comment 15 Respondent Cllr Anketell Jones Number: Name:   | Respondent<br>Organisation:                  |
| Agent ID: Agent Name:   | Organisation.                                |
|   | ts sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Policy CR1  |  |
| Comment on the Site:  |  |
| 2.114 - 2.133 The document acknowledges the changing status of high stree social behaviour taking place. This requires adaptation by Councils and busing services demanded by today's public.   |  |
| High streets remain vulnerable to inflexible management and out of date exthe space and regulatory framework in which they operate will need constate to show consistent and profitable trade patterns can they be considered resout of town sites. | ant monitoring. Only when high streets begin |
| Change requested:   |  |

| Respondent 6389 Comment 30 Respondent Number: Number: Name:  | Respondent Cycle Bath Organisation:                                     |  |  |
|--|---|--|--|
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the origin  | al comment? $\square$ Attachments sent with the comment? $\square$      |  |  |
|  |   |  |  |
| Placemaking Options Plan Reference: Pol  | cy CR1  |  |  |
| Comment on the Site:   |   |  |  |
| 1. Agree – readily accessibleby cycle  |   |  |  |
| That cycling provision should be provided following desire lines   |   |  |  |
| Along highly desirable routes where there is provided  | a high – over 3000 per hr - volume of traffic segregated tracks must be |  |  |
| That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access |   |  |  |
| Change requested:  |   |  |  |
|  |   |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Policy CR2 Number: 805 Respondent 224 Comment 41 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR2 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 1667 Comment 12 Respondent **Respondent** Widcombe Association Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR2 **Comment on the Site:** Emerging Policy Approach CR2 is also generally supported, but subject to further consideration of the threshold to be set following completion of Stage 2 of the 2014 Retail Study. **Change requested:** Respondent 2611 Comment 31 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

#### **Comment on the Site:**

2.121 refers to the GVA Retail Assessment carried out in 2014. As with its predecessor, it identifies the Bath demographic as predominantly "Urban Intelligence", i.e. concerned for social and environmental issues, interested in sustainable food production (and yet it still advocates more mass market retailers and more parking (p.18)

#### **Change requested:**

Placemaking Options Plan Reference: Policy CR2

| Sc  | hedule of Com   | nments on the Placema   | king Plan Options Doc  | ument in Plan                                       | Order   |
|---|---|---|--|---|---|
| Respondent 2611 Con Number: Number: Number  | _   | Respondent<br>Name:   |  | Respondent<br>Organisation:                         | Transition Bath   |
| Agent ID: Agen  | t Name:   |   |  |   |   |
| Further Information a   | available in the  | e original comment?   | Attachments sent   | with the comr                                       | nent?   |
| Placemaking Options   | Plan Referenc   | ee: Policy CR2  |  |   |   |
| <b>Comment on the Site</b> Objection, unless there  |   | sultation on the precise  | thresholds of floor spa  | ace (cf. comme                                      | ent on 2.121)   |
| the 2014 Retail Study"<br>Modification: we also   | feel that a full  | ·   | ds to take place, which  | should assess                                       | completion of Stage 2 of whether the development opments  |
| Number: N<br>Agent ID: Agen   | Number:<br>it Name:   | Respondent Cllr Ankete Name: e original comment?                      |  | Respondent<br>Organisation:<br>with the comr        | nent?   |
| Placemaking Options   | Plan Referenc   | e: Policy CR2   |  |   |   |
| social behaviour taking<br>services demanded by<br>High streets remain vu<br>the space and regulato | ument acknow<br>g place. This re<br>today's public<br>ulnerable to inf<br>ory framework | quires adaptation by Co.  lexible management ar in which they operate | ouncils and businesses<br>and out of date expectat<br>will need constant mor | to supply new<br>tions. They do<br>nitoring. Only v | ntion of commercial and<br>/alternative goods and<br>not require subsidy but<br>when high streets begin<br>time to allocate retail to |
|   |   |   |  |   |   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy CR3 Number: 813 Respondent 224 Comment 42 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR3 Comment on the Site: Option 3 – we encourage the development of evidence base to support this option as is encourages whole street approaches. **Change requested:** Respondent 2663 Comment 8 Respondent Ms Jacky Wilkinson Respondent Number: Number: **Organisation:** Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy CR3 Comment on the Site: This policy does not reflect fully the wording of Core Strategy CP12. CP12 defines Local Centres and then expalins that uses which contribute to maintaining the vitality, viability and diversity of centres within the hierarhy will be encouraged. Policy CR3 should state that these uses (not just retail) will also be protected. With changes to the way we shop, this policy should be about neighbourhood vitality which derives from a mix of uses. There should be a policy to protect small scale uses such as cultural/creative/start businesses in or adjacent to centres. There should be at the least be a marketing test and if the buildings are occupied by a small business/cultural/creative indutry use, then this should be evidence of demand. This is now even more urgent due to the impact that the changes to the General Permitted Development Order are having a harmful impact on the availability of small affordable premises especially in Bath. **Change requested:**

Number:

Agent ID:

Respondent 3069 Comment 17 Respondent Cllr Anketell Jones

Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

**Agent Name:** 

Respondent

Organisation:

| Schedule of Commo                                    | ents on the Placema | aking Plan Options Document in Plan Order  |
|--|---------------------|--|
| Placemaking Options Plan Reference:                  | Policy CR3          |  |
| Comment on the Site:                                 |                     |  |
|  |                     | atus of high streets. There is an evolution of commercial and councils and businesses to supply new/alternative goods and  |
| the space and regulatory framework in                | which they operate  | nd out of date expectations. They do not require subsidy but will need constant monitoring. Only when high streets begin be considered resilient. This is not the time to allocate retail to |
| Change requested:                                    |                     |  |
|  |                     |  |
|  |                     |  |
| Respondent 6389 Comment 31 Res<br>Number: Number: Na | spondent<br>me:     | Respondent Cycle Bath Organisation:  |
| Agent ID: Agent Name:                                |                     |  |
| Further Information available in the o               | riginal comment?    | $\square$ Attachments sent with the comment? $\square$   |
| Placemaking Options Plan Reference:                  | Policy CR3          |  |
| Comment on the Site:                                 |                     |  |
|  | 0.                  | vell designed appropriate for the development ie long term   |
| needs covered, secure, convenient and                | easy to access      |  |
| Change requested:                                    |                     |  |
| - ·  |                     |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy C4 Number: 817 Respondent 224 Comment 43 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy C4 Comment on the Site: Agree with policy approach. We encourage the development of a design guide for appropriate tables and chairs. **Change requested:** Respondent 2663 Comment 1 Respondent Ms Jacky Wilkinson Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy C4 **Comment on the Site:** This policy should also state that the tables and chairs in the conservation areas or in the setting of listed buildings should not enclosed in by planters, fences or ropes and that there should be no commercial advertisements on the tables, chairs, or umbrellas. It is these features which have demonstrably harmed the street scene and visually privatise the public realm. The large planter boxes outside the Abbey Hotel are one example of many now springing up in the streetscene. If this is considered too detailed, then the Council should prepare some simple guidance. After all the Council can control this as the licensing authority. **Change requested:** Respondent 6389 Comment 32 Respondent Respondent Cycle Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy C4 Comment on the Site:

1. or cycling

| Schedule of Comments on the Placema | aking Plan Options Document in Pl | an Order |
|-------------------------------------|-----------------------------------|----------|
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |
|                                     |                                   |          |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy C5 Number: 820 Respondent 224 Comment 44 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy C5 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 828 Comment 6 Respondent **Respondent** Deeley Freed Estates Number: Number: Name: **Organisation:** Limited and DFE Projects Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy C5 **Comment on the Site:** Paragraphs 2.136 and 2.137 of the PPOD record how dispersed local shops can serve day-to-day needs and provide valuable social and community benefit. The comment is made in the document that small-scale local shops should be encouraged. This recognition is welcomed and endorsed. However, the size of local need shops referred to in Policy CR5 – 200 sq m – is too small to meet current consumer requirements or the practical requirements of leading retailers (hence the decline in unit numbers referred to in paragraph 2.136). Accordingly, for the reasons indicated in relation to emerging Policy CR1, the definition should be deleted and the term "small-scale" interpreted on the basis of its normal meaning and site-specific circumstances. **Change requested:** The definition of "small-scale" in Policy CR5 would be counter-productive and would be likely to inhibit provision of quantitative and qualitative needs. Accordingly, the definition in the policy and the reference to 200 sq m in the penultimate paragraph should be deleted to allow the term "small-scale" to be interpreted on the basis of its normal meaning and site-specific circumstances. Respondent 2611 Comment 35 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:**

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Placemaking Options Plan Reference: Policy C5

Agent ID:

## **Comment on the Site:**

Full support. Local shops should be sufficiently dispersed to meet residents' daily needs (including fresh food), i.e. within easy walking or cycling distance, or by bus.

## **Change requested:**

Introduce measures such as the requirement for Health Impact Assessments and control the proliferation of class use A5 premises, as other local authorities have done.

| Respondent 4815 Comment 3 Respondent Timothy Cantell Number: Number: Name:  | Respondent Bear Flat Association Organisation: (BFA)   |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachme  | nts sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy C5   |  |
| Comment on the Site:  |  |
| BFA welcomes the emphasis on Bath's neighbourhoods and considers that important functions for their surrounding residential communities' and ensuring good access to a range of services within easy walking or cycling We commend the policies which support local shops, restricting change of (CR5) and which protect community buildings from development (LCR1). BFA wishes to see Bear Flat protected and improved as a centre and in pallocal shops. In particular, we see scope to enhance Hayes Place as a pede community. | d to 'support more sustainable lifestyles, '. of use if the shops are 'useful' to the community articular to safeguard and add to the provision of |
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 6389 Comment 33 Respondent Number: Name:   | Respondent Cycle Bath Organisation:  |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachme  | nts sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy C5   |  |
| Comment on the Site:  |  |
| That cycling provision should be provided following desire lines  |  |
| Along highly desirable routes where there is a high – over 3000 per hr - voprovided   | olume of traffic segregated tracks must be   |
| That all developments have cycle parking / storage that is well designed a needs covered, secure, convenient and easy to access   | appropriate for the development ie long term   |
| Change requested:   |  |

|  | Schedule of C  | omments on the Place                                 | making Plan Options Document in Plan Order  |
|--|--|--|---|
| Respondent 644<br>Number:  |  |  | Respondent Organisation:  |
| Agent ID: 233  | <b>Agent Name:</b> ⊤ເ  | ırley Associates Limited                             |   |
| Further Informat   | ion available in   | the original comment?                                | Attachments sent with the comment?  |
| Placemaking Opt  | tions Plan Refer   | ence: Policy C5                                      |   |
| Comment on the   | Site:  |  |   |
|  | _  | ng Policy Approach CR25<br>gy Policy RA1, to state:- | 5. However, we consider the wording of point i should be  |
| which provide for  | local needs) wit   |  | ropriately located small-scale local shops (less than 200sqm tlement with a defined Housing Development Boundary, nenity.   |
| •  |  | e wish to participate in blic (EIP) Hearing Sessic   | further Placemaking Plan consultations and to attend any ons.   |
| Change requeste  | d:   |  |   |
|  |  |  |   |
|  |  |  |   |
| Respondent 658<br>Number:  | 31 Comment : Number:   | Respondent Mrs Sus<br>Name:                          | Respondent Organisation:  |
|  |  |  | n and Planning Consultancy  |
| _  | _  |  | Attachments sent with the comment?  |
| Placemaking Opt  | tions Plan Refer   | ence: Policy C5                                      |   |
| Comment on the   | Site:  |  |   |
| Part ii of the polic<br>where they have<br>implies that if the<br>of use would be fo | y states that pla<br>a realistic poter<br>re is no realistic<br>orthcoming for v | tial to perform a contin<br>chance of the shops per  | range of use of existing buildings in A1 use will be refused in cases buing role in meeting the retail needs of the local area. This rforming a continuing retail role, planning permission for change athetic schemes and this could be expressed in the supporting sound. |

## **Change requested:**

The specific change requested is that when the Local Shopping Area designations are reviewed as part of the procedure, the shops at 5-8 (inclusive) High Street, Paulton are removed from the designation.

## Plan Order Placemaking Options Plan Reference: Fast Food Outlets / Paragraph 2.139 Number: 823 Respondent 2611 Comment 36 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Fast Food Outlets / Paragraph 2.139 **Comment on the Site:** School children are not the only people who might be exposed to unhealthy foods from fast food outlets. Bath has a large number of university students, and areas of the city fall within the 20% multiply-deprived populations nationally.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

## Plan Order Placemaking Options Plan Reference: Markets Number: 827 Respondent 224 Comment 45 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Markets **Comment on the Site:** Markets A policy should include options 1, 2 and 3. Change requested: Respondent 6392 Comment 3 Respondent Dr Virginia Williamson **Respondent** Bath Area Growers Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### Comment on the Site:

Placemaking Options Plan Reference: Markets

Fully support the introduction of a policy to encourage new markets (Option 1) and retain existing markets (Option 2). The objective should be to increase the availability of fresh, preferably local, food.

# Plan Order Placemaking Options Plan Reference: Paragraph 2.142 Number: 827 Respondent 2611 Comment 37 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Paragraph 2.142 **Comment on the Site:** Fully support the introduction of a policy to encourage new markets (Option 1) and retain existing markets (Option 2). The objective should be to increase the availability of fresh, preferably local, food.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

| Placemaking Options Plan Reference:   | Detailed Green bent boundary /  | n Order<br>mber: 841 |  |  |  |
|---|---|----------------------|--|--|--|
| Respondent 304 Comment 4 Respondent Number: Number: Name:   | Respondent University of Organisation:  | f Bath               |  |  |  |
| Agent ID: 44 Agent Name: Define Planning and  | d Design Ltd  |                      |  |  |  |
| Further Information available in the original com   | ment? $\square$ Attachments sent with the comment? $\square$  |                      |  |  |  |
| Placemaking Options Plan Reference: Detailed G  | reen Belt Boundary / Paragraph 2.153  |                      |  |  |  |
| Comment on the Site: Paras 2.153-2.156 Green Belt Boundaries  |   |                      |  |  |  |
| changed in 2007 is not to be reviewed at this time,   | on to Policy SB26, it is accepted that the Green Belt boundar<br>but it would be wrong to rule out future changes to the Green around the city (e.g. The Sulis Club) in order to facilitate the | reen Belt in         |  |  |  |
|   | of the Core Strategy which recognises that exceptional or vor alteration of its boundaries possibly could be demonstrate Universitys development needs.   |                      |  |  |  |
| Respondent 3069 Comment 18 Respondent C Number: Number: Name:  Agent ID: Agent Name:                        | Organisation:   |                      |  |  |  |
| Further Information available in the original com   | ment? Attachments sent with the comment?  |                      |  |  |  |
| Placemaking Options Plan Reference: Detailed Green Belt Boundary / Paragraph 2.153                          |   |                      |  |  |  |
| when facing loss of green belt; they fully understar<br>know that loss of green belt land will take from Ba | verrode objections and demonstrated quite clearly that Gro  | gs. They             |  |  |  |
| Change requested:   |   |                      |  |  |  |
|   |   |                      |  |  |  |
| Respondent 4719 Comment 2 Respondent Number: Number: Name:  | Respondent Kingswood F Organisation:  | oundation            |  |  |  |
| Agent ID: 221 Agent Name: GVA   |   |                      |  |  |  |
|   |   |                      |  |  |  |

Placemaking Options Plan Reference: Detailed Green Belt Boundary / Paragraph 2.153

#### Comment on the Site:

Paragraphs 2.153-2.156 indicate the LPA's consideration of a detailed Green Belt Boundary review across the District. While the Core Strategy has been acknowledged to set the general extent of Green Belt and its delineation, the Launch document indicated that consideration would be given to amend the boundaries at specific points to address minor anomalies.

Consideration of all requests to remove land from the Green Belt received following the PMP Launch consultation were considered by the LPA and have been published alongside this Options Document. This concludes that there are no such anomalies or exceptional circumstances identified or demonstrated at this stage.

Though our previous letter of representation indicated the Foundation's desire to have the Green Belt boundary reviewed in relation to its Estate, it has not been listed within this document. As such, it is unclear if the LPA has given consideration to a review of the Green Belt at this location. We therefore reiterate our previous request that the boundaries of the Green Belt are reviewed and removed from the Foundation's Estate, in the interest of the Foundation's Strategy.

As previously iterated, we consider there are exceptional circumstances justifying the removal of the Foundation's land interests from the Green Belt. 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 the current designation of much of its land interest 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 without undue restriction, and to deliver alternative land uses on land no longer required for core educational purposes.

#### **RECOMMENDATIONS:**

We request that the LPA consider the Kingswood Foundation's Estate and land interest in a further review of the detailed Green Belt boundary. With a view to the exceptional circumstances, we recommend removing these land interests from Green Belt designation.

#### **Change requested:**

Respondent 4800 Comment 1 Respondent Mr Walter Sweetenham and Number: Name: Dr Dileas Sweetenham Organisation:

Agent ID: 28 Agent Name: Nash Partnership

Further Information available in the original comment? <a> Attachments sent with the comment? <a> •</a>

Placemaking Options Plan Reference: Detailed Green Belt Boundary / Paragraph 2.153

#### Comment on the Site:

- 1.Introduction
- 1.1 Nash Partnership is instructed by Mr Walter Sweetenham and Dr Dileas Sweetenham, owners of Come House, Lynbrook Lane in Bath, to make representations through the Bath and North East Somerset 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 is broadly triangular in shape with an access off Lynbrook Lane serving a two storey dwelling that is positioned centrally within the site (see Appendix 1). Along its south-eastern boundary the land rises steeply to a heavily

wooded ridge line that defines the boundary here. To the north-east the boundary is defined by a strong tree belt. On its north-western/western edge the site boundary is defined by trees and hedging which in part abuts the rear boundaries of the dwellings at Entry Hill Gardens. Much of the land within these boundaries is laid to lawn, with a copse of trees in the northern corner and the wooded embankment described above.

- 3. reen Belt Designation
- 3.1 The site is covered by a narrow finger of Green Belt that reaches into the urban area. Generally in this area the Green Belt boundary follows the rear boundaries of properties on the edge of the urban area of Bath. In respect of Combe House however, the Green Belt runs across the property and right up to the road frontage of Lynbrook Lane (see Appendix 2).
- 4. Planning Policy
- 4.1 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.
- 4.2 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 address minor anomalies in the Green Belt boundary, within the context of national policy as set out in the National Planning Policy Framework (NPPF).
- 4.3 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.
- 4.4 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.
- 5. Amendment to the Green Belt Boundary
- 5.1 The site, as outlined above, sits at a lower elevation than the open land to east and its character is clearly residential. The site is not visible from this adjoining open land and in character forms part of the low density residential fringe to this part of the city. Its inclusion within the Green Belt does not contribute significantly to any of the five purposes of the Green Belt:

Check unrestricted sprawl of large built-up areas: The site is enveloped within the broad spatial form of the built up area.

Prevent neighbouring towns merging into one another: It does not perform any role in this respect.

Assist in safeguarding the countryside from encroachment: The site is within the broad spatial envelope of the built-up area, sitting at a level significantly below the ridge line of the open countryside beyond to the east/northeast and can be more appropriately safeguarded by re-setting the Green Belt boundary.

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 for safeguarding the setting of heritage assets or the Universal Values of the World Heritage Site in this particular location. In this respect, fingers of green land penetrating the urban area are an 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 Lynbrook Lane. Other planning controls are available to safeguard the interests of character and setting.

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.

- 5.2 The Green Belt designation here is considered to be an anomaly that should be rectified through the Placemaking Plan. The current residential use of the site is overly constrained by the Green Belt designation when other appropriate planning controls are in place to safeguard character and amenity. Also, while the current owners have no intention of development to provide additional dwellings on this land, it is in a very sustainable location and the potential for considering future development, taking account of the Conservation Area, World Heritage Site and other factors, should not be precluded by Green Belt Designation. A revised Green Belt boundary is therefore proposed as shown at Appendix 3.
- 5.3 This boundary reflects the general principle, exhibited generally by the Green Belt boundary in the vicinity, of following the rear boundaries of properties defining the edge of the urban area. The proposed boundary follows the ridge line which marks the dramatic change in level between the open land to the east/north-east and the built up area of this part of the city. This ridge line is wooded as is the proposed north-eastern boundary.
- 5.4 Amendment of the boundary as proposed would therefore establish a Green Belt boundary that does not 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.
- 6. Conclusion
- 6.1 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.

#### **Change requested:**

Respondent4805Comment1Respondent Mr & Mrs CollinsRespondentNumber:Number:Name:Organisation:

Agent ID: 28 Agent Name: Nash Partnership

Further Information available in the original comment? <a> Attachments sent with the comments sent with the comments

Placemaking Options Plan Reference: Detailed Green Belt Boundary / Paragraph 2.153

#### Comment on the Site:

- 1. INTRODUCTION
- 1.1 Nash Partnership is instructed by Mr and Mrs Collins, owners of Orchard House, Bathwick Hill, Bath to make representation in respect of the Placemaking Plan Options Document, November 2014, paragraphs 2.153 to 2.156.
- 2. REPRESENTATIONS SUBMITTED IN RESPECT OF THE LAUNCH DOCUMENT
- 2.1 Consultation was carried out by the Council on the Placemaking Plan Launch Document in autumn 2013 and representations were submitted on behalf of Mr and Mrs Collins. These representations sought an amendment to the Green Belt boundary to exclude the property on the basis that this would not prejudice the purposes of designating land as Green Belt and that as currently drawn, the boundary here is inconsistent with the general alignment to the rear of properties on Bathwick Hill. The full representation is included at Appendix 1.
- THE COUNCIL'S RESPONSE TO THE LAUNCH DOCUMENT REPRESENTATIONS.
- 3.1 The current Options Document proposes no amendment to the Green Belt boundary on the basis that no exceptional circumstances are considered to exist. This reasoning is further articulated in a supporting document titled 'Requests for Land to be removed from the Green Belt - Analysis and recommendations, November 2014'. The document states that whilst the site is relatively small it still contributes to the purposes of the Green Belt as evidenced by a Green Belt assessment undertaken by Arup for the Core Strategy. It goes on to conclude that there has been no change in circumstances and is no overriding justification for amending the Green Belt boundary.
- 4. REBUTTAL
- 4.1 The principle planning consideration is whether the land performs a Green Belt function. In this respect it is significant that on its frontages the site constitutes part of the continuous urban form running along Bathwick Hill from the central part of the city up to Claverton Down. None of this frontage is within the Green Belt. It is only at Orchard House that the Green Belt extends to abut the highway running up Bathwick Hill.
- 4.2 The continuation of the Green Belt designation up to the Bathwick Hill frontage at Orchard House is inconsistent with the general alignment of the Green Belt boundary which is set back substantially from the road frontage along Bathwick Hill.

Retaining the Green Belt boundary up against the road frontage only at Orchard Cottage is not necessary for fulfilment of the purposes of the Green Belt. This is illustrated by consideration of the application of aspects of Green Belt policy to Orchard Cottage.

- 4.3 For example, there is no planning reason that would justify application of Green Belt policy considerations to any proposal for redevelopment or extension of Orchard House and not to adjacent properties, other than the fact that the former currently lays within the Green Belt boundary and that latter outside it. In terms of materials planning impacts there is no justification for this distinction. It is clear therefore that the Green Belt boundary as currently set in relation to Orchard House does not fulfil the purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). In this respect a more detailed explanation is given in Appendix 1 against each of the five purposes of the Green Belt identified in the NPPF.
- 4.4 The Councils response to the points set out in Appendix 1 is contained in the supporting document 'Requests for Land to be removed from the Green Belt - Analysis and recommendations, November 2014', referred to in paragraph 3.1 above. This refers to evidence set out in the Green Belt assessment undertaken by Arup. However, this document, titled 'Bath and North East Somerset Green Belt Review - Stage 1 Report' provides a very broad assessment of the Green Belt, based upon large land parcels. Orchard House constitutes a tiny fragment of land parcel 'South East of Bath and there is no analysis of the particulars of the boundary at this location. The assessment considers in broad terms the purposes of the Green Belt addressed in Appendix 1 and the following comments are made on this aspect of the assessment:

Check the unrestricted sprawl of built up areas: The assessment refers to this Green Belt purpose in respect of major development and the broad role of this part of the Green Belt in checking unrestricted sprawl is accepted. However, as noted above, Orchard House is a relatively small area of land and in extending to the highway boundary on Bathwick Hill, the Green Belt boundary here is inconsistent with its general alignment in the vicinity of Bathwick Hill. In this respect it is significant that the Arup assessment states 'The south eastern fringe of Bath is relatively fragmented and the topography, inconsistency of urban edge and diversity of development types may present opportunity for the consolidation ("rounding off") the urban edge of Bath, while retaining areas of open space.'

Preventing neighbouring towns merging into one another: The assessment states that the Green Belt has helped to prevent ribbon development out of the City along transport corridors such as the A36 and A363. This is of no relevance to the land at Orchard House which clearly plays no role in respect of this Green Belt purpose.

Assist in safeguarding the countryside from encroachment: The assessment concludes that the Green Belt parcel overall serves the purpose of protecting the countryside. However, it does not consider the detailed alignment of the Green Belt boundary. At Orchard House the land is surrounded on three sides by the built up area of Bath and fronts on to Bathwick Hill as a constituent element in the continuous urban frontage running down towards the city centre and up to Claverton Down.

To preserve the special character of historic towns: The assessment finds that this parcel strongly performs this role as it contains part of and provides the setting for the City of Bath World Heritage site. This is agreed with in terms of the broad extent of the land parcel. Again however, the assessment does not consider the particular circumstances at Orchard House. It is clearly the case that extending the Green Belt to abut Bathwick Hill is not necessary for the purpose of preserving the special character of Bath.

To assist in urban regeneration by encouraging the recycling of derelict and other land: The assessment concludes that the land parcel is important to this purpose given its close proximity to the urban area of Bath. The role played by the Green Belt is accepted but proximity to the urban area is an inherent feature of Green Belts and there will be other important factors driving the evident high level of recycling of derelict and other land in the city, including its attractiveness as a location and associated land values. In this respect, the land at Orchard House is not of a scale that would prejudice the recycling of derelict and other land, particularly given the other planning sensitivities and constraints it is subject to.

- 4.5 The Green Belt assessment cited by the Council does not therefore evidence that it is necessary to include land at Orchard House in the Green Belt in order to fulfil the purposes of the Green Belt. It is our view that the Green Belt designation unjustifiably extends across Orchard House to abut the highway at Bathwick Hill and that this is unnecessary to the purposes served by the Green Belt. This we consider to constitute exceptional circumstances that warrant revision to the Green Belt boundary.
- 4.6 The Green Belt boundary here should accord with the general alignment of the boundary in this area, which is to follow the rear boundaries of properties fronting Bathwick Hill and adjacent roads. It should also be defined using recognisable physical features that are likely to be permanent. These things are achieved by the amended Green Belt boundary alignment proposed in Appendix 1.

#### 5. CONCLUSIONS

- 5.1 The continuation of the Green Belt to abut the highway at Bathwick Hill is unjustified when considered in relation to the general alignment of the Green Belt boundary in this location and is not necessary to serve the established purposes of the Green Belt. The Green Belt assessment cited by the Council does not provide evidence to the contrary.
- 5.2 In this respect, it is important that planning policy restrictions are applied to land only where this is necessary for planning purposes in accordance with national and local policies. This is not the case in respect of inclusion of Orchard House within the Green Belt. There are therefore exceptional circumstances that provide grounds for a review and amendment of the Green Belt boundary.
- 5.3 The current extent of the Green Belt designation at Orchard House is considered to be inappropriate and to

therefore present exceptional circumstances that justify realignment of the boundary. The proposed boundary revision set out in Appendix 1 ensures land included within the Green Belt fulfils the purpose of the Green Belt, is consistent with the general alignment of the boundary in this part of the city and provides a boundary that is recognisable and likely to be permanent. It is therefore requested that this boundary amendment is made.

| CI | ha | ng | e i | re | qu | es | te | d: |
|----|----|----|-----|----|----|----|----|----|
|    |    |    |     |    |    |    |    |    |

Respondent 4811 Comment 1 Respondent F R Daw Respondent Number: Name: Organisation:

Agent ID: 28 Agent Name: Nash Partnership

Further Information available in the original comment? <a></a> Attachments sent with the comment? <a></a>

Placemaking Options Plan Reference: Detailed Green Belt Boundary / Paragraph 2.153

#### Comment on the Site:

- 1. INTRODUCTION
- 1.1 Nash Partnership is instructed by F R Daw, owners of Prior Park Garden Centre in Bath, to make representations in respect of the Placemaking Plan Options Document, November 2014, paragraphs 2.153 to 2.156.
- 2. REPRESENTATIONS SUBMITTED IN RESPECT OF THE LAUNCH DOCUMENT
- 2.1 Consultation was carried out by the Council on the Placemaking Plan Launch Document in autumn 2013 and representations were submitted on behalf of F R Daw. These representations sought an amendment to the Green Belt boundary to exclude the garden centre site on the basis that this designation is inappropriate and does not fulfil the Green Belt's fundamental aim of preventing urban sprawl or the five purposes of including land within the Green Belt. The full representation is included at Appendix 1.
- 3. THE COUNCIL'S RESPONSE TO THE LAUNCH DOCUMENT REPRESENTATIONS
- 3.1 The current Options Document proposes no amendment to the Green Belt boundary on the basis that no exceptional circumstances are considered to exist. This reasoning is further articulated in a supporting document titled 'Requests for Land to be removed from the Green Belt Analysis and recommendations, November 2014'. The document states that whilst the site is relatively small it still contributes to the purposes of the Green Belt, as evidenced by a Green Belt assessment undertaken by Arup for the Core Strategy. It goes on to conclude that there has been no change in circumstances or overriding justification for amending the Green Belt boundary.
- 4. REBUTTAL
- 4.1 The principle planning consideration is whether it is necessary for the land to be included in the Green Belt in order for the Green Belt to fulfil its fundamental aim and the related policy purposes of including land within the Green Belt. If it is not then the current inclusion is inappropriate and constitutes exceptional circumstances that justify a review of the boundary.
- 4.2 The assessment made in comments on the Placemaking Plan Launch Document and included as Appendix 1 to this submission concludes that the garden centre site does not fulfil the purposes of including land within the Green Belt. However, the Council's response contends that while the site is relatively small and abuts the Green Belt boundary, it still contributes to the purpose of the Green Belt, citing as evidence the Green Belt assessment prepared by Arup for the Core Strategy.
- 4.3 However, this document, titled 'Bath and North East Somerset Green Belt Review Stage 1 Report' provides a very

broad assessment of the Green Belt, based upon large land parcels. Prior Park Garden Centre constitutes a very small part of land parcel 'South East of Bath' and there is no analysis of the particulars of the boundary at this location. The assessment considers in broad terms the purposes of the Green Belt addressed in Appendix 1 and the following comments are made on this aspect of the assessment:

Check the unrestricted sprawl of built up areas: The assessment refers to this Green Belt role in respect of major development and the broad role of this parcel of the Green Belt in checking unrestricted sprawl is accepted. However, this role is limited in the vicinity of the garden centre as a result of proximity to the city centre and the configuration of the urban area. There may be other planning reasons for restricting development but any development in this locality would be unlikely to constitute sprawl. Prior Park Garden Centre is developed and clearly forms part of the urban area of Bath. In this respect it is significant that the Arup assessment states 'The south eastern fringe of Bath is relatively fragmented and the topography, inconsistency of urban edge and diversity of development types may present opportunities for the consolidation ("rounding off") the urban edge of Bath, while retaining areas of open space.

Preventing neighbouring towns merging into one another: The assessment states that the Green Belt has helped to prevent ribbon development out of the City along transport corridors such as the A36 and A363. This is of no relevance to the land at Prior Park Garden Centre, which clearly plays no role in respect of this Green Belt purpose and where existing development on Prior Park Road already extends further to the south.

Assist in safeguarding the countryside from encroachment: The assessment concludes that the Green Belt parcel overall serves the purpose of protecting the countryside. However, it does not consider the detailed alignment of the Green Belt boundary. Prior Park Garden Centre is a developed site which is part of the urban area of Bath and therefore does not constitute countryside.

To preserve the special character of historic towns: The assessment finds that this parcel strongly performs this role as it contains part of and provides the setting for the City of Bath World Heritage site. This is agreed with in terms of the broad extent of the land parcel. Again however, the assessment does not consider the particular circumstances at Prior Park Garden Centre. Here the land is developed and while the trees contribute to the character of this part of Bath, the expanse of tarmac parking area and the buildings and structures on the site do not. The environment here is not one of countryside but is urban, characterised by substantial houses in Bath Stone, set amongst mature trees. Including the site within the green belt does not therefore contribute to preserving the special character of the city.

To assist in urban regeneration by encouraging the recycling of derelict and other land: The assessment concludes that the land parcel is important to this purpose given its close proximity to the urban area of Bath. However, the land at Prior Park Garden Centre is itself brownfield and forms part of the urban area. If at any stage in the future it were to be redeveloped this would constitute urban regeneration.

- 4.4 It is concluded therefore that the Green Belt assessment cited by the Council does not provide evidence that that the land at Prior Park Gardens contributes to fulfilment of the fundamental aim and associated five purposes of including land within the Green Belt.
- 4.5 Prior Park Garden Centre fronts onto Prior Park Road at a point where the environment is clearly urban and is characterised by built form running into the centre of Bath. The site, with its building, structures and extensive parking area, is part of the urban fabric of this part of the city. The inappropriate nature of the Green Belt designation is highlighted by consideration of potential future redevelopment of land directly opposite the garden centre on the other side of Prior Park Road. In such circumstances it would be necessary to apply a number of planning considerations but these would not include maintaining openness per se.

There are no sound planning reasons for the application of this principle to the garden centre site.

4.6 The Council's response points to the National Planning Policy Framework (NPPF) provisions for development on previously developed land within the Green Belt.

However, these provisions are clearly not designed for circumstances where the setting is urban. Here any future development should respond to a range of requirements, including the NPPF provisions on opportunities for development within Conservation Areas and World Heritage Sites. Application of these and other provisions is potentially constrained by the inappropriate inclusion of this site within the Green Belt.

4.7 The inclusion of Prior Park Garden Centre within the Green Belt does not fulfil the fundamental aim of the Green Belt and the five purposes of including land within it.

In this respect, it is important that planning policy restrictions are applied to land only where this is necessary for planning purposes in accordance with national and local policies. This is not the case in respect of inclusion of Prior Park Garden Centre within the Green Belt. There are therefore exceptional circumstances that provide grounds for a review and amendment of the Green Belt boundary.

4.8 The question then is one of an appropriate alignment of the Green Belt boundary.

This matter was given independent consideration by a Local Plan Inspector in 1988 as set out in Appendix 1. The Inspector concluded that the finger of open countryside that penetrates towards the centre of Bath in this area appears to terminate at the hedgerow at the southern boundary of the garden centre and that this hedgerow should form the boundary of the Green Belt. This conclusion in our view is correct and by implication inclusion of the garden centre within the Green Belt is not justified.

#### 5. CONCLUSIONS

- 5.1 Prior Park Garden Centre forms part of the urban area of Bath. It does nocontribute to fulfilment of the fundamental aim of the Green Belt in preventing urban sprawl and its inclusion within the Green Belt does not serve the five purposes that must be the basis of such inclusion. A Local Plan Inspector has reached this same conclusion and recommended that the appropriate boundary to the Green Belt here is the historic hedge line running east west on the southern boundary of the garden centre and then running north-south along its western edge.
- 5.2 The current inclusion of Prior Park Garden Centre within the Green Belt is not necessary or justified in planning terms. The revised boundary as set out in Appendix 1 recognises the site as part of the urban area of Bath, establishes a clear and recognisable boundary that is likely to be permanent and safeguards the purposes of the Green Belt. It is therefore requested that this boundary amendment is made.

| Change requested:   |                                   |                                   |
|---|-----------------------------------|-----------------------------------|
| Respondent 5171 Comment 1 Res<br>Number: Number: Na           | •                                 | Respondent<br>Organisation:       |
| Agent ID: Agent Name: Further Information available in the or | iginal comment? $\Box$ Attachmer  | nts sent with the comment? $\Box$ |
| Placemaking Options Plan Reference:                           | Detailed Green Belt Boundary / Pa | aragraph 2.153                    |

#### **Comment on the Site:**

I don't wish to waste Council time unnecessarily but I was disappointed by the Council's standard and, in my opinion, rather perfunctory response to my application for a minor boundary change to the Bath Inner Green Belt, giving me little confidence that my request was thoroughly investigated before a decision was made.

#### **Change requested:**

I would appreciate if the Council would:

- 1.Provide me with a more detailed response with particular reference to the comment in the Arup Stage 1 Green Belt Review report (April 2013.6.4 Around Bath.Land parcel: South Eastern fringe of Bath)- 'The South Eastern fringe of Bath is relatively fragmented and the topography, inconsistency of urban edge and diversity of development types may present opportunities for the consolidation("rounding off)the urban edge of Bath while retaining areas of open space.'
- 2. Visit the site (it is only a small area in the City of Bath) to be able to fully appreciate how the topography of the surrounding land secludes my land, such that a boundary change would have little, if any, effect on the "openness" of the

Green Belt and that there is an alternative clearly defined boundary that, along with the topography of the land, would still prevent urban sprawl.

My contention is that this land is protected by being in a Conservation Area and an Area of Outstanding Natural Beauty but does not necessarily have to also be included in the Green Belt as it contributes little to the "openness" of the Green Belt. I am also not sure that when the Green Belt boundary was reviewed in 2007 that it was appreciated that this land, that has my garage built on it, is curtilage of my house.

Thank you for taking time to consider this.

Placemaking Options Plan Reference: Detailed Green Belt Boundary /

Paragraph 2.155

Plan Order Number: 843

| Respondent 102<br>Number:   | Comment 32 Number: | Respondent Robin Kerr<br>Name:               | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|---|--------------------|--|---|
| Agent ID: Ag  | gent Name:         |  |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                    |  |   |
| Placemaking Option  | ons Plan Referer   | nce: Detailed Green Belt Boundary / Paragrap | oh 2.155  |
| Comment on the S  | Site:              |  |   |
| Surely the Inspecto   | r has already ap   | proved Green Belt removal at Odd Down?       |   |
| Change requested  | :                  |  |   |
|   |                    |  |   |

**Placemaking Options Plan Reference:** Previously developed sites in the Green

Belt / Paragraph 2.164

Plan Order Number: 852

| Respondent 6510 Comment 2 Res<br>Number: Number: Na                       | spondent Mrs V Hamilton-Davies ame:                 | Respondent Organisation: |
|---|---|--------------------------|
| Agent ID: 272 Agent Name: Planning Further Information available in the o | g Ventures Ltd  riginal comment?   Attachments sent | with the comment? $\Box$ |
| Placemaking Options Plan Reference:                                       | Previously developed sites in the Green E           | Belt / Paragraph 2.164   |

#### **Comment on the Site:**

This policy needs to reflect the revised and more pragmatic approach that the NPPF is taking to the re-development of previously used sites/brownfield sites that are washed over by Green Belt. The NPPF no longer restricts the definition of previously used sites to Major Existing Developed Sites i.e institutional facilities, but has opened this up to all previously developed sites in the Green Belt.

This policy should not specify a restriction for residential development to limited infilling in villages and sites within the defined housing development boundary. There are sites within villages that are previously developed brownfield sites that are washed over by the Green Belt and sited either immediately adjacent to or outside housing development boundaries that are attached to villages and fall within the wider undefined boundary of a village. These fall within the NPPFs classification and are therefore now applicable for development subject to other relevant criteria.

### **Change requested:**

Agree with the proposed alternative option to remove the reference to defined housing development boundary. Suggested alternative text is

Residential development in villages in the Green Belt will be permitted for infilling and on brownfield sites and previously developed land.

Placemaking Options Plan Reference: Previously developed sites in the Green

Belt

Plan Order Number: 853

| Number: Number: Na                      | spondent<br>ime:                            | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |
|---|---|--|
| Agent ID: Agent Name:                   |   |  |
| Further Information available in the o  | riginal comment? $\square$ Attachments sent | with the comment? $\square$                                    |
| Placemaking Options Plan Reference:     | Previously developed sites in the Green I   | Belt   |
| Comment on the Site:                    |   |  |
| Previously developed sites in the Green | n Belt                                      |  |
| Support option 1.                       |   |  |
| Change requested:                       |   |  |
|   | spondent<br>nme:                            | Respondent Prior Park College Organisation:                    |
| Agent ID: 201 Agent Name: GVA           |   |  |
| Further Information available in the o  | riginal comment? $\square$ Attachments sent | with the comment? $\Box$                                       |
| Placemaking Options Plan Reference:     | Previously developed sites in the Green I   | Belt   |

# **Comment on the Site:**

On behalf of my client, Prior Park College, I wish to provide comments on the emerging Bath and North East Somerset Council Placemaking Plan within the public consultation timescales of 27 November 2014 to 30 January 2015. It is our understanding that the Council seeks comments on options and emerging policy approaches on a site by site and policy by policy basis.

These representations focus on Section 2 of the draft Plan which sets out proposed Development Management Policies and in particular on the proposed approach for previously developed sites in the Green Belt.

Paragraph 2.152

We agree with the Council's key policy aims set out at paragraph 2.152 of the Plan of ensuring that the Green Belt is protected from inappropriate development and kept permanently open.

Paragraphs 2.157 to 2.164

With regards to previously developed sites in the Green Belt, the Plan refers to Government advice prior to the adoption of the NPPF which recognised that there may be a number of major existing development sites (MEDS) in the Green Belt where limited infilling or redevelopment would be allowed provided this would not impact on the openness of the Green Belt (para 2.157). We understand that, while the NPPF still applies strict controls on development in the Green Belt, it makes an exception for all previously developed sites rather than just MEDS' and also takes away the requirement to define a boundary within which development would be acceptable. In theory therefore, as alluded to in paragraph 2.162 of the draft Plan, the provisions of the NPPF should provide sufficient guidance for those institutions in the Green Belt wishing to expand.

Nevertheless, the draft Placemaking Plan seeks views on the future of MEDS identified in the adopted Local Plan under Policy GB3 as well as other large and/ or significant sites.

At this stage, Bath Spa University is the only MEDS that is formally identified in the emerging Placemaking Plan as a development site under 'Emerging Policy Approach SB31). In seeking views on the approach to be adopted for other previously developed sites in the Green Belt, the draft Placemaking Plan puts forward three potential options (para 2.164):

#### Option J

Not define any boundaries other than Bath Spa University and rely on the NPPF (para 89) for considering proposals on previously developed land in the Green Belt.

#### Option 2

Apply the approach proposed for Bath Spa University to the other Policy GB.3 sites with boundaries as currently defined on the Policies Map providing a case can be made to justify this approach for each site

#### •Option 3

Adopt the approach proposed in Option 2 for the Policy GB.3 sites and other large and/or significant sites in the District. Prior Park College is identified at paragraph 2.160 of the draft Placemaking Plan as one of the existing educational facilities defined in the adopted Local Plan as MEDS under saved Policy GB.3. The College is recognised as an 'educational establishments where development may be necessary as part of on-going changes and improvements to education and to assist in securing social and economic benefits for the local community.'

Prior Park College is an established development site in the Green Belt. The site accommodates a range of listed and non-listed buildings which date back to 1742. Since 2000 the College has been the subject of a programme of refurbishment throughout and reconfiguration which have been secured though a series of planning approvals including the following:

- Erection of a new sports centre (ref. 10/05094/FUL)
- Erection of a gymnasium extension (ref: 07/01305/FUL)
- Extension of two storey extension to the Theatre (ref: 05/02010/FUL)
- Refurbishment and extension to swimming pool (ref: 03/01143/FUL); and
- Erection of a two and a half storey extension to east of the classroom block (ref: 02/02272/FUL).

The College is one of the top independent co-educational boarding and days schools in the UK and also one of the largest with a community of 580 students. Prior Park is therefore a key social and economic facility in Bath and its longevity and future sustainability should be supported within the context of its location within a particularly environmentally sensitive area.

Prior Park College is likely to require further enhancements in the future in order to maintain an attractive offer for current and prospective students. The College require the reassurance that should they wish to enhance existing facilities on site this could be possible provided that the openness of the Green Belt is retained.

While we understand that the NPPF supports, in principle, limited infilling or partial or complete redevelopment of previously developed sites in the Green Belt, a clear policy approach to the site would be helpful to inform any future plans for additional infill development on the Prior Park College site, providing the assurance that any future proposals that meet the established parametres are likely to be positively received by the Council.

The NPPF advises that the planning system plays a key role in encouraging sustainable economic growth (paragraph 19). In line with this the Council planning policies should demonstrate a clear policy approach to supporting the economic growth of key local and social facilities such as Prior Park College. In addition, we consider that agreeing the area around Prior Park College to which paragraph 89 of the NPPF would apply would not only provide clarity to the College but would also assist Planning Officers in determining applications for any future development proposals on the site. We therefore consider that there is strong case for justifying the same approach being adopted for the Prior Park College site as is currently proposed for Bath Spa University, as set out in Option 2.

| 89 of the NPPF should apply and therefore request that the boundar Placemaking Plan.   | ary is shown on plan within Section 1 of the  |
|--|---|
| Change requested:  |   |
|  |   |
| Respondent 304 Comment 5 Respondent Number: Name:  | Respondent University of Bath Organisation:   |
| Agent ID: 44 Agent Name: Define Planning and Design Ltd  |   |
| Further Information available in the original comment? $\Box$ Atta   | achments sent with the comment? $\Box$        |
| Placemaking Options Plan Reference: Previously developed sites   | s in the Green Belt                           |
| Comment on the Site:   |   |
| The University welcomes the Councils acknowledgement of the gre<br>reuse and redevelopment of previously developed sites in the design | ·   |
| University would specifically like to explore with the Council in rela   |   |
| potentially elsewhere around the City.   |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 4719 Comment 3 Respondent Number: Number: Name:   | Respondent Kingswood Foundation Organisation: |
| Agent ID: 221 Agent Name: GVA  |   |
| Further Information available in the original comment? $\Box$ Atta   | achments sent with the comment? $\Box$        |
| Placemaking Options Plan Reference: Previously developed sites   | s in the Green Belt                           |

We are satisfied that the MEDS boundary as defined in the Local Plan proposals map covers the area to which paragraph

### **Comment on the Site:**

Paragraphs 2.159-2.164 consider the requirement to specifically designate Major Existing Developed Sites within the Green Belt. Acknowledging changes in national policy since the adoption of the Local Plan in 2007, the LPA has questioned whether it remains necessary to specifically delineate boundaries of Major Existing Developed Sites (MEDS) in the Green Belt, considering the provisions of paragraph 89 of the National Planning Policy Framework (NPPF), which apply to all previously developed sites. Those sites that already benefit from MEDS status are said to include 'educational establishments where development may be necessary as part of on-going changes and improvements to education'; circumstances which could equally apply to Kingswood School.

The document then considers three different approaches: firstly, to not designate any MEDS (with the exception of Bath Spa University); secondly, to designate only the current identified MEDS, where this is justified; and thirdly, to consider designation of MEDS upon existing sites and other candidate sites in the district.

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.

Though a case could be made for development through paragraph 89 of the NPPF, this does not afford a site-specific understanding of the extent and curtilage of such sites, particularly where they are of an unusual formation or delineation. As such, designation of MEDS presents a clear advantage at a planning stage to provide clarity and certainty for the LPA and applicants.

#### **RECOMMENDATIONS:**

We strongly recommend that the LPA pursues 'Option 3' outlined in relation to Previously Developed Sites in the Green Belt, with designation of the Kingswood Estate as a Major Existing Site in the Green Belt. This presents the best opportunity for clarity and certainty for the Foundation in achieving its objectives to continue the enhancement of its education facilities and provision. This is particularly critical if the LPA does not intend to alter the Green Belt boundaries within the Foundation's land interests (as related above).

| within the Foundation's land interests (as related above).                 |  |
|--|--|
| Change requested:  |  |
|  |  |
|  |  |
| Parameter C42C C   |  |
| Respondent 6426 Comment 7 Respondent Mr Steven Kerry Number: Number: Name: | Respondent Persimmon Homes Organisation: Severn Valley |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachment   | nts sent with the comment? $\Box$                      |
| Placemaking Options Plan Reference: Previously developed sites in the      | Green Belt   |
| Comment on the Site:   |  |
| Although this section has 3 policy options there does not appear to be an  | Emerging Policy Approach which differs to the          |
| other sections in the document.  |  |
| Option 1 would be preferable as the NPPF provides adequate guidance or     |  |
| well how to proceed with the redevelopment of previously developed site    |  |
| paragraph 89 of the NPPF, 'the development of any previously developed     | ····   |
| development providing it would not have a greater impact on the openne     | ···  |
| including land within it than the existing development', should provide su | _  |
| suitable redevelopment to be permitted without restrain of further unnec   | cessary policies or boundaries.                        |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6430 Comment 1 Respondent Mr Mark Mallett                       | Respondent Chew Valley School                          |
| Number: Name:  | Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachment        | nts cont with the comment?                             |
| Attachme   | ins sent with the comment? —                           |
|  |  |
| Placemaking Options Plan Reference: Previously developed sites in the      | Green Belt   |

#### **Comment on the Site:**

Thank you for your advice regarding the current consultation on the Placemaking Plan. Having discussed the matter with Governors we would make the following submission by way of comment on the Plan:

Chew Valley School wishes to respond to the Consultation on the Bath and North East Somerset Placemaking Plan (Part 2 of the Local Plan Options Document) with particular reference to the emerging policies relating to previously developed

sites in the Green Belt (paragraphs 2.157 to 2.164).

Under the B&NES Local Plan 2007 Chew Valley School, was identified as a 'Major Existing Developed Site' (Policy GB.3) which permitted development of educational establishments as may be necessary as part of ongoing changes and improvements to education, helping to secure social and economic benefits to the local community.

Chew Valley School wishes to ensure that these development principles are reserved in the new plan making process for the school site and for it to retain its designated status as a Major Existing Developed Site within the context of the B&NES Core Strategy and the NPPF.

The school constantly needs to re-evaluate and develop its role within, and relationship to, the local community, both from the geographical context in the rural Chew Valley and its responsibility in the provision of services (educational, community, health, economic, wellbeing and social). It is therefore essential that a suitable policy framework is in place to ensure that any proposal from the school can be properly considered within this changing context.

There have already been pre-application discussions around the provision of a Community Arts Space on the school site and, during the plan period, further developments may come forward. It is for this reason that Chew Valley School would wish to continue to be identified as a GB.3 site and to support the proposed Option 2 put forward in the Placemaking Plan; Option 2

Apply the approach proposed for Bath Spa University to the other Policy GB.3 sites with boundaries as currently defined on the Policies Map providing a case can be made to justify this approach for each site.

I would be grateful if you would take the necessary steps to ensure that these comments are placed before decision-makers as they move towards completing policy decisions in relation to the Placemaking Plan.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: Visual amenities of the Green Belt /

Paragraph 2.167

Plan Order Number: 856

|   | espondent Robin Kerr<br>ame:   | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |
|---|--|---|--|
| Agent ID: Agent Name:   |  |   |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |   |  |
| Placemaking Options Plan Reference: Visual amenities of the Green Belt / Paragraph 2.167                |  |   |  |
| Comment on the Site:  |  |   |  |
| development for miles around, including   | "no development within or visible from the ng within Bath? Also, it should be recognise cinity of the Green Belt, eg an eastern Bath | ed that there may be a need for some  |  |
| Change requested:   |  |   |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy GB1 Number: 857 Respondent 151 Comment 9 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy GB1 Comment on the Site: Visual Amenities p215 We support EPA GB1. We agree that it would be very difficult to create a workable, succinct and effective policy that anticipates the myriad possibilities that will emerge locally. In the detail of these matters Parish Councils should be trusted to preserve and enhance their sense of their own Place. **Change requested:** Respondent 224 Comment 47 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy GB1 Comment on the Site: Support for emerging policy GB1. **Change requested:** Respondent 300 **Comment** 5 **Respondent** Mr James Read Respondent Curo Group Number: Number: Organisation: Name: Agent ID: 171 Agent Name: Stride Treglown Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

# **Comment on the Site:**

We support the proposal set out under Option 2, specifically that it would be appropriate to rely on policy contained within the adopted Core Strategy and the NPPF.

To include policy as currently drafted would simply replicated existing policy without providing any locally specific amplification.

Placemaking Options Plan Reference: | Policy GB1

# Furthermore, the policy wording as currently drafted is a negatively worded policy which seeks to control development, rather than to positively and proactively promote appropriate development in locations where it would be appropriate. It is our view that paragraph 81 of the NPPF already sets out adequate policy on this matter. **Change requested:** To adopt Option 2. Comment 7 Respondent Respondent 301 **Respondent** South West HARP Number: Number: Name: **Organisation:** Planning Consortium **Agent ID:** 43 **Agent Name:** Tetlow King Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy GB1 Comment on the Site: This policy does not conform with the NPPF. The NPPF is clear in the aims and purposes of the Green Belt. Whilst paragraph 81 does mention visual amenity, it is evident on reading the NPPF's Green Belt section (paragraph 79-92) as a whole that the proposed policy would not be appropriate. The exceptions under paragraph 89 are clearly indicating that a "visually detrimental" development could be allowed as an exception. This should be recognised in the policy. It is also a concern that the Council have chosen to apply the same level of protection to development "within or visible from the Green Belt". This is evidently not appropriate. Development visible from the Green Belt does not fall under the scope of Green Belt protection; as affirmed in numerous planning appeals. Evidently, development could be built up to the Green Belt boundary, and thus could be visible from it. Sites in such locations would be assessed under the general landscape policies of the Council. This policy requires re-consideration. **Change requested:** Respondent 304 Comment 6 Respondent **Respondent** University of Bath Number: Number: Name: **Organisation:** Agent ID: 44 Agent Name: Define Planning and Design Ltd Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy GB1

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### Comment on the Site:

This policy now goes beyond the scope of protection afforded to the Green Belt in the NPPF, and should therefore, be excluded from the Place Making Plan.

# **Change requested:**

It is entirely appropriate to rely on the NPPF and existing policies within the Core Strategy in this regard.

| Schedule of Comments on the Placemaking Plan Op  | tions Document in Plan Order  |
|--|---|
| Respondent 322 Comment 2 Respondent Number: Name:  | <b>Respondent</b> Bath Spa University <b>Organisation:</b>                                      |
| Agent ID: 47 Agent Name: CSJ Planning Consultants Limited  |   |
| Further Information available in the original comment? <a> Attachme</a>  | ents sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy GB1   |   |
| Comment on the Site: 3.15. We would suggest that the emerging policy approach, that in essent can be viewed from within the Green Belt boundary could be refused on the basis that it was visually detrimental to bodds with the five purposes of the Green Belt as stated in NPPF. Such a proposed only in a subjective manner as to what was deemed visually proposed outside the Green Belt boundary. | o the Green Belt, is in our view completely at policy would be highly restrictive and would be  |
| Change requested: 3.16. The Placemaking Plan should rely on national planning policies and   | not include a policy that safeguards visual   |
| amenity.   |   |
| Respondent 3095 Comment 9 Respondent Dr NJT Long Number: Name: Agent ID: Agent Name: Further Information available in the original comment?  Attachme  | Respondent Bath and North East Organisation: Somerset Branch of the ents sent with the comment? |
| Placemaking Options Plan Reference: Policy GB1   |   |
| Comment on the Site: The CPRE supports the inclusion of policy GB1 to protect visual amenity is protection over that offered by the NPPF.  Change requested:   | n the Green Belt as a valuable extra level of   |
|  |   |
| Respondent 4719 Comment 4 Respondent Number: Name:   | Respondent Kingswood Foundation Organisation:   |
| Agent ID: 221 Agent Name: GVA  |   |
| Further Information available in the original comment? $\Box$ Attachme   | ents sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy GB1   |   |

# **Comment on the Site:**

Whilst this is an aspect that we have not previously commented upon, it raises concerns for the Foundation, given the proximity and relationship of the School to the boundary of the Green Belt. Whilst the stated intention is to provide further guidance upon policy cited in the NPPF, the emerging policy expressed here adds little value or clarity to this. Whilst it remains such an obtusely worded policy, we have concerns that it could be subject to a wide degree of interpretation, unduly restricting development and providing uncertainty for the Foundation as it pursues its Estate Strategy. It is also unclear why visual amenity, out of several aspects and dimensions cited in paragraph 81, for a specific

| Schedule of Comments on the Placemaking Plan Options  | Document in Plan Order                                 |
|---|--|
| local policy.   |  |
| RECOMMENDATIONS:  |  |
| If the LPA wishes to draft specific local policy relating to visual amenities in the to ensure that this does not unduly constrain development adjacent to, but or particularly important consideration for Previously Developed Sites in the Gre                               | utside of, the Green Belt. This is a                   |
| Change requested:   |  |
|   |  |
| Respondent 6426 Comment 8 Respondent Mr Steven Kerry Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments s   | sent with the comment? $\Box$                          |
| Placemaking Options Plan Reference: Policy GB1  |  |
| Comment on the Site:  |  |
| The Emerging Policy Approach: GB1 presents the issue of how the visual impa Belt will be measured in the context of protecting views visible from the Gree determined through a rudimental Landscape Visual Impact Assessment. If this the need for the emerging policy at all? | n Belt, and whether it could in fact be                |
| This presents the further issue of agreeing a cut-off point for determining who visually detrimental to the Green Belt. Development will inevitably be visible therefore what tools of measure will decision-makers implement to gauge who permitted?                           | from the Green Belt to some degree,                    |
| Change requested:   |  |
|   |  |
|   |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy GB2 Number: 864 Respondent 151 Comment 2 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy GB2 Comment on the Site: Rural Areas p118 We share the view of the context at para 1.343. We note it is intended to replace Green Belt Policy HG.6 with EPAGB2 at p216. **Change requested:** Residential Development p216 We support EPA GB2. We do not support the Alternative Option to do away with HDBs. Respondent 151 Comment 10 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy GB2 Comment on the Site: Residential Development p216 We support EPA GB2. We do not support the Alternative Option to do away with HDBs. **Change requested:** Residential Development p216 We support EPA GB2. We do not support the Alternative Option to do away with HDBs. Respondent 224 Comment 48 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

#### Comment on the Site:

Support for emerging policy GB2.

Placemaking Options Plan Reference: Policy GB2

|  | Document in Plan Order  |
|--|---|
| Change requested:  |   |
|  |   |
|  |   |
| Demandark 244 C  |   |
| Respondent 244 Comment 13 Respondent Susan E Green Number: Name:   | Respondent Home Builders Organisation: Federation   |
| Trume!   | Organisation. Federation  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments se   | ent with the comment? $\square$   |
|  |   |
| Placemaking Options Plan Reference: Policy GB2   |   |
|  |   |
| Comment on the Site:   | Los set out in pergaranh 2 172 which will   |
| It is also noted that emerging policy GB2 is not in accordance with the proposa require further clarification by the Council.  | r as set out in paragraph 2.172 which will  |
| , equite tartific claim catter by the equitors   |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 301 Comment 8 Respondent  | Respondent South West HARP  |
| Number: Name:  | Organisation: Planning Consortium   |
| Agent ID: 43 Agent Name: Tetlow King Planning  |   |
|  | ent with the comment? $\Box$  |
| Turther information available in the original comment:   Attachments se  | int with the comment:   |
|  |   |
| Discomplying Outline Dien References   Dollar CD2  |   |
| Placemaking Options Plan Reference: Policy GB2   |   |
| ,  |   |
| Placemaking Options Plan Reference: Policy GB2  Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the  | NPPF is clear that "limited affordable  |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is   |   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.   | s well established that this refers to rural  |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill development.   | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.   | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur  | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development. This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  Change requested:  | velopments are unlikely to exceed 10units, ral villages. Reference to RES in the Green  |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  | s well established that this refers to rural velopments are unlikely to exceed 10units,   |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development. This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  Change requested:  Respondent 3095 Comment 10 Respondent Dr NJT Long   | velopments are unlikely to exceed 10units, ral villages. Reference to RES in the Green  Respondent Bath and North East                                      |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  Change requested:  Respondent 3095 Comment 10 Respondent Dr N J T Long Number: Name:  Agent ID: Agent Name: | velopments are unlikely to exceed 10units, ral villages. Reference to RES in the Green  Respondent Bath and North East Organisation: Somerset Branch of the |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  Change requested:  Respondent 3095 Comment 10 Respondent Dr NJT Long Number: Name:                          | velopments are unlikely to exceed 10units, ral villages. Reference to RES in the Green  Respondent Bath and North East Organisation: Somerset Branch of the |
| Comment on the Site:  Whilst infill represents the majority of development within the Green Belt, the housing for local community needs" is also an exception, see paragraph 89. It is exception sites (RES), which are not by their nature, infill development.  This is particularly pertinent given the recent amendments to the PPG. Infill devand as such there is little opportunity to deliver affordable housing in these rur Belt should be made in this policy.  Change requested:  Respondent 3095 Comment 10 Respondent Dr N J T Long Number: Name:  Agent ID: Agent Name: | velopments are unlikely to exceed 10units, ral villages. Reference to RES in the Green  Respondent Bath and North East Organisation: Somerset Branch of the |

#### **Comment on the Site:**

As stated above, the CPRE supports the concept of a Housing Development Boundary, including for villages washed over by the Green Belt. It also supports the view that, in general, for these villages HDB's should not be extended and that

development should be confined within them in the form of infill. The CPRE also notes that in the past, the carrying out of infill development has filled many of the spaces within villages that give character and shape and that the loss of these 'fingers' of countryside is to be regretted. We suggest, therefore, that the determination of planning applications based on the infill justification should take into account the amenity offered by the gaps in built up frontage.

| Change requested:   |
|---|
|   |
|   |
| Respondent 6448 Comment 1 Respondent Mr Ian Stuart Campbell Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy GB2  |
| Comment on the Site:  |
| GB2 is sound as emerging. The alternative would allow very broad interpretation of limited infilling and remove HDB's. The HDBs are not exceptions as listed in NPPF 89 and 90, but are a valuable tool in implementing the permitted limited infilling in NPPF 89. The removal of this tool would lead to very wide interpretation of limitations for infilling, and open up sites which could be beyond any which would have existed with the application of an HDB. This would conflict with HG6, saved into the Core Strategy from the Local Plan with good reason, and relating to very build sensitive Green Belt R3 settlements as listed in HG6.  The effect of UD7 on GB2 is covered by my separate submission re UD7.  Change requested:  Maintain GB2 as expressed in the emerging Plan. Omit the alternative. |
| Respondent 6554 Comment 1 Respondent Mr Peter Roberts Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy GB2  |
| Comment on the Site:  |

Draft Policy gb2 suggests that all villages will be retained within the Green Belt. This is not supported by Paragraph 86 of the NPPF which states:

"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the

openness of the Green Belt, the village should be included in the Green Belt.

If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal

development management policies, and the village should be excluded from the Green Belt."

As such, in order for the plan to be consistent with National Planning Policy, these villages should be removed from the green belt unless the openness of the village provides a demonstrable and important characteristic of the village that

needs to be protected by means other than normal development control policies.

# **Change requested:**

Remove villages from the green belt.

| Placemaking Options Plan Reference: Extensions to buildings   | in the Green Belt Plan Order<br>Number: 870   |
|---|---|
| Respondent 151 Comment 11 Respondent Number: Name: Agent ID: Agent Name: Further Information available in the original comment?   Attachments sent  | Respondent DUNKERTON PARISH Organisation: COUNCIL  with the comment?  |
| Placemaking Options Plan Reference: Extensions to buildings in the Green Belt   |   |
| Comment on the Site:  Extensions to buildings in the Green Belt p217  We support option 2 at para 2.176. This stage in planning development often see on unpredictable personal interpretations. We therefore welcome a valuable oppunhelpful, poorly understood and misinterpreted restrictions about the deemed increases. That said, there is no need to "rely solely on the NPPF" – the current we the sense of Place created by a proposed extension can be assessed by Parish Con | portunity to get away from the often "appropriateness" of proposed % volume ording of option 2 - as any local threat to |
| subsequently made having taken into account all relevant EPAs.  Change requested:  Extensions to buildings in the Green Belt p217   |   |
| We support option 2 at para 2.176. This stage in planning development often see on unpredictable personal interpretations. We therefore welcome a valuable oppunhelpful, poorly understood and misinterpreted restrictions about the deemed increases.  | ortunity to get away from the often   |
| Respondent 224 Comment 49 Respondent<br>Number: Number: Name:   | Respondent Bath Preservation Trust Organisation:  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent  | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Extensions to buildings in the Green Belt   |   |
| Option 2, and review of SPD (not withdraw).   |   |
| Change requested:   |   |
| Respondent 224 Comment 50 Respondent Number: Number: Name: Agent ID: Agent Name:  | Respondent Bath Preservation Trust Organisation:  |
| Further Information available in the original comment?   Attachments sent   |   |

Placemaking Options Plan Reference: Extensions to buildings in the Green Belt

| Comment on the Site:   |                                    |                                   |
|--|------------------------------------|-----------------------------------|
| Option 1.  |                                    |                                   |
| Change requested:  |                                    |                                   |
| Respondent 3069 Comment 19 Res   | pondent Cllr Anketell Jones        | Respondent                        |
|  | me:                                | Organisation:                     |
|  |                                    |                                   |
| Agent ID: Agent Name:  |                                    |                                   |
| Agent ID: Agent Name: Further Information available in the or  | riginal comment?   Attachmen       | nts sent with the comment? $\Box$ |
|  |                                    |                                   |
| Further Information available in the or  |                                    |                                   |
| Further Information available in the or Placemaking Options Plan Reference:  Comment on the Site:  | Extensions to buildings in the Gre |                                   |
| Further Information available in the or Placemaking Options Plan Reference:  Comment on the Site:  Some of the pre 1947 dwellings within the order of the orde | Extensions to buildings in the Gre | en Belt                           |

Placemaking Options Plan Reference: Replacement buildings in the Green Belt

Respondent 151 Comment 12 Respondent Number: Name: Organisation: COUNCIL

Agent ID: Agent Name:

Further Information available in the original comment? Attachments sent with the comment?

Placemaking Options Plan Reference: Replacement buildings in the Green Belt

#### **Comment on the Site:**

Replacement Buildings in the Green Belt p217

We support Option 1 at para 2.178. We believe that to be appropriate, sufficient and workable. For the avoidance of doubt it should require proposals to be compliant with emerging design principles to protect and maintain local character.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Plan Order

Number: 873

# Plan Order Placemaking Options Plan Reference: Urban Design - Context / Paragraph 2.182 Number: 877 Respondent 3069 Comment 20 Respondent Cllr Anketell Jones Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Urban Design - Context / Paragraph 2.182 **Comment on the Site:** 2.182 The design of large and peripheral housing sites eg Ensleigh will work only if the rigour of design principles are applied without exception. The greatest risk is that they do not evolve as identifiable places and they lose habitability and identity because the original vision wasn't sufficiently evolved. **Change requested:**

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

Placemaking Options Plan Reference: Urban Design - Local Evidence /

Paragraph 2.187

Plan Order Number: 882

| Respondent 102 Comment 34 Re<br>Number: Number: Na | espondent Robin Kerr<br>ame:                 | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|--|--|---|
| Agent ID: Agent Name:                              |  |   |
| Further Information available in the o             | original comment? $\square$ Attachments sent | with the comment? $\Box$  |
|  |  |   |
| Placemaking Options Plan Reference:                | : Urban Design - Local Evidence / Paragrap   | h 2.187   |
| Comment on the Site:                               |  |   |
| The Bath Public Realm and Movement                 | Strategy should be included in this list.    |   |
| Change requested:                                  |  |   |
|  |  |   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy UD1 Number: 889 Respondent 224 Comment 51 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD1 Comment on the Site: This policy should come first within Section 2. The image of the Holburne extension is inappropriate to illustrate urban design as it is an exceptional site-specific building in parkland. The emerging principles on page 11 should be cross referenced here. Urban Design Policies MUST be supported with an up-to-date evidence base, in particular character appraisals and management plan for the Bath Conservation Area. Cumulative harm must be avoided in the WHS, in accordance with NPPG and therefore needs to be prevented through policy. **Change requested:** Include greater emphasis on character. Respondent 244 Comment 2 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD1 Comment on the Site: As identified by the Council there are a number of policy proposals (H1, UD1, SCR4, and SCR8) which the Council will have to re-consider when the final outcomes of the Housing Standards Review are known in order that the Council's policies are correctly aligned and consistent with national policy. **Change requested:**

Number:

**Agent Name:** 

Comment 7 Respondent Susan E Green

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Name:

Respondent 244

Number:

Agent ID:

**Respondent** Home Builders

**Organisation:** Federation

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |
|---|
| Placemaking Options Plan Reference: Policy UD1  |
| Comment on the Site:  It is noted that the Urban Design policies (UD1 - UD6) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (ST7 and H2) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy UD1 the word "delight" is subjective. How will the Council define "delight" when determining planning applications?            |
| Change requested:   |
|   |
| Respondent 274 Comment 6 Respondent Gary Parsons Respondent Sport England Organisation:   |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy UD1  |
| Comment on the Site: 4. Active Design   |
| In relation to 'Emerging Design Values' (page11) and 'Urban Design General Principles' (UD1 page 221), Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy.   |
| Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a developer's checklist has been completed and can be accessed via http://www.sportengland.org/facilities-planning-for-sport/planning-tools-and-guidance/active-design/  |
| Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness. |
| Sport England would encourage new development be designed in line with the Active Design principles to secure sustainable design and this could be an amendment which we recommend to 'Urban Design General Principles' (UD1 page 221).   |
| The Active Design work is currently under review with possibly a new 'version' to be considered when published that meets the health / physical activity agenda too.  |
| Change requested:   |
|   |

| Respondent 301 Comment 9 Respondent Number: Name:  | Respondent South West HARP Organisation: Planning Consortium  |
|--|---|
| Agent ID: 43 Agent Name: Tetlow King Planning  |   |
| Further Information available in the original comment? $\Box$ Attachme   | ents sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD1   |   |
| Comment on the Site:   |   |
| In line with our comments above on Space and Access Standards, we recombine the publication of details from the housing standards review. It council makes reference to a number of standards which the Governmenational standards review, as under the rationale that there are too marguidance that add unnecessary cost and complexity to the house building Secured by Design, Lifetime Homes, HCA's HQI, Code for Sustainable House the explanatory text and wording of this policy should be reconsidered to Government. | n particular, we note with concern that the ent have indicated are to be subsumed into the ny codes, standards, rules, regulations and g process. Particular reference was made to mes, Standards and Quality in Development. |
| Change requested:  |   |
| Respondent 304 Comment 7 Respondent Number: Name:  | Respondent University of Bath Organisation:   |
| Agent ID: 44 Agent Name: Define Planning and Design Ltd  |   |
| Further Information available in the original comment?   Attachment  | ents sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD1   |   |
| Comment on the Site:  As an advocate of the importance of good design, the University support have some concerns in relation to how they are interpreted and applied imprecise in their drafting (e.g. Policy UD.5 criteria i and ii), and there is a places, development). Consequently the policies could be open to wide  | , as in their current form they are somewhat a lack of clarity in the terms used (e.g. buildings,   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 1667 Comment 2 Respondent Number: Name:   | Respondent Widcombe Association Organisation:   |
| Agent ID: Agent Name:  | -   |
| Further Information available in the original comment? $\Box$ Attachme   | ents sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD1   |   |

# **Comment on the Site:**

UD.1 to UD.8: The WA supports the emphasis on high quality design in development throughout the city, but feels there should be more explicit recognition of the importance of quality in the treatment of the public realm. This requires clear

policy guidance not only on the design and selection of materials in the creation and repair of streets, footpaths and public spaces but on road signage, lighting and the means of traffic management appropriate in a WHS and in Conservation Areas. There also needs to be a greater commitment to ensuring that any works undertaken by the Council or its contractors represents the best design and craftsmanship and sets a high standard. This also requires greater coordination between the various Council departments and teams to reduce the visual impacts of multiple signposts and road markings where effective alternatives can be used.

| Change requested:  |  |
|--|--|
|  |  |
| Respondent 2611 Comment 38 Respondent Number: Number: Name: Agent ID: Agent Name:  | Respondent Transition Bath Organisation:           |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\Box$                |
| Placemaking Options Plan Reference: Policy UD1   |  |
| Comment on the Site:   |  |
| Strongly support: We strongly support emerging policy UD1, in particu foot, cycle, public transport and by car – in that order. Streets and Spa should be designed to be energy efficient. | ·  |
| Change requested:  |  |
| "Could you add in connections by foot and cycle need to be made alon   | g desire lines?                                    |
|  |  |
| Respondent 6389 Comment 3 Respondent Adam Reynolds Number: Number: Name:   | Respondent Cycle Bath Organisation:                |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\Box$                |
| Placemaking Options Plan Reference: Policy UD1   |  |
| Comment on the Site:   |  |
| Cycle Bath held their monthly meeting last night and discussed in deta   | il the Place Making Plan.                          |
| Many comments were made along the lines of "although they seem to  | be making all the right noises at the beginning of |

Many comments were made along the lines of "although they seem to be making all the right noises at the beginning of the document, the actual place making content is very car centric".

We, as an organisation feel that this document needs to be at the forefront of thinking about the public realm.

With the recent 15 year study in Copenhagen where they showed that people that cycled to work were 40% less likely to die during the course of the study compared to people who did no exercise, we feel that enabling people to feel safe to cycle to school and work or just pop to the shops has to be one of the highest objectives to the place making plan.

Our concern is that although there is a nod to the Sustrans design guidance, that any 'place making' can in effect ignore good cycle infrastructure design that would enable ages 8-80 to cycle.

We feel a certain standard of cycle infrastructure should be upheld and that this should conform to the something similar mentioned in the Welsh Active Travel Design guidance (as well as mentioned in the Sustrans guidance).

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order We also feel that the use of the cycle and pedestrian audit tools (provided in the Welsh guidance) are critical to enable councillors to 'ask' council officers to deliver specific routes to a high quality without needing to have the expertise in the area to be able to critically asses the designs the officers deliver. Cycle Bath have grave concerns that the current Place Making plan can effectively side-line the delivery of high quality cycling infrastructure which is needed to enable people who want to cycle but feel roads are too dangerous. The place making plan must enable cycling and must provide strong minimum standards (and guidance) and the tools that can enable this to happen.

| Respondent 6389 Comment 34 Respondent Number: Name:   | Respondent Cycle Bath Organisation:                   |
|---|---|
| Agent ID: Agent Name:  Further Information available in the original comment?   | Attachments sent with the comment? $\Box$             |
| Placemaking Options Plan Reference: Policy UD1  |   |
| Comment on the Site:  |   |
| 111. Agree  |   |
| That cycling provision should be provided following desire lines  |   |
| Along highly desirable routes where there is a high – over 3000 provided  | per hr - volume of traffic segregated tracks must be  |
| That all developments have cycle parking / storage that is well d<br>needs covered, secure, convenient and easy to access | lesigned appropriate for the development ie long term |
| Change requested:   |   |
|   |   |
| Respondent 6410 Comment 5 Respondent Ms Gaynor Par<br>Number: Number: Name:   | Respondent Linden Homes Strategic Organisation: Land  |
|   |   |
| Agent ID: 28 Agent Name: Nash Partnership   |   |

#### **Comment on the Site:**

5.1 This policy requires buildings and spaces to be designed to be energy efficient. It however imprecise and energy efficiency is to be covered by the Building Regulations as a result of the Housing Standards Review.

#### **Change requested:**

We request therefore that point vii to policy D1, requiring buildings and spaces to be designed to be energy efficient, is deleted .

| Schedule of Comments on the Flacemaking Flan Op  |   |
|--|---|
| Respondent 6414 Comment 6 Respondent Number: Number: Name:   | Respondent Radstock Land LP Organisation:   |
| Agent ID: 162 Agent Name: Pegasus  |   |
| Further Information available in the original comment?   Attachme  | ents sent with the comment?   |
| Placemaking Options Plan Reference: Policy UD1   |   |
| Comment on the Site:   |   |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and   | I UD.6 are all inconsistent with the NPPF.  |
| All of these policies are negatively worded by stating that that developm set out by the policy are met.   | ent will not be permitted unless all of the criteria  |
| This is a binary approach to development which does not allow for a bala undertaken. The NPPF is clear that when considering development, the cand negative) in order to come to a balanced view about whether it reprethis balancing exercise permission should be refused only where any advoutweigh the benefits associated with the proposals. | decision taker must weigh up all impacts (positive esents sustainable development. In undertaking |
| Thus it is accepted that development may have some adverse impacts, be sustainable development unless it outweighs the benefits associated wit other proposed policies in the Placemaking Plan Options document (e.g. the need to consider the benefits of the proposal alongside any adverse  | h the development. This is clearly accepted in emerging policies NE3 and HE1 both recognise       |
| Change requested:  |   |
|  |   |
| Respondent 6414 Comment 12 Respondent Number: Name:  | Respondent Radstock Land LP Organisation:   |
| Agent ID: 162 Agent Name: Pegasus  |   |
| Further Information available in the original comment?   Attachme  | ents sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD1   |   |
| Comment on the Site:   |   |
| The policy sets out 7 design principles which "will be applied" and "Deve principles will not be permitted".   | lopments which fail to reflect these urban design   |
| As currently worded emerging policy UD.1 is therefore not consistent wire exercise/cost-benefit analysis to be undertaken.   | th the NPPF as it does not allow for a balancing  |
| In order to be consistent with the NPPF this policy can require developm the 7 design principles, but it cannot stipulate that development will be a their entirety.   |   |
| Change requested:  |   |

| Schedule of Comments on the Placemaking  | Plan Options Document in Plan Order  |
|--|--|
| Respondent 6415 Comment 6 Respondent Number: Number: Name:   | <b>Respondent</b> Strongvox Homes <b>Organisation:</b>   |
| Agent ID: 162 Agent Name: Pegasus  |  |
| Further Information available in the original comment? $\Box$  | Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Policy UD1   |  |
| Comment on the Site:   |  |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4,  | UD.5 and UD.6 are all inconsistent with the NPPF.  |
| All of these policies are negatively worded by stating that that d<br>set out by the policy are met.   | evelopment will not be permitted unless all of the criteria  |
| This is a binary approach to development which does not allow undertaken. The NPPF is clear that when considering development and negative) in order to come to a balanced view about wheth this balancing exercise permission should be refused only where outweigh the benefits associated with the proposals. | ent, the decision taker must weigh up all impacts (positive er it represents sustainable development. In undertaking |
| Thus it is accepted that development may have some adverse in sustainable development unless it outweighs the benefits assoc other proposed policies in the Placemaking Plan Options docum the need to consider the benefits of the proposal alongside any   | iated with the development. This is clearly accepted in ent (e.g. emerging policies NE3 and HE1 both recognise       |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6415 Comment 12 Respondent Number: Number: Name:  | Respondent Strongvox Homes Organisation:   |
| Agent ID: 162 Agent Name: Pegasus  |  |
| Further Information available in the original comment? $\Box$  | Attachments sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy UD1   |  |
| Comment on the Site:   |  |
| Emerging Policy Approach: UD.1   |  |
| The policy sets out 7 design principles which "will be applied" ar principles will not be permitted".  | nd "Developments which fail to reflect these urban design  |
| As currently worded emerging policy UD.1 is therefore not cons exercise/cost-benefit analysis to be undertaken.  | istent with the NPPF as it does not allow for a balancing  |
| In order to be consistent with the NPPF this policy can require d<br>the 7 design principles, but it cannot stipulate that developmen<br>their entirety.   |  |
| Change requested:  |  |

# Respondent 6426 Comment 9 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Name: Organisation: Severn Valley Agent ID: Agent Name: Further Information available in the original comment? Placemaking Options Plan Reference: Policy UD1

# **Comment on the Site:**

Paragraph i. states that 'Places should be designed for people - to be safe, comfortable, varied and attractive. They should offer opportunities for interaction and delight'. What facilities/ measures are in place that can adequately measure the urban design principles with respect to 'delight'? The preceding urban design principles 'safety, variation and attractiveness' can all be determined to a level of appropriateness to some degree, if somewhat subjectively. Delight is a far more elusive concept by which to determine urban design as acceptable or not.

Paragraph iv. Reading 'Development should work with the landscape' is too general and doesn't really add anything to the overall policy approach. Rather this should be amended to 'Development should coincide with and contribute to the landscape'. This rephrasing allows for a more solid understanding of what is required, adding greater emphasis to the way the development reacts with the existing landscape.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy UD2 Number: 892 Respondent 151 Comment 1 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation:** COUNCIL Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD2 Comment on the Site: In this respect, while we are pleased to see the Emerging Policy Approach (EPA) UD2 concerning Local Character and Distinctiveness (p222) and EPA UD5 (p225) concerning Building Design, we are concerned to note that in the Emerging Design Values under Craftsmanship at p11 we see an intent to "Encourage the Inventive, the progressive and challenging". Given the record of many feted architects that seems like taking an unnecessary risk to allow them to resort to a favourite solution in "iconic" design – acres of sheet glass – and an unintended complication in the debate about what constitutes good design. The old, concrete Southgate carbuncle was, no doubt and in its time, pitched by its designers as being inventive, progressive and challenging and we would not wish to be led there again by policy. And there seems to be hints that it might, as with the Riverside Development the design of the new blocks of flats seems ominously redolent of the old concrete Southgate forms. **Change requested:** Respondent 224 Comment 52 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy UD2 Comment on the Site: **Change requested:** We prefer the use of the word respect, rather than reflect. Respondent 244 Comment 8 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:**

# Comment on the Site:

It is noted that the Urban Design policies (UD1 - UD6) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (ST7 and

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy UD2

H2) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy UD1 the word "delight" is subjective. How will the Council define "delight" when determining planning applications? Change requested: Respondent 304 **Comment** 8 Respondent **Respondent** University of Bath Number: Number: Name: Organisation: Agent ID: 44 Agent Name: Define Planning and Design Ltd Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy UD2 Comment on the Site: As an advocate of the importance of good design, the University supports the intent of these policies. However, it does have some concerns in relation to how they are interpreted and applied, as in their current form they are somewhat imprecise in their drafting (e.g. Policy UD.5 criteria i and ii), and there is a lack of clarity in the terms used (e.g. buildings, places, development). Consequently the policies could be open to wide interpretation and difficult to effectively apply. **Change requested:** Respondent 1667 Comment 3 Respondent **Respondent** Widcombe Association Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: |Policy UD2 **Comment on the Site:** UD.1 to UD.8: The WA supports the emphasis on high quality design in development throughout the city, but feels there should be more explicit recognition of the importance of quality in the treatment of the public realm. This requires clear policy guidance not only on the design and selection of materials in the creation and repair of streets, footpaths and public spaces but on road signage, lighting and the means of traffic management appropriate in a WHS and in Conservation Areas. There also needs to be a greater commitment to ensuring that any works undertaken by the Council

or its contractors represents the best design and craftsmanship and sets a high standard. This also requires greater coordination between the various Council departments and teams to reduce the visual impacts of multiple signposts and

# Bath and North East Somerset Council

**Change requested:** 

road markings where effective alternatives can be used.

| Respondent 2484 Comment 10 Respondent James Warren Number: Name: Respondent Bath Heritage Site Organisation:  Agent ID: Agent Name:   |
|---|
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
|   |
| Placemaking Options Plan Reference: Policy UD2  |
| Comment on the Site: There is an adopted Supplementary Planning Document "Bath City-Wide Character Appraisal SPD" which is currently argely ignored by developers and planning officers alike. Its purpose is to preserve the local characteristics of the various areas of the World Heritage site. Although this document is mentioned in the context of the historic environment, there is a general tendency to disregard areas of Bath such as Twerton and Southdown as having a historic value despite being chart of the World Heritage Site and being clearly visible in important views, and thus it needs to be added to UD2 as well. |
| Change requested:   |
| o bring this adopted policy to the attention of those who should heed it, it should be specifically mentioned in the text of JD2. Add:  |
| iii Within the boundary of the City Of Bath World Heritage Site, developments should be consistent with the local   |
| haracteristics identified in the Bath City-Wide Character Appraisal SPD.  |
| Respondent 2663 Comment 4 Respondent Ms Jacky Wilkinson Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy UD2  |
| Comment on the Site: his policy should come off the fence about design. The Council should encourage good modern, innovative design which espects its context. It should also support accurate use of historic styles where justified in order to re-unify lost compositions.   |
| JD.2 is the best policy for judging density. Ditch the references elsewhere to density figures. These rarely help make good townscape or good places to live.   |
| Change requested:   |
|   |
|   |
| Respondent 6314 Comment 1 Respondent Dr Virginia Williamson Respondent Number: Name: Organisation:  |
| Agent ID: Agent Name:   |
| Further Information available in the original comment? 🗹 Attachments sent with the comment? 🗆   |
| Placemaking Options Plan Reference: Policy UD2  |

Para 1.31 introduces the development of the River Corridor area, describing it as the "valley floor". Further in the same

**Comment on the Site:** 

section, reference is made in SB3, SB4, SB5 and SB6 about the necessity of ensuring that the roofscapes are 'sensitive to their prominence when seen from Beechen Cliff and the surrounding hillsides' (SB4, para 8.)

The roofscapes are very visible, and could be used for the mitigation of climate change, using rooftop gardens, well-designed solar panels, etc. However, as these photos make clear, the facades of these monolithic buildings are also visually intrusive. The fact that they are faced with Bath stone does not mean that they merge into the Georgian architecture.

As the photos of Bath Western Riverside make clear, development along the river corridor will be clearly visible from the hills that surround Bath and care will need to be taken to avoid the "factory block" appearance.

Does UD2 preclude any "iconic" modern design? This traditional approach has in the past resulted in the Hilton, Kingsmead House, etc., and latterly Bath Western Riverside. Will colourful buildings ever be allowed?

| Change requested:   |  |
|---|--|
|   |  |
| Respondent 6414 Comment 7 Respondent Number: Name:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment?   | Respondent Radstock Land LP Organisation:  Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy UD2  |  |
| Comment on the Site:  |  |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, U   | UD.5 and UD.6 are all inconsistent with the NPPF.  |
| All of these policies are negatively worded by stating that that do set out by the policy are met.  | evelopment will not be permitted unless all of the criteria  |
| This is a binary approach to development which does not allow fundertaken. The NPPF is clear that when considering developme and negative) in order to come to a balanced view about whether this balancing exercise permission should be refused only where outweigh the benefits associated with the proposals. | ent, the decision taker must weigh up all impacts (positive er it represents sustainable development. In undertaking |
| Thus it is accepted that development may have some adverse in sustainable development unless it outweighs the benefits associon other proposed policies in the Placemaking Plan Options document the need to consider the benefits of the proposal alongside any  | ated with the development. This is clearly accepted in ent (e.g. emerging policies NE3 and HE1 both recognise        |
| Change requested:   |  |
|   |  |
| Respondent 6414 Comment 13 Respondent Number: Number: Name:   | Respondent Radstock Land LP Organisation:  |
| Agent ID: 162 Agent Name: Pegasus   |  |
| Further Information available in the original comment? $\Box$   | Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD2  |  |

#### Comment on the Site:

# **Change requested:**

As currently worded the policy states that development "will not be permitted where it is harmful to local character and distinctiveness".

Either the policy must clarify that development will not be permitted where any harm to local character and distinctiveness significantly and demonstrably outweighs any benefits, or it should be reworded to require that development must demonstrate that it has had regard to a set of criteria.

| Respondent 6415 Comment 7 Respondent Number: Number: Name:  | Respondent Strongvox Homes Organisation:             |  |
|---|--|--|
| Agent ID: 162 Agent Name: Pegasus   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |  |
| Placemaking Options Plan Reference: Policy UD2  |  |  |
| Comment on the Site:  |  |  |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.   |  |  |
| All of these policies are negatively worded by stating that that developme set out by the policy are met.   | ent will not be permitted unless all of the criteria |  |
| This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably outweigh the benefits associated with the proposals. |  |  |
| Thus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing sustainable development unless it outweighs the benefits associated with the development. This is clearly accepted in other proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise the need to consider the benefits of the proposal alongside any adverse impact).  |  |  |
| Change requested:   |  |  |

# Plan Order Placemaking Options Plan Reference: Policy UD3 Number: 894 Respondent 244 **Comment** 9 **Respondent** Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD3 Comment on the Site: It is noted that the Urban Design policies (UD1 - UD6) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (ST7 and H2) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy UD1 the word "delight" is subjective. How will the Council define "delight" when determining planning applications? **Change requested:** Respondent 304 Comment 9 Respondent **Respondent** University of Bath Number: Number: Name: **Organisation:** Agent ID: 44 Agent Name: Define Planning and Design Ltd Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy UD3 **Comment on the Site:** As an advocate of the importance of good design, the University supports the intent of these policies. However, it does have some concerns in relation to how they are interpreted and applied, as in their current form they are somewhat imprecise in their drafting (e.g. Policy UD.5 criteria i and ii), and there is a lack of clarity in the terms used (e.g. buildings, places, development). Consequently the policies could be open to wide interpretation and difficult to effectively apply. **Change requested:** Respondent 1667 Comment 4 Respondent **Respondent** Widcombe Association Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

# Comment on the Site:

UD.1 to UD.8: The WA supports the emphasis on high quality design in development throughout the city, but feels there should be more explicit recognition of the importance of quality in the treatment of the public realm. This requires clear

Placemaking Options Plan Reference: Policy UD3

policy guidance not only on the design and selection of materials in the creation and repair of streets, footpaths and public spaces but on road signage, lighting and the means of traffic management appropriate in a WHS and in Conservation Areas. There also needs to be a greater commitment to ensuring that any works undertaken by the Council or its contractors represents the best design and craftsmanship and sets a high standard. This also requires greater coordination between the various Council departments and teams to reduce the visual impacts of multiple signposts and road markings where effective alternatives can be used.

| Change requested:   |   |  |
|---|---|--|
|   |   |  |
| Respondent 2611 Comment 39 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:  |  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attack  | hments sent with the comment? $\Box$  |  |
| Placemaking Options Plan Reference: Policy UD3  |   |  |
| Comment on the Site:  Strongly support: We strongly support emerging policy UD3, in partic provide safe and quality routes."  Viii/ix/: In recognition of climate change and the better insulation in reference to summer overheating, which is a problem with the curre residents are complaining about. We feel that avoiding summer over will become almost as important as insulation in properties going for and is more applicable to large non-domestic buildings. Ix is not that Would UD.3 permit urban agriculture, informal food growing spaces, (vi.), (vii.) and (ix.) | more modern homes, could the document include a nt Bath Western Riverside designs which the heating of buildings with integrated external shading ward. Passive ventilation is only part of the solution easy to understand |  |
| Change requested:  ii— change to 'semi permeable' ie allow walking and cycling not cars. Could you reword viii/ix to reflect to cover the more general issue of   | -   |  |
| Respondent 6389 Comment 35 Respondent Number: Name: Agent ID: Agent Name: Further Information available in the original comment?  Attack  | Respondent Cycle Bath Organisation: hments sent with the comment?   |  |
| Placemaking Options Plan Reference: Policy UD3  |   |  |
| Comment on the Site:  i. Agree very good  ii. Allow cyclists [& pedestrians] through and not vehicles  iv. Good links to by bicycle  Change requested:  |   |  |

| Agent ID: Agent  | umber: Name  | ndent Dr Virginia Williamson  | Respondent<br>Organisation:  | Bath Area Growers  |
|--|--|---|--|--|
| _  | t Name:<br>vailable in the origi   | inal comment?   Attachm   | ents sent with the comn  | nent?  |
| Placemaking Options  | Plan Reference: Po   | olicy UD3   |  |  |
| Book, too prescriptive   | h connect with info  | rmal food growing (para 2.298<br>gardens, mini-orchards instea<br>en architecture would address                                     | ad of hard landscaping, a  | nd other types of  |
| Change requested:  |  |   |  |  |
| Respondent 6414 Co<br>Number: N  | omment 8 Respo   |   | Respondent<br>Organisation:  | Radstock Land LP   |
| Agent ID: 162 Agent  |  |   |  |  |
| Further Information a  | valiable in the origi  | inal comment?   Attachm   | ents sent with the comn  | nent? —  |
| Placemaking Options  | Plan Reference: Po   | olicy UD3   |  |  |
| Comment on the Site: As currently worded en  |  | .1, UD.2, UD.3, UD.4, UD.5 and  | d UD.6 are all inconsister   | t with the NPPF.   |
|  |  |   |  |  |
| ·  | •  | by stating that that developm   | nent will not be permitte  | d unless all of the criteria   |
| set out by the policy ar<br>This is a binary approac<br>undertaken. The NPPF<br>and negative) in order   | ch to development wis clear that when come to a balance permission should be   | which does not allow for a bala<br>onsidering development, the d<br>ced view about whether it repu<br>be refused only where any adv | ancing exercise or cost-b<br>decision taker must weig<br>resents sustainable deve  | enefit analysis to be<br>h up all impacts (positive<br>opment. In undertaking  |
| This is a binary approach undertaken. The NPPF and negative) in order this balancing exercise outweigh the benefits at thus it is accepted that sustainable developme other proposed policies. | ch to development wis clear that when contour to come to a balance permission should be associated with the development may ent unless it outweigns in the Placemaking | which does not allow for a bala<br>onsidering development, the d<br>ced view about whether it repu<br>be refused only where any adv | ancing exercise or cost-b<br>decision taker must weig<br>resents sustainable deve<br>verse impacts significantl<br>but that this does not pre<br>th the development. This<br>emerging policies NE3 a | enefit analysis to be h up all impacts (positive lopment. In undertaking y and demonstrably  event it from representing is clearly accepted in |

| Schedule of Comments on the Placemaking Plan Options  | Document in Plan Order                    |  |  |  |
|---|---|--|--|--|
| Respondent 6414 Comment 14 Respondent Number: Number: Name:   | Respondent Radstock Land LP Organisation: |  |  |  |
| Agent ID: 162 Agent Name: Pegasus   |   |  |  |  |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |   |  |  |  |
| Placemaking Options Plan Reference: Policy UD3  |   |  |  |  |
| Comment on the Site:  |   |  |  |  |
| Change requested:   |   |  |  |  |
| Emerging Policy Approach: UD.3  |   |  |  |  |
| As currently worded, the policy states that "Development will not be permitted urban fabric, in particular development should be".  | d unless it contributes positively to the |  |  |  |
| To be consistent with the NPPF the policy must be reworded to state that "Dev<br>contributes positively to the urban fabric, having regard to the following design  | •   |  |  |  |
|   |   |  |  |  |
| Respondent 6415 Comment 8 Respondent Number: Name:  | Respondent Strongvox Homes Organisation:  |  |  |  |
| Agent ID: 162 Agent Name: Pegasus   |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments se  | ent with the comment? $\Box$              |  |  |  |
|   |   |  |  |  |
| Placemaking Options Plan Reference: Policy UD3  |   |  |  |  |
| Comment on the Site:  |   |  |  |  |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6   | are all inconsistent with the NPPF.       |  |  |  |
| All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria set out by the policy are met.  |   |  |  |  |
| This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably outweigh the benefits associated with the proposals. |   |  |  |  |
| Thus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing sustainable development unless it outweighs the benefits associated with the development. This is clearly accepted in other proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise the need to consider the benefits of the proposal alongside any adverse impact).  |   |  |  |  |
| Change requested:   |   |  |  |  |
|   |   |  |  |  |

| As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean?   | Schedule of Comments on the Placemaking Plan Options Document in Plan Order |                   |  |                          |                |                      |
|--|---|-------------------|--|--------------------------|----------------|----------------------|
| Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  Change requested:  Emerging Policy Approach: UD.3  As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required. |   |                   |  |                          | -              | _                    |
| Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  Change requested:  Emerging Policy Approach: UD.3  As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.  | Agent ID: 162 Age   | ent Name: Peg     | asus   |                          |                |                      |
| Comment on the Site:  Change requested: Emerging Policy Approach: UD.3  As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.   | Further Informatio  | n available in th | ne original comment? $\Box$                            | Attachments sent w       | vith the com   | ment?                |
| Change requested:  Emerging Policy Approach: UD.3  As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?   Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.  | Placemaking Optio   | ns Plan Referer   | nce: Policy UD3  |                          |                |                      |
| As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.   | Comment on the Si   | te:               |  |                          |                |                      |
| As currently worded, the policy states that "Development will not be permitted unless it contributes positively to the urban fabric, in particular development should be".  To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.   | Change requested:   |                   |  |                          |                |                      |
| To be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it contributes positively to the urban fabric, having regard to the following design principles".  Respondent 6426 Comment 10 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.   | Emerging Policy App   | roach: UD.3       |  |                          |                |                      |
| Number: Name: Organisation: Severn Valley  Agent ID: Agent Name:  Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean?  More clarification is required.   | To be consistent wit  | th the NPPF the   | policy must be reworded<br>fabric, having regard to th | ne following design prir | nciples".      |                      |
| Agent ID: Agent Name:  Further Information available in the original comment?  Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean?  More clarification is required.  |   |                   |  |                          | •              |                      |
| Placemaking Options Plan Reference: Policy UD3  Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean?  More clarification is required.   | Agent ID: Ag  | ent Name:         |  |                          | _              | ,                    |
| Comment on the Site:  We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean?  More clarification is required.   | Further Information   | n available in th | ne original comment? $\Box$                            | Attachments sent w       | vith the com   | ment?                |
| We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.  | Placemaking Optio   | ns Plan Referer   | nce: Policy UD3  |                          |                |                      |
| We have trouble understanding what 'reflecting local character and reinstating 'broken' parts of the settlement mean? More clarification is required.  | Comment on the Si   | te:               |  |                          |                |                      |
| Change requested:  | We have trouble un  | derstanding wh    | at 'reflecting local charact                           | er and reinstating 'bro  | oken' parts of | the settlement mean? |
|  | Change requested:   |                   |  |                          |                |                      |

## Plan Order Placemaking Options Plan Reference: Policy UD4 Number: 896 Respondent 244 Comment 10 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD4 Comment on the Site: It is noted that the Urban Design policies (UD1 - UD6) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (ST7 and H2) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy UD1 the word "delight" is subjective. How will the Council define "delight" when determining planning applications? **Change requested:** Respondent 262 Comment 2 Respondent lan Lings **Respondent** Woodland Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: |Policy UD4 Comment on the Site: Urban Design – Streets & Spaces The Woodland Trust would like to see the role of trees and small wooded areas recognised in urban design. Tree planting can deliver a wide range of benefits for local communities, in both a rural and urban setting, and this is strongly supported by current national planning policy. We also consider that the Council has a statutory duty to promote tree planting. Section 197 of the Planning Act (1990) states:

It shall be the duty of the local planning authority –

(a) to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees;

197. Planning permission to include appropriate provision for preservation and planting of trees.

The Woodland Trust supports the work, and is a member of, the Trees and Design Action Group - a unique multidisciplinary group of professionals and organisations from both the private and public sectors that is seeking to promote the benefits of trees within the built environment. A South West TDAG is currently being set up and the group is promoting the publication `Trees in Townscape' (TDAG June 2012) - which contains 12 principles of best practice aimed at designers, developers and planners to encourage integrated, joined up thinking, strategies, policies and implementation

relating to trees in the urban realm. `Trees in Townscape' is endorsed by a number of local authorities http://www.tdag.org.uk/trees-in-the-townscape.html.spx

We recommend that B&NES considers this guidance in developing this Plan.

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 Plan. 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'.

Indeed Bath & North East Somerset's own Green Infrastructure Strategy March 2013 (Final version approved as Council Strategy) supports the concept of urban street trees -

"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. Trees reduce the effects of air pollution and storm water runoff, and reduce energy consumption through moderation of the local climate. Trees create potential for employment, encourage inward investment, bring in tourism and add value to property. Trees also support healthy lifestyles by improving areas for recreation, cycle routes and footpaths, The "urban forest" including woodlands and trees in streets, parks, private and public gardens, plays an important role in creating sustainable communities by providing numerous aesthetic, social, health and biodiversity benefits. However for everyone to enjoy them they need to be located near to where people live or be readily accessible. Green infrastructure provides opportunities to connect woodlands sites and improve access, to raise community awareness of the wide benefits of trees through tree planting, management ownership.

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  |
| Delivery aims and objectives – achieving the benefits (P.62)  |
| Secure the multiple benefits that trees and woodlands can provide   |
| Develop a tree and woodland strategy  |
| • Improve access to woodlands within and on edges of settlements through good signage, interpretation and promotion   |
| Prioritise new woodland and street tree planting within and close to settlements  |
| • Protect ancient and notable trees and woodlands through the use of Tree Preservation Orders and by encouraging appropriate management   |
| • Ensure that trees are included in design requirements for new developments  |
| • Encourage community groups to address trees and woodland in neighbourhood plans   |
| Explore the role of wood fuel as a renewable energy source  |
| Bring neglected orchards back into management and create new ones".   |
| Change requested:   |
|   |
|   |
| Respondent 304 Comment 10 Respondent Respondent University of Bath Number: Name: Organisation:  |
| Agent ID: 44 Agent Name: Define Planning and Design Ltd   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy UD4  |
| Comment on the Site:  As an advocate of the importance of good design, the University supports the intent of these policies. However, it does have some concerns in relation to how they are interpreted and applied, as in their current form they are somewhat imprecise in their drafting (e.g. Policy UD.5 criteria i and ii), and there is a lack of clarity in the terms used (e.g. buildings, polaces, development). Consequently the policies could be open to wide interpretation and difficult to effectively apply.  Change requested: |
|   |
|   |

| Schedule of Comments on the Placemaking Plan Op  | ptions Document in Plan Order  |
|--|--|
| Respondent 1667 Comment 5 Respondent Number: Name:   | <b>Respondent</b> Widcombe Association <b>Organisation:</b>  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachm  | ents sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Policy UD4   |  |
| Comment on the Site:   |  |
| JD.1 to UD.8: The WA supports the emphasis on high quality design in dishould be more explicit recognition of the importance of quality in the traceology guidance not only on the design and selection of materials in the coublic spaces but on road signage, lighting and the means of traffic mans Conservation Areas. There also needs to be a greater commitment to enter its contractors represents the best design and craftsmanship and sets coordination between the various Council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination between the various council departments and teams to remain the coordination the coordination that the coordin | reatment of the public realm. This requires clear creation and repair of streets, footpaths and agement appropriate in a WHS and in suring that any works undertaken by the Council is a high standard. This also requires greater |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 40 Respondent Number: Name:  | <b>Respondent</b> Transition Bath <b>Organisation:</b>   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachm  | ents sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Policy UD4   |  |
| Comment on the Site:   |  |
| ii – Highly agree  |  |
| From an aesthetic and sustainability perspective we would like to reduce modern urban developments are dominated by cars parked in front of band hidden as much as possible, to support this we feel that local service transport need to be provided in order to reduce the demand. Additional cars should be provided by Car Clubs.  | ouildings. We would like to see parking minimized es like schools, small local shops and public  |
| Change requested:  |  |
| Walking and cycling routes should take priority over on street car parkin  | g. Cycle parking needs to be provided  |
| Could you reflect our comments in the emerging policy? e.g. xii. Avoid car dominant frontages by reducing the need for car owne Clubs  | ership with the provision of local services and Car  |
| Respondent 6389 Comment 36 Respondent<br>Number: Name:   | Respondent Cycle Bath Organisation:  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachm   | ents sent with the comment? $\Box$   |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |  |
|--|--|--|--|
| Placemaking Options Plan Reference: Policy UD4   |  |  |  |
| Comment on the Site:   |  |  |  |
| That cycling provision takes priority over parking   |  |  |  |
| Cycling infrastructure must be to the CROW manual  |  |  |  |
| That cycling provision should be provided following desire lines   |  |  |  |
| Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided  |  |  |  |
| Junction must be improved for priority of cycling over vehicles  |  |  |  |
| That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access   |  |  |  |
| Change requested:  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Respondent 6414 Comment 9 Respondent Respondent Radstock Land LP Number: Number: Organisation:   |  |  |  |
|  |  |  |  |
| Number: Name: Organisation:  |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment?   Attachments sent with the comment?  |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus   |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment?   Attachments sent with the comment?  |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD4  Comment on the Site:  |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD4  Comment on the Site:  As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.  All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria  |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Policy UD4  Comment on the Site:  As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.  All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria set out by the policy are met.  This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably  |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment? Attachments sent with the comment?  Placemaking Options Plan Reference: Policy UD4  Comment on the Site:  As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.  All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria set out by the policy are met.  This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably outweigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing sustainable development unless it outweighs the benefits associated with the development. This is clearly accepted in other proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise   |  |  |  |
| Number: Name: Organisation:  Agent ID: 162 Agent Name: Pegasus  Further Information available in the original comment?   Attachments sent with the comment?   Placemaking Options Plan Reference: Policy UD4  Comment on the Site:  As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.  All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria set out by the policy are met.  This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably outweigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing sustainable development unless it outweighs the benefits associated with the development. This is clearly accepted in other proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise the need to consider the benefits of the proposal alongside any adverse impact). |  |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |  |  |
|--|--|--|--|--|
| espondent 6414 Comment 15 Respondent Radstock Land LP umber: Name: Organisation:   |  |  |  |  |
| gent ID: 162 Agent Name: Pegasus   |  |  |  |  |
| urther Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |  |  |  |
| Placemaking Options Plan Reference: Policy UD4   |  |  |  |  |
| omment on the Site:  |  |  |  |  |
| hange requested:   |  |  |  |  |
| nerging Policy Approach: UD.4  |  |  |  |  |
| currently worded, the policy states that "Development will not be permitted unless it is well connected, in particular"  |  |  |  |  |
| be consistent with the NPPF the policy must be reworded to state that "Development should demonstrate that it is well innected, having regard to the following desigb principles".   |  |  |  |  |
|  |  |  |  |  |
| espondent 6415 Comment 9 Respondent Respondent Strongvox Homes umber: Number: Organisation:  |  |  |  |  |
| gent ID: 162 Agent Name: Pegasus   |  |  |  |  |
| urther Information available in the original comment? $\square$ Attachments sent with the comment? $\square$   |  |  |  |  |
| lacemaking Options Plan Reference: Policy UD4  |  |  |  |  |
| omment on the Site:  |  |  |  |  |
| currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.   |  |  |  |  |
| I of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria t out by the policy are met.   |  |  |  |  |
| is is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be idertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive id negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking is balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably atweigh the benefits associated with the proposals. |  |  |  |  |
| tus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing stainable development unless it outweighs the benefits associated with the development. This is clearly accepted in her proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise e need to consider the benefits of the proposal alongside any adverse impact).  |  |  |  |  |
| e need to consider the benefits of the proposal alongside any adverse impact).   |  |  |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                             |          |  |  |
|---|----------|--|--|
| Respondent 6415 Comment 14 Respon<br>Number: Number: Name   |          | Respondent Strongvox Homes Organisation: |  |
| Agent ID: 162 Agent Name: Pegasus   |          |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |          |  |  |
|   |          |  |  |
| Placemaking Options Plan Reference: Po  | licy UD4 |  |  |
| Comment on the Site:  |          |  |  |
| Change requested:   |          |  |  |
| Emerging Policy Approach: UD.4  |          |  |  |
| As currently worded, the policy states that unless it is well connected, in particular"                 |          |  |  |
| To be consistent with the NPPF the policy r connected, having regard to the following of                |          | oment should demonstrate that it is well |  |

### Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy UD5 Number: 898 Respondent 224 Comment 53 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD5 Comment on the Site: 'Well designed' and 'well articulated' requires points of reference. Design values need to translate into specific policy. Change requested: Respondent 244 Comment 11 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Policy UD5 **Comment on the Site:** It is noted that the Urban Design policies (UD1 - UD6) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (ST7 and H2) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy UD1 the word "delight" is subjective. How will the Council define "delight" when determining planning applications? **Change requested:** Respondent 304 Comment 11 Respondent **Respondent** University of Bath Number: Number: Name: **Organisation:**

### Comment on the Site:

As an advocate of the importance of good design, the University supports the intent of these policies. However, it does have some concerns in relation to how they are interpreted and applied, as in their current form they are somewhat imprecise in their drafting (e.g. Policy UD.5 criteria i and ii), and there is a lack of clarity in the terms used (e.g. buildings,

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Agent ID: 44 Agent Name: Define Planning and Design Ltd

Placemaking Options Plan Reference: Policy UD5

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order places, development). Consequently the policies could be open to wide interpretation and difficult to effectively apply. **Change requested:** Respondent 1667 Comment 6 Respondent **Respondent** Widcombe Association Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD5 Comment on the Site: UD.1 to UD.8: The WA supports the emphasis on high quality design in development throughout the city, but feels there should be more explicit recognition of the importance of quality in the treatment of the public realm. This requires clear policy guidance not only on the design and selection of materials in the creation and repair of streets, footpaths and public spaces but on road signage, lighting and the means of traffic management appropriate in a WHS and in Conservation Areas. There also needs to be a greater commitment to ensuring that any works undertaken by the Council or its contractors represents the best design and craftsmanship and sets a high standard. This also requires greater coordination between the various Council departments and teams to reduce the visual impacts of multiple signposts and road markings where effective alternatives can be used. **Change requested:** Respondent 6414 Comment 10 Respondent **Respondent** Radstock Land LP Number: Number: Name: **Organisation:**

Agent ID: 162 Agent Name: Pegasus

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy UD5

### Comment on the Site:

As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.

All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria set out by the policy are met.

This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably outweigh the benefits associated with the proposals.

Thus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing sustainable development unless it outweighs the benefits associated with the development. This is clearly accepted in other proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise the need to consider the benefits of the proposal alongside any adverse impact).

| Change requested:  |   |
|--|---|
|  |   |
|  |   |
|  |   |
| Respondent 6414 Comment 16 Respondent  | Respondent Radstock Land LP   |
| Number: Name:  | Organisation:   |
| Agent ID: 162 Agent Name: Pegasus  |   |
| Further Information available in the original comment? $\Box$ Attachi  | ments sent with the comment? $\Box$   |
| <b>0</b> 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1   |   |
| Discourse Control Discourse Date 1975  |   |
| Placemaking Options Plan Reference: Policy UD5   |   |
|  |   |
| Comment on the Site:   |   |
| Change requested:  |   |
| Emerging Policy Approach: UD.5   |   |
| 0 0 , 11   |   |
| As currently worded, the policy states that "Development will not be p   | ermitted unless it is well detailed, in particular".  |
|  |   |
| To be consistent with the NPPF the policy must be reworded to state t  | hat "Development should demonstrate that it is well   |
| detailed, having regard to the following design principles".   |   |
|  |   |
| Respondent 6415 Comment 10 Respondent  | Respondent Strongvox Homes  |
| Number: Name:  | Organisation:   |
| Agent ID: 162 Agent Name: Pegasus  |   |
|  |   |
| Further Information available in the original comment?   Attach  | ments sent with the comment? $\Box$   |
|  |   |
| Placemaking Options Plan Reference: Policy UD5   |   |
|  |   |
| Comment on the Site:   |   |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 a   | nd UD.6 are all inconsistent with the NPPF.   |
| All of those policies are possitively worded by stating that that develop  | mont will not be permitted unless all of the critoria   |
| All of these policies are negatively worded by stating that that develop set out by the policy are met.  | ment will not be permitted unless all of the criteria   |
| set out by the policy are met.   |   |
| This is a binary approach to development which does not allow for a ba   |   |
| inis is a sinary approach to acverophicit which account allow for a bi   | alancing exercise or cost-benefit analysis to be  |
| undertaken. The NPPF is clear that when considering development, the   |   |
|  | e decision taker must weigh up all impacts (positive  |
| undertaken. The NPPF is clear that when considering development, the   | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking   |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re   | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking   |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any acoutweigh the benefits associated with the proposals.  | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably   |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any acoutweigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts,   | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably but that this does not prevent it from representing   |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any acoutweigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, sustainable development unless it outweighs the benefits associated with the proposals.   | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably but that this does not prevent it from representing with the development. This is clearly accepted in   |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any account weigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, sustainable development unless it outweighs the benefits associated wother proposed policies in the Placemaking Plan Options document (e.  | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably , but that this does not prevent it from representing  vith the development. This is clearly accepted in  g. emerging policies NE3 and HE1 both recognise |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any acoutweigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, sustainable development unless it outweighs the benefits associated with the proposals.   | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably , but that this does not prevent it from representing  vith the development. This is clearly accepted in  g. emerging policies NE3 and HE1 both recognise |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any account weigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, sustainable development unless it outweighs the benefits associated wother proposed policies in the Placemaking Plan Options document (e.  | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably , but that this does not prevent it from representing  vith the development. This is clearly accepted in  g. emerging policies NE3 and HE1 both recognise |
| undertaken. The NPPF is clear that when considering development, the and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any account weigh the benefits associated with the proposals.  Thus it is accepted that development may have some adverse impacts, sustainable development unless it outweighs the benefits associated wother proposed policies in the Placemaking Plan Options document (e. the need to consider the benefits of the proposal alongside any adversal contents. | e decision taker must weigh up all impacts (positive presents sustainable development. In undertaking dverse impacts significantly and demonstrably , but that this does not prevent it from representing  vith the development. This is clearly accepted in  g. emerging policies NE3 and HE1 both recognise |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order       |   |  |  |
|---|---|--|--|
| Respondent 6415 Comment 15 Respondent Number: Number: Namber:                     | pondent<br>me:                              | Respondent Strongvox Homes Organisation:   |  |
| Agent ID: 162 Agent Name: Pegasus   |   |  |  |
| Further Information available in the or   | riginal comment? $\square$ Attachments sent | with the comment? $\Box$                   |  |
|   |   |  |  |
| Placemaking Options Plan Reference:   | Policy UD5                                  |  |  |
| Comment on the Site:  |   |  |  |
| Change requested:   |   |  |  |
| Emerging Policy Approach: UD.5  |   |  |  |
| As currently worded, the policy states th   | nat "Development will not be permitted ເ    | nless it is well detailed, in particular". |  |
| To be consistent with the NPPF the polic detailed, having regard to the following |   | opment should demonstrate that it is well  |  |

### Plan Order Placemaking Options Plan Reference: Policy UD6 Number: 900 Respondent 224 **Comment 54 Respondent Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD6 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 244 Comment 12 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation **Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD6 **Comment on the Site:** It is noted that the Urban Design policies (UD1 - UD6) are repetitive perhaps the Council could consider if fewer more concise policies are appropriate. There is also an overlap between the Urban Design policies and other policies (ST7 and H2) again the Council could consider amalgamation of these policies especially if for example it is agreed that density is a function of character and design. In Policy UD1 the word "delight" is subjective. How will the Council define "delight" when determining planning applications? **Change requested:** Respondent 1667 Comment 7 Respondent **Respondent** Widcombe Association Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

### Comment on the Site:

UD.1 to UD.8: The WA supports the emphasis on high quality design in development throughout the city, but feels there should be more explicit recognition of the importance of quality in the treatment of the public realm. This requires clear policy guidance not only on the design and selection of materials in the creation and repair of streets, footpaths and public spaces but on road signage, lighting and the means of traffic management appropriate in a WHS and in Conservation Areas. There also needs to be a greater commitment to ensuring that any works undertaken by the Council

Placemaking Options Plan Reference: Policy UD6

or its contractors represents the best design and craftsmanship and sets a high standard. This also requires greater coordination between the various Council departments and teams to reduce the visual impacts of multiple signposts and road markings where effective alternatives can be used.

| Change requested:  |   |
|--|---|
|  |   |
| Respondent 6389 Comment 37 Respondent Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments ser | Respondent Cycle Bath Organisation:       |
| Turther information available in the original comment: — Attachments ser   | it with the comment:                      |
| Placemaking Options Plan Reference: Policy UD6   |   |
| Comment on the Site:   |   |
| That cycling provision should be provided following desire lines   |   |
| That all developments have cycle parking / storage that is well designed appropriated appropriate covered, secure, convenient and easy to access     | riate for the development ie long term    |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6414 Comment 11 Respondent Number: Name:  | Respondent Radstock Land LP Organisation: |
| Agent ID: 162 Agent Name: Pegasus  |   |
| Further Information available in the original comment? $\Box$ Attachments ser  | nt with the comment? $\Box$               |
| Placemaking Options Plan Reference: Policy UD6   |   |

### **Comment on the Site:**

As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 and UD.6 are all inconsistent with the NPPF.

All of these policies are negatively worded by stating that that development will not be permitted unless all of the criteria set out by the policy are met.

This is a binary approach to development which does not allow for a balancing exercise or cost-benefit analysis to be undertaken. The NPPF is clear that when considering development, the decision taker must weigh up all impacts (positive and negative) in order to come to a balanced view about whether it represents sustainable development. In undertaking this balancing exercise permission should be refused only where any adverse impacts significantly and demonstrably outweigh the benefits associated with the proposals.

Thus it is accepted that development may have some adverse impacts, but that this does not prevent it from representing sustainable development unless it outweighs the benefits associated with the development. This is clearly accepted in other proposed policies in the Placemaking Plan Options document (e.g. emerging policies NE3 and HE1 both recognise the need to consider the benefits of the proposal alongside any adverse impact).

| Change requested:  |  |
|--|--|
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 6414 Comment 17 Respondent Number: Number: Name:  | Respondent Radstock Land LP Organisation:  |
| Agent ID: 162 Agent Name: Pegasus  |  |
| Further Information available in the original comment? $\Box$ Attach   | ments sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy UD6   |  |
| Comment on the Site:   |  |
| Change requested:  |  |
| Emerging Policy Approach: UD.6   |  |
| As currently worded, the policy states that "Development will not be $\mathfrak p$ amenity, proposals should"  | permitted unless it provides for appropriate levels of   |
| To be consistent with the NPPF the policy must be reworded to state t provides for appropriate levels of amenity, having regard to the follow  | ·  |
|  |  |
| Respondent 6415 Comment 11 Respondent Number: Number: Name:  | Respondent Strongvox Homes Organisation:   |
| Tunio!   | Organisation.  |
| Agent ID: 162 Agent Name: Pegasus  | ments sent with the comment? $\Box$  |
| Further Information available in the original comment?   Attach  | ments sent with the comment? —   |
| Placemaking Options Plan Reference: Policy UD6   |  |
| Comment on the Site:   |  |
| As currently worded emerging policies UD.1, UD.2, UD.3, UD.4, UD.5 a   | and UD.6 are all inconsistent with the NPPF.   |
| All of these policies are possible by station that they do not be  |  |
| All of these policies are negatively worded by stating that that develop set out by the policy are met.  | oment will not be permitted unless all of the criteria   |
| This is a binary approach to development which does not allow for a b undertaken. The NPPF is clear that when considering development, th and negative) in order to come to a balanced view about whether it re this balancing exercise permission should be refused only where any a outweigh the benefits associated with the proposals. | e decision taker must weigh up all impacts (positive epresents sustainable development. In undertaking |
| Thus it is accepted that development may have some adverse impacts sustainable development unless it outweighs the benefits associated vother proposed policies in the Placemaking Plan Options document (e.the need to consider the benefits of the proposal alongside any advers   | with the development. This is clearly accepted in .g. emerging policies NE3 and HE1 both recognise     |
| Change requested:  |  |
|  |  |
|  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |                                   |   |  |
|---|-----------------------------------|---|--|
| Respondent 6415 Commen<br>Number: Number                                    | -                                 | Respondent Strongvox Homes Organisation:  |  |
| Agent ID: 162 Agent Name  | : Pegasus                         |   |  |
| Further Information available   | e in the original comment? $\Box$ | $\square$ Attachments sent with the comment? $\square$                                    |  |
|   |                                   |   |  |
| Placemaking Options Plan Re   | ference: Policy UD6               |   |  |
| Comment on the Site:  |                                   |   |  |
| Change requested:   |                                   |   |  |
| Emerging Policy Approach: UD  | 0.6                               |   |  |
| As currently worded, the police amenity, proposals should"                  | y states that "Development w      | vill not be permitted unless it provides for appropriate levels of                        |  |
|   |                                   | d to state that "Development should demonstrate that it the following design principles". |  |

### Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy UD7 Number: 904 Respondent 224 Comment 55 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD7 Comment on the Site: Option 2 is irrelevant to UD7 but needs consideration and policy approach elsewhere. **Change requested:** Respondent 1667 Comment 8 Respondent **Respondent** Widcombe Association Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD7 **Comment on the Site:** UD.1 to UD.8: The WA supports the emphasis on high quality design in development throughout the city, but feels there should be more explicit recognition of the importance of quality in the treatment of the public realm. This requires clear policy guidance not only on the design and selection of materials in the creation and repair of streets, footpaths and public spaces but on road signage, lighting and the means of traffic management appropriate in a WHS and in Conservation Areas. There also needs to be a greater commitment to ensuring that any works undertaken by the Council or its contractors represents the best design and craftsmanship and sets a high standard. This also requires greater coordination between the various Council departments and teams to reduce the visual impacts of multiple signposts and road markings where effective alternatives can be used. **Change requested:** Respondent 6448 Comment 2 Respondent Mr Ian Stuart Campbell Respondent Number: Number: Name: Organisation:

#### Comment on the Site:

Agent ID:

(a) The definition of infilling in UD7 affects GB2. There is a case for relating this to the Settlements classifications and adjusting it accordingly. For villages covered by Core Strategy RA1 and RA2 the emerging policy is sound as it is

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Agent Name:** 

Placemaking Options Plan Reference: Policy UD7

permissive of infill to the level necessary to meet the build requirements for these classifications in the Green Belt.

The degree of protection against inappropriate development or extension / creation of, appropriateness is greater for the 20 settlements listed in GB2 (2.168 section) than for RA1 and RA2. I therefore submit that Local Plan saved HG6 be retained for these settlements, allowing for very limited build on sites within the HDB's in these settlements and subject to the HG6 supportive tight definition of infill. Green Belt policy is restrictive and changes of infill definition should not work to the detriment of the Belt.

(b) The concept that Neighbourhood Plans might "Identify" (In other words "Create") locally specific definitions of infill with "reference to local characteristics" is just about as opaque as a policy exclusion can be. What local characteristics should apply? Why should parishes/communities which have produced a Neighbourhood Plan be given the ability to amend policy whereas parishes which have not developed such a plan would be disadvantaged by comparison? This proposal is bad policy as it is unduly selective, opaque and not supported by any experience or rationale.

### **Change requested:**

- (a) The definition of Infill proposed be adopted except "In Green Belt villages falling outside R1 and R2 classifications, saved Policy HG6 and it's supporting definition of infill will be retained."
- (b) Omit "Neighbourhood Plans in B&NES may identify a locally specific definition of infill, with reference to local characteristics.".

### Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy UD8 Number: 910 Respondent 224 Comment 56 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD8 Comment on the Site: Lighting policy should not make a distinction between CA and WHS (the WHS should be afforded the same protection as the CA). The policy MUST include reference and specificity to CA and character appraisal. More clarity regarding appropriate levels of light emission is needed by officers determining applications for shops and site identification. Lighting policy should cover e.g. buildings, public realm, shops, site identification. **Change requested:** Respondent 281 Comment 15 Respondent Alison Howell **Respondent** Natural England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy UD8

#### **Comment on the Site:**

Lighting UD8: we strongly support the inclusion of a specific policy as necessary to provide the context and parameters for lighting.

### **Change requested:**

Respondent 828 Comment 7 Respondent Respondent Deeley Freed Estates
Number: Name: Organisation: Limited and DFE Projects

Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy UD8

### Comment on the Site:

The general principles involved in emerging Policy UD8 are broadly welcomed. It is relevant that paragraphs 2.206 makes reference to research in progress and describes Policy UD8 as simply "an initial policy approach" pending completion and analysis of that research. That qualification is important and Deeley Freed Estates and DFE Projects would like to

comment on any draft policy when that work has been completed.

Pending that time, the draft policy goes into far too much detail and is based on insufficient justification in relation to the precise requirements of the policy. For example, the general sensitivity of bats to lighting is known but the details are complex and much less understood and thus the test in criterion 3(a) on Policy UD8 could never be met. Similarly, in the absence of a database and soundly-based standards, many other requirements of the draft policy approach would be onerous and virtually impossible to meet (for example, criterion 1 – what is "unacceptable"?; criterion 2 – what does maintenance of light levels involve and what is an improvement?; Criterion 3 – has the network of corridors been defined and, if so, where?; Criterion 4 – does minimization imply acceptability? (For Criterion 5 the requirement is unclear – conflict with NPPF para 154).

### **Change requested:**

Replacement of Policy UD8 is required. It is recognised that the policy approach is work in progress. However, a clear statement of principles would be helpful instead of the draft policy – principles that are based on sound justification – the science involved, evidence, databases and relevant standards.

| Respondent 1667 Comment 9 Respondent Number: Number: Name:  | Respondent Widcombe Association Organisation:      |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachme  | ents sent with the comment? $\square$              |
| Placemaking Options Plan Reference: Policy UD8  |  |
| Comment on the Site:  |  |
| The WA supports the emerging policy approach to external lighting, with lighting, in UD.8 and urges the Council to apply this policy rigorously, parvisible from within it, to avoid further damage to the largely dark skyline                           | ticularly in the World Heritage Site and locations |
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
| Respondent 2611 Comment 41 Respondent   | Respondent Transition Bath                         |
| Number: Name:   | Respondent Transition Bath Organisation:           |
| Number: Name: Agent ID: Agent Name:   | Organisation:                                      |
| Number: Name:   | Organisation:                                      |
| Number: Name: Agent ID: Agent Name:   | Organisation:                                      |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachme   | Organisation:                                      |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachme  Placemaking Options Plan Reference:  Policy UD8  | Organisation:                                      |
| Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment? ☐ Attachme  Placemaking Options Plan Reference: Policy UD8  Comment on the Site:  Strongly support: SMART lighting particularly if it leads to energy saving | Organisation:                                      |
| Number: Name: Agent ID: Agent Name: Further Information available in the original comment?   Placemaking Options Plan Reference: Policy UD8  Comment on the Site:   | Organisation:                                      |

| Schedule of Comments on the Placemaking Plan Options Doo   | cument in Plan Order  |
|--|---|
| · · · · · · · · · · · · · · · · · · ·  | Respondent Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\hfill \square$<br>Attachments sent  | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD8   |   |
| Comment on the Site:   |   |
| The roll out of new LED non scatter street lights is beginning to take effect. The cit   | ty nightscape has changed creating dark                               |
| sky vistas.<br>All new developments should be lit to a similarly reduced level.  |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6314 Comment 2 Respondent Dr Virginia Williamson Number: Name:  | Respondent Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\hfill \square$<br>Attachments sent  | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy UD8   |   |
| Comment on the Site: Support policy UD8 to reduce light pollution. The nightscape view from, e.g., Beed bright floodlighting of Southgate's southern façade. Dark corridors should not be coterminous with pedestrian routes, so that safety at Sports grounds, including schools and universities, should make sure that floodlight place. Could the type of sports floodlighting be modified so that it isn't so visually  Change requested: | t night is not compromised. hting is used only when sports are taking |
| Qualify "dark corridors" to ensure safety of pedestrian routes.  |   |
|  |   |
| · ·  | Respondent Cycle Bath Organisation:                                   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\ \square$ Attachments sent  | with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy UD8   |   |
| Comment on the Site:   |   |
| Cycle routes must be considered for lighting   |   |
| Change requested:  |   |

Placemaking Options Plan Reference: Green Infrastructure Checklist options

Plan Order Number: 925

| Respondent 151<br>Number:   | Comment 13 Number: | Respondent<br>Name:                    | Respondent DUNKERTON PARISH Organisation: COUNCIL |
|---|--------------------|--|---|
| Agent ID: Ag  | ent Name:          |  |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |                    |  |   |
| Placemaking Optio   | ns Plan Referen    | Green Infrastructure Checklist options |   |
| Comment on the Si   | ite:               |  |   |
| Green Infrastructure  | e p231             |  |   |
| At para 2.217, if the Green Infrastructure is a key component of sustainable development, and we agree it should be, then it follows that option 2 at para 2.218 must be the better choice. |                    |  |   |
| Change requested:   |                    |  |   |

### Placemaking Options Plan Reference: Policy NE1

Plan Order Number: 926

|  |   | Number. 520                                       |
|--|---|---|
|  | pondent<br>me:                            | Respondent DUNKERTON PARISH Organisation: COUNCIL |
| Agent ib. Agent Name.                    |   |   |
| Further Information available in the o   | riginal comment?   Attachments sent       | with the comment? $\Box$                          |
| Placemaking Options Plan Reference:      | Policy NE1                                |   |
| Comment on the Site:                     |   |   |
| Change requested:                        |   |   |
|  |   |   |
| Green Infrastructuture p231              |   |   |
|  |   |   |
|  | re is a key component of sustainable deve | opment, and we agree it should be, then           |
| it follows that option 2 at para 2.218 m | ust be the better choice.                 |   |
|  |   |   |
|  |   |   |
|  | pondent Mrs Jane Hennell                  | <b>Respondent</b> The Canal & River Trust         |
| Number: Number: Na                       | me:                                       | Organisation:                                     |
| Agent ID: Agent Name:                    |   |   |
|  |   |   |
| Further Information available in the o   | riginal comment? $\Box$ Attachments sent  | with the comment? $\square$                       |
|  |   |   |
|  |   |   |
| Placemaking Options Plan Reference:      | Policy NE1                                |   |
|  |   |   |
| Comment on the Site:                     |   |   |
| Green Infrastructure NE1                 |   |   |
| Green milastracture IVL1                 |   |   |

In an increasingly fast-paced and crowded world, our historic canals and rivers provide a local haven for people and nature. The Canal & River Trust (the Trust) is the charity entrusted with the care of 2,000 miles of waterways in England and Wales. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objects including:

To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;

To protect and conserve objects and buildings of heritage interest;

To further the conservation, protection and improvement of the natural environment of inland waterways; and

To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

Within the Bath & North Somerset district The Canal & River trust act as Navigation Authority for parts of the River Avon, although in some sections we also own adjoining land which is used as a towpath. We also own and maintain the Kennet & Avon Canal.

The River and Canal Corridor is arguably the districts most important Green Infrastructure asset and the importance of protecting and enhancing such an asset is well recognised at all levels in national and local policy. We welcome the councils recommendation that developers must provide sufficient information by way of a checklist to allow G.I to be properly considered and we have no comments to make on which of the various options is more suitable as a way of

proving this information.

We are concerned that emerging Policy NE1 does not go far enough to promote and protect existing GI assets or ensure the long term suitability of existing or new assets. Section 1a requires development to contribute to the development, protection and enhancement of an asset, or create new links to it. Section 1b ensures the development does not adversely affect the integrity and value of the asset, again welcomed.

Neither section 1 nor section 3, (proposals for major development) set out how GI assets may be protected or enhanced, or how the long term management of existing or new assets will take place to ensure that they remain fit for purpose. An audit of the existing provision is a good way to establish base line information but further guidance could be given on what is expected as a result of a development.

Particular issues may arise where an existing GI asset is foundaround the development (but not within it or under the applicants control) and is to be relied upon within the audit of GI. The mechanism by which protection or enhancement takes place should be given further consideration as it is not reasonable for third party owners of GI assets to suffer increased burdens as a result of development. The Policy needs to make it clear that protection and enhancement should also include long term maintenance of the GI asset if the development will result in an increase in its use and therefore future degradation.

The Canal & River Trust requests further discussions with the Council to establish how best to deal with this matter.

### **Change requested:**

are concerned that emerging Policy NE1 does not go far enough to promote and protect existing GI assets or ensure the long term suitability of existing or new assets. Section 1a requires development to contribute to the development, protection and enhancement of an asset, or create new links to it. Section 1b ensures the development does not adversely affect the integrity and value of the asset, again welcomed.

Neither section 1 nor section 3, (proposals for major development) set out how GI assets may be protected or enhanced, or how the long term management of existing or new assets will take place to ensure that they remain fit for purpose. An audit of the existing provision is a good way to establish base line information but further guidance could be given on what is expected as a result of a development.

Particular issues may arise where an existing GI asset is foundaround the development (but not within it or under the applicants control) and is to be relied upon within the audit of GI. The mechanism by which protection or enhancement takes place should be given further consideration as it is not reasonable for third party owners of GI assets to suffer increased burdens as a result of development. The Policy needs to make it clear that protection and enhancement should also include long term maintenance of the GI asset if the development will result in an increase in its use and therefore future degradation.

The Canal & River Trust requests further discussions with the Council to establish how best to deal with this matter

| Respondent 224<br>Number: |                  | spondent<br>ame:         | Respon<br>Organis        | ndent Bath Preservation Trust sation: |
|---------------------------|------------------|--------------------------|--------------------------|---------------------------------------|
| Agent ID: Age             | ent Name:        |                          |                          |                                       |
| Further Information       | available in the | original comment? $\Box$ | Attachments sent with th | e comment?                            |
| Placemaking Option        | s Plan Reference | Policy NE1               |                          |                                       |
| Comment on the Sit        | e:               |                          |                          |                                       |
| Agree with policy app     | oroach.          |                          |                          |                                       |

| Change requested:  |
|--|
|  |
| Respondent 245 Comment 4 Respondent Mr Andy Reading Number: Name: Organisation:  Agent ID: Agent Name:   |
| Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy NE1   |
| Comment on the Site:  We are pleased to see reference has been made in this section to key waterbodies (e.g. lakes, waterways) in the BANES area which provide multi-functional benefits for communities and the environment. Overall we are happy with the emerging policy approach (NE1) and the need to for development to protect the integrity of GI and contribute to its improvement. We would support the pro-active approach suggested for major developments in terms of the developer having to demonstrate how GI has been factored into the proposals/masterplan. |
| Change requested:  |
|  |
| Respondent 262 Comment 3 Respondent lan Lings Respondent Woodland Trust Organisation:  |
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Policy NE1   |
| Comment on the Site:  Whilst appropriate tree planting and woodland conservation is acknowledged as being a design principle it should also be seen as being an integral part of development and design principles. Also, we would like to see this being expanded to encompass a requirement for larger scale woodland creation in respect of more significant developments as part of developer obligations (section 106 or CIL).  |
| Change requested:  |
|  |
|  |
| Respondent 281 Comment 16 Respondent Alison Howell Number: Name: Respondent Natural England Organisation:  |
| Agent ID: Agent Name:  |
| Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy NE1   |
| Comment on the Site:   |

NE1, NE5 and NE6: we strongly support the approach of a dedicated policy on GI, Ecological Networks and protecting

| Schedule of Comments on the Placemaking Pla trees and woodland.   | n Options Document in Plan Order   |
|---|--|
| Change requested:   |  |
| Respondent 301 Comment 10 Respondent Number: Number: Name: Agent ID: 43 Agent Name: Tetlow King Planning Further Information available in the original comment?   | Respondent South West HARP Organisation: Planning Consortium chments sent with the comment?                          |
| Placemaking Options Plan Reference: Policy NE1  |  |
| Comment on the Site: It is arbitrary that all major development must submit an audit of exnot be appropriate in all instances. The Growth and Infrastructure Act (2013) s6 requires that local inform (a) must be reasonable having regard, in particular, to the nature at (b) may require particulars of, or evidence about, a matter only if it is material consideration in the determination of the application." The Council should set out the circumstances under which an audit of major applications.  Change requested:  | rmation requirements are: nd scale of the proposed development; and is reasonable to think that the matter will be a |
| Respondent 3069 Comment 22 Respondent Cllr Anketell Jones Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?  | Respondent Organisation:  chments sent with the comment?   |
| Placemaking Options Plan Reference: Policy NE1  |  |
| Comment on the Site:  Overarching Principles  There is a growing understanding that Green Infrastructure/Natural the wildlife it hosts. There are health and wellbeing benefits for peo a monetary figure be calculated to create a value that the majority of the state | ple as well. To better understand the benefit of GI can  |
| Change requested:   | n residents cashy anderstand:  |
| Respondent 6414 Comment 18 Respondent Number: Name:   | Respondent Radstock Land LP Organisation:  |
| Agent ID: 162 Agent Name: Pegasus   |  |
| Further Information available in the original comment? $\Box$ Attac   | chments sent with the comment? $\Box$  |

| Placemaking Options Plan Reference: | Policy NE1 |
|-------------------------------------|------------|
|                                     |            |

#### Comment on the Site:

Emerging Policy NE1 requires major development to be accompanied by:

a) an 'audit' of existing green infrastructure assets within and around the development site together with the current GI functions of the site itself; and

b)GI "proposal" demonstrating how GI has been incorporated into the scheme in order to increase function and improve connectivity including links to existing the local and strategic networks.

The Government has been clear on the need to limit unnecessary burdens upon the process of building homes. It is considered that the requirements for a GI audit and proposal represent an unjustified and unnecessary burden upon those applying for planning permission for large scale development.

With regards to ecological surveys the PPG is clear that "Local planning authorities should only require ecological surveys where clearly justified, for example if they consider there is a reasonable likelihood of a protected species being present and affected by development. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity."

The same must apply to any requirement for an assessment of Green Infrastructure. Furthermore, it is the responsibility of the LPA, as part of the Local Plan evidence base to undertake an audit of existing green space.

### **Change requested:**

It is therefore recommended that Policy NE1 be reworded to require development proposals to demonstrate that they have had regard to existing green infrastructure networks and have maximised opportunities to design green infrastructure into the proposed development.

| Respondent 6415<br>Number: | _                   | espondent<br>Jame:          | Respondent<br>Organisation    | Strongvox Homes |
|----------------------------|---------------------|-----------------------------|-------------------------------|-----------------|
| Agent ID: 162 Ag           | gent Name: Pegas    | us                          |                               |                 |
| Further Information        | on available in the | original comment? $\square$ | Attachments sent with the com | ment? $\square$ |
| Placemaking Optic          | ons Plan Reference  | : Policy NE1                |                               |                 |

### **Comment on the Site:**

Emerging Policy Approach: NE1

Emerging Policy NE1 requires major development to be accompanied by:

- a) an 'audit' of existing green infrastructure assets within and around the development site together with the current GI functions of the site itself; and
- b) GI "proposal" demonstrating how GI has been incorporated into the scheme in order to increase function and improve connectivity including links to existing the local and strategic networks.

The Government has been clear on the need to limit unnecessary burdens upon the process of building homes. It is considered that the requirements for a GI audit and proposal represent an unjustified and unnecessary burden upon those applying for planning permission for large scale development.

With regards to ecological surveys the PPG is clear that "Local planning authorities should only require ecological surveys where clearly justified, for example if they consider there is a reasonable likelihood of a protected species being present

and affected by development. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity."

The same must apply to any requirement for an assessment of Green Infrastructure. Furthermore, it is the responsibility of the LPA, as part of the Local Plan evidence base to undertake an audit of existing green space.

### **Change requested:**

It is therefore recommended that Policy NE1 be reworded to require development proposals to demonstrate that they have had regard to existing green infrastructure networks and have maximised opportunities to design green infrastructure into the proposed development.

|   | pondent Mr Steven Kerry<br>me:          | Respondent Persimmon Homes Organisation: Severn Valley  |  |  |
|---|---|---|--|--|
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |   |   |  |  |
| Placemaking Options Plan Reference:   | Policy NE1                              |   |  |  |
| Comment on the Site:  |   |   |  |  |
|   | nlikely impact the green infrastructure | en infrastructure 'across the district' should across the entire district, instead would mstances or be removed altogether. |  |  |
| Point 2 should be amended to read 'Development should consider and reflect the principles, delivery aims and objectives as set out in the Green Infrastructure Strategy where possible.'  |   |   |  |  |
| Option 3 is the preferable option as reference is already made in a section of the majority of Design & Access Statements, evaluation of the existing environment, landscape strategy etc. This can be extended as a stand-alone section of the DAS which in practice would also- show how evaluation of the existing green infrastructure has advised the design of the proposed scheme. |   |   |  |  |
| Change requested:   |   |   |  |  |

Placemaking Options Plan Reference: Policy NE2 Number: 938 Respondent 151 Comment 14 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy NE2 Comment on the Site: Landscape p234 We support EPA NE2. Change requested: Respondent 224 Comment 58 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: | Policy NE2 Comment on the Site: **Change requested:** Policy should make specific mention of the WHS and OUV, and should reference the WHS Landscape Setting SPD. The implication of this is that all significant development in Bath requires LVIA. Respondent 301 Comment 11 Respondent **Respondent** South West HARP Number: Number: Name: **Organisation:** Planning Consortium **Agent ID:** 43 **Agent Name:** Tetlow King Planning Further Information available in the original comment? 

Attachments sent with the comment?

### Comment on the Site:

Policy 1(a) does not indicate that protection of landscapes is commensurate. There is clearly a distinction between designated and un-designated landscapes; as recognised in paragraph 113 of the NPPF. This is not currently evident within the policy wording. Re-wording of this 1(a) is required to recognise this. Of course, protection of undesignated landscapes is important, however the distinction must clearly be made.

Policy 3 is not appropriate. "All proposals with potential to impact on the landscape character of an area or on views" covers a significant number of proposals. "An impact" is not a suitable threshold. It would perhaps be pertinent to change this to significant or substantial impact, noting that pre-application advice should be sought to determine whether the development proposal meets this threshold.

Placemaking Options Plan Reference: Policy NE2

Plan Order

| Change requested:  |   |
|--|---|
|  |   |
|  |   |
| Respondent 3069 Comment 23 Respondent Cllr Anketell Jones Number: Name:  | Respondent                                  |
| Number: Name: Agent ID: Agent Name:  | Organisation:                               |
| Further Information available in the original comment?   Attachments see   | ent with the comment? $\Box$                |
|  |   |
| Placemaking Options Plan Reference: Policy NE2   |   |
| Comment on the Site:   |   |
| Landscape and Bath are inextricably linked. It's protection should be paramour worth to the city and neighbouring villages should be attempted.                  | nt and again, an estimate of its financial  |
|  |   |
| Change requested:  |   |
|  |   |
| Respondent 6346 Comment 2 Respondent   | Respondent Mactaggart and Mickel            |
| Number: Name:  | Organisation:                               |
| Agent ID: 205 Agent Name: Rocke Associates   |   |
| Further Information available in the original comment? $\Box$ Attachments see  | ent with the comment? $\Box$                |
| Placemaking Options Plan Reference: Policy NE2   |   |
| Comment on the Site:   |   |
| Landscape  Forgrain Policy Approach NE2  |   |
| Emerging Policy Approach: NE2 The emerging policy approach is potentially onerous, in particular for developments of the policy approach is potentially onerous. | ment on strategic greenfield sites. It has  |
| been accepted in allocating the strategic sites that there is likely to be some nedevelopment of previously undeveloped sites in open countryside beyond the     |   |
| potentially inconsistent with criterion 1(a) which requires development to prot  | tect and enhance local landscape character, |
| features and distinctiveness regardless of whether they enjoy national protection This policy should be amended to allow essential development allocated in the  |   |
| without conflicting with it. It is agreed that to revert to an approach relying on landscape protection areas  | s would be a retrograde step, and           |
| potentially inconsistent with delivering sustainable development.  | s would be a retrograde step, and           |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6392 Comment 4 Respondent Dr Virginia Williamson Number: Name:  | Respondent Bath Area Growers                |
| Number: Name: Agent ID: Agent Name:  | Organisation:                               |
|  | ent with the comment? $\square$             |
| •  |   |

| Schedule of Comments on the Flacemaking Flan Opt   |  |
|--|--|
| Placemaking Options Plan Reference: Policy NE2   |  |
|  |  |
| Comment on the Site:   |  |
| Final bullet point: This is the only positive reference to orchards in the do under NE3.   | ocument, other than inclusion in a list of habits      |
| Orchards should be treated as food sources, not just as habits. As such, the Orchards can also be integrated into urban landscaping, playing a role in contract the contract of the contract o |  |
| Change requested:  |  |
|  |  |
| Respondent 6426 Comment 12 Respondent Mr Steven Kerry Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachment  | nts sent with the comment? $\square$                   |
|  |  |
| Placemaking Options Plan Reference: Policy NE2   |  |
| Comment on the Site:   |  |
| In point 1(a) we recommend deleting 'regardless of whether they enjoy not of the guidance.   | ational protection', which adds nothing in terms       |
| Point 1(b) merely repeats NPPF paragraph 116 for major developments in policy to deal with 'non-major developments'.   | the AONB. It might be appropriate for the              |
| With regard to point 1(c) we would like to point out that community preference evaluation.   | erences should not override proper landscape           |
| Change requested:  |  |
| <del> </del>   |  |
|  |  |
|  |  |
| Respondent 6580 Comment 1 Respondent Mr Andrew Lord Number: Number: Name:  | Respondent Cotswolds Conservation Organisation: Board  |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachmen  | nts sent with the comment? $\square$                   |
| Placemaking Options Plan Reference: Policy NE2   |  |
|  |  |
| Comment on the Site:   |  |

The Cotswolds Conservation Board supports the reference at paragraph 2.225 to the AONB. However, we do recommend that additional text is added as to the specific guidance provided at Paras. 115 and 116 of the NPPF in relation to AONBs and the existence of additional guidance in the Cotswolds AONB Management Plan 2013-2018 and the associated Position Statements. These together provide very detailed guidance on the correct policy approach and detail on how to approach development within and within the setting of an AONB.

### **Change requested:**

See above - make additional reference to the guidance provided at Paras.115 and 116 of the NPPF, the Cotswolds AONB Management Plan 2013-2018 and associated Position Statements.

## Plan Order Placemaking Options Plan Reference: Policy NE3 Number: 946 Respondent 224 Comment 59 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE3 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 245 Comment 5 Respondent Mr Andy Reading **Respondent** Environment Agency Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE3 Comment on the Site: We are supportive of the strong emerging policy approach in relation to these topics. For clarity there may be potential in the future draft Placemaking Plan to combine these policies with the green infrastructure policy (NE1). It could also be argued that currently policy NE3 (sites, species and habitats) and policy NE5 (ecological networks) need to be made more consistent. For example NE3 allows development in instances where other benefits of the development outweigh the adverse impacts, while NE5 does not permit any development unless it makes positive contributions towards ecological networks. These different policy positions may need to be addressed to avoid confusion in applying the policies at the planning application stage. **Change requested:** Respondent 821 Comment 4 Respondent Deborah Porter **Respondent** Cam Valley Wildlife Number: Number: Name: **Organisation:** Group Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE3

The approach sounds fine on paper, but this approach has not worked in B&NES and we are having difficulty seeing how

Bath and North East Somerset Council

**Comment on the Site:**Sites, Species and Habitats

this plan will tackle the problem sufficiently well to make any significant step-change. There has been a consequent significant loss of biodiversity. Economic and transport benefits, whether having a soundly argued basis or not, are considered in B&NES to 'trump' wildlife and biodiversity value and the health or functionality of a biodiversity network in the case where there is a corporate or strategic argument in favour of a particular development. The view of the ecologist regarding situations where the ecological importance of retaining a site or habitats in situ outweighs the benefits presented has not been taken seriously enough in our opinion. Adequate mitigation and full compensation has too often not been required or ensured in planning decisions, regardless of the stipulations in natural environment policy, and B&NES has not sought to direct its own funding towards reversal of declines brought about by these decisions. We feel that the importance of sites, species and habitats is not being brought out adequately in this plan and that the strength of the policies needs to be boosted.

There has been a culture in B&NES that undervalues the importance of biodiversity resources in favour of economic benefits, a readiness to accept speculative or theoretic economic/developmental gains as benefits, and too heavy a reliance on the efficacy of mitigation and compensation for losses, which almost invariably do not appear to fully mitigate or compensate. The various of constraints to providing protection and enhancement of biodiversity and wildlife resources in the District has led to a significant overall loss of biodiversity and wildlife value within the District. The impact of wildlife and biodiversity protection initiatives within or outside the Council has not provided like value.

When considering the effectiveness of natural environment policies, we are aware that the B&NES Local Plan was examined and it was determined that there was no need to include in site-specific policies for sites of known sensitivity instruction that the requirements of key natural environment policies should be fulfilled. This was seen as unnecessary duplication and that the natural environment policies would be applied and, therefore, protect. In execution of decisions, however, a double-take was executed with regard to policies on ecological matters that advocated refusal or required full mitigation/compensation for losses, allowing full mitigation and compensation to be bypassed. We feel that it is vital that this plan makes it plain that this is not an option – otherwise, wildlife and biodiversity will continue to be 'trumped' and there will be no net gain to nature as required in the NPPF.

### Ecology

The context of the Ecology section is unsound. NPPF para 114 instructs LPAs to set out a strategic approach in their local Plan, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Whilst emerging policy Ecological networks policy NE. 5 seeks to create a network it is not protective of elements of a developing network. The NPPF makes a distinction between biodiversity and GI, which means that the impact of development on biodiversity networks should not be restricted to an identified GI network. The emerging The GI policy refers to effects on protected biodiversity, on designated sites and the contribution that these designated sites make to the ecological network (Ecology 2.229). In order to have an effective network, protection is needed for the features or locations that will make up that network in the future and we are not there yet.

### Policy NE.3

The policy is unsound. It is weaker than the combination of the B&NES Local Plan policies in respect of providing mitigation and compensation for the impact on locally important and nationally important species (many of which are not protected species). To provide habitat of equal value to habitat lost is a nonsense in respect of the conservation and enhancement of biodiversity, as there is no requirement in the policy to provide a resource that will support the species actually being lost and these may effectively be irreplaceable as has been the case in Radstock. It is easy for developers to claim that created or improved habitat will in time support a range of species as significant as those to be lost to development, but there is absolutely no proof that such claims actually deliver on their promises. Delivery of this outcome also depends entirely on there being access to the mitigation/compensation habitat by a range of species that are equal in value (locally, regionally and nationally) to the species lost to the immediate impact of development and to the effect of significant reductions in populations of important species. Also, further impacts such as losses due to changes to micro-habitats or conditions and/or to reduced habitat size in 'bad' years are a value that is lost but rarely factored in. It is easy for developers' consultants to claim that there are probably such replacement communities extant in the locale with no proof whatsoever. We cannot see how policy NE.3 adequately responds to this in order to protect the resource and ensure that there are net gains.

The policy refers to Section 41 of the NERC Act 2006 but does not refer to the Council's Section 40 duty under the Act, in which the key role that Local Authorities play in the conservation of biodiversity is recognised and formalised:

| "Every public body must, in exercising its functions have regard, so far a functions, to the purpose of conserving biodiversity".  | s is consistent with the proper exercise of those  |
|--|--|
| This includes protection of locally important species, which are not affor   | rded adequate protection under this policy.  |
| The policy will not deliver the Ecology policy aims set out on page 235.   |  |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 42 Respondent Number: Name:  | Respondent Transition Bath Organisation:   |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachm  | ents sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Policy NE3   |  |
| Comment on the Site:  Final bullet point: This is the only positive reference to orchards in the ounder NE3.  Orchards should be treated as food sources, not just as habits. As such, LCR8. Orchards can be integrated into urban landscaping, playing a role | they should be promoted and protected? Under   |
|  |  |
| Change requested:  |  |
| Respondent 6346 Comment 3 Respondent Number: Name:   | Respondent Mactaggart and Mickel Organisation:   |
| Respondent 6346 Comment 3 Respondent Number: Number: Name: Agent ID: 205 Agent Name: Rocke Associates  |  |
| Respondent 6346 Comment 3 Respondent Number: Number: Name: Agent ID: 205 Agent Name: Rocke Associates  | Organisation:  |
| Respondent 6346 Comment 3 Respondent Number: Name: Agent ID: 205 Agent Name: Rocke Associates Further Information available in the original comment?  Attachm  | organisation:  The ents sent with the comment?  The ents sent with the comment with the c |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |   |  |  |  |
|--|---|--|--|--|
| Respondent 6426 Comment 13 Respondent Mr Stev<br>Number: Number: Name:   | en Kerry Respondent Persimmon Homes Organisation: Severn Valley |  |  |  |
| Agent ID: Agent Name:  |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |  |  |  |
|  |   |  |  |  |
| Placemaking Options Plan Reference: Policy NE3   |   |  |  |  |
| Comment on the Site:   |   |  |  |  |
| Point 2(a) goes beyond NPPF paragraph 118.   |   |  |  |  |
| We recommend point 2(d) be extended with 'or features can be replaced'.  |   |  |  |  |
| As a matter of continuity and to avoid confusion, is there a difference between a 'watercourse' as stated in point 1(d) and a 'waterway' as stated in paragraph 3? |   |  |  |  |
| Change requested:  |   |  |  |  |
|  |   |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy NE4 Number: 951 Respondent 23 Comment 4 Respondent Dr Lucy Rogers Respondent Avon Wildlife Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE4 Comment on the Site: In addition, regarding the emerging policy approach for ecosystem services (p238: NE4), the Trust supports the need for a dedicated policy as spelt out in Option 1 so that this is embedded in the Council's planning policy and will be taken into account in determining whether development can take place. Ecosystem services is a wider concept than GI but is an essential tool to use in conjunction with it (the Guide published by the Wildlife Trusts and the TCPA illustrates how planners can use GI as a multi-functional resource capable of protecting and enhancing the natural environment and providing the landscape, ecosystem services and quality of life benefits required to underpin sustainability). A point that seems to be omitted from the emerging policy wording is that the natural environment also underpins our economy, providing an enormous range of products and services worth many billions of pounds to local, regional and national economies. It is essential that these wider benefits of ecosystem services are recognised more generally within the planning system and when development is considered. The Trust supports the proposal in point 3 that ecosystem services should be included within a Design and Access Statement and GI provision. 1 planning for a healthy environment –good practice guidance for green infrastructure and biodiversity. Town and Country Planning Association/The Wildlife Trusts. July 2012. 2 T. Sunderland (2012) Microeconomic Evidence for the Benefits of Investment in the Environment – Review. Natural England Research Report 033. Sheffield: Natural England. http://publications.naturalengland.org.uk/publication/32031 **Change requested:** Respondent 224 Comment 60 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

Comment on the Site:
Agree with policy approach.

**Change requested:** 

Placemaking Options Plan Reference: Policy NE4

| Schedule of Comments on the Placemaking Plan Optio  | ons Document in Plan Order  |
|---|---|
| Respondent 245 Comment 6 Respondent Mr Andy Reading Number: Name:   | Respondent Environment Agency Organisation:   |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments   | is sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy NE4  |   |
| Comment on the Site:  |   |
| We are supportive of the strong emerging policy approach in relation to the the future draft Placemaking Plan to combine these policies with the green  | ,   |
| t could also be argued that currently policy NE3 (sites, species and habitats) be made more consistent. For example NE3 allows development in instance outweigh the adverse impacts, while NE5 does not permit any development cowards ecological networks. These different policy positions may need to be the policies at the planning application stage. | es where other benefits of the development t unless it makes positive contributions |
| Change requested:   |   |
|   |   |
| Respondent 304 Comment 12 Respondent  | Respondent University of Bath   |
| Number: Number: Name:   | Organisation:   |
| Agent ID: 44 Agent Name: Define Planning and Design Ltd   |   |
| Further Information available in the original comment? $\Box$ Attachment  | is sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy NE4  |   |
| Comment on the Site:  |   |
| The University fully supports the intent of these policies, but as currently dropositive in that they are not proportionate in the protection they afford the as for example Policy NE3 is) and fail to recognise the implicit balancing of a facilitating sustainable development.   | to environmental features of differing value  |
| <b>Change requested:</b> As such the policies extend beyond the provisions of the NPPF, and should be   | be revised accordingly.   |
|   |   |
| Respondent 821 Comment 5 Respondent Deborah Porter Number: Name:  | Respondent Cam Valley Wildlife Organisation: Group                                  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attachments   | is sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy NE4  |   |

### **Comment on the Site:**

The beneficial impact of green spaces, especially natural green spaces on mental health and economic productivity are well documented and appear to be key elements of cultural services (See CABE research)There is a danger, in defining

cultural and other services in brackets within the policy, that important elements of those services will erroneously be

overlooked or deemed not to be as important as those specified. **Change requested:** Respondent 6426 Comment 14 Respondent Mr Steven Kerry **Respondent** Persimmon Homes Number: Number: Name: **Organisation:** Severn Valley Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Policy NE4 **Comment on the Site:** Ecosystem services have deeply entrenched relationships with other policy sources, green infrastructure, SUDs, and nature conservation for example therefore the inclusion of a stand-alone policy would be unnecessary. An inclusion of text that describes an approach to recognise wider benefits of ecosystem services such as that included in paragraph 109 of the NPPF, as detailed in Option 2 would be the more beneficial option. Reference to ecosystems through the adjoining policies could be made thereby detailing how the objectives could be delivered without over-complication through an additional policy. Policy approach option 2 also enables an assessment to be made based on the circumstances of each case.

**Change requested:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Policy NE5 Number: 956 Respondent 23 Comment 5 Respondent Dr Lucy Rogers Respondent Avon Wildlife Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE5 Comment on the Site: The Trust supports a dedicated 'ecological network' policy and welcomes the emerging policy wording for ecological networks (p239:NE5). We agree that it is essential to map these alongside the implementation of the GI strategy. We strongly support the other options outlined in points 1 and 2 i.e. to include Strategic Nature Areas, B-lines, woodlands and watercourses alongside buffers. **Change requested:** Respondent 224 Comment 61 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy NE5 Comment on the Site: Agree with policy approach. **Change requested:** Respondent 245 Comment 7 Respondent Mr Andy Reading **Respondent** Environment Agency Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

#### **Comment on the Site:**

We are supportive of the strong emerging policy approach in relation to these topics. For clarity there may be potential in the future draft Placemaking Plan to combine these policies with the green infrastructure policy (NE1).

It could also be argued that currently policy NE3 (sites, species and habitats) and policy NE5 (ecological networks) need to be made more consistent. For example NE3 allows development in instances where other benefits of the development outweigh the adverse impacts, while NE5 does not permit any development unless it makes positive contributions

Placemaking Options Plan Reference: | Policy NE5

| towards ecological networks. These different policy positions may need to the policies at the planning application stage.   | be addressed to avoid confusion in applying                      |
|---|--|
| Change requested:   |  |
|   |  |
|   |  |
| Respondent 281 Comment 17 Respondent Alison Howell Number: Name:  | <b>Respondent</b> Natural England <b>Organisation:</b>           |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachmen   | ts sent with the comment? $\Box$                                 |
| Placemaking Options Plan Reference: Policy NE5  |  |
| Comment on the Site: NE1, NE5 and NE6: we strongly support the approach of a dedicated policy trees and woodland.   | on GI, Ecological Networks and protecting                        |
| Change requested:   |  |
|   |  |
| Respondent 304 Comment 13 Respondent Number: Number: Name:  | Respondent University of Bath Organisation:                      |
| Agent ID: 44 Agent Name: Define Planning and Design Ltd   | v  |
| Further Information available in the original comment? $\Box$ Attachmen   | ts sent with the comment? $\square$                              |
| Placemaking Options Plan Reference: Policy NE5  |  |
| Comment on the Site:  |  |
| The University fully supports the intent of these policies, but as currently deprohibitive in that they are not proportionate in the protection they afford (as for example Policy NE3 is) and fail to recognise the implicit balancing of in facilitating sustainable development. | to environmental features of differing value                     |
| Change requested:   |  |
| As such the policies extend beyond the provisions of the NPPF, and should   | be revised accordingly.  |
|   |  |
| Respondent 821 Comment 6 Respondent Deborah Porter Number: Name:  | <b>Respondent</b> Cam Valley Wildlife <b>Organisation:</b> Group |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachmen   | ts sent with the comment? $\Box$                                 |
| Placemaking Options Plan Reference: Policy NE5  |  |
|   |  |

We support strongly the inclusion of a n ecological network policy such as the one suggested as long as there is additional

protection in policy NE.3 to protect elements that may become an important part of the network, particularly in the case of species that should be conserved in order that they can benefit from the network that is created.

We are wary of basing the mapping of ecological networks upon the presumption that the listed elements in para 2.238 are the key components. Certainly they should be viewed as important components, but there is a danger that if they are viewed as key components it will be assumed that to link them is perhaps more important than to put resources into other network development opportunities. There is no certainty that all the resources presently recognised as listed components are of good enough quality to warrant being considered to be key components of a well-functioning network Further work must be done in order to establish this. We think it is important to try to identify a potential network that will work. It is notable that some of the wildlife resources of the highest value in the District in recent years have not been recognised as important until 'too late', as they were not already one of the listed components. In Radstock, for example, the hub of the ecological network was not a designated resource, was subsequently allocated as a development opportunity in the B&NES Local Plan, and has now been effectively ripped out. The restoration areas idea could possibly help to replace some of the loss where this has happened in an area.

We think that the addition of the Other Options to the policy is desirable and that emerging work on networks may suggest the inclusion of other options.

| Number: Number: Na   | pondent<br>me:              | Respondent Radstock Land LP Organisation:               |
|--|-----------------------------|---|
| Agent ID: 162 Agent Name: Pegasus  | 1                           |   |
| Further Information available in the o   | riginal comment? $\Box$ At  | tachments sent with the comment? $\Box$                 |
| Placemaking Options Plan Reference:  | Policy NE5                  |   |
| Comment on the Site:   |                             |   |
| Change requested:  |                             |   |
| merging Policy Approach: NE5   |                             |   |
| merging policy NE5 is considered unne<br>nerefore be deleted.                  | ecessary due to its overlap | with other policies in the plan. The policy should      |
| he policy requires development to ma<br>n more detail by emerging policies NE3 |                             | ical networks – this matter is already adequately cover |
| Respondent 6415 Comment 18 Res   | •                           | Respondent Strongvox Homes                              |
| Number: Number: Na   | me:                         | Organisation:   |
|  |                             |   |
| Agent ID: 162 Agent Name: Pegasus<br>Further Information available in the o    |                             | tachments sent with the comment? $\Box$                 |

# Emerging Policy Approach: NE5 Emerging policy NE5 is considered unnecessary due to its overlap with other policies in the plan. The policy should therefore be deleted. The policy requires development to maintain and enhance ecological networks – this matter is already adequately covered in more detail by emerging policies NE3 and NE1. Respondent 6426 Comment 15 Respondent Mr Steven Kerry **Respondent** Persimmon Homes Number: Number: Name: **Organisation:** Severn Valley Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE5 Comment on the Site: We feel that this policy could easily be combined with policy NE3, and find a stand-alone policy for ecological networks unnecessary. **Change requested:**

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

**Change requested:** 

# Plan Order **Placemaking Options Plan Reference:** Policy NE6 Number: 964 Respondent 151 Comment 15 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE6 Comment on the Site: Trees and Woodland Conservation p241 The wording of para 1 of EPA NE6 requires further thought. It is difficult to envisage a development proposal that could not be judged by someone to have an adverse effect on "trees" of perceived value. That could create all sorts of unnecessary, inefficient and possibly mischievous discussions. Para 3 refers, perhaps more appropriately and practically, to veteran trees; maybe that is more what para 1 might be about. **Change requested:** Trees and Woodland Conservation p241 The wording of para 1 of EPA NE6 requires further thought. It is difficult to envisage a development proposal that could not be judged by someone to have an adverse effect on trees of perceived value. That could create all sorts of unnecessary, inefficient and possibly mischievous discussions. Para 3 refers, perhaps more appropriately and practically, to veteran trees; maybe that is more what para 1 might be about. Respondent 224 Comment 62 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE6 Comment on the Site: Agree with policy approach. This policy MUST be supported with an up-to-date evidence base, in particular character appraisals and management plan for the Bath Conservation Area. **Change requested:** Respondent 262 Comment 4 Respondent lan Lings Respondent Woodland Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy NE6

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### Comment on the Site:

Natural Environment – Trees & Woodland Conservation

We note the comments on ancient woodland in this section and we support EMERGING POLICY APPROACH: NE6 paras 1, 2 & 4. However, as regards para 3, it is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. 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 emerging national policy as set out below.

With B&NES' ancient woodland cover at 1.86%, below the average ancient woodland cover for Great Britain of 2.40%, it is vital that this Placemaking Plan document does all it can to protect the remaining resource in the Council area.

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.

Emerging national policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The Communities and Local Government (CLG) Select Committee published its report following its June 2014 inquiry into the 'Operation of the National Planning Policy Framework (NPPF)', in which it has specifically recognised the need for better protection for ancient woodland (Tues 16th Dec 2014). The CLG Select Committee report states: 'We agree that ancient woodland should be protected by the planning system. Woodland that is over 400 years old cannot be replaced and should be awarded the same level of protection as our built heritage. We recommend that the Government amend paragraph 118 of the NPPF to state that any loss of ancient woodland should be "wholly exceptional". We further recommend that the Government initiate work with Natural England and the Woodland Trust to establish whether more ancient woodland could be designated as sites of special scientific interest and to consider what the barriers to designation might be.' http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf.

This shows a clear direction of travel, recognising that the NPPF does not currently provide sufficient protection for ancient woodland. Until the NPPF is amended there is a clear role for Local Plans and associated documents to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF.

This recommendation should also 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 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 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'.

A good 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 Bristol City Council - Site Allocations and Development Management Policies (Adopted July 2014) [part of Local Plan) states that Policy DM17: Development Involving Existing Green Infrastructure

#### Trees

All new development should integrate important existing trees. Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted".

We would therefore like to see para 3 of EMERGING POLICY APPROACH: NE6 amended to read -

"Development proposals directly or indirectly affecting ancient woodland or ancient trees will not be accepted".

| <b>~</b> 1. |       |       |       |    |
|-------------|-------|-------|-------|----|
| n           | naa   | roali | OCTO! | м. |
| CIIC        | IIIKC | reau  | COLC  | u. |

| Respondent 304  | Comment 14     | Respondent                  | <b>Respondent</b> University of Bath |
|---|----------------|-----------------------------|--------------------------------------|
| Number:   | Number:        | Name:                       | Organisation:                        |
| Agent ID: 44 Ag   | gent Name: Def | ine Planning and Design Ltd |                                      |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                |                             |                                      |

| Placemaking | g Options P | lan Referen | ce: Po | licy NE6 |
|-------------|-------------|-------------|--------|----------|
|-------------|-------------|-------------|--------|----------|

#### Comment on the Site:

The University fully supports the intent of these policies, but as currently drafted they are considered to be too prohibitive in that they are not proportionate in the protection they afford to environmental features of differing value (as for example Policy NE3 is) and fail to recognise the implicit balancing of social, economic and environmental objectives in facilitating sustainable development.

#### **Change requested:**

As such the policies extend beyond the provisions of the NPPF, and should be revised accordingly.

| Schedule of Comments on the Placemaking Plan Options Do   | different in Flan Graci                                |
|---|--|
| Respondent 3069 Comment 24 Respondent Cllr Anketell Jones Number: Name:   | Respondent Organisation:                               |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                               |
| Placemaking Options Plan Reference: Policy NE6  |  |
| Comment on the Site:  2.241 Trees have a very high profile in the affections of Bath residents. The loss of objections and some dismay. The suggested emerging policy NE6 would go some is working to stem any losses.    | ,  |
| Change requested:   |  |
|   |  |
| Respondent 6414 Comment 20 Respondent Number: Name:   | Respondent Radstock Land LP Organisation:              |
| Agent ID: 162 Agent Name: Pegasus   |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                               |
| Placemaking Options Plan Reference: Policy NE6  |  |
| <b>Comment on the Site:</b> As currently worded emerging policy NE6 is not consistent with the NPPF as it doe benefit analysis to be undertaken.  | es not allow for a balancing exercise/cost-            |
| As currently worded part 1 of the policy states that "development will only be per adverse impact on trees [or veteran tree] and woodlands of wildlife, landscape, hivalue".  |  |
| Furthermore, part 1 of the policy is in direct conflict with part 4, which recognises unavoidable, appropriate compensation should be made.   | that where adverse impact is                           |
| Change requested:   |  |
| To be consistent with the NPPF the policy must be reworded to state that "develonable adequately mitigate for any adverse impact on trees, including veteran trees) and historic, amenity, productive or cultural value". | •  |
| -   |  |
| Respondent 6415 Comment 19 Respondent Number: Number: Name:   | <b>Respondent</b> Strongvox Homes <b>Organisation:</b> |
| Agent ID: 162 Agent Name: Pegasus   |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$                               |
| Placemaking Options Plan Reference: Policy NE6  |  |
|   |  |

Bath and North East Somerset Council

Comment on the Site:

Emerging Policy Approach: NE6

As currently worded emerging policy NE6 is not consistent with the NPPF as it does not allow for a balancing exercise/cost-benefit analysis to be undertaken.

As currently worded part 1 of the policy states that "development will only be permitted where... it does not have an adverse impact on trees [or veteran tree] and woodlands of wildlife, landscape, historic, amenity, productive or cultural value".

Furthermore, part 1 of the policy is in direct conflict with part 4, which recognises that where adverse impact is unavoidable, appropriate compensation should be made.

#### **Change requested:**

To be consistent with the NPPF the policy must be reworded to state that "development should seek to avoid or adequately mitigate for any adverse impact on trees, including veteran trees) and woodlands of wildlife, landscape, historic, amenity, productive or cultural value".

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy HE1 Number: 980 Respondent 151 Comment 16 Respondent Respondent DUNKERTON PARISH Number: Number: **Organisation: COUNCIL** Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy HE1 Comment on the Site: Heritage Assets p244 We support EPA HE1 paras 4 and 7, applicable to the industrial archaeology of the coal canal and mine workings in the Cam Valley as captured in our Parish Character Assessment (ref para 2.258). **Change requested:** Respondent 224 Comment 63 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy HE1 **Comment on the Site:** Policy HE1 MUST be supported with an up-to-date evidence base, in particular UP TO DATE character appraisals and management plan for the Bath Conservation Area. 7. Locally important heritage assets require identification. The HER must be easily accessible format. **Change requested:** Respondent 279 Comment 23 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Organisation: Name: Agent ID: **Agent Name:**

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

#### Comment on the Site:

The importance of the HE is perhaps underrated.

Placemaking Options Plan Reference: Policy HE1

Local and national evidence is available to demonstrate heritage has a key role in the districts economy. The anticipated rate of growth in the tourism sector alone highlights the importance of the historic environment, particularly Bath as a WHS, to the local and national economy and as a key asset to help achieve sustainable growth.

The heritage at risk register also includes conservation areas and historic parks and gardens.

Mindful of this welcome commitment might it be helpful to indicate when an appraisal for Bath may be forthcoming?

To guide prospective applicants and help to ensure such heritage assessments are robust, reference might be made to the availability of advice and guidance provided by English Heritage (Historic England post April 2015).

There is an opportunity to revisit, restructure and redraft this policy to help accord with national policy, avoid repetition and improve its clarity.

English Heritage would welcome the opportunity to discuss potential detailed changes.

Points 2 should be redrafted to more accurately reflect national policy.

English Heritage would welcome the opportunity to discuss potential detailed changes.

Point 3 appears to repeat point 5d.

English Heritage would welcome the opportunity to discuss potential detailed changes.

Text in this paragraph could be rationalised.

English Heritage would welcome the opportunity to discuss potential detailed changes.

The individual policies for each type of heritage asset could be combined as many of the requirements are generic. If retained they require adjustment.

English Heritage would welcome the opportunity to discuss potential detailed changes.

No reference is made to Battlefields.

English Heritage would welcome the opportunity to discuss potential detailed changes.

Might future development be expected to support the delivery of the WHS Management Plan? Is there a reason why only the WHS Setting SPD is referred to and not all other material planning guidance? English Heritage would welcome the opportunity to discuss potential detailed changes.

Reference to the Historic Environment Record is suggested.

English Heritage would welcome the opportunity to discuss potential detailed changes.

It may be helpful to also refer to locally important heritage assets as non-designated heritage assets (term used in national policy) and ensure a definition is provided in the glossary.

English Heritage would welcome the opportunity to discuss potential detailed changes.

#### **Change requested:**

Review and reemphasise the value of the HE to the local economy.

The Council will ...periodically update the Heritage at Risk Register working with English Heritage..

The help prospective applicants prepare robust and credible heritage assessments reference should be made to advice and guidance provided by Historic England.

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 828 **Comment** 8 Respondent **Respondent** Deeley Freed Estates Number: Number: Name: **Organisation:** Limited and DFE Projects Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy HE1 Comment on the Site: The first four paragraphs of Policy HE1 appear to be a restatement of parts of national policy with slight variations. The government advises against such an approach unless there is a good reason for it. Paragraph 5(a) of the policy refers to the objectives of the WHS Management Plan. That is concerned with management. Instead, the focus of HE1 needs to be simply (as stated in Core Strategy policy B4) ensuring no harm to the Outstanding Universal Value of the World Heritage Site, its authenticity and integrity. That focus is obscured by referring to the management plan and the reference should be deleted. Undue focus on the (important) setting also needs to be avoided. Additional text explaining the important reasons why Bath has been inscribed as a WHS could helpfully be included in the preceding text, outside the policy. Paragraph 5(c) of the policy refers to Conservation Areas and the necessary focus on the special character or appearance which justifies designation as an area of architectural or historical interest. It will be helpful if paragraph 5(c) of the draft policy is amended to make it clear that proposals will be judged against the particular elements of character and/or appearance which have justified designation of the conservation area concerned – a matter set out in the relevant designation report considered by the Council at the time of designation, or as updated in any subsequent formal conservation area enhancement statement prepared and adopted by the Council. **Change requested:** Paragraph 5(a) – delete reference to WHS management plan and WHS Setting SPD and replace with the phrase: "ensuring no harm to the Outstanding Universal Value of the World Heritage Site, its authenticity and integrity." Paragraph 5(c) - amend to make it clear that proposals will be judged against the particular elements of character and/or appearance which have justified designation of the conservation area concerned and specify (generically) the documents where that is stated. Respondent 2663 Comment 2 Respondent Ms Jacky Wilkinson Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:**

# Comment on the Site:

This policy should make clear reference to the protection of unlisted heritage assets. The Council should restart the Locally Listed Buildings SPD which was prepared and then abandoned in 2008. Please refer to the English Heritage Guidance "Local Listing - Good Practice Guide" 2012. This explains that local lists are good practice as they assist in identifying locally important buildings/structures before development proposals are made. It also recommends that there should be a relevant policy in the Local Plan. This is to ensure that the demolition of such structures can be resisted in accordance with the plan. There is case study where South Glos have done just this.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

In case this suggestion raises questions of resources, I would point out that the SPD is already written and that the list does not necessarily have to be done by the Council itself. Many Councils for example have lists of locally important

Placemaking Options Plan Reference: Policy HE1

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |
|--|
| historic parks and gardens compiled by the local gardens trust.  |
| In Bath there many highly historic and attractive unlisted buildings - Bath Press and the Fire Station being two examples that spring to mind.   |
| Change requested:  |
|  |
|  |
| Respondent 3069 Comment 25 Respondent Cllr Anketell Jones Respondent Number: Name: Organisation:   |
| Agent ID: Agent Name:  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy HE1   |
| Comment on the Site:   |
| The Placemaking Plan makes strong and convincing statements on the protection of heritage assets. It needs to do this because there is a leniency in the Planning process that condones the development of contemporary buildings within conservation areas and in close proximity to listed buildings. This approach to development in Bath is detrimental, undermining its true character and identity.  |
| Change requested:  |
|  |
|  |
| Respondent 6346 Comment 4 Respondent Respondent Mactaggart and Mickel Number: Name: Organisation:  |
| Agent ID: 205 Agent Name: Rocke Associates   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy HE1   |
| Comment on the Site:  Historic Environment Emerging Policy Approach: HE1  The policy approach is considered to be incorrect in terms of the approach to non-designated archaeological heritage assets of demonstrably equal significance to Scheduled Ancient Monuments (criterion 3). The latter benefit from statutory protection, and non-designated assets cannot be deemed to hold the same significance otherwise the presumption must be that they would have been scheduled. Therefore, unless an archaeological asset is designated as an SAM, it must be assumed not to have the same significance and cannot be granted the same policy status and protection as a SAM. |
| Change requested:  |

| Schedule of Comments on the Placemaking Plan Option   | ns Document in Plan Order  |
|---|--|
| Respondent 6410 Comment 6 Respondent Ms Gaynor Parkinson Number: Number: Name:  | Respondent Linden Homes Strategic Organisation: Land                                   |
| Agent ID: 28 Agent Name: Nash Partnership   |  |
| Further Information available in the original comment? $\Box$ Attachments   | s sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy HE1  |  |
| Comment on the Site:  |  |
| 6.1 Policy HE1 expects developments that will have an impact upon heritage significance of the assets. This is unduly onerous and goes beyond the NPPF planning applications to take account of the desirability of sustaining and en   | requirement (paragraph 131) for decisions on   |
| Change requested:   |  |
| We therefore request that point 1 to policy HE1 is amended to read - 'will be the heritage assets unless there are benefits or other reasons for not doing so, in and to consider opportunities for enhancing or better revealing the significant $\frac{1}{2}$   | n accordance with the provisions of the NPPF,  |
|   |  |
| Respondent 6426 Comment 16 Respondent Mr Steven Kerry Number: Name:   | Respondent Persimmon Homes Organisation: Severn Valley                                 |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments   | s sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy HE1  |  |
| Comment on the Site:  |  |
| In paragraph 3 it states that 'non-designated archaeological heritage assets a Scheduled Ancient Monuments'. This opens up the question as to how non-comeasured to be of equal significance to Scheduled Ancient Monuments. In a the same, and reaffirm the need to recognise the special significance of Sche | designated archaeological assets can be ny case we find it inappropriate to treat them |
| Change requested:   |  |
|   |  |

### Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Paragraph 2.259 Number: 982 Respondent 224 **Comment** 64 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Paragraph 2.259 **Comment on the Site:** Option 1. **Change requested:**

**Placemaking Options Plan Reference:** Somersetshire Coal Canal and the Wansdyke

Plan Order Number: 986

| Respondent 151 Comment 17 Res<br>Number: Number: Na | pondent<br>me:                  | Respondent DUNKERTON PARISH Organisation: COUNCIL   |
|---|---------------------------------|---|
| Agent ID: Agent Name:                               |                                 | 5.8454  |
| Further Information available in the or             | riginal comment?   Attachn      | nents sent with the comment? $\Box$   |
| Placemaking Options Plan Reference:                 | Somersetshire Coal Canal and    | the Wansdyke  |
| Comment on the Site:                                |                                 |   |
| Somerset Coal Canal p246                            |                                 |   |
| nfrastructure.  Change requested:                   |                                 |   |
|   | pondent Rohan Torkildsen<br>me: | Respondent English Heritage Organisation:   |
| Agent ID: Agent Name:                               |                                 |   |
| Further Information available in the or             | riginal comment?   Attachn      | nents sent with the comment? $\Box$   |
| Placemaking Options Plan Reference:                 | Somersetshire Coal Canal and    | the Wansdyke  |
| Comment on the Site:                                |                                 |   |
| • • •   | Somersetshire Coal Canal and    | ise the importance of and protect the intrinsic the Wansdyke and indicate the routes on the |
|   |                                 |   |
| Change requested:                                   |                                 |   |

# Placemaking Options Plan Reference: Policy LCR1

Plan Order Number: 994

| Respondent 151 Co<br>Number: N  |                    | pondent<br>me:                      | Respondent DUNKERTON PARISH Organisation: COUNCIL |
|---|--------------------|-------------------------------------|---|
| Agent ID: Agent   | : Name:            |                                     |   |
| Further Information a   | vailable in the oi | riginal comment?   Attachments sent | with the comment? $\Box$                          |
| Placemaking Options   | Plan Reference:    | Policy LCR1                         |   |
| Comment on the Site:  |                    |                                     |   |
| Local Community Facili  | ties p249          |                                     |   |
| We support EPAs LCR1  | and LCR2.          |                                     |   |
| Change requested:   |                    |                                     |   |
|   |                    |                                     |   |
|   |                    |                                     |   |
|   | _                  | pondent Mrs Jane Hennell<br>me:     | Respondent The Canal & River Trust Organisation:  |
| Agent ID: Agent   | : Name:            |                                     |   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                    |                                     |   |
| Placemaking Options   | Plan Reference:    | Policy LCR1                         |   |

#### **Comment on the Site:**

In an increasingly fast-paced and crowded world, our historic canals and rivers provide a local haven for people and nature. The Canal & River Trust (the Trust) is the charity entrusted with the care of 2,000 miles of waterways in England and Wales. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objects including:

To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;

To protect and conserve objects and buildings of heritage interest;

To further the conservation, protection and improvement of the natural environment of inland waterways; and

To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

Within the Bath & North Somerset district The Canal & River Trust act as Navigation Authority for parts of the River Avon, although in some sections we also own adjoining land which is used as a towpath. We also own and maintain the Kennet & Avon Canal.

We note that it is recommended that the Wansdyke and Somerset Coal Canal have their own policies While we have no objections to the promotion of these two assets we question whether the Kennet & Avon Canal and/or river corridor should benefit from a similar policy covering all aspects of it. This would be in line with the approach taken by Wiltshire Council who has a separate policy for the Kennet & Avon and Wilts & Berks Canal.

The canal is recognised in the placemaking document as a multi-functional asset but is then covered in a piecemeal fashion by lots of policies, for example the issues resulting to moorings and residential boaters are covered by a policy and recreational use by another. However the canal (and river) is also an ecological and water resource, a sustainable transport route, sometimes a public right of way, heritage asset, source of rural employment, landscape feature, catalyst for economic development and free health resource. It is inevitable that sometimes there will be overlap or conflict between the policies but this may be better avoided by a standalone policy relating to the use, protection and enhancement of the waterways. The Canal & River Trust would request the opportunity to discuss the need for such a policy further with the Council, and if deemed necessary provide possible examples for the wording of the policy and supporting text.

| Change requested:  |
|--|
|  |
| Respondent 163 Comment 1 Respondent Mr Ross Anthony Respondent The Theatres Trust Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy LCR1  |
| Comment on the Site:  The Theatres Trust supports Emerging Policy LCR1 as it reflects item 70 of the National Planning Policy Framework which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.  For clarity a description of community facilities should be included in the text and in the glossary, and we suggest this succinct all-inclusive description which would obviate the need to provide examples: community facilities provide for the health and wellbeing, spiritual, recreational, leisure and cultural needs of the community.  Change requested: |
|  |
| Respondent 274 Comment 3 Respondent Gary Parsons Number: Number: Name: Organisation:  Agent ID: Agent Name: Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Policy LCR1  |

#### **Comment on the Site:**

For sport buildings and land that are not playing pitches (swimming pools, tennis courts, athletics tracks etc) there should also be a wider Sport Strategy including swimming pools, sports halls and other non playing pitch sports. Sport England has recently produced a final technical guide for Assessing Needs & Opportunities (ANOG) regarding sport to accompany the NPPF (as referenced on the DCLG website).

http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/

We are also working with the Council on the production of this type of Strategy that should be adopted by June 2015. The work on this strategy started before the ANOG guidance was published, so whilst the emerging work is not ANOG

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order compliant, it has followed guidance published by Sport England. We would strongly recommend that B&NES use ANOG next time (by June 2018) in order to produce a LA wide assessment and develop a subsequent area wide strategy from. This work is imperative to meet local community and recreational needs (page 247). W **Change requested:** Respondent 4803 Comment 9 Respondent **Respondent** Waddeton Park Limited Number: Number: Name: **Organisation:** Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: | Policy LCR1 Comment on the Site: 4.5.1 Para 2.263 (p248) says that the Council should 'plan positively to meet the needs for social, recreational, cultural facilities and services'. We entirely agree with this sentiment and it is important that additional community facilities are provided to meet the needs of the growing and aging population. Para 2.273 says that 'new facilities will be supported provided they are in easily accessible locations and the land'. This sentence is left unfinished, and it unclear what it is going on to say. 4.5.2 In general we support these statements and encourage the plan to go further to identify suitable locations for these types of uses, specifically within Midsomer Norton. The area to the south of the town is well related to existing development, adjacent to housing, employment and sports facilities with easy access into the town centre. There is an opportunity to develop here and include community facilities and improve access up Silver Street. **Change requested:** Respondent 4815 Comment 2 Respondent Timothy Cantell **Respondent** Bear Flat Association Number: Number: Name: Organisation: (BFA) Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

#### Comment on the Site:

We commend the policies which support local shops, restricting change of use if the shops are 'useful' to the community (CR5) and which protect community buildings from development (LCR1).

#### Change requested:

Placemaking Options Plan Reference: Policy LCR1

|  | Schedule of Co    | mments on the Placemaki                          | ng Plan Options Docume    | ent in Plan Order       |              |
|--|-------------------|--|---------------------------|-------------------------|--------------|
| Respondent 6389                            | Comment 39        | Respondent                                       | Resp                      | ondent Cycle Bath       | l            |
| Number:                                    | Number:           | Name:  | Orga                      | anisation:              |              |
| Agent ID: Ag                               | gent Name:        |  |                           |                         |              |
| Further Information                        | on available in t | he original comment? $\Box$                      | Attachments sent with     | the comment? $\Box$     |              |
| Placemaking Option                         | ons Plan Refere   | nce: Policy LCR1                                 |                           |                         |              |
| Comment on the S                           | ite:              |  |                           |                         |              |
| That cycling provisi                       | on should be pr   | ovided following desire line                     | es                        |                         |              |
| ·  | ure, convenient   | arking / storage that is well and easy to access | l designed appropriate fo | or the development i    | e long term  |
| Change requested                           | <u> </u>          |  |                           |                         |              |
|  |                   |  |                           |                         |              |
|  |                   |  |                           |                         |              |
| Respondent 6500                            | Comment 2         | Respondent Mr Peter Fe                           | ar <b>Res</b> r           | ondent                  |              |
| Number:                                    | Number:           | Name:  | Orga                      | anisation:              |              |
| Agent ID: Ag                               | gent Name:        |  |                           |                         |              |
| Further Information                        | on available in t | he original comment? $\Box$                      | Attachments sent with     | the comment? $\Box$     |              |
| Placemaking Option                         | ons Plan Refere   | nce: Policy LCR1                                 |                           |                         |              |
| Comment on the S                           | ite:              |  |                           |                         |              |
| It is disappointing t<br>Community Asset T |                   | eference is made within th                       | e whole of the Placemaki  | ng Options documer      | nt to        |
| This process needs of closure.             | a Policy and Me   | thodology to enable Comr                         | nunities to safeguard imp | ortant local facilities | under threat |
| Change requested                           | :                 |  |                           |                         |              |
|  |                   |  |                           |                         |              |

Reference to a Community Asset Transfer process supported by an approved policy and methodology that would assist communities to navigate their way through the Community Asset Transfer process.

# Plan Order Placemaking Options Plan Reference: Public houses Number: 998 Respondent 274 **Comment** 4 **Respondent** Gary Parsons Respondent Sport England Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Public houses Comment on the Site: We support the Policy Aims as set out on page 248. **Change requested:** Respondent 4815 Comment 7 Respondent Timothy Cantell **Respondent** Bear Flat Association Number: Number: Name: Organisation: (BFA) Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Public houses

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### **Comment on the Site:**

BFA underlines the policy to prevent the redevelopment or change of use of a public house. We are keen to see The Bear and The Devonshire in our area continue as pubs. We favour Option 1.

#### **Change requested:**

# Number: 1003

Placemaking Options Plan Reference: Policy LCR2

| Respondent 151 Number:   | Comment 19 Res         | spondent<br>ame:           |                              | t DUNKERTON PARISH<br>on: COUNCIL |
|--|------------------------|----------------------------|------------------------------|-----------------------------------|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                        |                            |                              |                                   |
|  |                        |                            |                              |                                   |
| Comment on the   | Site:                  |                            |                              |                                   |
| Local Community  | Facilities p249        |                            |                              |                                   |
| We support EPAs  | LCR1 and LCR2.         |                            |                              |                                   |
| Change requeste  | d:                     |                            |                              |                                   |
|  |                        |                            |                              |                                   |
|  |                        |                            |                              |                                   |
| Respondent 262<br>Number:  |                        | spondent lan Lings<br>ame: | Responden<br>Organisatio     | t Woodland Trust<br>on:           |
| Agent ID:  | Agent Name:            |                            |                              |                                   |
| <b>Further Informat</b>  | ion available in the o | original comment?          | Attachments sent with the co | mment? $\square$                  |

#### **Comment on the Site:**

Meeting local community and recreational needs

Placemaking Options Plan Reference: Policy LCR2

In terms of meeting local community and recreational needs our response to your previous Placemaking Plan consultation asked for our Space for People publication to be taken into account given that this and the Woodland Access Standard (WASt) provide an important policy tool complimenting other access standards which can be used in delivering green infrastructure standards. However, this publication is still not acknowledged. Whilst the Placemaking Plan seeks to complement your Core Strategy by setting out in more detail the development aspirations and the planning requirement for the delivery of key development sites, if the WASt is acknowledged accordingly together with Space for People', which is the first UK-wide assessment of any form of greenspace, this would provide an important contributor to the design of green infrastructure and placemaking for Bath and North Somerset.

We therefore reiterate that we would like to see the importance of trees and woodland recognised for health & wellbeing and recreation. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. At the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to uppertier and unitary local authorities. This is reinforced by the Care Act 2014.

Although the relationship between the natural environment and health is a complex one, it is now widely accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.

Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.

Plan Order

This linkage between woodland and health is now firmly embedded in national Government policy for health, planning and forestry –

- Health: "Access to green spaces is associated with better mental and physical health across socioeconomic
  groups.....Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where
  tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health
  inequalities." Healthy Lives, Healthy People (Government White Paper, November 2010, paras 3.36-37).
- Planning: "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision." National Planning Policy Framework (DCLG, March 2012, para 73).
- Forestry: "Our trees, hedgerows, woods and forests contribute significantly to the quality of life in both rural and urban areas. Amongst other things, they enhance the local environment and biodiversity, support economic growth through regeneration, help mitigate the impact of climate change, assist in reducing air pollution and provide important health and educational benefits....The Natural Environment White Paper recognised the value and potential for green spaces to support and contribute to everyone's health and well-being. This is being reflected in the Public Health Outcomes Framework, which underpins the new public health duty of local authorities'. Government Forestry Policy Statement (Defra, January 2013, p.16).

Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our Space for People publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure.

The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:

- that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.

| Change requesto | ea: |
|-----------------|-----|
|-----------------|-----|

| Respondent 1556     | Comment 11         | Respondent          | Respondent Strategic Land                 |
|---------------------|--------------------|---------------------|---|
| Number:             | Number:            | Name:               | Organisation: Partnerships                |
| Agent ID: 128 Ag    | gent Name: Pete    | er Brett Associates |   |
| Further Information | on available in th | e original comment? | Attachments sent with the comment? $\Box$ |

#### Comment on the Site:

Para 2.263 (p248) says that the Council should plan positively to meet the needs for social, recreational, cultural facilities and services. We entirely agree with this sentiment and it is important that additional community facilities are provided to meet the needs of the growing and aging population. Para 2.273 says tha new facilities will be supported provided they are in easily accessible locations and the land. This sentence is left unfinished, and it is unclear what it is going on to say. In general we support these statements and encourage the plan to go further to identify suitable locations for these types of uses, specifically within Midsomer Norton. The sites to the south of the town are well related to existing development, adjacent to housing, employment and sports facilities with easy access into the town centre. There is an opportunity to improve access up Silver Street through the identification of land for additional retirements and affordable housing, extra

| care and much needed community facilities.  |   |
|---|---|
| Policy LCR2 says new development should be within or well related locations on the edge of existing settlement offer the opportunity community. Given that there are only very limited sites available we development boundaries are so tightly drawn, it will be necessary to the settlement.    | to provide new facilities which are needed by the vithin the settlement due to the fact that the        |
| Change requested:   |   |
| Sites to the south of Midsomer Norton should be considered as su comprehensive development.   | table for providing community facilities as part of a   |
| Respondent 4803 Comment 10 Respondent Number: Number: Name:   | Respondent Waddeton Park Limited Organisation:  |
| Agent ID: 128 Agent Name: Peter Brett Associates  |   |
| Further Information available in the original comment? $\Box$ Att   | achments sent with the comment? 🗹   |
| Placemaking Options Plan Reference: Policy LCR2   |   |
| Comment on the Site:  |   |
| 4.6.1 This policy says new development should be 'within or well remany locations on the edge of existing settlement offer the opport community. Given that there are only very limited sites available with development boundaries are so tightly drawn, it will be necessary to the settlement. | tunity to provide new facilities which are needed by the vithin the settlement due to the fact that the |
| Change requested:   |   |
|   |   |
| Respondent 6389 Comment 40 Respondent Number: Number: Name:   | Respondent Cycle Bath Organisation:   |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Att   | achments sent with the comment? $\square$   |
| Placemaking Options Plan Reference: Policy LCR2   |   |
| Comment on the Site:  |   |
| Agree – sustainable transport modes   |   |
| That cycling provision should be provided following desire lines  |   |
| That all developments have cycle parking / storage that is well des needs covered, secure, convenient and easy to access  | igned appropriate for the development ie long term  |

**Change requested:** 

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                                  |             |  |  |  |
|--|-------------|--|--|--|
| Respondent 6446 Comment 3 Respondent Respondent Number: Name: Organisation:                                  |             |  |  |  |
| Agent ID: 233 Agent Name: Turley Associates Limited  |             |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$      |             |  |  |  |
| Placemaking Options Plan Reference:  | Policy LCR2 |  |  |  |
| Comment on the Site:   |             |  |  |  |
| We support the Emerging Policy Approach LCR2 as currently detailed in the Placemaking Plan Options Document. |             |  |  |  |
| Change requested:  |             |  |  |  |
|  |             |  |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy LCR3 Number: 1009 Respondent 1556 Comment 12 Respondent Respondent Strategic Land Number: Number: **Organisation:** Partnerships Name: Agent ID: 128 Agent Name: Peter Brett Associates Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy LCR3 Comment on the Site: We note that the Midsomer Norton Neighbourhood Plan identified education as a key component of the Neighbourhood Plan, and understand that there is a projected shortfall in primary school capacity. The Core Strategy identifies the provision of 2470 new homes in the Somer Valley and while most have been committed there are still a considerable number to be built which will lead to a generation of a considerable number of children and requirement for new school places. While this policy includes specific provision for the expansion of Welton Primary school at Midsomer Norton, it is our belief that there is a need for more school places in this market town, especially in the south. Planning for the growth of the town in a comprehensive and holistic way allows for proper provision to be made for the long term. Given the way the administrative boundaries are drawn, so closely round Midsomer Norton, it is necessary for BANES and Midsomer Norton Town Council to actively engage and work with Mendip and Somerset Councils to identify the most appropriate location for a new school and ensure that this is adequately established to cater for local children. **Change requested:** Provision should be made for an existing school to the south of Midsomer Norton as set out above. Respondent 2611 Comment 43 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy LCR3 **Comment on the Site: Building for Schools** New schools need to be designed and built to the benefit and encourage sustainable transport modes as the core means

New schools need to be designed and built to the benefit and encourage sustainable transport modes as the core means of travel to school for pupils and staff.

We would also like to see them meet minimum as-built energy performance standards e.g. DEC 'A' ratings, as the current recently design buildings don't do this (Verco 2013 Schools Energy Survey) and rate very poorly compared with their Victorian counterparts on a CO2/m2 energy usage basis.

#### **Change requested:**

|   | Schedule of C  | comments on the Place   | emaking Plan Options Document in Plan Order   |
|---|--|---|---|
| Respondent 4803<br>Number:  | Comment 1 Number:  | 1 Respondent<br>Name:   | <b>Respondent</b> Waddeton Park Limited <b>Organisation:</b>  |
| Agent ID: 128 Ag  | gent Name: Po  | eter Brett Associates   |   |
| Further Information   | on available in  | the original comment  | ? Attachments sent with the comment?  |
| Placemaking Optic   | ons Plan Refer   | ence: Policy LCR3   |   |
| Comment on the S  | ite:   |   |   |
| Neighbourhood Pla<br>identifies the provis<br>considerable numb<br>new school places. | n, and unders<br>sion of 2470 neer to be built w<br>While this pol | tand that there is a pro<br>ew homes in the Some<br>which will lead to a gen<br>icy includes specific pro | In the definition of the second places in this market town, especially in the south.  |
| for the long term. G<br>necessary for BANE<br>Councils to identify                    | Given the way<br>S and Midsom<br>the most app                      | the administrative bou<br>er Norton Town Cound<br>ropriate location for a I                               | ensive and holistic way allows for proper provision to be made<br>ndaries are drawn, so closely round Midsomer Norton, it is<br>til to actively engage and work with Mendip and Somerset<br>new school and ensure that this is adequately established to cater<br>sets out the opportunity for a school to be incorporated as part of |
| Change requested  | :  |   |   |
|   |  |   |   |
|   |  |   |   |
| Respondent 6389<br>Number:  | Comment 4 Number:  | 1 Respondent Name:  | Respondent Cycle Bath Organisation:   |
| Agent ID: Ag  | gent Name:   |   |   |
| Further Information   | on available in  | the original comment  | ? $\square$ Attachments sent with the comment? $\square$  |
| Placemaking Optic   | ons Plan Refer   | ence: Policy LCR3   |   |
| Comment on the S  | ite:   |   |   |
| All schools must be   | easily accessi   | ble by bicycle  |   |
| That cycling provision  | on should be p   | provided following desi   | re lines  |
| Along highly desiral<br>provided  | ole routes whe   | ere there is a high – ove   | er 3000 per hr - volume of traffic segregated tracks must be  |
| Junction must be in   | nproved for pr   | iority of cycling over ve   | ehicles   |
| •   | •  | parking / storage that at and easy to access  | is well designed appropriate for the development ie long term   |
| Change requested  | •  |   |   |
|   |  |   |   |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                             |             |  |  |  |
|---|-------------|--|--|--|
| Respondent 6468 Comment 2 Respondent Mr N Barnett Respondent Umber: Name: Organisation:                 |             |  |  |  |
| Agent ID: Agent Name:   |             |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |             |  |  |  |
|   |             |  |  |  |
| Placemaking Options Plan Reference:   | Policy LCR3 |  |  |  |
| Comment on the Site:  |             |  |  |  |
| Should Farmborough Primary School be included under policy LCR3?  |             |  |  |  |
| Change requested:   |             |  |  |  |
|   |             |  |  |  |

# Placemaking Options Plan Reference: Policy LCR5

| Respondent 274 Comment 1<br>Number: Number:  | Respondent Gary Parsons Name: | Respondent Sport England Organisation: |  |  |
|--|-------------------------------|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                               |  |  |  |
| Placemaking Options Plan Reference: Policy LCR5  |                               |  |  |  |

#### Comment on the Site:

Thank you for consulting Sport England on the above Local Plan 'Placemaking Plan' options document. These comments attached build on those made on an earlier consultation dated 20 September 2013.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

The new Sport England Strategy 2012-17 sets a challenge to:

- See more people taking on and keeping a sporting habit for life
- Create more opportunities for young people
- Nurture and develop talent
- Provide the right facilities in the right places
- · Support local authorities and unlock local funding
- Ensure real opportunities for communities

Sport England has assessed the Placemaking Plan in the light of Sport England's Planning for Sport: Forward Planning guidance. A copy is enclosed with this letter and it can be found on our Planning for Sport section of the website http://www.sportengland.org/facilities-planning/planning-for-sport/

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (DCLG, 2012).
- Sport England's Planning for Sport webpages (2015).
- 1. Local Plan & Evidence Base

The National Planning Policy Framework (NPPF) published in March 2012 (replacing PPS12 & PPG17) states:

Paragraph 73 – Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to health and well-being of communities. Planning policies should be based on up-to-date assessment of the needs for open space, sport and recreation facilities and opportunities for new provision. The assessments should

Plan Order

Number: 1018

identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF) (formerly PPS12 and PPG17), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation in Bath and NE Somerset. We are, however, aware that the Council's Leisure Team are working on producing one with adoption of a Playing Pitch Strategy by June 2015.

3. Protection of Sport & Recreation including playing fields

Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). Thatsaid, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields) paragraph 74:

Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- •• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- •• the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Sport England would be very concerned if any existing playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility.

Sport England acknowledges the Emerging Approach LCR5 (page 255). This roughly follows the NPPF and our own national policy on protecting playing fields. In response to criterion 1 re: 'no longer demand or evidence' this needs to be justified by the emerging Playing Pitch and Sports Facility strategies (to be adopted by June 2015). Developers locking the gates does not demonstrate no demand! The Council may want to be clear on what they deem reasonable? Evidence of 'marketing the site' to the community/others at recreational land value for 3 years could be considered.

Sport England is not aware of any disposal of playing fields in this document, we need to protect what is needed to meet local community and recreational needs. In the event that we have missed a site allocation that affects playing fields or land last used as playing fields, please contact me direct immediately.

| and last used as playing fields, please contact me direct immedia | 1 , 3                                      |
|---|--|
| Change requested:   |  |
|   |  |
| Respondent 2611 Comment 44 Respondent Number: Name:               | Respondent Transition Bath Organisation:   |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ At  | tachments sent with the comment? $\square$ |
| Placemaking Options Plan Reference: Policy LCR5                   |  |
| Comment on the Site:  |  |
| Strongly agree  |  |

| Schedule of Comments on the Placemaking Pla                                  | an Options Document in Plan Order                 |
|--|---|
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6389 Comment 42 Respondent Number: Number: Name:                  | Respondent Cycle Bath Organisation:               |
| Agent ID: Agent Name:  | · ·   |
| Further Information available in the original comment?   Atta                | schments sent with the comment?                   |
| Atta   | ichinents sent with the comment:                  |
| Placemaking Ontions Plan Reference: Policy I CRE                             |   |
| Placemaking Options Plan Reference: Policy LCR5                              |   |
| Comment on the Site:   |   |
| Must be easily accessible by bicycle   |   |
|  |   |
| That cycling provision should be provided following desire lines             |   |
| Along highly desirable routes where there is a high – over 3000 per provided | hr - volume of traffic segregated tracks must be  |
| Junction must be improved for priority of cycling over vehicles              |   |
| That all developments have cycle parking / storage that is well design       | gned appropriate for the development ie long term |
| needs covered, secure, convenient and easy to access                         |   |
| Change requested:  |   |
| Change requested.  |   |
|  |   |

### Placemaking Options Plan Reference: Policy LCR6

Plan Order Number: 1023

| Respondent 244 Comment 6 Respondent Susan E Green Number: Number: Name:  Agent ID: Agent Name:                           | Respondent Home Builders Organisation: Federation |
|--|---|
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$                  |   |
| Placemaking Options Plan Reference: Policy LCR6  |   |
| Comment on the Site:   |   |
| Likewise under Policy LCR6 on financial contributions the Council will h "double dipping" between CIL and S106 payments. | ave to be mindful that there is no perceived      |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 262 Comment 6 Respondent lan Lings Number: Name:  | Respondent Woodland Trust Organisation:           |
| Agent ID: Agent Name:  | •   |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$                  |   |
| Placemaking Options Plan Reference: Policy LCR6  |   |

#### **Comment on the Site:**

Meeting local community and recreational needs

In terms of meeting local community and recreational needs our response to your previous Placemaking Plan consultation asked for our Space for People publication to be taken into account given that this and the Woodland Access Standard (WASt) provide an important policy tool complimenting other access standards which can be used in delivering green infrastructure standards. However, this publication is still not acknowledged. Whilst the Placemaking Plan seeks to complement your Core Strategy by setting out in more detail the development aspirations and the planning requirement for the delivery of key development sites, if the WASt is acknowledged accordingly together with Space for People', which is the first UK-wide assessment of any form of greenspace, this would provide an important contributor to the design of green infrastructure and placemaking for Bath and North Somerset.

We therefore reiterate that we would like to see the importance of trees and woodland recognised for health & wellbeing and recreation. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. At the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to uppertier and unitary local authorities. This is reinforced by the Care Act 2014.

Although the relationship between the natural environment and health is a complex one, it is now widely accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.

Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.

This linkage between woodland and health is now firmly embedded in national Government policy for health, planning and forestry –

- Health: "Access to green spaces is associated with better mental and physical health across socioeconomic
  groups.....Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where
  tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health
  inequalities." Healthy Lives, Healthy People (Government White Paper, November 2010, paras 3.36-37).
- Planning: "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision." National Planning Policy Framework (DCLG, March 2012, para 73).
- Forestry: "Our trees, hedgerows, woods and forests contribute significantly to the quality of life in both rural and urban areas. Amongst other things, they enhance the local environment and biodiversity, support economic growth through regeneration, help mitigate the impact of climate change, assist in reducing air pollution and provide important health and educational benefits....The Natural Environment White Paper recognised the value and potential for green spaces to support and contribute to everyone's health and well-being. This is being reflected in the Public Health Outcomes Framework, which underpins the new public health duty of local authorities'. Government Forestry Policy Statement (Defra, January 2013, p.16).

Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our Space for People publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure.

The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:

- that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

# Placemaking Options Plan Reference: Policy LCR7

Plan Order Number: 1032

| Respondent 154 Comment 5 Res<br>Number: Number: Na   | spondent Mrs Jane Hennell<br>ame: | <b>Respondent</b> The Canal & River Trust <b>Organisation:</b> |  |  |
|--|-----------------------------------|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                   |  |  |  |
| Placemaking Options Plan Reference:  | Policy LCR7                       |  |  |  |

#### Comment on the Site:

Recreational development proposals affecting waterways

In an increasingly fast-paced and crowded world, our historic canals and rivers provide a local haven for people and nature. The Canal & River Trust (the Trust) is the charity entrusted with the care of 2,000 miles of waterways in England and Wales. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objects including:

To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;

To protect and conserve objects and buildings of heritage interest;

To further the conservation, protection and improvement of the natural environment of inland waterways; and

To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

Within the Bath & North Somerset district The Canal & River Trust act as Navigation Authority for parts of the River Avon, although in some sections we also own adjoining land which is used as a towpath. We also own and maintain the Kennet & Avon Canal.

The Trust supports the councils comment that development proposals must be carefully controlled to avoid the gradual erosion of the inherent character of the Kennet & Avon canal, but mention that this can happen not just as a result of recreational development but all types of development alongside waterways. The text does not make it clear when or how the five identified canal related sites were chosen or why they are still considered as the only possible locations for water related recreational development.

Without this evidence we suggest that such a policy would be unsound and we recommend that either option 2 is taken forward, or that the desire to protect the waterway from unsuitable recreational development is taken forward in a specific waterway related policy which encompasses a much wider brief.

#### **Change requested:**

The text does not make it clear when or how the five identified canal related sites were chosen or why they are still considered as the only possible locations for water related recreational development.

Without this evidence we suggest that such a policy would be unsound and we recommend that either option 2 is taken forward, or that the desire to protect the waterway from unsuitable recreational development is taken forward in a specific waterway related policy which encompasses a much wider brief.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order                             |                  |                                     |  |  |
|---|------------------|-------------------------------------|--|--|
|   | spondent<br>nme: | Respondent Cycle Bath Organisation: |  |  |
| Agent ID: Agent Name:   |                  |                                     |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                  |                                     |  |  |
|   |                  |                                     |  |  |
| Placemaking Options Plan Reference:   | Policy LCR7      |                                     |  |  |
| Comment on the Site:  |                  |                                     |  |  |
| Important to safe guard and improve routes along canals and rivers for cycling                          |                  |                                     |  |  |
| Change requested:   |                  |                                     |  |  |
|   |                  |                                     |  |  |

# Placemaking Options Plan Reference: Telecommunications Development

Plan Order Number: 1039

| Respondent 279 Comment 25 Respondent Rohan Torkildsen Number: Name:  | Respondent English Heritage Organisation:  |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attack   | hments sent with the comment? $\Box$   |
|  |  |
| Placemaking Options Plan Reference: Telecommunications Develo  | pment  |
| Comment on the Site:   |  |
| Insensitive installation and location of apparatus can cause harm to d including for example townscapes, archaeology and historic surfaces. have the ability to influence practice with or without policy/and/or su            | The council should consider whether it needs to  |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 4311 Comment 1 Respondent Number: Name:   | Respondent 3, Telefonica (O2), EE Organisation: (formerly Orange & T-  |
| Agent ID: 184 Agent Name: Mobile Operators Association   |  |
| Further Information available in the original comment? $\Box$ Attack   | hments sent with the comment? $\Box$   |
|  |  |
| Placemaking Options Plan Reference: Telecommunications Develo  | pment  |
| Comment on the Site:  Thank you for your recent consultation on the above. We have consider the following comment on their behalf.   | dered the proposal relevant to the Mobile Operators  |
| We would take this opportunity to comment that we consider it importantly within the emerging Local Plan. We consider that the vital role and social fabric of communities merit the inclusion of a policy which developments. | that telecommunications play in both the economic $% \left( 1\right) =\left( 1\right) \left( $ |
| National guidance recognises this through Section 5: "Supporting high<br>Planning Policy Framework (March 2012) which provides clear guidant<br>telecommunications development.  | ·  |
| The National Planning Policy Framework (NPPF) at paragraph 42 conf   | irms that;   |
| "advanced, high quality communications infrastructure is essential foin 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   | e 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 emerging 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."

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy LCR8 Number: 1050 Respondent 225 **Comment** 1 **Respondent** Dr Virginia Williamson **Respondent** Bath & North East Number: Number: Name: **Organisation:** Somerset Allotments Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy LCR8 Comment on the Site: The Association supports the Council's intention to enhance policy CF.8. The inclusion of the paragraph about amenity land is fully supported. However, we have a number of queries: Policy CF.8 (para B3.40) referred to private allotments. These are not mentioned in LCR8. The term 'formal' allotments is used. A number of allotment sites within B&NES now have small orchards in 'difficult to cultivate' areas. The phrase "community value" in (i.) of CF.8 has been omitted from LCR8. This means other types of value, even commercial value, could be implied. CF.8 specifies accessibility as within 1,000m. The current version of the Green Spaces Strategy, which covers new allotment provision, defines accessibility as within 600m of residence. The GSS is due for revision this spring, so we would need to be assured that it does not reduce acceptable definition of accessibility below this distance. The Allotments Association would like to reach agreement with Planning Policy staff about the type of evidence required to demonstrate that land was last used for allotments. In the last 18 months, there have been two cases where planning officers have rejected evidence provided by former tenants and have introduced their own thresholds which are not included in CF.8. **Change requested:** Include private allotments. The legal term (in general use) for council-owned allotments is "statutory allotments". Include orchards in the list of amenity land. Change the wording so that (i.) of LCR8 reads "The importance of the development outweighs the community value of the site as allotments and ..."

| Respondent 225 Comment Number: Number:   | 7 Respondent Dr Virginia Williamson Name: | <b>Respondent</b> Bath & North East <b>Organisation:</b> Somerset Allotments |
|--|---|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |   |  |
| Placemaking Options Plan Reference: Policy LCR8  |   |  |

# Comment on the Site:

The Association supports the Council's intention to enhance policy CF.8. The inclusion of the paragraph about amenity

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |   |  |  |  |
|--|---|--|--|--|
| land is fully supported. However, we have a number of queries:   |   |  |  |  |
| Policy CF.8 (para B3.40) referred to private allotments. These are not mentioned in LCR8. (see Change)   |   |  |  |  |
| The term 'formal' allotments is used. Do you mean statutory? (see Change)  |   |  |  |  |
| A number of allotment sites within B&NES now have small orchards in 'difficult to cultivate' areas. (see Change)   |   |  |  |  |
| The phrase "community value" in (i.) of CF.8 has been omitted from LCR8. This means other types of value, even commercial value, could be implied. (see Change)  |   |  |  |  |
| CF.8 specifies accessibility as within 1,000m. The current version of the Green Spaces Strategy, which covers new allotment provision, defines accessibility as within 600m of residence. The GSS is due for revision this spring, so we would need to be assured that it does not reduce acceptable definition of accessibility below this distance.                              |   |  |  |  |
| The Allotments Association would like to reach agreement with Planning Policy staff about the type of evidence required to demonstrate that land was last used for allotments. In the last 18 months, there have been two cases where planning officers have rejected evidence provided by former tenants and have introduced their own thresholds which are not included in CF.8. |   |  |  |  |
| The Association has a number of other comments about paragraphs within the Placemaking Plan, but this format doesn't permit these comments to be made on-line. They will therefore be submitted in hard copy.  |   |  |  |  |
| Change requested:  |   |  |  |  |
| Include private allotments.  | _ |  |  |  |
| The legal term (in general use) for council-owned allotments is "statutory allotments".  |   |  |  |  |
| Include orchards in the list of amenity land.  |   |  |  |  |
| Change the wording so that (i.) of LCR8 reads "The importance of the development outweighs the community value of the site as allotments and …"  |   |  |  |  |
|  | _ |  |  |  |
| Respondent 279 Comment 26 Respondent Rohan Torkildsen Respondent English Heritage Number: Name: Organisation:  |   |  |  |  |
| Agent ID: Agent Name:  |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |  |  |  |
| Placemaking Options Plan Reference: Policy LCR8  |   |  |  |  |
| Comment on the Site:   |   |  |  |  |
| Do the District's allotments contribute to the local historic character of an area and therefore be considered to be non-designated heritage assets?   |   |  |  |  |
| Change requested:  |   |  |  |  |

| Schedule   | of Comments on the Placemak  | ng Plan Options Document in Plan Order   |
|--|--|--|
| Respondent 314 Commer<br>Number: Number  | nt 1 Respondent Ms Helen W<br>r: Name:   | oodley Respondent Organisation:  |
| Agent ID: Agent Name   | e:   |  |
| Further Information available  | le in the original comment? $\Box$   | Attachments sent with the comment? $\Box$  |
|  |  |  |
| Placemaking Options Plan Ro  | eference: Policy LCR8  |  |
| Comment on the Site:   |  |  |
| wish to support the Allotme<br>Policies. I would also like to a                            | add, in relation to LCR8, that 600 king and cycling; and that that dis                                     | in particular on Local Food, Green Spaces and Allotments m should be the maximum distance from home to stance should be shorter in hilly territory. 1000m can be too   |
| Change requested:  |  |  |
| As for the Allotment Associati   | ion's representation, with the ac  | ldition of the above.  |
|  |  |  |
| Respondent 2611 Commer<br>Number: Number   | •  | Respondent Transition Bath Organisation:   |
| Agent ID: Agent Name   | e:   |  |
| Further Information availabl   | le in the original comment? $\ \Box$   | Attachments sent with the comment? $\Box$  |
| Placemaking Options Plan Re  | eference: Policy LCR8  |  |
| Comment on the Site:   |  |  |
| The new policies on rural issuvery good to see. However, the approaches up. It may be that | he sections on residential develo<br>at the different sections were wr<br>see daily needs shopping, edible | ispersed local shops, on food growing opportunities, etc. are appeared and urban design don't seem to have picked these litten in isolation, but it gives the impression of lack of joineder landscapes, etc., built into those policies. Key changes we |
| <ul> <li>Provision for allotments in t<br/>site allotment provision as pe</li> </ul>       |  | evelopments (1.36-1.53) – currently none are required. On-   |
| Option 4   |  |  |
|  | ing car usage and therefore carb   | side development, providing accessible fresh food for on emissions, pollution and congestion; this is preferable to  |
| existing buildings as well as no   | ew developments. This would al   | xample with edible micro gardens or the use of solar PV on so help reduce the monolithic landscape which has been which is visible from the surrounding hills  |
|  | These impact on other groups apage on planning experience from o   | art from school children e.g. University students, and it ther cities  |

• Orchards: we would like to see a greater promotion of orchards and fruit growing trees throughout the Placemaking

• We recommend learning how other local authorities, e.g. Brighton & Hove, have developed policies and procedures to

Plan particularly as part of large housing developments

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order inject local food growing and urban agriculture into the planning process. **Change requested:** Respondent 2611 Comment 45 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy LCR8 Comment on the Site: Strongly support: agree with wording on allotments **Change requested:** Respondent 2890 Comment 1 Respondent Mrs Jacqueline Burrows Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy LCR8 Comment on the Site: • I strongly support the enhancement of Policy CF8 • I strongly support the inclusion into CF8 of the paragraph referring to amenity land. Policy LCR8 should cover private as well as statutory allotments. • CF8 describes allotment land as having 'community value', but LCR8 refers only to 'value'. The words 'community value' should be reinstated in LCR8 for avoidance of risk or misinterpretation regarding commercial value. • If development should ever (hopefully not) be allowed on an allotment space, the developer must provide replacement allotments within a specified distance. This must be strictly observed and enforced. CF8 specified within 1,000 metres. However LCR8 refers to the Green Spaces Strategy which specifies a distance of 600 metres. The Council must protect the distance requirement (viz accessibility) when the Green Spaces Strategy is revised in 2015. **Change requested:** • Policy LCR8 should cover private as well as statutory allotments The words 'community value' should be reinstated in LCR8 for avoidance of risk or misinterpretation regarding commercial value.

• the paragraph referring to amenity land should be included into CF8

| S  | chedule of Co     | mments on the Placemaking Plan Options Do       | cument in Plan Order                                 |
|--|-------------------|---|--|
| Respondent 3058 (Number:                       | Comment 1 Number: | Respondent Mr Bernard Morgan Name:              | Respondent Organisation:                             |
| Agent ID: Age                                  | nt Name:          |   |  |
| Further Information                            | available in th   | ne original comment? $\Box$ Attachments sent    | with the comment? $\Box$                             |
|  |                   |   |  |
| Placemaking Option                             | s Plan Referen    | Policy LCR8                                     |  |
| Comment on the Sit                             | .0.               |   |  |
|  |                   | or the Allotments Association's comments on L   | LCR8 and LCR9 .                                      |
| Change requested:                              |                   |   |  |
| As specified in the All                        | lotment Associ    | ation's submission.                             |  |
|  |                   |   |  |
| <b>D</b>                                       |                   |   |  |
| Respondent 4815 (Number:                       | Comment 8 Number: | Respondent Timothy Cantell Name:                | Respondent Bear Flat Association Organisation: (BFA) |
| Agent ID: Age                                  | nt Name:          |   | (2004)   |
|  |                   | ne original comment?   Attachments sent         | with the comment? $\Box$                             |
|  |                   |   |  |
| Placemaking Option                             | s Plan Referen    | rce: Policy LCR8                                |  |
|  |                   |   |  |
| REA agrees that any l                          |                   | nts or informal food growing spaces should be   | resisted Roth the allotments in our                  |
|  |                   | ce and to Alexandra Park, not only meet dema    |  |
| character of the area                          | and provide v     | alued community assets. We support LCR8.        |  |
| Change requested:                              |                   |   |  |
|  |                   |   |  |
|  |                   |   |  |
| Respondent 6377                                | Comment 1         | Respondent 'WiCCiam 'f. OatCey                  | Respondent   |
| Number:  | Number:           | Name:   | Organisation:  |
| Agent ID: Age                                  | nt Name:          |   |  |
| Further Information                            | available in th   | ne original comment?   Attachments sent         | with the comment? $\Box$                             |
| Placemaking Option                             | es Plan Poforon   | Policy I CP8                                    |  |
| i lacemaning Option                            | is i ian neiciel  | i oney teno                                     |  |
| Comment on the Sit                             |                   |   |  |
| "I am writing to supp<br>4 and 5 set out on pa | •                 | on of policies LRC8 and LRC9, but would like to | see LRC9 amended in line with Options                |
|  | 18C 2U2.          |   |  |
| Change requested:                              |                   |   |  |

| Schedule of Comments on the Placemaking Plan Options   | Document in Plan Order                                   |
|--|--|
| Respondent 6392 Comment 6 Respondent Dr Virginia Williamson Number: Number: Name:  | <b>Respondent</b> Bath Area Growers <b>Organisation:</b> |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachments s   | Sent with the comment? $\Box$                            |
| Placemaking Options Plan Reference: Policy LCR8  |  |
| Comment on the Site: Policy CF.8 (para B3.40) referred to private allotments. These are not mention A number of allotment sites within B&NES now have small orchards in 'difficu' The phrase "community value" in (i.) of CF.8 has been omitted from LCR8. It not to the community, not for commercial gain.   | lt to cultivate' areas.                                  |
| Change requested: Include private allotments. Include orchards in the list of amenity land. Change the wording so that (i.) of LCR8 reads "The importance of the develop site as allotments" and"  | ment outweighs the community value of the                |
| Respondent 6509 Comment 1 Respondent Mrs Lucy Gulotti Number: Name:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments s   | Respondent Organisation:                                 |
| Placemaking Options Plan Reference: Policy LCR8  |  |
|  |  |
| Comment on the Site:  CF.8 describes allotment land as having community value, but LCR8 refers me be interpreted as commercial value. The words community value should be re  LCR8 should cover private as well as statutory allotments.   | ,  |
| If development was ever allowed on an allotment, the developer would have specific distance. CF.8 specified within 1,000 metres. LCR8 refers to the Green of 600 metres. We want to see this distance (a.k.a accessibility) protected what the contract of the | n Spaces Strategy which specifies a distance             |
| Change requested:  |  |
|  |  |
| Respondent 6556 Comment 1 Respondent Mr Peter Rybacki Number: Number: Name:  | Respondent<br>Organisation:                              |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments s  | sent with the comment? $\square$                         |
| Placemaking Options Plan Reference: Policy LCR8  |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Comment on the Site:** This should cover private as well as statutory allotments. CF.8 describes allotment land as having "community value". LCR8 refers merely to "value". To avoid an unintended interpretation of 'commercial value' the words "community value" should be reinstated in LCR8. CF.8 specified that replacement allotments should be within 1,000 metres. LCR8 refers to the Green Spaces Strategy which specifies a distance of 600 metres. This distance (a.k.a accessibility) should be protected when the Green Spaces Strategy is revised later this year **Change requested:** Respondent 6565 Comment 1 Respondent Mrs Carolyn Turner Respondent Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy LCR8

I would support this policy - protecting existing allotment sites is a valuable contribution to local community life.

Comment on the Site:

**Change requested:** 

## Placemaking Options Plan Reference: Policy LCR9

Plan Order Number: 1051

| Respondent 224 Comment 65 Respondent Number: Name:  | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachmen                                 | nts sent with the comment? $\square$                           |
| Placemaking Options Plan Reference: Policy LCR9   |  |
| Comment on the Site:  |  |
| Support Option 5.   |  |
| Change requested:   |  |
| Respondent 225 Comment 6 Respondent Dr Virginia Williamson Number: Number: Name:  Agent ID: Agent Name: | Respondent Bath & North East Organisation: Somerset Allotments |
| Further Information available in the original comment? $\Box$ Attachmen                                 | nts sent with the comment? $\Box$                              |
| Placemaking Options Plan Reference: Policy LCR9   |  |

#### **Comment on the Site:**

The Association is glad to support LCR9. A minor amendment to the main text would be to include orchards in the list of growing spaces to be provided within developments.

The Association also supports Option 4, which we understand to mean that developments of 140 dwellings or more will have on-site allotment provision. However, we are unsure of the purpose/meaning of Option 5. Does it mean that developments of fewer than 140 dwellings will be required to fund allotment provision via S106 agreements? It is difficult to comment on the method of allotment funding when the different options are not made specific.

The key point is that the Council says it has no land available for the creation of new allotment sites. All new development creates demand, and there is existing latent demand. Therefore, developers must provide on-site allotments for developments of any size (the threshold of 140 dwellings in Option 4 is in line with the current Green Spaces Strategy). This is preferable for other reasons, apart from land availability: security is better, ease of access results in better cultivation. If the Council is convinced that the developer is unable to provide on-site allotments, then it must require the developer to provide the full cost of off-site provision, including the purchase of accessible, suitable (i.e. Of horticultural quality) land according to the formula in the Green Spaces Strategy and in accordance with the Allotment Site Selection guidelines and the Design Guide (i.e. Paras 2.302-2.305).

#### **Change requested:**

The comments made above should be taken into account in the revision of the document, i.e. by September 2015.

| Schedule of Comments on the Placemaking Plan Option   | s Document in Plan Order  |  |  |
|---|---|--|--|
| Respondent 225 Comment 8 Respondent Dr Virginia Williamson Number: Name:  | Respondent Bath & North East Organisation: Somerset Allotments                          |  |  |
| Agent ID: Agent Name:   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments   | sent with the comment? $\Box$   |  |  |
| Placemaking Options Plan Reference: Policy LCR9   |   |  |  |
| Comment on the Site:  |   |  |  |
| The Association is glad to support LCR9. A minor amendment to the main tex growing spaces to be provided within developments. However, the following  |   |  |  |
| The Association also supports Option 4, which we understand to mean that dhave on-site allotment provision. However, we are unsure of the purpose/m developments of fewer than 140 dwellings will be required to fund allotment to comment on the method of allotment funding when the different options  | neaning of Option 5. Does it mean that t provision via S106 agreements? It is difficult |  |  |
| The key point is that the Council says it has no land available for the creation of new allotment sites. All new development creates demand, and there is existing latent demand. Therefore, developers must provide on-site allotments for developments of any size (the threshold of 140 dwellings in Option 4 is in line with the current Green Spaces Strategy). This is preferable for other reasons, apart from land availability: security is better, ease of access results in better cultivation. If the Council is convinced that the developer is unable to provide on-site allotments, then it must require the developer to provide the full cost of off-site provision, including the purchase of accessible, suitable (i.e. Of horticultural quality) land according to the formula in the Green Spaces Strategy and in accordance with the Allotment Site Selection guidelines and the Design Guide (i.e. Paras 2.302-2.305). |   |  |  |
| Change requested:   |   |  |  |
|   |   |  |  |
| Respondent 2611 Comment 46 Respondent Number: Number: Name: Agent ID: Agent Name:   | Respondent Transition Bath Organisation:  |  |  |
| Further Information available in the original comment?   Attachments  | sent with the comment? $\Box$   |  |  |
| Placemaking Ontions Plan Reference: Policy I CRQ  |   |  |  |

#### **Comment on the Site:**

A minor amendment to the main text would be to include orchards in the list of growing spaces to be provided within developments

Brighton & Hove Council include questions about food growing space in their planning application questionnaire. They have also been able to get developers to take some innovative approaches to food growing: See link - Brighton & Hove City Council: Food Growing Planning Advice Note

Object: Given the shortage of allotment land in Bath and long waiting lists we urge the council to adopt 'Option 4' requiring developers of large developments over 140 homes to provide on-site allotments, 'Option 5' would be a less acceptable alternative

Given on all 3 MOD sites, while recognising the need for allotments, the council has agreed a financial contribution instead without plans for delivering allotments. We think there should be a Grampian condition imposed on all large developments to ensure allotments are built on-site or nearby.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  Change requested:   |
|--|
| Respondent 2890 Comment 2 Respondent Mrs Jacqueline Burrows Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?   |
| Placemaking Options Plan Reference: Policy LCR9  |
| Comment on the Site:  I strongly support the introduction of Policy LCR9 relating to allotment provision. Option 4 of LCR9 requires developers to create allotments on any site where 140 or more dwellings are built. This must be strictly observed and enforced.  I support the amendment of LCR9 to include Option 4 (on-site provision) and smaller residential developments being required to contribute to allotment provision.  I understand that Curo is resisting providing any allotments at Foxhill/Mulberry Park, but this must be a requirement of any planning permission or future build, and strictly enforced. Similarly any other large developments in the City (Warminster Road, Lansdown MoD etc).  Better Council management of existing allotment sites (faster enforcement of non-cultivation, requirements to remove large fruit trees and overhanging hedges etc) would alleviate some of the pressure on demand for allotments in the City. Self-management is not a viable option.  Change requested: |
| Respondent 3058 Comment 2 Respondent Mr Bernard Morgan Respondent Number: Name: Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy LCR9  |
| Comment on the Site: I would like to record my support for the Allotments Association's comments on LCR8 and LCR9.  Change requested: As specified in the Allotment Association's submission.  |
| Respondent 6377 Comment 2 Respondent 'WiCCiam 'f. OatCey Respondent Organisation:  Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment?  Placemaking Options Plan Reference: Policy LCR9   |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order **Comment on the Site:** "I am writing to support the adoption of policies LRC8 and LRC9, but would like to see LRC9 amended in line with Options 4 and 5 set out on page 262." **Change requested:** Respondent 6392 Comment 1 Respondent Dr Virginia Williamson **Respondent** Bath Area Growers Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy LCR9 **Comment on the Site:** Maps 24 and 25 of Bath City Riverside enterprise area masterplan 2014-2029....... These maps indicate 2 edible walls along the river. This is the only reference we could find to locations for informal food growing, referred to in pp.260-262 of the Options document. **Change requested:** Different types of informal food growing, such as rooftop gardens, edible landscaping and edible walls should be encouraged along the river corridor developments. Cordon fruit trees could provide living 'railings'. Respondent 6509 Comment 2 Respondent Mrs Lucy Gulotti Respondent Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: |Policy LCR9 **Comment on the Site:** LCR9 should be amended to include Option 4 (on-site provision) and smaller residential developments required to contribute to allotment provision to address increased demand. Change requested: Respondent 6556 Comment 2 Respondent Mr Peter Rybacki Respondent Number: Number: Name: **Organisation:** Agent ID: **Agent Name:**

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

#### **Comment on the Site:**

Placemaking Options Plan Reference: | Policy LCR9

# Change requested: All residential developments (including smaller than 140 ) should be required to contribute to allotment provision. Respondent 6565 Comment 2 Respondent Mrs Carolyn Turner Respondent Number: Number: Name: Organisation: Agent ID: Agent Name: Further Information available in the original comment?

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### **Comment on the Site:**

Placemaking Options Plan Reference: Policy LCR9

Well-formulated policy, but please do incorporate the options for requiring developers to include (and to pay for) the establishment of new allotment sites as part of their planning obligations where the need is likely to arise (options 4/5 on page 262 of the Options document).

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Placemaking Options Plan Reference: Sustainable Transport - Context /

Paragraph 2.306

Plan Order Number: 1053

| Respondent 102 Comment 35<br>Number: Number:   | Respondent Robin Kerr<br>Name: | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|--|--------------------------------|---|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                                |   |  |  |
| Placemaking Options Plan Referen   | ce: Sustainable Transport      | t - Context / Paragraph 2.306   |  |  |

#### **Comment on the Site:**

This section should refer to the transport strategies for Bath (and Keynsham and Radstock). The Bath Transport Strategy recognises that Bath suffers from high levels of traffic and air pollution and that the intrusion of traffic needs to be reduced. The entire road network in the city suffers from air pollution above the legal limit, a fact recognised by its designation as an Air Quality Management Area.

The Placemaking Place should also recognise explicitly the connection between development and traffic generation. The potential development sites within Bath defined in the draft plan are extensive, and development options are suggested for each area. Each option will generate traffic which will have a local impact, and there will also be an aggregate effect on the road network, with considerable traffic growth. We have yet to see any modelling of the land use options or an assessment of the aggregate impact. If such work has been undertaken, it is not reported in the draft Plan nor in the Sustainability Appraisal. The conclusion from an analysis of the consequences for traffic growth can be either to plan for the additional growth, or conversely, to reconsider the development options and plan for less intensive use of the land. The Placemaking Plan needs to address this issue fairly and squarely, and to make it clear that, even though all these sites have been identified as in principle suitable for housing development, before any permissions are granted there must be proper studies of their traffic impact on the whole city and its distributor roads, and their availability for development must be held back until any work necessary to improve highways, public transport or traffic management has been planned, funded and committed. We propose below suggestions to strengthen this section of the Plan.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |
|                   |  |  |  |

Placemaking Options Plan Reference: Sustainable Transport - Context /

Paragraph 2.307

Plan Order Number: 1054

Respondent 102 Comment 36 Respondent Robin Kerr
Number: Number: Name: Organisation: Residents' Associations

Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: Sustainable Transport - Context / Paragraph 2.307

Comment on the Site:

#### **Change requested:**

Add a new policy aim: "To reduce traffic congestion and air pollution and the intrusion of vehicles in urban areas". (This is based on Policy GABP5 of the Bath Transport Strategy).

Placemaking Options Plan Reference: Promoting Sustainable Travel / Paragraph

2.309

Plan Order Number: 1057

| Respondent 102 Comment 37 R Number: Number: Number:  | Respondent Robin Kerr<br>Name:             | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|--|--|---|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |  |   |  |  |
| Placemaking Options Plan Reference   | e: Promoting Sustainable Travel / Paragrap | h 2.309   |  |  |

#### Comment on the Site:

#### **Change requested:**

Insert new paragraphs after para 2.309:

- 2.310 The Bath Transport Strategy recognises that Bath suffers from high levels of traffic and air pollution and that the intrusion of traffic needs to be reduced. The entire road network in the city suffers from air pollution above the legal limit, a fact recognised by its designation as an Air Quality Management Area. [Keynsham, Radstock etc]
- 2.310 The development options considered in this Plan will generate additional traffic and there will also be an aggregate effect on the road network. The impact in each area, and the aggregate impact on the road network of the options put forward, will be assessed as part of the ongoing work stemming from this Plan and the Transport Strategies for Bath and other urban areas. Development of these sites will not proceed until any work necessary to improve highways, public transport or traffic management has been planned, funded and committed.

Placemaking Options Plan Reference: Promoting Sustainable Travel / Paragraph

Plan Order Number: 1058

2.310

Respondent 102 Comment 38 Respondent Robin Kerr
Number: Name: Organisation: Residents' Associations

Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

Placemaking Options Plan Reference: Promoting Sustainable Travel / Paragraph 2.310

Comment on the Site:

Change requested:

Add to point 1 after 'traffic management' and parking control...

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy ST1 Number: 1059 Respondent 93 Comment 7 Respondent Sean Walsh Respondent Highways Agency Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ST1 Comment on the Site: Transport is key in facilitating sustainable development. Emerging Policy Approach ST1 - The Agency supports this policy in full and is encouraged by the requirement to ensure that applications for development seek to reduce traffic and encourage sustainable transport modes by reducing the reliance on the private car. **Change requested:** Respondent 224 **Comment** 66 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy ST1 Comment on the Site: Agree with policy approach. Policy H2 should encourage car free development in city centre locations, this should be referenced in ST1. **Change requested:** Respondent 2611 Comment 2 Respondent

## Comment on the Site:

Number:

Agent ID:

We very much welcome and support the aim of 'achieving better quality places as the physical setting for life', and that it 'is about creating good places that promote people's health, happiness, and well-being'. That the emphasis on 'well connected places' and use of 'sustainable modes of transport' especially walking and cycling is very good.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Placemaking Options Plan Reference: | Policy ST1

**Agent Name:** 

Name:

**Respondent** Transition Bath

**Organisation:** 

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order General comments • The city of Bath should be viewed as the whole 'World Heritage Site', which it is, rather than just the historic city centre. • The policy seems to have big plans for additional city centre parking (1.73), we feel this is incompatible with the council's congestion and air quality aspirations, and that this policy should be removed in favour of park and ride capacity, public transport, walking and cycling (see comments on Air Quality Management below) • More emphasis needs to be made of being within easy reach of the bus network and the need to have a wellconnected bus network We strongly support that sustainable travel modes take priority, and that walking and cycling are stated as highly important, we would like to see it stated that the pedestrian and cycling routes should be provided along desire lines and be of a high quality with segregated cycle tracks That car parking related to developments needs to be limited to disability users, and minimal operational needs, only • There is no mention of provision for Car Club car parking spaces anywhere in the plan and further thought on future integration of antonymous vehicles needs to be included. That provision of parking is kept to the absolute minimum and disassociated from the residential units if possible, future model shifts from antonymous vehicles/Car Clubs might lead to a 95% reduction in parking requirements, the current policy which is short sighted needs to take this into account • There should be minimum standards for the provision of electric car parking points on all large new developments, and the requirement to include cabling to allow the charging of all vehicles in future • Any substantial new development needs Proper Sustainable Travel Plans, particularly for commuting using sustainable modes of transport, also Car Sharing, Taxis and multi modal. We are concerned that Neighbourhood Hubs / Local Centres are not properly represented within the strategy. Dispersed Local Shops is not the same, and only London Road seems to have been considered. We have made a suggestion in the detail section below to include a new section 'CR6' to deal with neighbourhood hubs? Recognition that most people who live in Bath live within a 10 minute walk of a Neighbourhood Hub. The investment of £1 million on the London Road Local Centre is very welcomed and this should be a commitment or all neighbourhood hubs, with the larger

| We would like to see 'Car Free' developments encouraged (examples here and here) |                            |  |
|--|----------------------------|--|
| Change requested:  |                            |  |
|  |                            |  |
|  |                            |  |
| Respondent 2611 Comment 47 Respondent  | Respondent Transition Bath |  |

Organisation:

• Home Zones is only mentioned for elderly and supported needs, this needs to be the intention for all residential areas

Agent ID: Agent Name:

Number:

ones such as Moorlands road getting £5 million.

Number:

Name:

especially those with families and children, and near schools

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy ST1

#### Comment on the Site:

Although we support general principles of ST1 to 8, particularly the modal shift to walking, cycling and public transport we feel it could be more positive and future looking. We also feel that the council is failing to address the issue of traffic pollution which is above EU recommended levels in Bath, and has not been improved in the last 10 years. In particular we would like to see the following:

- 1. New standard alone sections walking (i.e. a separate 'ST section), cycling and public transport
- 2. Integration of car clubs woven into the policy to reduce demand for parking and second cars. The policy should include forward thinking proposals which should take into account the potential disruptive changes from antonymous vehicles in the next 10 to 20 years, with the potential like Car Clubs to reduce demand for car parking by up to 95%.
- 3. The promotion of electric and plug-in vehicles with requirements for minimum numbers of electric charging points for all new developments, and cabling to allow future access for all vehicles to charging points
- 4. A positive policy with respect to pollution if cars must be driven: positive incentives for low pollution vehicles and disincentives for highly pollution vehicles. Measures could include a low emissions zone, higher parking/permit charges for diesels (and lower ones for electrics)
- 5. Provision of local services to avoid the need for transport

#### **Change requested:**

The policy should be updated to include more proactive measures on reducing pollution and congestion.

The policy includes no mention of Car Clubs or electric vehicles.

It should be assumed that any new development is likely to increase congestion and therefore pollution, and that this will act against any policy to reduce pollution.

The council should be aiming to reduce traffic pollution below EU recommended levels, nothing in the whole document seems to address this?

| Respondent 2611 Comment 48<br>Number: Number:  | Respondent<br>Name:        | Respondent Transition Bath Organisation: |  |  |
|--|----------------------------|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                            |  |  |  |
| Further Information available in th  | a ariainal sammant?        | hannanta cont with the comment?          |  |  |
| Further Information available in th  | e original comment?  Attac | hments sent with the comment? $\Box$     |  |  |

#### **Comment on the Site:**

Qualified agree - That removable of congestion does not mean providing more road space for cars to drive quicker or that traffic management is not a substitute for proper segregated provision for pedestrians and cyclists, and that assisting the integration of all forms of transport does not mean more cars and lorries

However we would like the consultation to include separate new sections for walking, cycling and public transport.

#### **Change requested:**

Points 1 & 2 & 5: Remove 'where possible'

Point 4: Add 'using sustainable forms of transport'

|   | Schedule of Co  | mments on the Placemaking F   | Plan Options Document in Plan Order  |        |
|---|---|---|--|--------|
| Respondent 3069<br>Number:  | Comment 26<br>Number:   | Respondent Clir Anketell Jone Name:   | es Respondent Organisation:  |        |
| Agent ID: Ag  | gent Name:  |   |  |        |
| Further Information   | on available in tl  | ne original comment? $\Box$ At  | tachments sent with the comment? $\Box$  |        |
| Placemaking Option  | ons Plan Referer  | Policy ST1  |  |        |
| sustainability and in   | s the one issue t<br>nvestment in alt   |   | e lives of nearly all residents. A continued emphasis on essential to the city's continuing success.   |        |
| Change requested  | :   |   |  |        |
|   |   |   |  | _      |
| Respondent 4815<br>Number:  | Comment 9 Number:   | <b>Respondent</b> Timothy Cantell <b>Name:</b>  | <b>Respondent</b> Bear Flat Association <b>Organisation:</b> (BFA)   |        |
| Agent ID: Ag  | gent Name:  |   |  |        |
| Further Information   | on available in tl  | ne original comment? $\Box$ At  | tachments sent with the comment? $\square$   |        |
| Placemaking Option  | ons Plan Referer  | Policy ST1  |  |        |
| greater emphasis of One is the intrusion be addressed. But the intrusive, dangerous Second, schools trathe morning rush he roads into Bath are matter should be cout as a particular of active as planning, | However, the pro- on two related isson of traffic in sub- che traffic on the us and polluting a offic should be accour show a mark similar. Our ow- considered across cause of traffic p transport and ecc- and investigation | tues.  The plan understal radial approaches and other restraffic in the centre.  The plan as an issue. Bested difference in traffic levels be traffic surveys highlight the restriction to the plan as an issue. The city, taking account of principlems and needing a separal ducation authority. There should | and unlikely to achieve significant impact. We suggest andably stresses the centre of the City and this needs to roads within the City but outside the centre is just as FA's observations of Wellsway and Bloomfield Road in petween school term time and holidays. Other main ole of Beechen Cliff School as a traffic generator but the ivate and State schools. School traffic should be singled te solution. This should involve the Council being prould be a programme of creating safe routes to schools on ort and establishing intra-urban school buses. |        |
| Respondent 6389   |   | Respondent  | Respondent Cycle Bath  |        |
| Number: Agent ID: Ag  | Number:<br>gent Name:   | Name:   | Organisation:  |        |
|   | -   | ne original comment? $\Box$ At  | tachments sent with the comment? $\Box$  |        |
| Placemaking Option  | ons Plan Referer  | nce: Policy ST1   |  | _<br>] |

#### **Comment on the Site:**

- 3. Agree
- 4. Agree
- 5. Agree remove the 'where possible'

It should be stated that the sustainable transport priorities are in this order – walking, cycling, public transport, vehicles

9. Ensure there is access to high quality cycling facilities by improving existing and providing new cycling facilities which would increase the proportion of journeys made by bicycle

That cycling provision should be provided following desire lines

Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided

Junction must be improved for priority of cycling over vehicles

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |

**Placemaking Options Plan Reference:** Policy ST2

# Number: 1063 Respondent 224 Comment 67 Respondent **Respondent** Bath Preservation Trust Number: Number: Organisation: Name: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ST2 Comment on the Site: Change requested: Option 2 should be included to cover public footpaths etc. Respondent 2611 Comment 49 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Policy ST2 Comment on the Site: Strongly Support: we support the council in safeguarding potential sustainable transport routes **Change requested:** Respondent 6389 Comment 45 Respondent Respondent Cycle Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ST2 Comment on the Site: Agree Important to keep all former rail lines for cycling **Change requested:**

Plan Order

# Placemaking Options Plan Reference: Public Rights of Way Number: 1066

| Respondent 151 Comment 20 Respondent Number: Name:  | Respondent DUNKERTON PARISH                    |
|---|--|
| Trainer   | Organisation: COUNCIL                          |
| Agent ID: Agent Name:   | _  |
| Further Information available in the original comment? $\Box$ Atta  | chments sent with the comment? $\Box$          |
| Placemaking Options Plan Reference: Public Rights of Way  |  |
| Comment on the Site:  |  |
| Public Rights of Way p265   |  |
| We support option 1 at para 2.315. We believe it is consistent and v  | workahla                                       |
| ve support option 1 at para 2.313. We believe it is consistent and v  | workubic.                                      |
| Change requested:   |  |
|   |  |
|   |  |
|   |  |
| Respondent 281 Comment 18 Respondent Alison Howell Number: Name:  | Respondent Natural England                     |
| Turner.   | Organisation:                                  |
| Agent ID: Agent Name:   | _  |
| Further Information available in the original comment? $\Box$ Atta  | chments sent with the comment? $\square$       |
|   |  |
|   |  |
| Placemaking Options Plan Reference: Public Rights of Way  |  |
|   |  |
| Comment on the Site:  | as most closely aligned to the requirements of |
| Placemaking Options Plan Reference: Public Rights of Way  Comment on the Site: Public Rights of Way: we endorse the approach set out in Option 1 approach 75, NPPF. | as most closely aligned to the requirements of |

Plan Order

**Placemaking Options Plan Reference:** Transport Infrastructure / Paragraph

2.316

Plan Order Number: 1067

| Respondent 102 Comment 39 R<br>Number: Number:  | Respondent Robin Kerr<br>Name: | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |  |
|---|--------------------------------|---|--|--|--|
| Agent ID: Agent Name:   |                                |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |                                |   |  |  |  |
|   |                                |   |  |  |  |
| Placemaking Options Plan Reference: Transport Infrastructure / Paragraph 2.316                          |                                |   |  |  |  |
| Comment on the Site:  |                                |   |  |  |  |

# Change requested:

This Section should refer to the Bath Transport Strategy, which has confirmed the need for a P&R to the east of Bath and the need to consider alternatives to the A46-A36 route through Bath for HGV.

Placemaking Options Plan Reference: A37 Bypass at Whitchurch, Clutton and

Temple Cloud / Paragraph 2.320

Plan Order Number: 1071

| Number: Number: Namber: Namber   | ne:   | Organisation:                       |  |  |
|--|---|-------------------------------------|--|--|
| Agent ID: Agent Name:  |   |                                     |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |                                     |  |  |
| Placemaking Options Plan Reference:  | A37 Bypass at Whitchurch, Clutton and T               | emple Cloud / Paragraph 2.320       |  |  |
| Comment on the Site:   |   |                                     |  |  |
| I write further to your email dated 26th the opportunity to comment on the emo   | November 2014 which invited comments erging document. | on the Placemaking Plan. We welcome |  |  |
| We note the reference in paragraph 2.320 that the safeguarded route of the A37 bypass at Whitchurch shown on the Bath & North East Somerset Local Plan proposals map needs to be deleted, as the land is currently being developed for housing.  |   |                                     |  |  |
| The part of the route within Bristol is safeguarded in the adopted Site Allocations & Development Management Policies Local Plan. It is understood that the West of England Future Transport Strategy will review the longer term transport schemes contained in the Joint Local Transport Plan, of which Whitchurch Bypass is one. Therefore, this safeguarding will need to be reviewed at the appropriate time. |   |                                     |  |  |
| Change requested:  |   |                                     |  |  |

Placemaking Options Plan Reference: A37 Bypass at Whitchurch, Clutton and

Temple Cloud /Paragraph 2.325

Plan Order Number: 1076

| Respondent 102 Comment 40 Respondent Robin Kerr<br>Number: Number: Name:                                | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |  |  |
|---|---|--|--|--|--|
| Agent ID: Agent Name:   |   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |   |  |  |  |  |
|   |   |  |  |  |  |
| Placemaking Options Plan Reference: A37 Bypass at Whitchurch, Clutton and Temple Cloud /Paragraph 2.325 |   |  |  |  |  |
| Comment on the Site:  |   |  |  |  |  |
| Change requested:   |   |  |  |  |  |
| Should propose an integrated plan for the Lower Bristol Road a  | nd the Enterprise Area development, making use of CIL                             |  |  |  |  |

funds.

| Placemaking Options Plan Reference: Policy ST3  | Plan Order<br>Number: 1081  |  |  |  |
|---|---|--|--|--|
| Respondent 102 Comment 41 Respondent Robin Kerr Number: Number: Name:   | Respondent Federation of Bath Organisation: Residents' Associations |  |  |  |
| Agent ID: Agent Name:   |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent  | with the comment? $\Box$  |  |  |  |
| Placemaking Options Plan Reference: Policy ST3  |   |  |  |  |
| Comment on the Site:  |   |  |  |  |
| Change requested:   |   |  |  |  |
| Needs to be read with an A36-A46 link in mind and so that such a link is not precl refer to the intention stated in the transport strategy to look at alternative route |   |  |  |  |
| Respondent 224 Comment 68 Respondent Number: Name:  | Respondent Bath Preservation Trust Organisation:                    |  |  |  |
| Agent ID: Agent Name:   |   |  |  |  |
| Further Information available in the original comment?   Attachments sent   | with the comment? $\Box$  |  |  |  |
| Placemaking Options Plan Reference: Policy ST3  |   |  |  |  |
| Comment on the Site:  |   |  |  |  |
| Agree with policy approach.   |   |  |  |  |
| 3 should be first.  |   |  |  |  |
| Change requested:   |   |  |  |  |
|   |   |  |  |  |
|   |   |  |  |  |
| Respondent 279 Comment 27 Respondent Rohan Torkildsen Number: Name:   | Respondent English Heritage Organisation:                           |  |  |  |
| Agent ID: Agent Name:   |   |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |   |  |  |  |
| Placemaking Options Plan Reference: Policy ST3  |   |  |  |  |
| Comment on the Site:  |   |  |  |  |
| Paragraph 2.326 and 2.327 and Policy ST3  | rooch to only rooming discharge with                                |  |  |  |
| English Heritage strongly endorses the commitments to a high quality design appr  | roach to any required intrastructure.                               |  |  |  |
| Change requested:   |   |  |  |  |

Plan Order

| Respondent 837 Comment 14 Respondent Mr David Redgewell Number: Name:   | Respondent South West Transport Organisation: Network, Railfuture |
|---|---|
| Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severn  | side, TFGBA   |
| Further Information available in the original comment? $\square$ Attachments sent   | with the comment? 🔽   |
| Placemaking Options Plan Reference: Policy ST3  |   |
| Comment on the Site:  |   |
| We welcome the deletion of the Whitchurch bypass and would like to see the ren<br>bypasses unless a clear public transport and walking/cycling benefit can be seen.<br>of the Lower Bristol Road in conjunction with Western Riverside Policy SB7, SB13 | We welcome the provision of bus lanes                             |
| Change requested:   |   |
| To improve public transport including showcase bus routes in Bath and North East<br>district and increase patronage on public transport.  | t Somerset together with air quality in the                       |
| Respondent 2611 Comment 50 Respondent Number: Name:   | Respondent Transition Bath Organisation:                          |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\square$ Attachments sent   | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy ST3  |   |
| Comment on the Site:  |   |
| Change requested: Point 4: Add can be shown that these have been provided for as the priority Point 7: Add to the benefit of  |   |
| Respondent 3069 Comment 27 Respondent Cllr Anketell Jones Number: Name:   | Respondent Organisation:  |
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\square$ Attachments sent   | with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy ST3  |   |
| Comment on the Site:  t must always be borne in mind that Bath is a World Heritage City and this should development of all transport infrastructure. Compatibility with historic surrounding secondary consideration.                                   |   |
| Change requested:   |   |

|  | Schedule of Comm     | ents on the Placemakin        | g Plan Options Document in    | Plan Order                    |
|--|----------------------|-------------------------------|-------------------------------|-------------------------------|
| Respondent 6389<br>Number:   | _                    | spondent Adam Reynold<br>ime: | Responde Organisat            |                               |
| Agent ID: Age  | ent Name:            |                               |                               |                               |
| Further Information  | n available in the o | riginal comment? $\Box$       | Attachments sent with the c   | comment? $\square$            |
| Placemaking Option   | ns Plan Reference:   | Policy ST3                    |                               |                               |
| Comment on the Si  | te:                  |                               |                               |                               |
| No where in the doc  | ument can I see re   | ference to the design sta     | ndards road space will be he  | eld accountable to.           |
| In particular, BANES this, defend themse   | •                    |                               | and walking infrastructure, h | owever when challenged on     |
| In all honesty the guidance is vague and allows poor quality dangerous solutions. So is the place making plan going to define the minimum design guidance that the council should deliver to? If so, what is the design guidance you will be working to. |                      |                               |                               |                               |
| Change requested:  |                      |                               |                               |                               |
| change requested.  |                      |                               |                               |                               |
|  |                      |                               |                               |                               |
| Respondent 6389<br>Number:   | _                    | spondent Adam Reynold<br>nme: | ls Responde Organisat         |                               |
| Agent ID: Age  | ent Name:            |                               |                               |                               |
| Further Information  | n available in the o | riginal comment? $\Box$       | Attachments sent with the c   | comment?                      |
| Placemaking Option   | ns Plan Reference:   | Policy ST3                    |                               |                               |
| Comment on the Si  | te:                  |                               |                               |                               |
| In light of the work t<br>is delivered?  | hat Welsh governn    | nent has done, can the g      | uidance be used to define th  | e standards to which the plan |
| http://wales.gov.uk,   | /topics/transport/v  | valking-cycling/active-tra    | vel-design-guidance/?lang=e   | en                            |
| Change requested:  |                      |                               |                               |                               |
| -  |                      |                               |                               |                               |
|  |                      |                               |                               |                               |
| Respondent 6389<br>Number:   | _                    | spondent<br>ime:              | Responde<br>Organisat         | ent Cycle Bath                |
| Agent ID: Age  | ent Name:            |                               |                               |                               |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |                      |                               |                               |                               |
| Placemaking Option   | ns Plan Reference:   | Policy ST3                    |                               |                               |
| Comment on the Si  2. Cycling will reduce  |                      |                               |                               |                               |

- 4. Agree
- . and cyclists
- 6. must not restrict the free flow of cyclists

That cycling provision should be provided following desire lines

Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided

Junction must be improved for priority of cycling over vehicles

That all developments have cycle parking / storage that is well designed appropriate for the development ie long term needs covered, secure, convenient and easy to access

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |
|                   |  |  |  |

**Placemaking Options Plan Reference:** Policy ST4

| r ideemaking opt                                |                     | referreer 1 only 31 1   |                            | Number: 1084   |
|---|---------------------|---|----------------------------|--|
|   |                     | spondent Mr David Redgew<br>me:                               | _                          | ent South West Transport<br>tion: Network, Railfuture      |
| Agent ID: 56 Agent                              | Name: South \       | Vest Transport Network, Ra                                    | ilfuture Severnside, TFGE  | 3A   |
| Further Information a                           | vailable in the c   | riginal comment? $\Box$ Att                                   | achments sent with the     | comment? 🗹   |
| Placemaking Options                             | Plan Reference:     | Policy ST4  |                            |  |
| Comment on the Site:                            |                     |   |                            |  |
|   | ll as general rail  | s at Westmoreland Station I<br>reight. Railfreight facilities | -                          | ee the site retained as a<br>d and Radstock should also be |
| Change requested:                               |                     |   |                            |  |
| Protection of railfreight                       | t facilities in the | district.   |                            |  |
|   |                     |   |                            |  |
| Respondent 2611 Co<br>Number: N                 |                     | spondent<br>ime:  | Respond<br>Organisa        | ent Transition Bath tion:                                  |
| Agent ID: Agent                                 | Name:               |   |                            |  |
| Further Information a                           | vailable in the c   | riginal comment?   Att  | achments sent with the     | comment?   |
| Placemaking Options                             | Plan Reference:     | Policy ST4  |                            |  |
| Comment on the Site:                            |                     |   |                            |  |
| Strongly Support: main travelling into and thro | •                   | reight yard may provide opt                                   | ions in future to reduce t | the volume of delivery vehicles                            |
| Change requested:                               |                     |   |                            |  |

Plan Order

Placemaking Options Plan Reference: Rail Station at Saltford / Paragraph 2.330

Plan Order Number: 1086

|  | pondent Lisa Bullock<br>me:   | Respondent Network Rail Organisation:  |  |
|--|---|--|--|
| Agent ID: Agent Name:  |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |   |  |  |
| Placemaking Options Plan Reference:  | Rail Station at Saltford / Paragraph 2.330  |  |  |
| Comment on the Site:   |   |  |  |
| Reopen the station at Saltford   |   |  |  |
| to in this policy document. BANES has usupport for the reopening of the station the Western Route Study (the long-term   | on to reopen the station at Saltford; this is undertaken a public exhibition on the properties in have recently been received by Network in strategy for the route up to 2043). I am reopening the station, or requesting for | posals early in 2014. Some letters of Rail during the consultation period for not aware of BANES approaching |  |
|  | stment in Stations document on the Netw   | ork Rail website which describes the   |  |
| process for those wishing to promote/develop a new station:  |   |  |  |
| As described in the document, Richard Clarke (Lead Strategic Planner, Western) would be the initial point of contact at Network Rail for anyone at BANES wishing to discuss this proposal. |   |  |  |
| Change requested:  |   |  |  |
|  |   |  |  |

Placemaking Options Plan Reference: Managing Traffic / Paragraph 2.333

Number: 1090 Respondent 102 Comment 42 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: Organisation: Residents' Associations Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: | Managing Traffic / Paragraph 2.333 **Comment on the Site: Change requested:** Should mention the aim in the Bath Transport Strategy (and the other towns if appropriate) to reduce traffic and to develop a traffic management plan accordingly. Respondent 2611 Comment 52 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

#### **Comment on the Site:**

## Change requested:

Not just 'historic streets & spaces', should be whole of World Heritage Site

Placemaking Options Plan Reference: | Managing Traffic / Paragraph 2.333

Plan Order

Placemaking Options Plan Reference: Managing Traffic / Paragraph 2.334

Plan Order Number: 1091

| Respondent 102 Comment 43<br>Number: Number:        | Respondent Robin Kerr<br>Name:                  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |
|---|---|---|
| Agent ID: Agent Name:                               |   |   |
| Further Information available in the                | ne original comment? $\Box$ Attachments sen     | t with the comment? $\square$   |
|   |   |   |
| Placemaking Options Plan Referen                    | Managing Traffic / Paragraph 2.334              |   |
| Comment on the Site:                                |   |   |
| Generally satisfactory, but ignores taccommodation. | the fact that, in Bath at least, the main shopp | ing streets are mixed up with residential   |
| accommodation.                                      |   |   |
| Change requested:                                   |   |   |
|   |   |   |

## Plan Order **Placemaking Options Plan Reference:** Policy ST5 Number: 1092 Respondent 224 Comment 69 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST5 Comment on the Site: There should be an Option 3 – to complete and put into action a Bath Transport Strategy. **Change requested:** Respondent 279 Comment 28 Respondent Rohan Torkildsen Respondent English Heritage Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST5 **Comment on the Site:** The same attention to contextual design quality and detail as Policy S3 should inform the traffic management proposals in this policy. **Change requested:** Respondent 837 Comment 15 Respondent Mr David Redgewell **Respondent** South West Transport Number: Number: Name: Organisation: Network, Railfuture Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA

#### **Comment on the Site:**

This should include a strong traffic management area in Keynsham Town Centre, Radstock Town Centre, Midsomer Norton Town Centre and new developments in Whitchurch. Each town requires good transport integration and reopening of Saltford station on its current site as part of MetroWest.

Further Information available in the original comment? 

Attachments sent with the comment?

#### **Change requested:**

To support growth in public transport as a traffic reduction measure and offer motorists a better choice of alternatives. The scheme should also improve public realm.

**Placemaking Options Plan Reference:** Policy ST5

|   | Schedule of Cor       | nments on the Placemal  | king Plan Options Doc   | cument in Plan Order                     |  |
|---|-----------------------|---|-------------------------|--|--|
| Respondent 2611<br>Number:                                      | Comment 53 Number:    | Respondent<br>Name:   |                         | Respondent Transition Bath Organisation: |  |
| Agent ID: Ag  | ent Name:             |   |                         |  |  |
| Further Informatio  | n available in th     | e original comment?   | Attachments sent        | with the comment? $\Box$                 |  |
| Placemaking Optio   | ns Plan Referen       | ce: Policy ST5  |                         |  |  |
| Comment on the S  | ite:                  |   |                         |  |  |
| Change requested:   | <u>.</u>              |   |                         |  |  |
| Point 3: Add that lin   | nked, continuou       | Bath shopping streets - ac<br>s and safe routes 'are' pre<br>an providing for motor v | ovided as a priority    |  |  |
| Respondent 3069<br>Number:                                      | Comment 28<br>Number: | Respondent Cllr Ankete<br>Name:   |                         | Respondent<br>Organisation:              |  |
| Agent ID: Ag  | ent Name:             |   |                         |  |  |
| Further Informatio  | n available in th     | e original comment? $\Box$  | Attachments sent        | with the comment? $\square$              |  |
| Placemaking Optio   | ns Plan Referen       | ce: Policy ST5  |                         |  |  |
| <b>Comment on the S</b><br>Pollution levels in B<br>residents.  |                       | l at unacceptable levels a  | and they are a fre      | quently expressed concern of many        |  |
| Change requested:<br>Could the emerging                         |                       | ST5 include " take the o  | pportunity to drive do  | own levels of pollution"                 |  |
| Respondent 6389<br>Number:                                      | Comment 46<br>Number: | Respondent<br>Name:   |                         | Respondent Cycle Bath Organisation:      |  |
| Agent ID: Ag  | ent Name:             |   |                         | _  |  |
| Further Informatio  | n available in th     | e original comment? $\Box$  | Attachments sent        | with the comment? $\Box$                 |  |
| Placemaking Optio   | ns Plan Referen       | ce: Policy ST5  |                         |  |  |
| Comment on the S<br>Cycling needs major<br>vehicles or speed of | r investment in p     | _   | or cycling, with segreg | gated tracks where there is volume of    |  |
| Change requested:   |                       |   |                         |  |  |
|   |                       |   |                         |  |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |  |                                     |  |
|---|--|-------------------------------------|--|
|   | spondent<br>nme:                             | Respondent Cycle Bath Organisation: |  |
| Agent ID: Agent Name:   |  |                                     |  |
| Further Information available in the o                                      | original comment? $\square$ Attachments sent | with the comment? $\Box$            |  |
|   |  |                                     |  |
| Placemaking Options Plan Reference:   | Policy ST5                                   |                                     |  |
| Comment on the Site:  |  |                                     |  |
| 3. Agree6 and encourage the use of cycling                                  |  |                                     |  |
| Change requested:   |  |                                     |  |
|   |  |                                     |  |

Placemaking Options Plan Reference: Park & Ride / Paragraph 2.335

Number: 1094 Respondent 102 Comment 44 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: Organisation: Residents' Associations Agent ID: **Agent Name:** Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ Placemaking Options Plan Reference: Park & Ride / Paragraph 2.335 **Comment on the Site:** The P&Rs should operate until late for 7 days a week, with secure overnight parking. That would enable their use by evening visitors and those staying overnight, who cannot currently use them. There should be a shuttle service of suitable vehicles for overnight visitors, serving the hotels and guest houses.

**Change requested:** 

Plan Order

## Plan Order **Placemaking Options Plan Reference:** Policy ST6 Number: 1097 Respondent 93 Comment 8 Respondent Sean Walsh Respondent Highways Agency Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST6 Comment on the Site: Emerging Policy Approach ST6 relating to the development of new or the expansion of existing Park and Ride sites ensures that there should be no unacceptable impact on the surrounding road network and its capacity to safely accommodate potential traffic generation. The Agency will need to ensure that this is the case and applicants will need to mitigate impacts on the SRN as necessary. We are encouraged that this approach is supported by the emerging policy approach ST7 which states that development should make provision for any improvements to the transport system which are required to render the development proposal acceptable. The requirement is also stated for a TA/TS to accompany applications for development likely to generate a significant number of trips in accordance with national planning policy. This is essential from the Agency's perspective as we need to understand the impact of development on the SRN to ensure that any severe impacts can be mitigated against. **Change requested:** Respondent 102 Comment 45 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: **Organisation:** Residents' Associations Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST6 Comment on the Site: **Change requested:** ST6 point 1 is basically meaningless. Clearly one cannot accept the unacceptable, and anyway this does not define what is 'unacceptable': unacceptable to whom, and on what criteria? There is no recognition of the necessity to strike a balance between the need for a P&R to help protect the environment of Bath and the need to minimise harm to the environment to the east of the city. Suggested revision:"a. Development can be shown to be in the public interest, taking into account the need to protect the Bath World Heritage Site by reducing traffic intrusion, and the potential impact on environmental assets and amenity including the setting of Bath and the Cotswolds AONB". Respondent 151 Comment 21 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? **Placemaking Options Plan Reference:** Policy ST6

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Comment on the Site: Park and Ride p271 We believe a better form of wording for EPA ST6 would be "minimal" rather than "no unacceptable." There will always be something deemed unacceptable from some dissenter's viewpoint and it would be unhelpful if a contrived opinion could be cited as policy. **Change requested:** Park and Ride p271 We believe a better form of wording for EPA ST6 would be minimal rather tha no unacceptable. There will always be something deemed unacceptable from some dissenters viewpoint and it would be unhelpful if a contrived opinion could be cited as policy. Respondent 279 Comment 29 Respondent Rohan Torkildsen Respondent English Heritage Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST6 Comment on the Site: The consideration of heritage assets should be an important policy consideration. **Change requested:** Include an explicit reference to heritage assets and their setting. Respondent 281 Comment 19 Respondent Alison Howell Respondent Natural England Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** | Policy ST6 Comment on the Site: Park and Ride: we endorse the approach of emerging policy ST6. **Change requested:** Respondent 837 **Comment** 16 **Respondent** Mr David Redgewell **Respondent** South West Transport

Number:

Name:

Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA

Further Information available in the original comment? 

Attachments sent with the comment?

Number:

Organisation: Network, Railfuture

| Schedule of Comments on t   | the Placemaking Plan Options Document in Plan Order  |
|---|--|
| Placemaking Options Plan Reference: Policy S  | T6   |
| Community on the City   |  |
| Comment on the Site:  | hoth bus and unit based and a Dayle Q. Dida at Whiteburgh included in the  |
| Whitchurch development plan to serve Bristol, I   | n both bus and rail based and a Park & Ride at Whitchurch included in the Keynsham and the South Bristol fringe.   |
| Change requested:   |  |
| We want a Park & Ride at Whitchurch and prote   | ection of the rail corridor from Newbridge to Warmley.   |
| Respondent 2611 Comment 55 Respondent Number: Number: Name:                                     | Respondent Transition Bath Organisation:   |
| Agent ID: Agent Name:   |  |
| Further Information available in the original co  | omment?  Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy S  | TT6  |
| Comment on the Site:  |  |
|   | o Bath and instead use public transport we recognise that this is difficult to ive, we support the council in expanding Park & Ride facilities as it will of town.   |
| Green Belt was weighed up against the benefits  | ur of the Green Belt. We feel that it would be better if impact on the of reduced pollution and congestion in the centre of town. We also feel nses of black tarmac and look to less visibly obtrusive surface treatments. |
| On existing sites, if not too visibly intrusive (e.g. panel 'roofing' on Park & Ride car parks. | Lansdown, Odd Down) we feel the council should look to install solar   |
| Change requested:   |  |
|   |  |
| Decreadest 2000 Comment 20 D  |  |
| Respondent 3069 Comment 29 Respondent Number: Number: Name:                                     | t Cllr Anketell Jones Respondent Organisation:   |
| Agent ID: Agent Name:   |  |
| Further Information available in the original co  | omment?  Attachments sent with the comment?  |
| Placemaking Options Plan Reference: Policy S  | TT6  |
| Comment on the Site:  |  |
| destinations for city residents wanting to access   | edefined. Can they fulfil the need for coach parking? Can they be used as the countryside? eed to be mitigated with rigorous environmental/ecological conditions.  |
| Change requested:   |  |
|   |  |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order        |  |                                     |  |
|--|--|-------------------------------------|--|
|  | spondent<br>nme:                         | Respondent Cycle Bath Organisation: |  |
| Agent ID: Agent Name:  |  |                                     |  |
| Further Information available in the o   | riginal comment? $\Box$ Attachments sent | with the comment? $\Box$            |  |
|  |  |                                     |  |
| Placemaking Options Plan Reference:  | Policy ST6                               |                                     |  |
| Comment on the Site:   |  |                                     |  |
| Provide for cycling as a viable, comfortable and safe alternative to using the bus |  |                                     |  |
| Change requested:  |  |                                     |  |
|  |  |                                     |  |

Placemaking Options Plan Reference: Coach Parking / Paragraph 2.338

Plan Order Number: 1099

| Respondent 102 Comment 46 Respondent Robin Kerr<br>Number: Name:  | <b>Respondent</b> Federation of Bath <b>Organisation:</b> Residents' Associations |  |  |
|---|---|--|--|
| Agent ID: Agent Name:   |   |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |   |  |  |
| Placemaking Options Plan Reference: Coach Parking / Paragraph 2.338                                     |   |  |  |
| Comment on the Site:  |   |  |  |
| The first mention of the Bath Transport Strategy!   |   |  |  |
| Change requested:   |   |  |  |
|   |   |  |  |

## Plan Order **Placemaking Options Plan Reference:** Policy ST7 Number: 1105 Respondent 93 Comment 9 Respondent Sean Walsh **Respondent** Highways Agency Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy ST7 Comment on the Site: Emerging Policy Approach ST6 relating to the development of new or the expansion of existing Park and Ride sites ensures that there should be no unacceptable impact on the surrounding road network and its capacity to safely accommodate potential traffic generation. The Agency will need to ensure that this is the case and applicants will need to mitigate impacts on the SRN as necessary. We are encouraged that this approach is supported by the emerging policy approach ST7 which states that development should make provision for any improvements to the transport system which are required to render the development proposal acceptable. The requirement is also stated for a TA/TS to accompany applications for development likely to generate a significant number of trips in accordance with national planning policy. This is essential from the Agency's perspective as we need to understand the impact of development on the SRN to ensure that any severe impacts can be mitigated against. **Change requested:** Respondent 102 Comment 47 Respondent Robin Kerr **Respondent** Federation of Bath Number: Number: Name: **Organisation:** Residents' Associations Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST7 Comment on the Site: **Change requested:** B&NES' current Local Plan states, under policy ES10, that development will not be permitted where it would: Have an adverse impact on health, the natural or built environment or amenity of existing or proposed uses by virtue of odour, dust and/or other forms of air pollution, or • Be likely to suffer unacceptable nuisance as a result of proximity to existing sources of odour, dust and/or other forms of air pollution. This policy should be saved in ST7. This is entirely the wrong time to weaken policy on air pollution related to development. ST7 was a material factor in the Inspector's rejection of the Tesco appeal on the Bath Press site. Respondent 279 **Comment** 30 **Respondent** Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

# Placemaking Options Plan Reference: Policy ST7 **Comment on the Site:** The policy currently fails to include explicit criteria to safeguard the district's historic environment. Development will not be approved that results in the generation of a significant increase in traffic and results in associated measures to facilitate this increase in traffic which harms the significance of the historic environment, unless appropriate mitigation can be achieved. All highway infrastructure will be required to comply with national guidance and standards set out in Manual for Streets, Manual for Streets 2 - wider application of the principles, the Design Manual for Roads and Bridges and any subsequent updates to these documents. **Change requested:** Respondent 837 Comment 17 Respondent Mr David Redgewell **Respondent** South West Transport Number: Number: Name: Organisation: Network, Railfuture Agent ID: 56 Agent Name: South West Transport Network, Railfuture Severnside, TFGBA Further Information available in the original comment? Attachments sent with the comment? Placemaking Options Plan Reference: Policy ST7 Comment on the Site: We support parking provision for the disabled and mobility impaired. We wish to see walking and cycling provision within the policy but also reference to public realm and transport assessments for cars and coaches must include disabled people. **Change requested:** More provision for mobility impaired within the policy Respondent 1366 Comment 1 Respondent Lisa Bullock **Respondent** Network Rail Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy ST7 Comment on the Site: Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. Level Crossing Safety

Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

planning policy to address. The impact from future development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.

As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. Therefore the location of proposed new development sites is an important consideration for Network Rail.

In this regard, we would request that the potential impacts from any new development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that:

• The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:

oSchedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".

Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and

The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

| Change requested:   |  |  |  |
|---|--|--|--|
|   |  |  |  |
| Respondent 2611 Comment 55 Respondent Number: Number: Name: Agent ID: Agent Name:           | Respondent Transition Bath Organisation: |  |  |
| Further Information available in the original comment?   Attachments sent with the comment? |  |  |  |
| Placemaking Options Plan Reference: Policy ST7  |  |  |  |
| Comment on the Site:  |  |  |  |
| Strongly agree.   |  |  |  |
| Change requested:   |  |  |  |
| Point 1: Add with the priority of walking and cycling following de                          | esire lines                              |  |  |
| Point 2: Add 'using sustainable forms of transport'   |  |  |  |
| Point 6: This needs to be qualified to discourage vehicle use                               |  |  |  |
| Point 8: That provision for walking an cycling takes priority                               |  |  |  |
| Point 9: As long as walking and cycling and PT are the priority                             |  |  |  |
| Point 11: Providing car parking should be discouraged as this wil                           | ll encourage car use                     |  |  |

|   | Schedule of Co        | omments on the Placema                           | aking Plan Options Docu   | ıment in Plan               | Order                 |
|---|-----------------------|--|---------------------------|-----------------------------|-----------------------|
| Respondent 6389<br>Number:  | Comment 50<br>Number: | Respondent<br>Name:                              |                           | Respondent<br>Organisation: | •                     |
| Agent ID: Ag  | gent Name:            |  |                           |                             |                       |
| Further Information   | n available in tl     | he original comment?                             | Attachments sent w        | ith the comr                | nent?                 |
| Placemaking Option  | ons Plan Referer      | nce: Policy ST7                                  |                           |                             |                       |
| Comment on the S  | ite:                  |  |                           |                             |                       |
| 2, 3 , 7 & 11 Agree6  | not to the detr       | iment of cycling                                 |                           |                             |                       |
| 7. with particular r  | egard to cycling      |  |                           |                             |                       |
| That cycling take pr  | iority over on-st     | treet parking                                    |                           |                             |                       |
| That cycling provision should be provided following desire lines  |                       |  |                           |                             |                       |
| Along highly desirable routes where there is a high – over 3000 per hr - volume of traffic segregated tracks must be provided |                       |  |                           |                             |                       |
| lunction must be improved for priority of cycling over vehicles   |                       |  |                           |                             |                       |
| •   |                       | parking / storage that is was and easy to access | vell designed appropriate | e for the deve              | elopment ie long term |
| Change requested  | ;                     |  |                           |                             |                       |
|   |                       |  |                           |                             |                       |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Parking Standards Number: 1120 Respondent 301 Comment 12 Respondent **Respondent** South West HARP Number: Number: **Organisation:** Planning Consortium Name: Agent ID: 43 Agent Name: Tetlow King Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Parking Standards Comment on the Site: We believe a combination of the two policies approaches would be the most effective, both in providing some certainty for developers whilst also reducing the officer time spent on assessing appropriate parking provision. Setting out a schedule for parking based upon type and location of development seems pertinent; based upon those factors identified in paragraph 2.355. Numerous local authorities are now taking this approach, highlighting different standards between urban areas (including distinction between city centre, city suburbs and market towns) and rural areas. The Council should then indicate factors which they would consider should a developer propose provision departing from the schedule. **Change requested:** Respondent 828 Comment 9 Respondent **Respondent** Deeley Freed Estates Number: Number: Name: Organisation: Limited and DFE Projects Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Parking Standards Comment on the Site: Paragraphs 2.347 – 2.352 (pages 274-5 of the PPOD) indicate a flexible approach non-residential parking based on the principles of promoting sustainable transport set out in the NPPF and Getting Around Bath Transport Strategy alongside site-specific circumstances and development-specific considerations. Such an approach is considered to be reasonable and necessary in the Council area generally and specifically in Bath. A similar flexible approach is indicated in relation to residential parking in paragraphs 2.353 – 2.357 (pages 275-6 of the PPOD) and it is put forward as the Council's preferred approach as option 2. Again, this is considered to be reasonable and necessary in the Council area generally and specifically in Bath. **Change requested:**

Number:

Agent ID:

Respondent 2611 Comment 56 Respondent

**Agent Name:** 

Number:

Name:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

**Respondent** Transition Bath

Organisation:

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |   |
|--|---|
| Placemaking Options Plan Reference: Parking Standards  |   |
| Comment on the Site:   |   |
| Object: why is there no opportunity to comment on parking standards? As per our previous comments we feel the counci hould using parking standards to reduce traffic and more particularly traffic pollution, by discouraging diesels and promoting electric cars, plugin hybrids and car clubs. The council should also plan for the needs of autonomous vehicles, with similar footprints to car clubs which over the next 2 decades will lead to disruptive changes in the current models of car ownership.                           |   |
| Parking standards should look to minimise parking in the centre of town. Provide differential parking and permit prices o discourage diesels and encourage electric vehicles. A standard for new parking facilities to provide 1 in N parking slots with charging points and ensure electricity cables are close to all spaces, so infrastructure is ready when electric cars become prevalent and need charging.  |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 3069 Comment 30 Respondent Cllr Anketell Jones Respondent Number: Name: Organisation:   |   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |   |
| Placemaking Options Plan Reference: Parking Standards  |   |
| Comment on the Site:   |   |
| conomic development in on the brownfield sites in central Bath will generate more employment and more demand for ransport to access employment sites. The pressure on the road network will inevitably increase. To stabilise/reduce demand for employment space parking there needs to be ongoing investment in public transport improvements as well as alternative modes of transport. Site by site assessments for parking may be flexible but an overall understanding that he city is a very large car park must not be forgotten. |   |
| Parking for residents seems to be an constant problem either in cost or available space. Residents Parking Zones have nelped allocate spaces to those who need it most and they control growth in demand. Where possible, parking in new levelopments should be assessed for its impact on a wider area and whether or not a new RPZ would be beneficial.  |   |
| Change requested:  |   |
|  |   |
|  | _ |
| Respondent 6426 Comment 17 Respondent Mr Steven Kerry Respondent Persimmon Homes Number: Name: Organisation: Severn Valley   |   |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$  |   |
| Placemaking Options Plan Reference: Parking Standards  |   |

#### **Comment on the Site:**

With regards to the two policy approach options outlined in the document, option 2 appears the more beneficial option spatially and socially. A certain degree of flexibility in the parking standards would enable schemes to respond better to

# local demands and site-specific issues which would result in more viable schemes that are provide a better fit in local contexts. **Change requested:**

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy SCR1 Number: 1149 Respondent 151 Comment 22 Respondent Respondent DUNKERTON PARISH Number: Number: Name: **Organisation: COUNCIL** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SCR1 Comment on the Site: Energy Efficiency p281 Whilst applauding the spirit of EPA SCR1, saying "the Council will require" detail of energy efficiency measures could really bog down the planning process (at the very least through Parish Councils) in creating comparatively low value arguments about draught-proofing and the depth of loft insulation. Many of the drawings we see presented by applicants and agents are often just about good enough to see where the proposed building footprint is going to be. How much more data would be needed to convince that sufficient EE measures were in place? We shudder at the thought. We would fully understand that everyone would expect applications to reflect good EE practice, best building standards and current government guidance as an Emerging Design Value. **Change requested:** Energy Efficiency p281 Whilst applauding the spirit of EPA SCR1, saying "the Council will require" detail of energy efficiency measures could really bog down the planning process (at the very least through Parish Councils) in creating comparatively low value arguments about draught-proofing and the depth of loft insulation. Respondent 279 Comment 31 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy SCR1 **Comment on the Site:** Might it be appropriate to cross reference here to the Sustainable Construction & Retrofitting Supplementary Planning Document and Energy Efficiency & Renewable Energy Guidance for Listed Buildings and Undesignated Historic Buildings? Change requested: Respondent 2611 Comment 3 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:**

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

| Schedule of Comments on the Placemaking Plan Option  | ns Document in Plan Order                        |
|--|--|
| Placemaking Options Plan Reference: Policy SCR1  |  |
| Comment on the Site:   |  |
| Overall we agree with the Energy Policy, with the following comments:  |  |
| <ul> <li>Despite restrictive government regulation, we think there should be a sepadwellings' – currently absent</li> </ul>  | arate policy section for 'new domestic           |
| • Allowable Solutions should be avoided if possible, and if required then should be avoided if possible.   | uld be delivered locally                         |
| • We strongly support the imposition of a 20% 'Merton Rule'  |  |
| • Forward thinking policy to include the support of roof-integrated solar PV, loverheating needs enhancing   | MVHR and shading to avoid summer                 |
| <ul> <li>The district heating criteria needs tightening, as developers dismiss the req<br/>ustification. A developer should be required to provide a well-defined 'distri<br/>development</li> </ul> |  |
| <ul> <li>Energy efficiency standards for non-domestic buildings should be enhanced significant extensions</li> </ul>   | d, particularly for new school buildings and     |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 57 Respondent Number: Name:  | Respondent Transition Bath Organisation:         |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ Attachments  | s sent with the comment? $\square$               |
| Placemaking Options Plan Reference: Policy SCR1  |  |
| Comment on the Site:   |  |
| There seems to be no section covering 'new developments' e.g. 'Energy Effices restricted under recent Deregulation Bill legislation, but we feel a section of  | ,  |
| For example we have concerns about overheating in new dwellings as is hap development, as a result of no solar shading.  | ppening at Crest Nicholson's Riverside           |
| Change requested:  |  |
| Add a section on new domestic dwellings.   |  |
| nclude a requirement to meet a summer 'overheating standard' e.g. Option the 'sustainability checklist planning application' if it isn't already?  | nal SAP assessment – include it as a question in |
| Respondent 2611 Comment 58 Respondent Number: Number: Name:  | Respondent Transition Bath Organisation:         |
| Agent ID: Agent Name:  | Organisation.                                    |
|  | _  |

| Placemaking Options Plan Reference: | Policy SCR1 |
|-------------------------------------|-------------|
|                                     |             |

#### **Comment on the Site:**

Strongly support: we strongly support this measure and hope in future, potentially with a change of government, that planning regulations require home owners upgrade the efficiency of their existing homes as part of getting permission to extend their homes. We support Option 1.

Comment: 'draft' proofing is spelt wrong in the 'Emerging Policy Approach: SCR1' box, if should be 'draught'

#### **Change requested:**

Correct spelling of 'draft' to 'draught'

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Policy SCR2 Number: 1154 Respondent 244 **Comment** 5 **Respondent** Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SCR2 Comment on the Site: The Council's proposals under Policies SCR2 and SCR4 will also have to be aligned and consistent with the outcomes of the Government's two recent consultations on Allowable Solutions and Next Steps to Zero Carbon Homes: Small Sites Exemptions. **Change requested:** Respondent 301 Comment 13 Respondent **Respondent** South West HARP Number: Number: Name: **Organisation:** Planning Consortium **Agent ID:** 43 **Agent Name:** Tetlow King Planning Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: | Policy SCR2 Comment on the Site: We support this policy. However, the Council should recognise the potential for third parties in providing the delivery of allowable solutions. Whilst the Council may indicate a preference for solutions to be facilitated by the LPA, there is currently nothing in the regulations to require this. Noting that there a recent consultation on allowable solutions closed in January 2015, the Council should review this policy accordingly when further details are released. **Change requested:** Respondent 304 Comment 15 Respondent **Respondent** University of Bath

#### Comment on the Site:

Number:

Emerging Policy SCR2 currently states that all major non-domestic development must achieve either BREEAM Excellent or a Display Energy Certificate LevelA. The University broadly support the intent of the approach set out within the emerging policy, and the University has been leading the way on Sustainable Construction for a number of years. There

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Number:

Placemaking Options Plan Reference: Policy SCR2

Agent ID: 44 Agent Name: Define Planning and Design Ltd

Name:

**Organisation:** 

are, however, some concerns with regard to the practicalities and enforceability of this proposal.

BREEAM is a recognised standard and has been used at the University both formally and informally for a number of buildings. However, it should be recognised that there are a number of different BREEAM versions (e.g. BREEAM Offices, BREEAM Further Education) and the criteria are regularly revised.

The differences between EPCs and DECs appear to be understood through the Place Making Plan, but there may be problems with the use of a DEC target. A DEC rating can be estimated/predicted (with some difficulty) at the design stage but requires many assumptions to be made which may not prove realistic, and predictions to be made which may not be possible. A true DEC following the national rules for calculation is only produced when a building has been built and operated for up to 2 years, at which point enforcement will / may not be possible.

Another issue specific to DECs is that they are a reflection of the building itself, but also of what takes place in that building, and may not therefore be a fair reflection of the energy efficiency of that building as the hypothetical benchmarks they compare against may not be a fair comparison. The University has several science buildings which contain specific highly energy-intensive research equipment (e.g. fume cupboards, clean room areas, furnaces, etc) and which are therefore poorly rated when compared with a national benchmark for an average laboratory.

| Number: Name:  | Respondent Transition Bath Organisation:   |
|--|--|
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ At   | tachments sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy SCR2  |  |
| Comment on the Site:   |  |
| Qualified support: while we support the general aims of this police to impose higher standards on its own buildings, in particular its sefficiency than Victorian Schools (2013 Verco Energy Survey of 72 department claims to require insulation at minimum building regressioner management of ventilation and thermostatic control is for | chools. Its recently built schools are no more energy & B&NES Schools). Although the council's architects ulations plus 25%, we think this policy is misguided as  |
| like schools.  | ar more important in bunungs with high internal gains  |
|  | nimum number of energy rating points under BREEAM ed of a period 2 years after delivery of new buildings,  |
| like schools.  Comment: include new standards for schools, ideally require a mi or minimum DEC ratings e.g. 'A'. 'Soft Landings' should be require with contractual requirements for deliverers to meet the energy   | nimum number of energy rating points under BREEAM ed of a period 2 years after delivery of new buildings, targets set during their planning applications. B&NES , so for example those more than 200m2? The word |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order   |  |  |  |  |
|---|--|--|--|--|
| Respondent 6576 Comment 6 Respondent Mr Sam Willitts Number: Number: Name:  | Respondent Keynsham Community Organisation: Energy |  |  |  |
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachme  | nts sent with the comment? $\Box$                  |  |  |  |
| Placemaking Options Plan Reference: Policy SCR2   |  |  |  |  |
| Comment on the Site:  |  |  |  |  |
| KCE seeks clarification on apartnership approach to providing carbon emisto the Council to encourage developers to work with community energy genergy solutions to tackling fuel poverty. |  |  |  |  |
| Change requested:   |  |  |  |  |

# Placemaking Options Plan Reference: Policy SCR3

Plan Order Number: 1159

| Respondent 2611 Comment<br>Number: Number:   | • | Respondent Transition Bath Organisation: |  |  |
|--|---|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |   |  |  |  |
| Placemaking Options Plan Reference: Policy SCR3  |   |  |  |  |

#### **Comment on the Site:**

Strongly Support: we strongly support the council's policy of delivering Allowable Solutions locally if possible, and disagree with national policy which is likely to lead large developers to offset carbon emissions at unrealistically low levels. We would hope however that Allowable Solutions are not necessary and onsite solutions are delivered particularly with reduced solar PV costs.

Comment: the 'Emerging Policy Approach: SCR12' box is mislabelled, it should be SCR3, the auto comment box is also wrong when you click through on-line and where it is labelled ST2.

#### **Change requested:**

Fix wording and commenting of section references which appears to be wrong (typos?).

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Policy SCR4 Number: 1163 Respondent 244 Comment 3 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SCR4 Comment on the Site: As identified by the Council there are a number of policy proposals (H1, UD1, SCR4, and SCR8) which the Council will have to re-consider when the final outcomes of the Housing Standards Review are known in order that the Council's policies are correctly aligned and consistent with national policy. **Change requested:** Respondent 279 Comment 32 Respondent Rohan Torkildsen **Respondent** English Heritage Number: Number: Name: **Organisation:**

#### **Comment on the Site:**

**Agent Name:** 

Placemaking Options Plan Reference: Policy SCR4

Agent ID:

Might it be appropriate to ensure that the 20% provision is provided in a way that is compatible with any environmental, landscape, townscape and or heritage consideration?

The design of any future provision will ensure that heritage assets including local areas of historical and architectural distinctiveness are conserved in a manner appropriate for their significance.

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

#### **Change requested:**

Respondent 304 Comment 16 Respondent Respondent University of Bath Number: Name: Organisation:

Agent ID: 44 Agent Name: Define Planning and Design Ltd

Further Information available in the original comment? 

Attachments sent with the comment?

#### Comment on the Site:

Emerging Policy SCR4 states that development will be expected to provide sufficient renewable energy generation to reduce carbon dioxide emissions from expected energy use in the buildings by at least 20%. The University broadly supports this aim,

Placemaking Options Plan Reference: | Policy SCR4

| Change | reau | ested | ı: |
|--------|------|-------|----|
|--------|------|-------|----|

but it should be recognised that certain renewable technologies are best applied in certain situations, and there should therefore be flexibility allowed for in, for example, a campus situation such that the technology can be applied to another more applicable building or location.

| Respondent 2611 Comment 61 Respondent Number: Number: Name:   | Respondent Transition Bath Organisation:  |
|---|---|
| Agent ID: Agent Name:   |   |
| Further Information available in the original comment? $\Box$ Attach  | ments sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy SCR4   |   |
| Comment on the Site:  |   |
| Qualified Support: we strongly support the policy to reduce CO2 emiss<br>imposing standards above 20% might be difficult to justify given curre<br>continue to review the situation if there is a national trend to greater   | nt national norms, but would like the council to  |
| However, we are concerned about the use of Allowable Solutions as a delivered locally and are likely to be an unrealistically/artificially low calternative removed from the policy, as we can't think of a good reason example to off-site delivery of a solar PV farm elsewhere in B&NES if concourage when delivering solar PV to install roof integrated panels | arbon prices. We would like the Allowable Solutions on why these might be used as an alternative for on-site delivery is not possible? We would also like |
| Comment: 2.390 – we were unable to find the referenced Regen SW r   | eport in the evidence base list .   |
| Change requested:   |   |
| Remove Allowable Solutions as an opt out, as all developers will try to or highly visible sites which might exclude the opportunity to install so   | •   |
| Clarity around the term 'in the locality' would be helpful?   |   |
|   |   |
| Respondent 6346 Comment 5 Respondent Number: Number: Name:  | Respondent Mactaggart and Mickel Organisation:  |
| Agent ID: 205 Agent Name: Rocke Associates  |   |
| Further Information available in the original comment? $\Box$ Attach  | ments sent with the comment? $\square$  |
| Placemaking Options Plan Reference: Policy SCR4   |   |
| Comment on the Site:  |   |
| On-Site Renewable Energy Requirement Emerging Policy Approach: Some The requirements of this emerging policy are potentially onerous, and requirements for which the provision is made in the higher order plan expected energy use in buildings by at least 20% should allow for a pothrough renewable energy generation alone.                                    | could prejudice delivery of the development<br>. Any requirement to reduce CO2 emissions from   |
| Change requested:   |   |

| Respondent 6410 Comment 7 Respondent Ms Gaynor Parkinson Number: Name:   | <b>Respondent</b> Linden Homes Strategic <b>Organisation:</b> Land        |
|--|---|
| Agent ID: 28 Agent Name: Nash Partnership  |   |
| Further Information available in the original comment? 🗹 Attachments   | sent with the comment? $\Box$   |
| Placemaking Options Plan Reference: Policy SCR4  |   |
| Comment on the Site:   |   |
| 7.1 Policy SCR 4 sets out a requirement for allocated development sites to proceed to be a set of the control of the contro    | ovide renewable energy generation to                                      |
| t is noted that the Inspector examining the Core Strategy referred to the Govering set within the Building Regulations.  | vernment intention of energy requirements                                 |
| He also noted that at the time of the Examination (April 2014), whilst the Government of the Country and the clauses related to local energy efficiency standards, equirements for a proportion of energy used in new developments to be from the spector found that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to sources in the locality, not one country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the country that the relevant clauses refer to source the country that the relevant clauses refer to source the country that the reference that the country that the country that the reference the country that the reference that the ref | thereby leaving the ability to set local m renewable sources. However the |
| le therefore concluded that it would be inappropriate to require a proportio esidential development through planning policy.   | n of renewable energy provision within new                                |
| Change requested:  |   |
| We therefore request that the requirement in policy SCR4 for renewable ene notlude renewable energy provision to achieve a 20% reduction in CO2 emissi sovernment Policy Statement related to the Housing Standards Review perm  | ions is deleted unless the forthcoming                                    |
| Respondent 6426 Comment 18 Respondent Mr Steven Kerry Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley                    |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments  | sent with the comment? $\Box$   |
|  |   |
| Placemaking Options Plan Reference: Policy SCR4  |   |
|  |   |
| Comment on the Site:  is government policy that all renewable energy measures for new developm   |   |
| Comment on the Site:  t is government policy that all renewable energy measures for new developmental regulations (i.e. building to Code 4) therefore a planning policy dedicated the energy measures for new developmental regulations (i.e. building to Code 4) therefore a planning policy dedicated the energing policy approach states that 'in exceptional circums attilised.' Allowable Solutions should not be an exception, they should be, as the states that 'in exception in the should be an exception.   | ated to this is not required.  nstances Allowable Solutions may be        |

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order  |  |  |  |
|--|--|--|--|
| Respondent 6576 Comment 7 Respondent Number: Number: Name  | ndent Mr Sam Willitts                    | Respondent Keynsham Community Organisation: Energy |  |
| Agent ID: Agent Name:  |  |  |  |
| Further Information available in the origi   | nal comment?   Attachments sent          | with the comment? $\Box$                           |  |
| Placemaking Options Plan Reference: Po   | olicy SCR4                               |  |  |
| Comment on the Site:   |  |  |  |
| KCE would expect the Council to encourage solutions. We would like to work with the visionary in its approach to renewable ene | Council to develop this model further. V | We believe the Council should be more              |  |
| Change requested:  |  |  |  |
|  |  |  |  |

**Placemaking Options Plan Reference:** Policy SCR5

|  | Number: 1167   |
|--|--|
| Respondent 224 Comment 70 Respondent Number: Number: Name:   | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\Box$ A  | ttachments sent with the comment? $\square$                    |
| Placemaking Options Plan Reference: Policy SCR5  |  |
| Comment on the Site:   |  |
| Change requested:  |  |
| Policy must include reference to character and visual amenity of   | heritage assets (listed buildings, WHS and CA).                |
| Where solar PVs are proposed, the use of minimal frame should particularly in WHS  | be specifically encouraged in all visible locations,           |
|  |  |
| Respondent 279 Comment 33 Respondent Rohan Torkildse Number: Name:   | en <b>Respondent</b> English Heritage <b>Organisation:</b>     |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? <a> A</a>   | ttachments sent with the comment? $\Box$                       |
| Placemaking Options Plan Reference: Policy SCR5  |  |
| Comment on the Site:   |  |
| English Heritage would support reference to the SPD in this police   | y.   |
| It is assumed the photograph of the historic terrace on a hillside example of good practice. Perhaps it illustrates a requirement for historic environment and any affected heritage asset is conserve | r an explicit policy reference to the need to ensure the       |
| Change requested:  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 62 Respondent Number: Number: Name:  | Respondent Transition Bath Organisation:                       |
| Tunio.   | Organisation.  |
| Agent ID: Agent Name:  Further Information available in the original comment?   A  | ttachments sent with the comment? $\Box$                       |
|  |  |
| Placemaking Options Plan Reference: Policy SCR5  |  |

Strongly Support: the aesthetics of solar PV are important and more clarity around this subject would be helpful, given the

uncertainties created by B&NES's council's failed attempt to remove solar PV from Thyme Barn at Claverton.

**Comment on the Site:** 

Plan Order

#### **Change requested:**

Change the wording to include references to roof integrated panels and their better aesthetics.

Placemaking Options Plan Reference: Ground Mounted Solar Arrays /

Paragraph 2.399

Plan Order Number: 1174

| Respondent 2611 Comment 64 Res<br>Number: Number: Na  | pondent<br>me:                           | Respondent Transition Bath Organisation: |  |  |
|---|--|--|--|--|
| Agent ID: Agent Name:   |  |  |  |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ |  |  |  |  |
|   |  |  |  |  |
| Placemaking Options Plan Reference: Ground Mounted Solar Arrays / Paragraph 2.399                       |  |  |  |  |
| Comment on the Site:  |  |  |  |  |
| Comment: we weren't sure in 2.399 wh  | ich 'table below' was being referred to? |  |  |  |
| Change requested:   |  |  |  |  |
| Insert missing table or clarify reference   |  |  |  |  |

**Placemaking Options Plan Reference:** Policy SCR6

| r lacemaking options                             | Train Neterchiee. Toney Se                                       |                                      | Number: 1175            |
|--|--|--------------------------------------|-------------------------|
| Respondent 224 Commer<br>Number: Number          | nt 71 Respondent<br>r: Name:                                     | Respondent<br>Organisation:          | Bath Preservation Trust |
| Agent ID: Agent Name                             | e:   |                                      |                         |
| Further Information availab                      | le in the original comment? $\Box$                               | Attachments sent with the com        | ment?                   |
|  |  |                                      |                         |
| Placemaking Options Plan R                       | eference: Policy SCR6  |                                      |                         |
| Comment on the Site:                             |  |                                      |                         |
| Change requested:                                |  |                                      |                         |
| Policy must include reference                    | e to character and visual amenity                                | of heritage assets (listed buildings | s, WHS and CA).         |
| Where solar PVs are propose particularly in WHS  | d, the use of minimal frame shou                                 | ld be specifically encouraged in al  | l visible locations,    |
|  |  |                                      |                         |
| Respondent 279 Commer Number: Number             | <ul><li>nt 34 Respondent Rohan Torkil</li><li>r: Name:</li></ul> | dsen Respondent Organisation:        | English Heritage        |
| Agent ID: Agent Name                             | e:   |                                      |                         |
| Further Information availab                      | le in the original comment? $\Box$                               | Attachments sent with the com        | ment?                   |
|  | D. I'. CODC  |                                      |                         |
| Placemaking Options Plan R                       | eterence: Policy SCR6  |                                      |                         |
| Comment on the Site:                             |  |                                      |                         |
| An explicit reference is requir and its setting. | red to ensure that any installation                              | n conserves the significance of any  | affected heritage asset |
| <u> </u>   |  |                                      |                         |
| Change requested:                                |  |                                      |                         |
|  |  |                                      |                         |
|  |  |                                      |                         |
| Respondent 281 Commer<br>Number: Number          | nt 20 Respondent Alison Howel r: Name:                           | Respondent Organisation:             | Natural England         |
| Agent ID: Agent Name                             | e:   | ŭ                                    |                         |
| Further Information availab                      | le in the original comment? $\Box$                               | Attachments sent with the com        | ment?                   |
|  |  |                                      |                         |
| Placemaking Options Plan R                       | eference: Policy SCR6  |                                      |                         |
| Comment on the Site:                             |  |                                      |                         |
|  | s: we support emerging policy ap                                 | proach SCR6.                         |                         |
| Change requested:                                |  |                                      |                         |
| Change requested.                                |  |                                      |                         |
|  |  |                                      |                         |

Plan Order

| Schedule of Comments on the Placemaking Plan Optic   |   |
|--|---|
| Respondent 2611 Comment 63 Respondent Number: Name:  | Respondent Transition Bath Organisation:  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachment   | ts sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy SCR6  |   |
| Comment on the Site:   |   |
| Strongly Support: we strongly support this policy and feel each site should be   | be considered on its own merits.  |
| We think a fixed 20% reduction is the best option, if you go for more they megrounds of 'Viability', but the policy needs on-going review, higher levels mas solar PV panel prices continue to fall. | ,   |
| Change requested:  |   |
|  |   |
|  |   |
|  |   |
| Respondent 3095 Comment 14 Respondent Dr N J T Long Number: Name:  | <b>Respondent</b> Bath and North East <b>Organisation:</b> Somerset Branch of the |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachment   | ts sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy SCR6  |   |
|  | -   |
| Comment on the Site: Paras 2.394 to 2.399 and SCR6   |   |
| raids 2.534 to 2.533 and 3Cho  |   |
| We hope that solar generation can be concentrated on roofs and brownfiel concerning the selection of sites and the minimisation of visual impact.  | ld sites. We welcome the policies in SCR6   |
| Change requested:  |   |
| <u> </u>   |   |
|  |   |
|  |   |
| Respondent 6576 Comment 8 Respondent Mr Sam Willitts Number: Number: Name:   | Respondent Keynsham Community Organisation: Energy                                |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachment   | ts sent with the comment? $\Box$  |
| Placemaking Options Plan Reference: Policy SCR6  |   |
| Comment on the Site:   |   |

KCE is disappointed that, although the Council indicates support for ground mounted solar arrays, it has not gone so far as to allocate potential sites for solar energy. KCE is keen to work with the Council to identify potential solar sites around Keynsham.

| Schedule of Comments on the Placemaking Plan Options Document in Plan Order |   |
|---|---|
| Change requested:   |   |
|   |   |
|   | _ |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |

# Placemaking Options Plan Reference: Policy SCR7 Plan Order Number: 1180

| Respondent 262<br>Number:   |                    |             | Respondent Woodland Trust Organisation: |
|---|--------------------|-------------|---|
| Agent ID: Ag  | ent Name:          |             |   |
| Further Information available in the original comment? $\square$ Attachments sent with the comment? $\square$ |                    |             |   |
|   |                    |             |   |
| Placemaking Optio   | ns Plan Reference: | Policy SCR7 |   |

#### Comment on the Site:

We would like to see the role of woodland recognised here. Bioenergy can offer huge carbon savings, since the carbon emitted by burning biomass or biofuels is balanced overall by the carbon taken in by the crops as they grow. However, the carbon and environmental costs of growing, harvesting, transport and processing, need to be taken into account.

The Trust supports the development of small-scale, local biomass projects such as wood-fuel heat and power, which minimise the costs and carbon emissions associated with transport.

To ensure that bioenergy delivers genuine greenhouse gas savings, without negative environmental impacts, it must be subject to a robust system of assurance or certification. For the production of woody biomass this means UK Woodland Assurance Standard and Forest Stewardship Council certification, but there is currently no equivalent for agricultural crops. Any certification system must be internationally agreed to avoid the problems simply being pushed overseas Current evidence is that the greatest potential greenhouse gas savings can be achieved through burning of woodchip to generate heat, gasification of biomass to produce electricity and the use of second generation biofuels produced from biomass. The Woodland Trust would therefore like to see bioenergy policies place greater emphasis on the use of woody biomass crops for these purposes, rather than on agricultural crops such as sugar beet and wheat for the production of biofuels.

We would like to see more use of wood as a fuel providing that harvesting is carried out sensitively and respects the biodiversity, scale and cultural importance of the site especially ancient woods.

We believe that woodland owners can benefit from the developing markets for wood fuel and that income streams generated would help owners deliver environmental and social benefits from their woods to society. Developing a market for low-grade timber through wood fuel projects could also make other woodland management operations with a high biodiversity benefit more economically viable, for example the restoration of planted ancient woodland sites currently under non-native conifers.

Harvesting methods must, however, be undertaken sensitively. It is vital that management of ancient woodland, long established plantations and coppice woodland for the production of wood fuel should be grounded in high standards of management for protection and enhancement of biodiversity. In ancient woodland it is important that plenty of dead wood remains, that veteran trees are protected and that coppicing is only undertaken after expert advice. Adherence to certification standards under the Forest Stewardship Scheme or UK Woodland Assurance Scheme would help to prevent inappropriate harvesting operations. This should be regulated through the Woodland Grant Scheme and the felling licence system to ensure that these woods are restored and managed in a sensitive way.

Use of timber from existing woodland can play an important role in sustaining rural communities, providing employment opportunities in timber harvesting and transport and supply chains. Government estimates that a medium scale 20MW wood-fired power plant (supplying energy for around 20,000 homes) would provide full-time employment for 48 permanent staff and significant short-term employment opportunities. We favour development of smaller plants serving around 5,000 homes which would still provide significant economic benefits to local communities. This would help to support the forestry sector and would offer valuable diversification opportunities for farmers.

Woodland Carbon: organisations often generate large amounts of carbon which contributes to higher levels of greenhouse gas emissions in our atmosphere. Customers and staff alike expect businesses to act positively and

responsibly to reduce their carbon emissions and support a more sustainable environment. By working with the WT as a Woodland Carbon partner, local authorities can be involved in a credible carbon removal scheme which operates under the government's Woodland Carbon Code. Our scheme is not a compulsory carbon offset solution, but is a voluntary way of mitigating emissions by planting trees here in the UK. For more information, see the WT's Woodland Carbon site - http://www.woodlandtrust.org.uk/mediafile/100032595/woodland-carbon-for-business-1013.pdf.

| Change requested:  |  |
|--|--|
|  |  |
|  |  |
|  |  |
| Respondent 2611 Comment 65 Respondent                                    | Respondent Transition Bath                         |
| Number: Name:  | Organisation:                                      |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment?   Attachr         | ments sent with the comment? $\Box$                |
|  |  |
| Placemaking Options Plan Reference: Policy SCR7                          |  |
|  |  |
| Comment on the Site:   |  |
| Strongly Support: Transition Bath strongly believes in community led/o   | owned/run renewable energy.                        |
| Comment: We don't really understand the semantic subtlety of Option      | 1. 'hanafit' varsus 'lad' varsus 'involvement'. It |
| would be helpful if this were spelt out?                                 | 1. Deficit versus feu versus involvement.it        |
|  |  |
| Change requested:  |  |
|  |  |
|  |  |
|  |  |
| Respondent 6576 Comment 9 Respondent Mr Sam Willitts Number: Name: Name: | Respondent Keynsham Community                      |
| Trainer  | Organisation: Energy                               |
| Agent ID: Agent Name:  |  |
| Further Information available in the original comment? $\qed$ Attachr    | ments sent with the comment? $\square$             |
|  |  |
| Placemaking Options Plan Reference: Policy SCR7                          |  |
|  |  |
| Comment on the Site:   |  |
| KCE is disappointed that the Council has not highlighted the potential f | or hydroelectricity generation in the BANES area.  |
| KCE has already identified several potential sites around Keynsham, an   | d there are other sites under consideration across |
| the region. What support will the Council give to community owned hy     | droelectricity schemes as part of its carbon       |
| reduction commitment?  |  |
| However, we welcome the Councils commitment to community led rei         | newable energy solutions and community             |
| involvement in such schemes. We would also like to see the Council pla   | ,  |
| work with locally based community energy groups to generate affordal     | , -  |
|  |  |
| Change requested:  |  |
|  |  |
|  |  |

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** Policy SCR8 Number: 1185 Respondent 224 Comment 72 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SCR8 Comment on the Site: Wording should specify if 'required' means that it must be designed in/included in design. This gives a specific instruction to developers. **Change requested:** Respondent 244 Comment 4 Respondent Susan E Green **Respondent** Home Builders Number: Number: Name: **Organisation:** Federation Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$

#### **Comment on the Site:**

Placemaking Options Plan Reference: Policy SCR8

Placemaking Options Plan Reference: Policy SCR8

As identified by the Council there are a number of policy proposals (H1, UD1, SCR4, and SCR8) which the Council will have to re-consider when the final outcomes of the Housing Standards Review are known in order that the Council's policies are correctly aligned and consistent with national policy.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |
|                   |  |  |  |
|                   |  |  |  |

Respondent 245 Comment 8 Respondent Mr Andy Reading Number: Name: Organisation:

Agent ID: Agent Name:

Further Information available in the original comment? 

Attachments sent with the comment?

#### Comment on the Site:

We are pleased to see that BANES are still keen to progress exemplar local water efficiency standards.

| Schedule of Comments on the Placemaking Plan Option  | s Document in Plan Order                                  |
|--|---|
| Respondent 304 Comment 17 Respondent Number: Name:   | <b>Respondent</b> University of Bath <b>Organisation:</b> |
| Agent ID: 44 Agent Name: Define Planning and Design Ltd  |   |
| Further Information available in the original comment? $\Box$ Attachments  | sent with the comment? $\Box$                             |
| Placemaking Options Plan Reference: Policy SCR8  |   |
| Comment on the Site:   |   |
| Emerging Policy SCR8 states a 25% improvement in water consumption as su points will be required. The University supports this standard, and is already                    |   |
| Change requested:  |   |
| Respondent 2611 Comment 66 Respondent<br>Number: Number: Name:   | Respondent Transition Bath Organisation:                  |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments  | sent with the comment? $\Box$                             |
| Placemaking Options Plan Reference: Policy SCR8  |   |
| Comment on the Site:   |   |
| Strongly Support: we strongly support measures i.ii and iii in increasing Bath's particularly with the long term effects of climate change increasing water stre           |   |
| Change requested:  |   |
|  |   |
|  |   |
| Respondent 6426 Comment 19 Respondent Mr Steven Kerry Number: Name:  | Respondent Persimmon Homes Organisation: Severn Valley    |
| Agent ID: Agent Name:  |   |
| Further Information available in the original comment? $\Box$ Attachments  | sent with the comment? $\Box$                             |
| Placemaking Options Plan Reference: Policy SCR8  |   |
| Comment on the Site: We question the premise of rainwater harvesting or other methods of captur residential development, rather this should be amended to 'should be encou |   |
| Change requested:  |   |
|  |   |

## **Placemaking Options Plan Reference:** Policy SCR9

Plan Order Number: 1188

| Respondent 151 Comment 23 Respondent Number: Name:  | Respondent DUNKERTON PARISH Organisation: COUNCIL  |
|---|--|
| Agent ID: Agent Name:   | Organisation. COUNCIL  |
|   | cachments sent with the comment? $\Box$  |
|   |  |
| Placemaking Options Plan Reference: Policy SCR9   |  |
| Comment on the Site:  |  |
| Cycle Storage p290  |  |
| EPA SCR9 seems very poorly developed at this stage. We assume t "All dwellings" as this is likely to be wholly impractical despite the unsure as to what "demonstrate" means – "dwellings" can't demodemonstrating in practice? When? And to who? And what sanction the much better alternative is Option 2, avoiding the creation of a | laudable green intentions of the policy. We are similarly onstrate anything, so who would be required do the ns might apply if the "demonstration" fails? We believe |
| Change requested:   |  |
| Cycle Storage p290  |  |
| EPA SCR9 seems very poorly developed at this stage. We assume t dwellings" as this is likely to be wholly impractical despite the laud  |  |

Respondent 828 Comment 10 Respondent Number: Name:

Respondent 828 Comment 10 Respondent Organisation: Limited and DFE Projects

demonstrating in practice? When? And to who? And what sanctions might apply if the "demonstration" fails? We believe

unsure as to what "demonstrate" meas - "dwellings"n't demonstrate anything, so who would be required do the

Agent ID: 149 Agent Name: Martin Bailey Consultant Chartered Town Planner

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy SCR9

#### **Comment on the Site:**

Policy SCR9 would require specific numbers of secure cycle parking spaces related to the number of bedrooms in a residential property. Whilst Deeley Freed Estates and DFE Projects firmly support the increased use of cycles in conjunction with development, the specific level of provision proposed in the policy has been put forward without any substantive justification in the PPOD and is considered to be excessive. The draft policy is unsound in the absence of such justification.

#### **Change requested:**

Adopt a more balanced and flexible approach - along the lines advocated by the Council in the PPOD for parking - and based on sound justification for reasonable levels of cycle storage provision.

|   | Schedule of Co        | mments on the Placema       | ang Plan Options Do    | cument in Plan Order   |
|---|-----------------------|-----------------------------|------------------------|--|
| Respondent 2611<br>Number:                  | Comment 67 Number:    | Respondent<br>Name:         |                        | Respondent Transition Bath Organisation:                               |
| Agent ID: Ag                                | ent Name:             |                             |                        |  |
| Further Informatio                          | n available in t      | he original comment? $\Box$ | Attachments sent       | t with the comment? $\Box$   |
|   |                       |                             |                        |  |
| Placemaking Optio                           | ns Plan Referei       | nce: Policy SCR9            |                        |  |
| Comment on the Si                           | ite:                  |                             |                        |  |
| development. We w                           | ould like the co      |                             | which includes show    | ough for non-domestic building<br>ers and changing rooms for buildings |
| I,ii and iii of the Eme                     | erging Policy sho     | ould be agreed and imple    | mented                 |  |
| Change requested:                           |                       |                             |                        |  |
|   |                       |                             |                        |  |
| Respondent 6389<br>Number:                  | Comment 51<br>Number: | Respondent<br>Name:         |                        | Respondent Cycle Bath Organisation:                                    |
| Agent ID: Ag                                | ent Name:             |                             |                        |  |
| Further Informatio                          | n available in t      | he original comment?        | Attachments sent       | t with the comment? $\Box$   |
| Placemaking Optio                           | ns Plan Referei       | nce: Policy SCR9            |                        |  |
| Comment on the Si                           | ite:                  |                             |                        |  |
| As well as storage al visitors and resident |                       | s should have good conve    | nient cycle parking th | nat is direct and easy to access for                                   |
| Change requested:                           |                       |                             |                        |  |
|   |                       |                             |                        |  |
|   |                       |                             |                        |  |
| Respondent 6426<br>Number:                  | Comment 20 Number:    | Respondent Mr Steven Name:  | Kerry                  | <b>Respondent</b> Persimmon Homes <b>Organisation:</b> Severn Valley   |
| Agent ID: Ag                                | ent Name:             |                             |                        |  |
| Further Informatio                          | n available in t      | he original comment?        | Attachments sent       | t with the comment? $\square$  |
| Placemaking Optio                           | ns Plan Referei       | nce: Policy SCR9            |                        |  |

#### **Comment on the Site:**

The emerging policy approach which introduces a new requirement for all new dwellings to demonstrate secure and accessible cycle storage is overly generous in its allocation of storage per dwelling bedroom. The allocation of storage facilities for 4 cycles for a 4 bedroom house is working on the assumption that every resident in each bedroom will use the facilities. Whilst the increase of cycle storage provision is generally welcomed the allocation of said storage has to be realistic. Along with suitable parking standards, the increase of cycle storage facilities to the extent recommended under

| developable space. | proach could jeopardise the viability of smaller residential schemes through the reduction of |  |
|--------------------|---|--|
| Change requested:  |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |
|                    |   |  |

# Schedule of Comments on the Placemaking Plan Options Document in Plan Order Placemaking Options Plan Reference: District Heating Plan Order

| Placemaking Options Plan Re  | rerence: District neating   | Number: 1195  |
|--|---|---|
| Respondent 2611 Comment 68 Res<br>Number: Number: Na   | pondent<br>me:  | Respondent Transition Bath Organisation:  |
| Agent ID: Agent Name:  |   |   |
| Further Information available in the or  | riginal comment?   Attachments sen  | with the comment? $\Box$  |
| Placemaking Options Plan Reference:  | District Heating  |   |
| Comment on the Site:   |   |   |
| flats, district heating subject to ground of<br>feasible; currently developers just state<br>reasons. We think there should be a seg<br>include this and for example the 20% M<br>some of the complexity of the need for | over certain densities e.g. 35 dph (net of conditions, should be required to conside they don't think it feasible on their plann parate 'Sustainable Construction List'/requerton Rule assessment. District heating hhomes to stop burning fossil fuels (gas) ir the potential energy transmission losses | r in detail whether district heating is ing applications without stating their uirement for larger developments which as the major benefit that it would reduce order to meet our 2050 carbon |
| Change requested:  |   |   |
| planning applications. Specify over what   | nent requirements for developers of suita<br>t size development this should happen – e<br>native 'Sustainable Construction List/Que   | e.g. 50 or more individual homes, blocks  |
|  | pondent<br>me:  | Respondent Transition Bath Organisation:  |
| Further Information available in the or  | riginal comment?   Attachments sen  | with the comment? $\Box$  |
| Placemaking Options Plan Reference:  | District Heating  |   |
| Comment on the Site:   |   |   |
| scope for additional capacity to serve no  | nt to be true "services company EON and earby sites, subject to negotiation." Durin were looking at other solutions elsewher  | g a recent visit they stated the current  |

Remove the reference to EON/Crest, or clarify their stance.

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order Placemaking Options Plan Reference: Policy SU1 Number: 1210 Respondent 224 Comment 74 Respondent **Respondent** Bath Preservation Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SU1 Comment on the Site: Need to ensure that does the SuDs evidence base adequately take into account the historic infrastructure. **Change requested:** Respondent 245 **Comment** 9 **Respondent** Mr Andy Reading **Respondent** Environment Agency Number: Number: Name: **Organisation: Agent Name:** Agent ID: Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SU1 **Comment on the Site:**

We are pleased to see a detailed policy approach is emerging in relation to sustainable drainage (Policy SU1). We are happy for the planning policy team to continue to liaise closely with the Council's Lead Local Flood Authority function in agreeing appropriate policy wording. We note the policy cross-references to the emerging West of England SuDS Guidance (2014). Following the Governments consultation, if it is intended to continue with a planning led approach to implementing SuDS (instead of SABS), then it may be appropriate for the West of England SuDS Guidance to be published as an SPD. This would ensure it is given appropriate weight in planning decisions.

| Change requested: |  |  |
|-------------------|--|--|
|                   |  |  |
|                   |  |  |

Comment 8 Respondent lan Lings Respondent 262 Respondent Woodland Trust Number: Number: Name: **Organisation:** 

**Agent Name:** Agent ID:

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Placemaking Options Plan Reference: Policy SU1

#### **Comment on the Site:**

The Woodland Trust believes that trees and woodland can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding. Whilst your adopted Core Strategy (2014) Policy CP2 acknowledges the need for sustainable construction and the provision of enhanced green infrastructure to minimise flooding, making sure all of your Local Authority area is resilient to climate change and flooding is essential.

Therefore, all of the development sites should take this into account: currently this is not the case with all of the 57 identified development sites. This would enable tree planting to be specifically highlighted as a green infrastructure option to reduce the rate of surface water discharge from new development across your District.

In addition,, whilst your Development Management Policy for Sustainable Drainage Systems and SuDS is identified as having key links with Core Strategies CP5 (Flood Risk Management) and CP7 (Green Infrastructure), currently there is no policy which specifically takes this into account with your Placemaking Plan. The natural environment is inextricably linked with climate change and will play a key role in both adaptation and mitigation. Therefore, land management with site allocations in Local Plans should encompass naturally functioning and processes, such as natural flood alleviation capacity, natural regeneration of brownfield sites & land, and natural succession of habitats. Achieving this should also be part of an integrated approach over landscape-scale areas as this will maximise the ability of the natural environment to be resilient in the face of climate change.

Specifically we would like to see this Development Management Policies document reference the use of trees and woodland as one of a range of natural flood prevention tools, particularly for SuDS.

Trees and woodlands offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management.

In addition, a joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: 'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives.

The Government's Independent Panel on Forestry (Defra, Final Report, July 2012) has emphasised these benefits by stating that:

'One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures'. This has been endorsed by the response in the Government Forestry Policy Statement (Defra Jan 2013) with the key objective (p.23) 'Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity', together with a Cumbria case study (p.22 - SCaMP) on water benefits from woodland creation.

Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.

Trees can reduce the likelihood of surface water flooding in urban situations too, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. There is a positive role here for the use of trees with SuDS initiatives (Measure 4.9, p.42). Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (Using green infrastructure to alleviate flood risk, Sustainable Cities - www.sustainablecities.org.uk/water/surface-water/using-gi/). The Woodland Trust has also produced a policy paper illustrating the benefits of trees for urban flooding – Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity.

There is also increasing evidence of the role of trees for water outcomes in rural situations. The Pontbren Project was a farmer led approach to sustainable land management in the uplands which discovered that tree planting had unexpected benefits in reducing water run-off from improved grassland – see report https://www.woodlandtrust.org.uk/mediafile/100084045/Pontbren-project.pdf.

The Woodland Trust has produced a further paper – Planting Trees to Protect Water – The role of trees and woods on farms in managing water quality and quantity – that shows how trees and woodland can help mitigate peak flood flows. The report is available at - https://www.woodlandtrust.org.uk/mediafile/100083903/Planting-trees-to-protect-water-RBC-Bluewater-farming-report-evidence.pdf.

The Woodland Trust has carried out a number of partnership riparian planting projects across the country, particularly along the Rivers Frome & Piddle in Dorset. Examples of using trees for flood mitigation can be found in our WoodWise publication - https://www.woodlandtrust.org.uk/mediafile/100091022/9-Wood-Wise-Winter-2013.pdf.

The Government's new agri-environment Countryside Stewardship scheme specifically targets woodland creation towards water benefits and it is therefore likely that this will represent a new funding resource for flood mitigation. The National Flood Forum too (http://www.nationalfloodforum.org.uk/about-us/.) is supporting community action for flooding that can link in to community tree planting schemes.

Finally we note that the Environment Agency's recently published – Flood and Coastal erosion risk management – Long Term Investment Scenarios (LTIS) 2014 (Environment Agency 2014) specifically states – "10.2 Other options to reduce risk

There is scope for alternative approaches to reducing risk in areas where community level defences are not available, although we are not yet able to quantify their potential benefits within the LTIS analysis. Some examples are:

• Natural flood management. The risk of flooding and coastal erosion cannot be managed solely by hard defences due to cost and sustainability. Alternative approaches, working with natural processes and rural land-use options can contribute to a more sustainable approach. We work with natural processes to reduce flood risk by protecting, restoring and emulating the natural regulating function of catchments, rivers, flood plains and coasts. These can reduce the risk of flooding by reducing run-off from catchments, and natural sediment behaviour can provide resilience to coastal flooding and erosion. These measures are usually used together with hard-engineering measures. They can also provide wider benefits to people and wildlife by making traditional defences more resilient to climate change, creating or restoring habitats, improving biodiversity, capturing and storing carbon, reducing sedimentation and improving water quality".

| nabitats, improving biodiversity, capturi  | ing and storing carbon, reducing se | edifficition and improving water quality. |
|--|-------------------------------------|---|
| Change requested:                          |                                     |   |
|  |                                     |   |
|  |                                     |   |
|  | pondent Rohan Torkildsen<br>me:     | Respondent English Heritage Organisation: |
| Agent ID: Agent Name:                      |                                     |   |
| Further Information available in the or    | iginal comment?   Attachmen         | nts sent with the comment? $\square$      |
| Placemaking Options Plan Reference:        | Policy SU1                          |   |
| Comment on the Site:                       |                                     |   |
| It is important to ensure the potential h  | arm caused by SUDS on the histor    | ic environment, particularly underground  |
| archaeology, is recognised.                |                                     |   |
| Change requested:                          |                                     |   |
| Consideration of an additional criteria re | e the historic environment.         |   |

|  | Schedule of Co   | mments on the Placema  | aking Plan Options Document in Plan Order  |
|--|--|--|--|
| Respondent 301<br>Number:                                      | Comment 14<br>Number:  | Respondent<br>Name:  | Respondent South West HARP Organisation: Planning Consortium   |
| Agent ID: 43 Ag  | gent Name: Tet   | ow King Planning   |  |
| Further Information  | on available in t  | ne original comment?   | Attachments sent with the comment?   |
| Placemaking Optic  | ons Plan Referer   | nce: Policy SU1  |  |
| Comment on the S   | ite:   |  |  |
| requires SuDS for re<br>that SuDS would be<br>The above commer | esidential develo<br>inappropriate.<br>Its are intended<br>Ith West HARP F | opments of 10 or more he<br>The Council's policy sho<br>to be constructive. We | ning applications does not accord with CLG's requirements. This nomes and major commercial schemes, unless demonstrated uld accord with the national approach. would like to be kept informed of this DPD's progress. Please etained on the Local Plan database, with Tetlow King Planning |
| Change requested   | :  |  |  |
|  |  |  |  |
|  |  |  |  |
|  | Comment 31   | Respondent Cllr Anket  | ell Jones <b>Respondent</b>  |
| Number:  | Number:  | Name:  | Organisation:  |
| Agent ID: Ag   | gent Name:   |  |  |
| Further Information  | n available in t   | ne original comment?   | Attachments sent with the comment?   |
| Placemaking Optic  | ons Plan Referer   | nce: Policy SU1  |  |
| Comment on the S   | ite:   |  |  |
|  |  | ne city is a long way dov<br>t have as much relevanc                           | vnstream within its catchment area, the sustainable drainage e as its own.   |
| Change requested   | 1  |  |  |
|  |  |  |  |
|  |  |  |  |
| Respondent 6346<br>Number:                                     | Comment 6<br>Number:   | Respondent<br>Name:  | Respondent Mactaggart and Mickel Organisation:   |
| Agent ID: 205 Ag   | gent Name: Roo   | ke Associates  |  |
| Further Information  | on available in t  | ne original comment?   | Attachments sent with the comment?   |
| Placemaking Optic  | ons Plan Referer   | nce: Policy SU1  |  |

#### **Comment on the Site:**

Site Specific SuDs Emerging Policy Approach: SU1

Once again, the emerging policy approach is excessively detailed, unduly complicated and too prescriptive. Moreover, it is too negative in its approach in permitting development 'only' where each of the 15 policy criteria are satisfied. It is considered that there is sufficient guidance (such as the West of England SuDS Guidance (2014) which is cited in the draft policy) to guide the preparation of drainage strategies, and therefore it is unnecessary, and indeed overly prescriptive, to include the detailed criteria in the policy itself with a potential brake on development unless compliance is achieved with

## each and every one. Moreover, since a number of the criteria are subjective, there is no certainty for intending developers regarding the requirements and the benchmark for compliance. **Change requested:** Respondent 6426 Comment 21 Respondent Mr Steven Kerry **Respondent** Persimmon Homes Number: Number: Name: **Organisation:** Severn Valley Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy SU1 **Comment on the Site:** Is this necessary in light of the emerging West of England SuDS Guidance? To make sure that the document is comprehensive a better approach would be a BANES Chapter in the West of England SuDS Guidance (as per the Bristol and North Somerset Chapters). '

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

#### Plan Order Placemaking Options Plan Reference: Policy PCS1 Number: 1216 Respondent 245 Comment 10 Respondent Mr Andy Reading **Respondent** Environment Agency Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy PCS1 **Comment on the Site:** In relation to this topic we would support the Council's intention of continuing to implement a precautionary approach and include a policy to ensure development is not at risk from, or does not contribute to, unacceptable levels of pollution. We consider it is important a Local Plan policy continues to be included so that preventative measures are implemented where appropriate. It also ensures activities continue to be considered which do not fall within the remit of other regulatory regimes (e.g. Environmental Permitting).

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

## Placemaking Options Plan Reference: Policy PCS2

Plan Order Number: 1222

| Respondent 2611 Comment 70<br>Number: Number:  | Respondent<br>Name: | Respondent Transition Bath Organisation: |  |  |
|--|---------------------|--|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                     |  |  |  |
| Placemaking Options Plan Referen   |                     |  |  |  |

#### Comment on the Site:

Object: the policy is weak and makes no attempt to reduce pollution to acceptable levels for good health, the policy seems to promote maintaining the status quo. We feel the council needs much stronger proposals, as we have indicated in our comments on policy ST1, which include differential parking charges and permits charges for diesel vehicles (high) and electric and plugin vehicles (low), required provision for electric car charging points for on-road parking in new developments and a more proactive policy to encourage car clubs.

The problem is B&NES has had Air Quality Management in place for a number of years, yet in that time air pollution has not reduced and is still above EU requirements. We don't believe the policy as proposed is proactive enough to make any difference to the current situation or indeed lead to a reduction. If new homes are going to be built in Bath, this is surely going to increase emissions & congestion and make the situation worse?

#### **Change requested:**

Completely rewrite the section on air quality as existing policies have not delivered a reduction in pollution, and this new approach seems no better. We would like to see a more proactive approach to reduce pollution, including 'Low Emission Zones', encouragement of low emission vehicles and the discouragement and banning of high emission diesels.

Correct PCS2/3 labelling of this section of the document as it's confusing.

Policies to reduce traffic pollution should be reflected under 'Sustainable Transport' as well.

## Plan Order **Placemaking Options Plan Reference:** Policy PCS3 Number: 1230 Respondent 262 Comment 9 Respondent lan Lings **Respondent** Woodland Trust Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy PCS3 Comment on the Site: We would like to see the document highlight the role that trees and woodland can contribute to improving air quality in green infrastructure design. Research by Columbia University has found asthma rates for young children were significantly lower in areas with more street trees – see our publication Urban Air Quality https://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality/. Trees and woods can also reduce the impact of the `urban heat island effect' which occurs when hard surfaces in summer act as giant storage heaters, absorbing heat during the day and releasing it at night. This too can affect air quality. Dramatic summer temperature differences of as much as 10°C between London and its surrounding areas have been recorded, which in turn exacerbate the symptoms of chronic respiratory conditions. Projections suggest this problem will get markedly worse. A study by the University of Manchester has shown that increasing tree cover in urban areas by 10% could decrease the expected maximum surface temperature in the 2080s by up to 4°C. **Change requested:** Respondent 281 Comment 21 Respondent Alison Howell **Respondent** Natural England Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy PCS3 Comment on the Site: Air Quality: we support emerging policy PCS3 as most closely aligned with paragraph 124 NPPF. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. **Change requested:** Respondent 2611 Comment 5 Respondent **Respondent** Transition Bath Number: Number: Name: Organisation: Agent ID: **Agent Name:**

Further Information available in the original comment?  $\Box$  Attachments sent with the comment?  $\Box$ 

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

| Placemaking Options Plan Reference: | Policy PCS3 |
|-------------------------------------|-------------|
|                                     |             |

#### **Comment on the Site:**

- Air Quality Standards in the consultation are very weak, as mentioned in the Transport Section above. We feel that this
  section needs completely rewriting to actively address this issue as previous policies have had no impact on pollution and
  the current proposals seem to be a continuation of the status quo. A more proactive approach would also have impacts
  on other areas of the document. We would like to see proposals to include
- o A 'low emissions zone' excluding the most polluting vehicles (diesels) from the centre of Bath
- o Incentives and disincentives to encourage low emissions vehicles (charging points and low parking/permit charges for electric and plug-in vehicles) and to discourage high emission vehicles (prohibition, high parking/permit charges)
- o Encouragement of car clubs, and further thought put into how this is compatible with future antonymous and electric vehicle developments
- o Removal of parking from city centre commercial developments, which is currently encouraged and set out in the document, which we feel is incompatible with the rest of the document. City centre commercial developments should only provide parking for the disabled, car clubs/pool cars and shift workers the remainder should be serviced by walking, cycling, public transport and Park & Ride. Providing additional parking in these developments is only going to increase congestion and pollution.

| Change requested: |  |  |  |
|-------------------|--|--|--|
|                   |  |  |  |

#### Plan Order Placemaking Options Plan Reference: Policy PCS5 Number: 1241 Respondent 245 Comment 11 Respondent Mr Andy Reading **Respondent** Environment Agency Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? **Placemaking Options Plan Reference:** Policy PCS5 **Comment on the Site:** We support the emerging policy approach for PCS5 to ensure land contamination is appropriately dealt with through the planning system. We are pleased to see reference in the emerging wording to the need to consider risk to the water environment. The onus should be on the developer and/or land owner to demonstrate safe development.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

### Placemaking Options Plan Reference: Policy PCS6 Number: 1247 Respondent 95 **Comment** 3 **Respondent** Chris MacArthur for and on **Respondent** The Coal Authority Number: Number: Name: behalf of Miss Rachael A Bust Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy PCS6 **Comment on the Site:** Support - The Coal Authority welcomes and supports this policy and its approach towards land instability issues. Reason - Mining legacy in Bath and North East Somerset area is a sizeable and locally distinctive issue. The policy makes plan users aware that unstable land is an important issue that requires consideration as part of development proposals. The Coal Authority considers that the policy accords with NPPF paragraphs 109, 120, 121 and 164. **Change requested:**

Plan Order

#### Plan Order Placemaking Options Plan Reference: Policy PCS7 Number: 1257 Respondent 245 Comment 12 Respondent Mr Andy Reading **Respondent** Environment Agency Number: Number: Name: Organisation: Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: Policy PCS7 **Comment on the Site:** We are pleased to see the inclusion of this policy. Given that the mapping is updated relatively frequently we would be happy for the Council to include a link to the mapping, rather than SPZ's being identified on the Policies Map, provided the Council are confident it will still be given sufficient weight in planning decisions.

Schedule of Comments on the Placemaking Plan Options Document in Plan Order

## **Placemaking Options Plan Reference:** Policy PCS8

Plan Order Number: 1264

| Respondent 224 Comment 75 Respondent Number: Name:                            | <b>Respondent</b> Bath Preservation Trust <b>Organisation:</b> |
|---|--|
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ A               | ttachments sent with the comment? $\Box$                       |
| Placemaking Options Plan Reference: Policy PCS8                               |  |
| Comment on the Site:  |  |
| Policy could be strengthened by spelling out the provisions of 13             | A.   |
| Change requested:   |  |
| Respondent 2611 Comment 71 Respondent Number: Number: Name:                   | Respondent Transition Bath Organisation:                       |
| Agent ID: Agent Name:  Further Information available in the original comment? | ttachments sent with the comment? $\Box$                       |
| Placemaking Options Plan Reference: Policy PCS8                               |  |
| Comment on the Site:  |  |

Strongly Support: if there is any uncertainty which suggest that hydraulic fracking might have any impact on Bath Hot Springs then such a development should not be allowed.

#### **Change requested:**

State very clearly that the 'precautionary risk principle' probably means no such development should take place in the rocks surrounding Bath even if there is the smallest risk of contamination. The springs have after all been used for over 2,000 years, and we feel a short-term need for energy should not put this at risk.

# Placemaking Options Plan Reference: Policy M1 Number: 1274

| Respondent 95<br>Number:   | Comment 1 Number: | Respondent<br>Name: | Chris MacArthur for and on behalf of Miss Rachael A Bust | <b>Respondent</b> The Coal Authority <b>Organisation:</b> |  |  |
|--|-------------------|---------------------|--|---|--|--|
| Agent ID: Agent Name:  Further Information available in the original comment?   Attachments sent with the comment? |                   |                     |  |   |  |  |
| Placemaking Options Plan Reference: Policy M1  |                   |                     |  |   |  |  |

#### **Comment on the Site:**

Background on The Coal Authority

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 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 and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; 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 and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales and MTAN2 in Wales.

Background on Coal Mining Issues in Bath and North East Somerset

Surface Coal Resources and Prior Extraction

As you will be aware, Bath and North East Somerset contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting up to 25% of the District area.

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.

Coal Mining Legacy

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

Within the Bath and North East Somerset there are approximately 570 recorded mine entries and around 62 coal mining related hazards have been reported to The Coal Authority which has required an emergency response. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence

Plan Order

unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.

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

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

| Change requested:   |  |
|---|--|
|   |  |
|   |  |
| Respondent 95 Number: 4 Respondent Chris MacArthur for and on Number: 4 Respondent Chris MacArthur for and on Sespondent Chris MacArthur for and on Organisation: Comment A Respondent Chris MacArthur for and on Organisation: |  |
| Agent ID: Agent Name:   |  |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$   |  |
|   |  |
| Placemaking Options Plan Reference: Policy M1   |  |
| Comment on the Site:  |  |
| Support - The Coal Authority supports the clear intention of these policies to avoid the sterilisation of minerals. The N   |  |
| in paragraphs 143 and 144 imposes the obligation to avoid the sterilisation of mineral resources. This policy approach  |  |
| establishes a suitable mechanism through which Bath and North East Somerset will be able to implement this requirement of National Planning Policy.   |  |
| requirement of National Fianting Policy.  |  |
| It is noted that the Policies Map will illustrate the precise boundary of the surface coal MSA, as required by the Core   |  |
| Strategy and as illustrated on Diagram 20a in the Core Strategy.  |  |
| Change requested:   |  |
| Change requested.   |  |
|   |  |

| Placemaking Options Plan Reference: Policy M5  | Number: 1303    |
|--|-----------------|
| Respondent 95 Comment 5 Respondent Chris MacArthur for and on Number: 5 Name: behalf of Miss Rachael A Bust Organisation:  | Authority       |
| Agent ID: Agent Name:  |                 |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |                 |
|  |                 |
| Placemaking Options Plan Reference: Policy M5  |                 |
| Comment on the Site:   |                 |
| Support - The Coal Authority supports the intention of setting out a policy to address energy minerals. The paragraphs 147 and 149 set out the national policy approach to the extraction of conventional and uncon hydrocarbons and coal respectively.  |                 |
| The Coal Authority would suggest that any draft policy should take account of the amended policy develo examination on the Somerset Minerals Plan.   | ped through     |
| It is noted that the Plan proposes to correctly illustrate the PEDL licence areas on the Proposals Map as re Planning Practice Guidance. You should be aware that DECC issues an updated PEDL map regularly, often of a month. Care should be taken to use the latest PEDL map as licences can lapse.  |                 |
| Comment - The Coal Authority would support the inclusion of a locally distinctive policy addressing new e technologies, such as Coal Bed Methane (CBM), Abandoned Mine Methane (AMM), and Underground Coa (UCG).   |                 |
| However, given the Placemaking Plan, the Council needs to be careful that it does not confuse CBM extraction "fracking" for shale gas. Whilst CBM involves the drilling of a deep borehole into coal seams, the methods CBM extraction are not the same as fracking for shale gas. The policy wording therefore needs to be caref focus on the impact of fracking. | employed for    |
| Comment - The Coal Authority does not consider it necessary for the energy minerals policy to address th surface coal. However in order to provide clarity for any prior extracton proposal that may come forward, sensible to indicate in the supporting text that any proposal for coal extraction will be determined in acconational policy.                    | it would be     |
| Change requested:  |                 |
|  |                 |
|  |                 |
| Respondent 224 Comment 76 Respondent Respondent Respondent Bath Present Number: Name: Organisation:  | servation Trust |
| Agent ID: Agent Name:  |                 |
| Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$  |                 |
| Placemaking Options Plan Reference: Policy M5  |                 |
| Comment on the Site:   |                 |
| Change requested:  |                 |

7 should say 'may have' rather than has an adverse impact.

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Respondent 2611 Comment 4 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy M5 Comment on the Site: • Fracking: Transition Bath objects to fracking as it will only increase the amount of carbon dioxide in the atmosphere, and we feel should only be allowed if combined with Carbon Capture and Storage **Change requested:** Respondent 2611 Comment 72 Respondent **Respondent** Transition Bath Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy M5 Comment on the Site: Qualified support: on the understanding that the council is constrained by national policy we support these proposals. However, it is our view that national policy should be changed to ban hydraulic fracking, unless it is combined with Carbon Capture and Storage (CCS), and that appropriate environmental safeguards are in place and a precautionary risk principle is applied. **Change requested:** We would like the council to state that fracking should not take place unless it has no impact on the world's carbon emissions, and that this would only be achievable if CCS was used. Respondent 6576 Comment 10 Respondent Mr Sam Willitts **Respondent** Keynsham Community Number: Number: Name: **Organisation:** Energy Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ **Placemaking Options Plan Reference:** Policy M5 Comment on the Site: KCE welcomes the Councils proposal to employ the precautionary principle when assessing proposals for shale gas. KCE believes that generating energy from renewable rather than carbon sources is the only way to meet the Governments carbon reduction targets, and protect the local environment. **Change requested:**

## Schedule of Comments on the Placemaking Plan Options Document in Plan Order Plan Order **Placemaking Options Plan Reference:** CIL / S106 Number: 1310 Respondent 93 Comment 10 Respondent Sean Walsh **Respondent** Highways Agency Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? $\Box$ Attachments sent with the comment? $\Box$ Placemaking Options Plan Reference: CIL / S106 Comment on the Site: The Agency is aware of the CIL that is to be introduced, and has previously been involved in its consultation. It is important that this is kept up to date in order to ensure that strategic infrastructure to facilitate development and growth is accounted for. Change requested: Respondent 274 **Comment** 5 **Respondent** Gary Parsons **Respondent** Sport England Number: Number: Name: **Organisation:** Agent ID: **Agent Name:** Further Information available in the original comment? Attachments sent with the comment? **Placemaking Options Plan Reference:** CIL / S106 Comment on the Site: 2. Planning Obligations/Community Infrastructure Levy (CIL) to Sport (pages 314-315) Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts. All new dwellings in Bath and NE Somerset in the plan period should provide for new or enhance existing sport and

The evidence base as mention in (1) above should inform the Infrastructure Delivery Plan (IDP) or CIL Reg 123 list. We all need to be mindful of s106 regs that restrict up to 5 schemes contributing to a single project.

recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and

**Change requested:** 

mental wellbeing.